

Statement of Mark Turner, Director  
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Before the Senate Committee on Health, Education, Labor and Pensions  
“The Promise of Accessible Technology:

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Washington, DC

Chairman Harkin, Ranking Member Enzi, and members of the committee, thank you for the opportunity to discuss issues of technology accessibility in the postsecondary environment. I began working in the postsecondary disability services environment nearly 2 decades ago and have proudly served in a variety of clinical and technical roles in both 2-year and 4-year public education institutions. My testimony today will focus on the issues faced by postsecondary institutions as they work to ensure that technology used to deliver educational programs and services are usable by all students, staff, faculty, and members of the public—irrespective of disability status.

## **The California State University**

### **Commitment to Excellence**

The CSU is the largest and most diverse four-year public university system in the country, with 23 campuses, approximately 427,000 students and 44,000 faculty and staff. The CSU's mission is to provide high-quality, accessible public education to meet the ever changing needs of the people of California. The CSU provides more than one-half of all undergraduate degrees granted to Latino, African American, and Native American students in California. Since the system's creation in 1961, it has awarded in excess of 2.5 million degrees. We currently award approximately 90,000 degrees each year.

### **Commitment to Equal Opportunity**

The CSU has a strong, longstanding commitment to ensuring that all members of the CSU community and the public at large are provided an equal opportunity to participate in and receive the benefits of university programs and services. This commitment is demonstrated through the following actions:

- **1977:** CSU campuses prepared self-evaluations that identified steps needed to ensure students with disabilities had equal access to educational opportunities.
- **1980:** CSU developed a policy statement entitled *Policy for the Provision of Services to Students with Disabilities* which formalized the objectives of the Disabled Students program (increasing enrollment of

students with disabilities and facilitating their access to educational programs), established common definitions of disabilities, listed support services to be offered, and served as the basis from which campus Disability Services programs were developed. The policy statement also clearly codified the CSU commitment to equal access:

*“...this policy is intended to ensure that no qualified individual with a disability shall, on the basis of disability, be excluded from participation in the services, programs, or activities of the CSU and its campuses.”*

- **1980:** CSU established the *Systemwide Advisory Committee on Services to Students with Disabilities*. This cross-disciplinary committee, comprised of administrators, faculty, staff, and students was charged with reviewing, evaluating, and recommending systemwide educational and administrative policies that address the needs of students with disabilities.
- **1990:** Pursuant to the Americans with Disabilities Act (ADA), CSU campuses appointed ADA coordinators and developed self-evaluation and transition plans to identify and remediate accessibility issues associated with additional areas including employment, construction, transportation, and telecommunication.
- **1990s-Present:** In the ensuing years, the CSU has affirmed and strengthened its commitment to accessibility. The policy statement has been reviewed and revised several times to reflect changes in the composition of students served by Disability Services offices, newly identified accessibility barriers, changes to available support services, and changes to the legislative or regulatory environment. In addition, the recently renamed *Services for Students with Disabilities Advisory Committee* remains an active and vital component of CSU’s accessibility strategy.

### **The CSU Disability Community**

The CSU community of students, staff, and faculty reflects the rich diversity of California’s population including persons with disabilities. During the Fall 2010 term, 10,775 students were registered to receive services from a campus Disability Services office<sup>1</sup>. In other words, the number of students with disabilities served by the CSU is equivalent to a mid-sized campus by itself. These students manifest disabilities across a variety of domains:

- Visual
- Hearing
- Communication
- Mobility
- Psychological/Psychiatric
- Learning Disabilities
- Attention Deficit Hyperactivity Disorder
- Acquired Brain Injury
- Autism Spectrum
- Other Functional Limitations

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<sup>1</sup> <http://www.calstate.edu/sas/documents/Fall2010Profile.xls>

