ADAAAC RESPONSE TO

FEEDBACK ON THE DRAFT ACCESSIBILITY POLICY

# Feedback Received:

1. Going Beyond
2. Policy Priorities
3. Oversight
4. Web links
5. Costs

# Changes made to policy draft:

* Section IV – added “Legacy Pages” definition
* New Section VII – added Priorities
* New Section VIII – added Oversight/Compliance – general statement
* Section XI - removed all web resources links except Accessibility Page

1. GOING BEYOND

Feedback: “*Policy is too absolute and does not include information on what to do if something cannot be made accessible. “…Their perspective is that UWM is already complying with legal requirements for instructional materials and the policy requires UWM to go beyond what is required by law currently. “*

Response: The UWM Accessibility Policy focuses on providing equal access to all students, employees and community members that use and visit our campus. It does not go beyond what is required for campus accessibility. The UWM Accessibility Policy embodies the requirements of the Federal laws including the Preamble to 1991 Title II: “Regulations should be interpreted to keep pace with developing technologies.” It incorporates the Wisconsin State Law that adhere to the standards set by the U.S. Access Board. It also affirms the UW System policies that “no otherwise qualified individual with a disability shall be denied access to or participation in any program, service, or activity offered by the universities” in addition, “the University of Wisconsin promotes the concept of [Universal Design](https://www.wisconsin.edu/disability-resources/universal-design-in-education-on-uw-system-campuses/) throughout the system. This concept holds that all designs should attempt to optimize usability for everyone, regardless of abilities... Everything is created to be as totally and universally accessible as possible. This includes the physical environment, the information environment and the curricular environment.” <https://www.wisconsin.edu/disability-resources/>

Information has been added to the Policy under a new Priorities section that states “When Legacy Information and Instructional Technologies cannot be brought into compliance, campus units are responsible for providing equally effective alternate access. Based on timeliness, accuracy of content and delivery in an equivalent manner as the original product.”

1. POLICY PRIORITIES

Feedback: *The Policy “has no gradations or suggestions of priorities, which implies that all materials available online need to be equally accessible immediately. The draft policy seeks to apply a single standard uniformly across a wide range of materials and infrastructure. Other institutions have taken a more priority-based approach….”*

Response:Priorities below were added to the Policy

Beginning (***date when this policy goes in to effec***t), all new and redeveloped Information and Instructional Technologies including web pages, web applications, and web content, created by UWM, on websites and subdomains used for UWM’s academic divisions, academic departments, and administrative offices shall conform to WCAG 2.0 AA.

Legacy Pages – Web pages published before January 1, 2017. Legacy pages are to be made accessible upon request for access by an individual in a timely manner. Complicated pages may require more time. In those cases, the responsible unit will respond to the request (within 10 business days) with an action plan indicating when the item may become accessible.

When legacy Information and Instructional Technologies cannot be brought into compliance, campus units are responsible for providing equally effective alternate access: Based on timeliness, accuracy of content and delivery in an equivalent manner as the original product.

The accessibility conversion of all other Legacy Pages is an ongoing process.

For setting priorities to make other legacy Web pages accessible, the following guidance is suggested:

* Course materials.
* Web pages that provide core institutional information including: admissions, registration, advising, catalogs, student services information, housing, financial aid and employment.
* Top 20% of web pages most frequently used. Each Department/College/Unit is responsible for determining their top 20%.

Statement of Accessibility on all Web Pages and Web-based Applications:

All web pages and web-based applications (including legacy pages) must display in a consistent location (e.g., menu or text in the banner or footer) a statement, or link to a statement, referring to a commitment to accessibility by the University. In addition, each page must have a link allowing users to contact the designated responsible position or positions within a college, department, program, or help desk (instead of individuals, who often change positions or duties).

The link may point to the Universities’ accessibility statement: <http://uwm.edu/accessibility/> or for full statements on web pages, the suggested language is:

“The [name of department or unit] is committed to making its websites accessible to all users, and welcomes comments or suggestions on access improvements. Please send comments or suggestions on accessibility to [position to contact].”

1. WEB LINKS

Feedback: ***“****don’t like having a lot of links in UWM’s policies. UWM’s policies aren’t updated all that regularly and many of these links will be dead at some point.”*

Response: Removed all web resources from the policy except for the link to the UWM Accessibility page which will now include that information.

1. CAMPUS OVERSIGHT

Feedback: “*Need information in the policy about campus Oversight”*

Response: a) Added new Section VIII that contains general statement on oversight by the Chancellor or designee.

b) Report prepared on what other UW campuses and R1 campuses have for campus

oversight of accessibility.

1. COSTS

Feedback: *“There is a lack of analysis of what it will cost to implement this policy and they wanted to know this information.”*

### Response:

* Majority of cost to implement accessibility policy– staff time
* Captioning – Staff time needed to edit and correct captions created by free software programs. $1.00/minute to send it out to contract vendor
* Audio only files - transcription - free transcription program (also a Google Chrome app)

<https://transcribe.wreally.com/how-it-works>

* Accessible PDFs – free to check – try to highlight it – if you can its accessible. If not, scan a new copy, or convert for free using free campus software “Read&Write Gold” or request a new scan through Libraries’ interlibrary loan.
* Websites – WAVE accessibility checker is free. Other costs: School/Departmental webmaster’s time. \*\*If help from outside the campus school or department is needed then it is @$65/hour. The Rule of thumb for the cost of retrofitting a website to make it accessible is 10X the cost of doing it during the design phase.
* LMS accessibility – Campus is moving from D2L to Canvas. Evaluate accessibility before moving materials – change, delete or update materials. Canvas has an accessibility checker software called UDoIT that checks accessibility, suggests changes and can make some of the changes.

## COST OF NON-COMPLIANCE:

* Loss of student enrollment due to inaccessible processes - $$$$ unknown
* Loss of student success – may result in students dropping out without completing their

degrees - *The U.S. Bureau of Labor Statistics states that only* ***16.4*** *per cent of students*

*with disabilities have completed a bachelor’s degree – a sharp difference compared to*

*the 34.6 of students without a disability who finish a first degree. This gap is a product of*

*the lack of support institutions give their students with disabilities, including the barriers*

*they face due to web inaccessibility. (US Bureau of Labor Statistics Department of*

*Labor, 2015.)*

* Loss of faculty and staff due to inaccessible IT and research- $$$$ unknown
* Lawsuits – result of OCR complaint when DOJ gets involved.
* Miami State – paid $108,000 plus $142,000 (less repaid debt of $40-$50,000) to student
* Louisiana Tech - $23,543 to student – plus legal fees  
  Florida State - $150,000 ($75,000 per 2 students) – plus legal fees
* CSU San Bernadino – $820,000 ($505,000 Attorney fees and $315,000 in damages)
* Bad publicity from a lawsuit that claims institutional discrimination - $$$$ unknown