

Web Accessibility Plan for New Content

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 Plan for New Content (Plan) to bring the OPI website's 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) 1.0. The Plan outlines the standards for webpage and document content, and is reinforced with training for agency staff. It further outlines a strategy for testing and ensuring content remains accessible in the future.

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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:

2. Policies and Procedures for New Online Content and Functionality:

By December 31, 2016, Montana OPI will submit to OCR for its review and approval proposed policies and procedures ("the Plan for New Content") to ensure that all new, newly added, or modified online content and functionality will be accessible to people with disabilities as measured by conformance to the Benchmarks for Measuring Accessibility set forth above, except where doing so would impose a fundamental alteration or undue burden.

- a) The Plan for New Content must include sufficient quality assurance procedures for full implementation, setting up a system of testing and accountability to maintain the accessibility of all online content and functionality on an ongoing basis, and backed by adequate personnel and financial resources. This requirement also applies to Montana's OPI online content and functionality developed by, maintained by, or offered through a third-party vendor or through the use of open sources, and includes setting up systems of accountability and verifying claims of accessibility by vendors or open sources.

When fundamental alteration or undue burden defenses apply, the Plan for New Content will require Montana OPI to provide equally effective alternate access. The Plan for New Content will require Montana OPI, in providing equally effective alternate access, to take any actions that do not result in a fundamental alteration or undue financial and administrative burdens, but

nevertheless ensure that, to the maximum extent possible, individuals with disabilities review the same benefits or services as their non-disabled peers.

Definitions

Assistive technology refers to the software people with disabilities use to interact with the web.

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.

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

Scope

The Plan for New Content includes the Montana OPI's website, accessible at www.opi.mt.gov as outlined by the OPI's Website Policy, 7.3.02.

Objectives

The Plan for New Content (the Plan) is aimed at applying and integrating 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 any OPI web content and functionality.

Accessibility standards will be:

- incorporated into every new webpage;
- required for all new document content posted to the website;

- reinforced through three levels of training; and
- built into webpage and content usability testing.

The sections below outline the processes and activities the agency will complete to accomplish accessibility for all online content and functionality.

Webpage Accessibility

The OPI Information Technology Systems Development Bureau (ITSDB Team)¹ will be responsible for developing webpage content that adheres to accessibility principles. Requests for new 'native' webpage content will be submitted via the agency's webpage content control process. According to the control process, the ITSDB team will validate the content posted uses valid HTML, CSS and other markups, scripting, and style techniques that reinforce accessibility.

Web Content Accessibility

Document Accessibility

Beginning in the first quarter of 2017, all newly posted documents will meet document accessibility criteria as established by the Benchmarks for Measuring Accessibility. Ensuring all documents posted are accessible will be accomplished by providing document content developers with access to software that supports accessible documents, training on the features accessible documents should contain, and building in a final check before submitted documents are posted to the web.

The majority of documents posted to the OPI website are PDFs², but are most often created in Microsoft Office programs. Document content developers will attend training to learn about creating accessible content, enabling the accessibility checking feature and then using that feature to check their documents before they are posted or converted.

The limited number of staff that do create PDFs directly in Adobe Acrobat programs will need to have access to Adobe Acrobat DC to meet accessibility standards. When staff receive training on the basics of

¹ The ITSDB team will be comprised of the current web development staff, an IT project manager and other agency personnel as determined by management.

² This figure is just under 12,500 PDFs.

accessibility in documents generally, they will be advised of this and installation of this software will be deployed on an individual basis.³

For consistency and quality, the uploading of documents to the website will continue to be the responsibility of the ITSDB Team. Agency-wide staff will receive instruction in creating accessible document content and run a preliminary accessibility check, but the ITSDB Team will validate the document's accessibility as part of the OPI Website Document Content Control Process. For this reason, the team will also take part in training for creating accessible document content. See the 'Training for Accessibility' section for more detail on training that will be provided.

Video Accessibility

All video content posted to the OPI website on or after October 15, 2016 has been closed captioned to meet accessibility requirements. The Office of Public Instruction YouTube channel is supporting the storage and closed captioning of all video content.

Prior to submitting a video, staff are currently required to create a transcript for each video. The transcript is sent along with the video to the agency's designated Closed Captioning Specialist (CCS) to be uploaded to YouTube. The CCS uploads the video and closed captions and performs a quality check to document and validate the video's accessibility through the agency's video control process. This video control process is based on captioning according to the *Described and Captioned Media Program* best practices that include:

- synchronization to appear at the same time audio is delivered without any errors;
- adequate time to be read completely and 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]

The web development staff posts the final approved video, making sure to properly identify the link. Beginning in the first quarter of 2017, staff will receive more specialized training to assume more

³ Adobe Acrobat Pro is included in a software contract held by the State of Montana Information and Technology Services Division, therefore will not result in any financial impact for the OPI.

ownership in creating captions at the division level with the community contributions feature in YouTube.