- Temporary

The accessibility issues encountered by students with disabilities in a postsecondary environment are the result of a combination of factors including (1) the student's specific functional impairments, (2) the specific instructional and administrative programs/services with which they interact, and (3) the level and nature of accessibility support provided by those programs/services. For this reason, the campus Disability Services program meets with each CSU student to establish an individualized plan of services that constitute 'reasonable accommodations'. These services may include Auxiliary Aids and Services which involve adjustments to the manner in which students participate in standard academic activities (e.g. interpreters, note-takers, alternate formats of print materials, adaptive technology) or, as appropriate, Academic Adjustments which involve modifications to the activities themselves (e.g. changes in the length of time permitted to complete a course requirement).

These services are essential for the success of students with disabilities. By addressing accessibility gaps in university programs/services, postsecondary institutions ensure students have the opportunity to fully utilize curricular materials, demonstrate a mastery of their curriculum, and develop the skills necessary for future employment. This is vital at a time when persons with disabilities have a far higher unemployment rate (13.5% vs. 8.9%) and far lower labor participation rate (20.7% vs. 69.6%) than those without disabilities<sup>2</sup>.

### **Current Challenges**

#### **Technology is rapidly and fundamentally changing the educational landscape.**

Over the past 20 years, technology has become a tightly integrated and ubiquitous component in the lives of Americans. The widespread adoption of mobile devices (e.g. smartphones, ebook readers, portable media players), the enormous growth in web-based services and information, and the widespread use of IT hardware (e.g. kiosks, Voice Response phone systems) are fundamentally transforming the ways in which individuals connect with one-another, companies, government, and educational institutions.

Postsecondary institutions have actively participated in this trend by incorporating technology products and services into instructional and administrative services. Campuses now commonly utilize web-based Learning Management Systems to deliver curricular content and activities, Lecture Capture systems to record and distribute audio/video recordings of class activities, Audience Response Systems (aka 'Clickers') to provide real-time, interactive evaluations and feedback, and Digital Textbooks which provide features (e.g. full-text searching, note taking) and supplemental materials (audio/video content, individualized assessment exercises) that are unavailable with conventional print-based books.

#### **Educational technology adoptions may improve or exacerbate accessibility issues for both students and institutions.**

Whether educational technology products help or hinder accessibility efforts depends largely on the extent to which the vendor incorporated accessibility into the product design and implementation. To exemplify this, consider the use of digital textbooks. Given that print-based textbooks are intrinsically inaccessible to those with

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<sup>2</sup> <http://www.bls.gov/news.release/empst.t06.htm>

print disabilities (e.g. blindness, partial sight, learning disabilities), university disability services programs often accommodate these students by producing accessible electronic versions of textbooks. While this process often delays the delivery of the book to students with disabilities and causes significant institutional expense, it does allow users with disabilities to then use assistive technology to convey the book content in an accessible format (e.g. Braille, large-print). Now let's compare the outcomes of 3 different scenarios:

- Vendor A produces both print books and accessible digital books. Thus students with disabilities simply purchase the accessible digital book—eliminating time-consuming and expensive accommodations. **This vendor's practices help both students and universities by eliminating an accessibility barrier.**
- Vendor B produces both print books and inaccessible digital books. Students with disabilities must request accommodations and wait for the institution to produce an accessible electronic version. **This vendor's practices harm both students and universities by requiring time-consuming, expensive accommodations.**
- Vendor C produces only digital books that are inaccessible. Students cannot use the digital book and universities cannot create an accessible digital book because there is no print version that may be converted into an accessible book. **This vendor's practices harm both students and institutions by denying students with disabilities the ability to access the book content.**

### **Accessibility support for many educational technology products remains inadequate**

Despite the development of accessibility standards for IT products<sup>3</sup> and an array of federal and state legislation<sup>4</sup> requiring that accessibility status be a major factor in the adoption of IT products, accessibility support by most educational technology vendors remains weak. Specifically:

- **Awareness of accessibility requirements or technical standards among educational technology vendors is uneven.** While larger vendors often demonstrate some familiarity with the needs of users with disabilities, many small to mid-sized vendors have little or no knowledge in this area. Vendors cannot design accessible products if they are unfamiliar with technical standards and will not do so if they do not understand the accessibility requirements of educational institutions.
- **The quality of accessibility documentation available from educational technology vendors, while improving, remains poor—making it difficult for universities to accurately gauge the nature of the product's accessibility support (e.g. features, gaps, workarounds, remediation plans/timelines).** Many vendors do not offer any form of accessibility documentation including Voluntary Product Accessibility Templates (VPATs). Even among vendors that provide accessibility documentation, the information provided is often incomplete, out-of-date, or inaccurate.
- **The overall level of commitment to technology accessibility by educational technology vendors is also uneven.** Many vendors cite limited financial resources as an impediment to developing accessible products. Others suggest that there is limited customer demand for accessibility features. Even among vendors who have initiated earnest efforts to incorporate (or expand) accessibility support for their

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<sup>3</sup> See Section 508 Standards (<http://www.section508.gov>) and W3C Web Content Accessibility Guidelines (<http://www.w3.org/TR/WCAG20/>)

<sup>4</sup> See California's Senate Bill 105 ([http://info.sen.ca.gov/pub/01-02/bill/sen/sb\\_0101-0150/sb\\_105\\_bill\\_20020929\\_chaptered.pdf](http://info.sen.ca.gov/pub/01-02/bill/sen/sb_0101-0150/sb_105_bill_20020929_chaptered.pdf))

products, there is a strong tendency toward ‘low-hanging fruit’ or ‘baseline compliance’ that often leaves significant accessibility barriers.

### **Accommodations associated with educational technology are a growing strain for postsecondary institutions**

Historically, disability services programs focused much of their efforts on providing accommodations associated with physical barriers while they worked to remediate those physical barriers. As educational technology adoptions have expanded, more instructional resources are being focused on accommodations associated with technology barriers. This is problematic for several reasons:

- **It is not always feasible to provide accommodations for inaccessible educational technology products.** Some technology products deliver information that cannot be conveyed via accommodations in a manner that is practicable or which provides equally effective access. For example, a postsecondary institution adopts a web application which allows library patrons to request and download electronic reserves materials. However, the kiosk is not accessible to screen reader users. While on-site users may request the assistance of sighted library staff to download the materials, off-site users with disabilities are unable to use this service since library staff cannot travel off-site.
- **Accommodations associated with inaccessible technology often involve significant complexity and costs--particularly if the product is inaccessible to a wide range of users with disabilities.** For example, software applications that are unusable by those who are blind, those with limited vision, and those with limited dexterity will necessitate significant planning and coordination by the university since each group will likely require different accommodations. In addition, a larger number of disability groups impacted by inaccessible technology will likely increase the frequency with which accommodations are required—driving up the costs associated with providing accommodations.
- Whereas most postsecondary institutions control their physical infrastructure and thus have the authority to remediate physical barriers, **postsecondary institutions have few remedies to compel technology vendors to remediate inaccessible technology products.** While campuses may elect to discontinue the use of inaccessible products, this is infrequently used as the process of switching to alternative products can be disruptive or expensive.

## **The CSU Accessible Technology Initiative (ATI)**

### **Inception and early activities**

Following passage of California Senate Bill 105 in 2002<sup>5</sup> and in recognition of the challenges regarding technology accessibility outlined above, the CSU began developing a comprehensive strategy to effectively tackle this issue. In 2004, CSU Chancellor Charles B. Reed released Executive Order 926 which strongly affirmed CSU’s commitment to ensuring equal access for persons with disabilities. EO 926 also recognized that accessibility was an institution-wide responsibility that must be managed by all campus units—not just disability services programs. Finally, EO 926 clearly outlined responsibilities of critical units and stakeholder groups and tasked campus executives (Presidents, Provosts) with designating a campus leader to coordinate ATI activities and build a cross-disciplinary team of administrators, staff, and faculty to implement the ATI.

