

Web Accessibility Corrective Action Plan
December 22, 2016



Executive Summary

Per the Resolution Agreement signed with the Office of Civil Rights on August 24, 2016, the Montana Office of Public Instruction (OPI) submits the following Corrective Action Plan (CAP) to bring its online content and functionality in compliance with World Wide Web Consortium's (W3C's) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA). The CAP provides a timeline of activities that will be completed between October 2016 and July 2018 to remedy online accessibility issues identified in the Web Accessibility Assessment Report. The timeline of activities outlines the priorities and plans for accessibility communication and training to ensure webpage content, documents, and media are accessible to individuals with disabilities.

Table of Contents

Background	4
Definitions.....	4
Scope.....	5
Objective	5
Communication/Training Timeline	6
Webpage Content Timeline	7
Website Development	7
Web Documents Timeline.....	9
Media Timeline	9

Background

In June of 2016, the Montana Office of Public Instruction (OPI), received notice of a complaint from the United States Department of Education's Office for Civil Rights (OCR). The OCR summarized the complaint as follows:

OCR received a Complaint of disability discrimination against the Montana Office of Public Instruction on May 16, 2016 (OCR Reference No. 10161224). The Complaint alleged that the OPI is discriminating on the basis of disability, because certain pages on its website are not accessible to persons with disabilities, including the Indian Education for All videos webpage at http://opi.mt.gov/Programs/IndianEd/IEFAVideo.html#gpm1_1. OCR will resolve this complaint in accordance with applicable laws and policies.

On August 24, 2016, the OPI entered into a Resolution Agreement with the Office for Civil Rights. This Corrective Action Plan (CAP) is prepared in accordance with Resolution Agreement Item 3 Assessment which states as follows:

3. Proposed Corrective Action Plan:
Simultaneously with the submission of the Assessment, Montana OPI will submit to OCR for its review and approval a proposed Corrective Action Plan to address all inaccessible content and functionality identified during Montana's OPI's Assessment. The proposed Corrective Action Plan will set out a detailed schedule for addressing problems, taking into account identified priorities, with all corrective actions to be completed within 18 months of the date OCR approved the Corrective Action Plan.

The Montana OPI understands that if all inaccessible content and functionality identified during the assessment is not removed or made accessible on a timely basis, it will be in violation of the Resolution Agreement with OCR, Section 504, Title II, and that the OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of the agreement.

Definitions

Benchmarks for Measuring Accessibility refer to the World Wide Web Consortium's (W3C's) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 for web content and functionality.

Document accessibility includes word processing documents, spreadsheets, PDFs, presentations and publications, which are scanned, uploaded or posted to the OPI website that allow for persons with disabilities to access the content contained within.

Document content developers refers to agency staff who are responsible for creating document-based content intended to be posted to the OPI website including Word documents, Excel, PDF, and PowerPoint documents.

Web accessibility means a person with a disability is provided the opportunity to acquire the same web information, engage in the same web interactions, and enjoy the same web services with substantially equivalent ease of use as a person without a disability.

Webpage content generally refers to the information in a webpage including text, images, forms, and sounds.

Web developer refers to agency staff who manage, maintain, and update native HTML page content on the OPI website.

Web documents refers to documents posted on the OPI website, but not part of native HTML page content including, Word documents, Excel spreadsheets, PowerPoint presentations, and PDFs.

Scope

The Corrective Action Plan includes the Montana OPI's website, accessible at www.opi.mt.gov as outlined by the OPI's Website Policy, 7.3.02. Dates referenced in the timeline are contingent on the OCR approving the CAP by January 31, 2017. A shift in this timeline will impact the deadlines identified in the CAP.

Objective

The Corrective Action Plan (CAP) addresses the areas of needed remediation identified in the OPI Website Accessibility Report, submitted on December 22, 2016.¹

¹ The Website Accessibility Check Questionnaire can be viewed in Appendix B of the Assessment Report.

Communication/Training Timeline

Remediation	Start Date	Completion Date	Responsible Party
Notify division leadership of upcoming website accessibility changes	September 2016	September 2016	Communications Director
Update to division leadership about awareness and training	November 2016	December 2016	IT Division Administrator, IT Project Manager (ITPM)
Provide online agency-wide accessibility awareness training	December 2016	February 2017	IT PM, IT Systems Development Bureau (ITSDB)
Train agency-wide document content developers on revising content for accessibility	1st Quarter 2017	2nd Quarter 2017	ITPM, ITSDB
Train web developers on building accessible webpage content	December 2016	1st Quarter 2016	ITPM, ITSDB
Develop accessibility reference site for agency staff	December 2016	1st Quarter 2017	ITPM, ITSDB

Communication and training will be key to preparing the agency to meet the Benchmarks for Measuring Accessibility as they relates to the website and content created and shared by the agency. The agency’s commitment to accessibility will be supported by regular training of agency staff responsible for developing content. Training will begin in December of 2016 and continue into 2017.