Training

A key component to supporting the OPI's commitment to web accessibility is providing accessibility awareness and technical training for staff. A three-tiered approach will be adopted for training, using a curriculum designed using the W3C's guidance on developing accessibility presentations.^[2]

Level 1 - Awareness

The first level of training will be related to general awareness and required for all the OPI staff. The training will identify what web accessibility is, why it's important to the OPI, provide information about how the OPI is supporting web accessibility, and provide access to more support. It will be provided in a video format and on the OPI's online learning Moodle platform, the Teacher Learning Hub.⁴ The course will utilize best practices for video content as outlined above and will be shared with staff by December 30, 2016.

Level 2 - Content Development

The second level of training is geared toward the OPI staff that develop documents and videos or webinars. These trainings will be conducted in-person and provided throughout the year beginning in February 2017. This training will be reinforced by an OPI Online Accessibility website intended to provide additional support to document content developers. The site will feature tips and short how-to videos for creating accessible content. It will also provide a forum for document content developers to discuss and share ideas, and ask questions.

Content - Document

Development of accessible documents will be organized around meeting the following general criteria including:

- built-in heading features;
- alternative text for images;
- self-describing links;
- formatted lists;

⁴ The Teacher Learning Hub follows all Section 508 accessibility guidelines in its course design. It provides discussion forums that are screen reader accessible, builds in heading structures for screen reader flow, and utilizes a clean layout and limited colors, as well as ensuring all videos are closed captioned.

- awareness of color contrast;
- clear identification of column and row heads in tables;
- tags to build in structure; and
- language and reading order.

Because the majority of the agency's content is created in Microsoft Excel, Word, and PowerPoint, the training will focus on the important features to include in each of these programs before posting or converting to PDF. Staff will also receive training on creating documents in Adobe Acrobat DC with an emphasis on the importance of 'tagging' documents.

Content - Video

Training for developing accessible videos will build on the agency's current process for ensuring all videos are captioned as explained in the 'Video Accessibility' section. Although new videos have been closed captioned since October 2016, this training will begin in February 2017 and give staff the tools and support to caption their own videos. With YouTube as the platform, the training will discuss building the transcript, uploading the transcript, and captioning the video according to the *Described and Captioned Media Program* best practices referenced in the 'Video Accessibility Section'.

Level 3 - Web Development

The third level of training will focus on providing education and resources for the web development team specific to accessible coding within the new website framework. Training will be organized around WebAIM's principles of accessible design including:

- providing appropriate alternative text for non-text content in webpages;
- providing appropriate document structure including headings, lists and other structural elements;
- providing headers for data tables;
- ensuring users can complete and submit all forms by labeling text fields, checkboxes, dropdown lists, etc., and using the <label> element;
- ensuring links make sense out of context;
- captioning and/or providing transcripts for media or audio,
- allowing users to skip repetitive elements on a page via a "Skip to Main Content" or "Skip Navigation" link;
- not relying on color alone to convey meaning;

- making sure content is clear and easy to read; and
- designing to standards by making standards HTML compliant and using Cascading Style Sheets to separate content from presentation. ^[3]

As a foundation for this work, the web development team attended a day-long training in December hosted by Web Accessibility in Mind (WebAIM). The training provided an in-depth evaluation of how state agencies can ensure their websites are accessible to individuals with various types of disabilities, including visual, mobility, hearing, cognitive, and learning disabilities. Based on that training, the web development team instituted standards and processes to guide accessible HTML development based on WebAIM's accessibility principles. Finally, the web development team will be supported with semi-monthly sessions organized around online resources provided by WebAIM's articles, resources, monthly newsletter, and blog.

Accessibility Testing

Accessibility testing is the final component of the Plan, and will be a critical part of ensuring the OPI's newly posted content is accessible. The agency's change and control processes for posting to the website establishes testing as a prerequisite to submission of content. The training staff receive will outline content development with accessibility in mind, incorporating a final check before the content is submitted for posting.

To sustain conformance to the Benchmarks for Measuring Accessibility, assessments will be a regular part of website maintenance. Automated assessments will occur annually and include a representative sample of webpages. The webpages will be selected using a structured process that identifies all types of content, at all levels of access. Larger accessibility issues, as well as individual documents, will be included in the assessment.

Automated assessments will be conducted by the ITSDB team using an online software that evaluates content based on 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. The tool will be selected by the ITSDB team based on the following criteria:

- cost;
- platform;
- scope;

- repair functionality; and
- report style.

Plan Summary

This Plan is submitted to bring content and functionality on the OPI website in line with the Benchmarks for Measuring Accessibility requirements. Central to the Plan is ensuring that OPI document content developers have the knowledge and tools to create accessible document and web content, in addition to routinely checking posted content accessibility and usability. The Plan will be adopted upon approval from the OCR and a report on implementation will be provided within 45 days of approval.

Bibliography

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

[2] "Developing Web Accessibility Presentations and Training: Overview ° Web Accessibility Initiative ° W3C", *W3C Web Accessibility Initiative (WAI)*, 2016. [Online]. Available: <https://www.w3.org/WAI/training/>. [Accessed: 18-Nov-2016].

[3] "WebAIM: Introduction to Web Accessibility", *Webaim.org*, 2016. [Online]. Available: <http://webaim.org/intro/>. [Accessed: 15-Nov-2016].