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<sup>5</sup> [http://www.leginfo.ca.gov/pub/01-02/bill/sen/sb\\_0101-0150/sb\\_105\\_bill\\_20020929\\_chaptered.html](http://www.leginfo.ca.gov/pub/01-02/bill/sen/sb_0101-0150/sb_105_bill_20020929_chaptered.html)

## Key Accomplishments

### Building Robust Capacity

While the release of a policy statement such as EO 926 was critical to catalyzing substantive actions on campuses, it was also clear that the CSU would need to build sufficient capacity (staff, funds, technical guidance, logistical support) to operate an effective systemwide initiative on such a large scale. Several key accomplishments that helped to build capacity during this phase included:

- Hiring dedicated ATI staffing to provide central leadership;
- Releasing guidance (Coded Memorandum AA-2007-04<sup>6</sup>) which outlined specific goals and success indicators to be addressed across 3 'Priority Areas' (Instructional Materials, Web, and Procurement and which required campuses to establish implementation plans and prepare annual reports to track progress;
- Releasing templates to assist campuses with developing their implementation plans and annual reports;
- Establishing 'Communities of Practices' comprised of campus ATI leaders ('Executive Sponsors Steering Committee') and implementers across each of the 3 'priority areas' to coordinate activities, share promising strategies, and identify areas requiring additional support;
- Launching a central Professional Development website<sup>7</sup> to repose training/awareness resources;
- Launching a central web repository to aggregate all ATI documentation and activities;
- Reviewing campus implementation plans and annual reports and providing responsive feedback;
- Conducting comprehensive Section 508 training<sup>8</sup> for campus procurement staff; and
- Establishing a systemwide web repository to store and share product accessibility documentation across the 23 CSU campuses<sup>9</sup>

### Influencing Product Accessibility

In 2007, the ATI had the opportunity to strongly influence the accessibility of several widely-deployed educational technology products in a manner that benefitted students and postsecondary institutions across the country.

- ATI staff evaluated Apple's iTunes U<sup>®</sup> product, which was being offered to postsecondary institutions across the nation, and determined that the product manifested serious accessibility barriers that would prevent most persons with disabilities from being able to use this product. In coordination with executive leadership at the Office of the Chancellor, ATI released a policy statement indicating that CSU campuses should not adopt iTunes U<sup>®</sup> in a production (student-facing) environment. The ATI then began coordinating with Apple to review the identified accessibility barriers, establish appropriate milestones and a timeline for remediating the product, evaluate updated product versions to gauge progress, and share updates with campuses. By the end of the agreed upon timeline, Apple had addressed all

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<sup>6</sup> <http://www.calstate.edu/AcadAff/codedmemos/AA-2007-04.pdf>

<sup>7</sup> <http://teachingcommons.cdl.edu/access/>

<sup>8</sup> <http://teachingcommons.cdl.edu/access/tech/508ProcurementTraining.shtml>

<sup>9</sup> <https://diva.sfsu.edu/help/vpat>

identified 'High Priority' accessibility barriers. As a result, the ATI issued guidance allowing CSU campuses to begin using iTunes U®.

- ATI staff participated in a systemwide Request for Proposal from vendors to provide Learning Management Systems (LMS) for CSU campuses. Learning Management Systems are used pervasively to deliver instruction where both faculty and student interact, faculty provide course assignments, and students turn in assignments. Accessibility problems with the technology would thus be a “high-impact, high-priority” issue for the CSU. The ATI was involved throughout the RFP process to ensure that accessibility was a core performance requirement and that this performance was verified. At the time of the RFP, Blackboard® was already the most widely deployed LMS in the CSU system. However, during accessibility testing, the Blackboard® system manifested significant accessibility barriers for students with disabilities and thus failed to meet minimum accessibility standards. As a result, Blackboard® was not an awardee for this RFP—a result which the company later acknowledged served as a ‘wake up call’. Subsequent to that RFP process, Blackboard® undertook a major accessibility review and remediation process for their product, culminating in an award by the National Federation of the Blind for its robust support for persons who are blind.