Webpage Content Timeline

Remediation	Start Date	Completion Date	Responsible Party
Make adjustments to current website template	October 17, 2016	October 31, 2016	IT SDB
Update division webpage owner list	November 2016	December 2016	ITSDB
Development of new website with focus on accessibility	2017	2018	ITSDB
Annual testing of website accessibility following launch	July 2018	July 2018	ITSDB

Website Development

Central to creating new webpage content that meets the Benchmarks for Accessibility requirements is the redesign of the current OPI website. The redesign will coincide with the newly elected 2017 administration, providing the opportunity to build the site with accessibility as a fundamental criteria. The new website will have accessible visual design and content reinforced through documented processes, training, and automated and manual quality assurance testing.

The development of the OPI’s new accessible website will focus on accessibility and usability up front. The agency’s competitive bid process will be used to find vendors knowledgeable of and experienced in creating accessible websites and web content, while also helping to control the cost. Funding for the new site development will come from the agency’s indirect cost budget and is anticipated to be between \$18,000 and \$25,000. This is based on a build that includes a basic content management system, number of pages of 250+, search engine optimization placement, responsive design, any database integration, and a built in accessibility testing tool.

The Request for Proposal (RFP) will require that OPI’s new site adheres to World Wide Web Consortium’s (W3C’s) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 for web content and functionality as cited in the OPI’s Website Policy.

The RFP will require vendors to adequately explain the following key points related to accessibility as part of their submissions:

- Describe experience in building accessible websites and other web content. Provide examples of work expressed in number and type of projects, as well as contract dollars.
- For reference, include the client name, address, and email address for two of the vendor's most recent projects that included accessibility as a key concern or component of the build.
- Briefly describe each of the individual team member's relevant qualifications and training related to accessibility requirements for web content.
- Explain the key design features that would be included in the website to ensure accessibility for those with disabilities that use assistive technology.
- Demonstrate experience in conducting website accessibility testing. This includes the ability to integrate accessibility testing software into the proposed website build that can be used by the OPI staff to conduct assessments.
- Describe training and support to be provided to the OPI web development staff responsible for managing the website going forward.

Web Documents Timeline

Remediation	Start Date	Completion Date	Responsible Party
Provide tools and training for agency staff to revise content for accessibility	December 2017	2nd Quarter 2017	IT Network Bureau & ITSDB
All documents currently residing on will be reviewed and updated for accessibility.	January 1, 2017	July 1, 2018	OPI Divisions, ITSDB

The OPI website contains nearly 14,000 documents that need to be checked and updated for accessibility according to the Benchmarks for Measuring Accessibility. Given the volume of document content, updating document accessibility will be a collaborative agency-wide effort lead by the OPI ITSDB. The ITSDB will provide the tools and training for division staff who are responsible for managing content to update their own documents, supported by OPI’s Website Document Content Control Process. Guidance will be provided in two ways: to activate accessibility checking tools in Adobe Acrobat DC and Microsoft Office products and providing guidance on the steps necessary to fix documents. This will be reinforced by in-person training and an online accessibility website that will contain best practices in the form of how to videos, instructional forms, and quick tips.

Media Timeline

Remediation	Start Date	Completion Date	Responsible Party
All media files posted on or after October 15, 2016 will have closed captioning. <ul style="list-style-type: none"> Communication to divisions about this new requirement sent on October 14, 2016 	October 15, 2016	October 15, 2016	OPI Divisions, ITSDB, ITPM
Move website video content to the OPI YouTube Channel	January 2017	July 2018	ITSDB
Agency staff receive training on closed captioning current videos	January 2017	July 2018	ITSDB, ITPM
All existing media files updated with closed captioning by agency staff	February 2017	July 2018	OPI Divisions, ITPM

The OPI website has just over 150 videos that must be closed captioned to meet accessibility standards. Currently, existing video content is stored in a video directory. Beginning in January, all video content will be moved to the OPI's YouTube channel and opened up to accept closed captioning via community contributions. Agency staff will attend training to learn the technical side of submitting captions with the community contributions feature, as well as basic principles of closed captioning in accordance with the *Described and Captioned Media Program* best practices, which include:

- synchronization to appear at the same time audio is delivered without any errors;
- adequate time to be read completely without obscuring any content;
- uniformity in style and presentation;
- consistency in content to that of the audio, including speaker and sound effects; and
- accessibility and availability to those who need them.^[1]

^[1] "DCMP Captioning Key", *Captioningkey.org*, 2016. [Online]. Available: http://www.captioningkey.org/quality_captioning.html. [Accessed: 15-Nov-2016]