### **Reviewing lessons learned, optimizing our leadership strategy**

It became apparent that there was a gap between the ideal vision of full accessibility and the capacity of campuses to deliver that vision. The ATI therefore conducted an analysis to determine areas where a shift in approach would improve or accelerate progress. This resulted in a number of important changes.

- **The most fundamental shift has been to ensure that campuses play a larger and more active role in shaping ATI priorities and driving systemwide projects.** Underlying this shift is the belief that the ATI office most constructively serves as a facilitator rather than as a policeman/auditor of progress. This shift has been achieved by leveraging our existing governance structures:
  - The newly formed ATI Leadership Council provides guidance on the selection and prioritization of ATI projects;
  - The Executive Sponsors Steering Committee provides feedback regarding the scoping and implementation of projects and discusses critical, institutional accessibility topics; and
  - The 3 Communities of Practice (Instructional Materials, Web, and Procurement) discuss institutional strategies (policies, business processes) promising tools, and emerging accessibility issues.
- **The ATI shifted its approach from the use of systemwide deadlines to a focus on continuous process improvement.** This new approach, which is based on Capability Maturity Model Integration<sup>10</sup>, emphasizes that campuses continuously improve their capabilities to reliably, promptly, and effectively meet the accessibility needs of their students, staff, faculty,. This approach encourages campuses to assess their current capabilities and priorities to best determine where institutional efforts should be directed and then tailor their accessibility implementation to the specific needs of their campus community.

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<sup>10</sup> CMMI Overview (<http://www.sei.cmu.edu/cmmi/>)

- **ATI accessibility requirements for procurement were revised to focus on technology products with the highest impact, rather than those within specific product categories or whose purchase met specific, prescriptive thresholds (e.g. dollar limits).** This shift encourages campuses to focus resources on those products for which accessibility limitations would pose the greatest barrier to persons with disabilities. In addition, it emphasizes that the accessibility status of high-impact products which are not subject to traditional procurement procedures (e.g. free applications or services such as Google Apps for Education®) should still be considered.
- **The ATI significantly expanded and improved gathering and sharing of data derived from campus annual reports.** Improvements include use of a web-based reporting application to streamline submissions, greater standardization of goals, success indicators, and status levels, and greater consistency in reporting structure across the 3 priority areas. These changes make it easier to gauge campus progress relative to the system as a whole, more easily discern areas of weakness/strength, and more easily select projects which targets areas of weakness. The CSU now has a reliable, replicable evaluation process that allows campuses to (1) review evidence-based management processes to evaluate campus ATI process and (2) use the new progress status level measurement system to assess ATI implementation progress.

### **Delivering Solutions**

The CSU is committed to leveraging our size to target critical institutional goals including achieving cost efficiencies—whether through coordinated procurement activities or the operation of shared services—and working with vendors to improve the accessibility level of products used by the CSU system and other postsecondary institutions throughout the country. Several examples of how we are delivering effective solutions are provided below.

#### **Center for Accessible Media (CAM)**

Each of the 23 CSU campuses provides alternate formats of print materials for students with print disabilities (e.g. blindness, partial sight, learning disabilities) registered at that campus. Beginning in the early 2000's, utilization of alternate media services began to grow such that significant resources were being expended to produce these materials. Thus in 2004, the CSU Center for Accessible Media (CAM)<sup>11</sup> was launched to provide a central web-based clearinghouse for all campuses to list, locate, and share curricular materials that have already been converted for use by students with print impairments. CAM currently lists 21,000 titles and facilitated 1,500 file exchanges during the 2011 calendar year. **By reducing or eliminating redundant efforts to produce these specialized materials, CAM produces hundreds of thousands of dollars in savings annually and improves time-to-delivery for students.** Many of the University of California campuses currently contract with the CSU for access to CAM, allowing institutions and students from both systems to benefit from the agreement.

#### **Automatic Sync captioning services contract**

All 23 CSU campuses work to ensure that audio/video content is provided in a manner that is accessible to persons with disabilities including providing transcripts for audio files and captions for video files. Campuses historically contracted for captioning/transcription services independently. As a result, there was little

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<sup>11</sup> Center for Accessible Media (<http://cam.calstate.edu> )



consistency regarding which vendors were used or the rates they charged. In 2008, the ATI coordinated a systemwide RFP for captioning/transcription services. The primary goal of the project was to leverage the volume of transcription/captioning occurring across the system to secure volume discounts for all participating campuses. Automatic Sync Technologies, the winning vendor, provided CSU users a customized web portal to their CaptionSync® service. In order to achieve the desired cost savings, the ATI pre-purchases 6 month blocks of anticipated service usage for the entire system and then bills campuses back for actual usage at the end of each block. **During the first 2 ½ years of this contract, the CSU has yielded savings of nearly \$90,000.** Service usage has increased each year since contract inception and satisfaction rates have been consistently high.

### **Professional Development website**

A critical component of campus ATI implementations is the effective use of training and awareness materials that build campus capacity to effectively address technology accessibility issues. Given that all CSU campuses share this goal, the ATI launched the ATI Professional Development website<sup>12</sup> to serve as a central web-based repository for materials developed by ATI staff, CSU campuses, and external entities with expertise in technology accessibility issues. **Materials from this site are extensively used by CSU campuses and have been adopted by numerous postsecondary and government agencies.**

### **eTextbook Accessibility project**

eTextbooks are a rapidly-growing segment of the postsecondary textbook market with a majority of the most commonly adopted postsecondary textbooks now available in electronic format. eTextbooks are being heavily marketed to postsecondary institutions and students both for the expanded range of features they offer and potentially significant cost savings vs. print-based books. The ATI eTextbook Accessibility project<sup>13</sup> is committed to supporting campuses in making informed adoption decisions regarding eTextbooks. To that end, the ATI recently released several checklist documents that campuses may use to gather consistent, standardize eTextbook product information. These documents were developed in close collaboration with CSU campuses and higher education publishers/distributors. The ATI will centrally aggregate these documents along with other relevant product accessibility information in order to reduce redundant efforts to gather this information. Moving forward, the eTextbook Accessibility project is currently developing a standardized template for conducting eTextbook accessibility evaluations that will facilitate comparing accessibility support across various eTextbook platforms.

### **Google Apps for Education project**

The CSU continues to leverage its size to advocate for improved accessibility support in widely-deployed educational technology products. In 2010, the Google Apps for Education® application suite was being considered for adoption by some CSU campuses; however the accessibility of the suite was questionable and needed further review before campus adoption. The CSU assembled a group of campus experts from several of our campuses (CSU Channel Islands, CSU Fresno, CSU San Diego, CSU East Bay) as well as the Center for Usability and Accessibility in Design at CSU Long Beach. These experts then performed an accessibility evaluation of the product and released the CSU Google Apps Evaluation report<sup>14</sup> in 2011. This report described the accessibility

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<sup>12</sup>ATI Professional Development site ([http://teachingcommons.cdlib.org/access/docs\\_multi/pdf\\_vid\\_tut/videos\\_only.shtml](http://teachingcommons.cdlib.org/access/docs_multi/pdf_vid_tut/videos_only.shtml))

<sup>13</sup> CSU ATI eTextbook Accessibility Project Briefing (<http://ati.calstate.edu/mod/book/view.php?id=315>)

<sup>14</sup> CSU Google Apps Evaluation report (<http://ati.calstate.edu/mod/book/view.php?id=280>)

gaps in the Google Apps for Education® product and provided campuses information regarding potential workarounds for those gaps. The evaluation team then met with Google to share the report. By leveraging the accessibility expertise in the system to conduct a single coordinated evaluation, the CSU avoided the costs associated with conducting individual campus-based evaluations and ensured that all campuses received consistent information. In addition, the report led Google to make substantial changes to their Google Apps for Education® applications which removed accessibility barriers for all users.

### **Web Accessibility Evaluation and Implementation project**

The CSU systemwide web presence encompasses millions of web pages and numerous web applications and is the basis for delivering many of our instructional and administrative programs and services. It is therefore crucial that the CSU establish a comprehensive web accessibility evaluation process that allows campuses to gauge the accessibility of our web presence in an efficient and effective manner. In support of this goal, the ATI established 2 key objectives:

- Institute a standardized set of automated and manual testing accessibility criteria for all CSU campuses that will result in more accessible content across the system and a more efficient workflow for users; and
- Provide a broad audience of CSU personnel access to a web accessibility evaluation tool that will help them publish accessible content.

### **The CSU ATI Accessibility Requirements**

A systemwide work group composed of representatives from the Office of the Chancellor and several campuses (CSU San Bernardino, CSU San Diego, CSU Channel Islands, Cal Poly San Luis Obispo) worked together to create a standardized set of accessibility requirements that integrate both automated and manual evaluation of web page accessibility and associated procedures for completing the evaluation. The Universal Design Center at Cal State University Northridge is providing support to the entire system by managing the requirements as they are fine-tuned and providing training and support services to all campuses so that the CSU ATI Accessibility Requirements are successfully and effectively implemented at all CSU campuses. This project is delivering the following benefits:

- Increasing the accessibility of web content and web applications by identifying barriers so that they may be removed;
- Increasing web accessibility at the time web content is published by providing easy to use accessibility checkpoints and remediation resources;
- Increasing the accessibility of web-based products purchased by the CSU by providing standardized web accessibility evaluation criteria that 23 campuses may use when evaluating web products; and
- Providing cost savings to the system in personnel time and effort by offering these shared services

The CSU web accessibility evaluation process has also been shared with a nationwide postsecondary audience via an online webinar. Other postsecondary institutions have expressed great interest in learning more about this process.

## **The CSU ATI Web Accessibility Evaluation tool implementation**

The CSU ATI recognized that a reliable evaluation methodology that is adopted systemwide would produce great benefits for students as well as improve the cost-effectiveness of the evaluation process. The CSU wanted to avoid having 23 different evaluation methodologies and tools that would result in confusion, conflicts, and inefficient use of our limited resources. The CSU ATI, in cooperation with our campuses, selected the HiSoftware Compliance Sheriff Web® evaluation tool which resulted in a cost savings of \$300,000 over 3 years. We also recognized that the tool needed improvements in order to extend its use to the wide variety of web content personnel on CSU campuses and to help fulfill our goal to publish and purchase accessible content rather than remediate content after publication. The working relationship between the vendor and the CSU system brought together the necessary stakeholder groups to solve this problem. A group of students at Cal Poly Pomona conducted a needs analysis involving input from several campuses which resulted in a scope of work that the vendor (HiSoftware) agreed to use to make product improvements. Upon completion of the improvements to the tool, Cal Poly San Luis Obispo will be testing the product and documenting the process to ensure that the campuses will be able to utilize the tool to its full potential. This project has provided a more effective implementation of this web accessibility evaluation tool across the CSU system and has led to meaningful improvements to a web accessibility evaluation tool that is used by postsecondary institutions across the country.

## **SurveyGizmo® Product Accessibility project**

SurveyGizmo®<sup>15</sup> is a popular survey tool used by many postsecondary institutions and corporations. The CSU ATI has been working with this company to improve the accessibility of the surveys created by the product. As a result of this work, the company has dramatically improved accessibility support over the past year—particularly for persons with visual impairments. The removal of these accessibility barriers benefits persons with disabilities across the country. In addition, SurveyGizmo® has significantly improved the quality of its accessibility documentation including the development of a Voluntary Product Accessibility Template. This will allow institutions across the country that are considering this product to clearly understand the extent and nature of accessibility support provided by the product. Moving forward, the CSU will be working with SurveyGizmo® to produce training materials that guide survey authors through the steps necessary to create accessible surveys.

## **Accessibility and Open Education Resources**

The CSU has been a leader in open education resources (OER) – free online teaching and learning materials – to improve the affordability and quality of learning through its project, called MERLOT (Multimedia Educational Resources for Learning and Online Teaching)<sup>16</sup>. CSU-MERLOT has made accessibility of OER a high priority and is implementing programs to raise the visibility and implementation of accessibility requirement in OER.

- MERLOT has added easy to use tools for accessibility experts and users of OER to contribute structured information about the accessibility of the OER;
- MERLOT has cataloged almost 100 open textbooks that have links to accessibility evaluation reports, providing users an assessment of the accessibility features of the resource;

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<sup>15</sup> SurveyGizmo (<http://www.surveygizmo.com/>)

<sup>16</sup> <http://www.merlot.org>

- MERLOT, in cooperation with the OpenCourseWare Consortium, will be building an online community and hosting an online webinar during International Open Education week (March 5-10, 2012);
- MERLOT's Content Builder authoring tool to create OER is designed to product accessible OER; and
- MERLOT will be facilitating higher education institutions and the OER community to grow the awareness of accessibility requirements and build accessibility into OER tools and services.

### **Standardizing the Accessibility Components of the Procurement Process**

By embedding accessibility into the procurement process, the CSU has the opportunity to minimize or avoid introducing accessibility barriers when purchasing technology products. The goal of this ATI project is to more tightly integrate accessibility into the procurement process by focusing on several key areas including process improvement, market research timing/techniques, and business procedures. A workgroup comprised of staff from the Office of the Chancellor and CSU campuses (CSU Sacramento, Cal Poly Pomona, San Francisco State, CSU Long Beach, CSU Channel Islands, CSU Fresno, and Cal Poly San Luis Obispo) are developing a number of important resources (e.g. standardized accessibility language for product solicitations and purchase contracts, Equally Effective Access Plan templates) and recommendations (e.g. adoption timelines, testing practices, and creating equally effectively access plans). Several of these resources are currently being piloted by campuses. This project is expected to significantly improve the ability of CSU campuses to ensure they are purchasing the most accessible, barrier-free EI&T products.

### **CSU Accessible Technology Network (CSU ATN)**

The CSU is developing the Accessible Technology Network (CSU ATN), a shared services network, that will serve the CSU and other higher education institutions. This network will leverage the campus accessibility experts across the system to provide shared services in several areas of accessibility including (1) Accessible product review and testing; (2) Working with vendors to increase the accessibilities of products; (3) Exploring new and innovative solutions for accessible instructional materials; (4) Promoting accessibility awareness; and (5) Providing training.

The CSU ATN is currently in the planning and development phases. When completed, the project is expected to provide numerous benefits including:

- Reducing redundancy and lowering accessibility costs by reviewing and testing commonly-used CSU products once;
- Improving the accessibility of technology products and accessibility documentation (e.g. Voluntary Product Accessibility Templates) for all educational institutions through vendor collaborations; and
- Providing CSU campuses and other postsecondary institutions with high quality training by leveraging campus experts in various disciplines.

### **California Department of Rehabilitation (DOR)/CSU Interagency agreement**

In 2011, the California Department of Rehabilitation contracted with the CSU to deliver a comprehensive web accessibility training curriculum for a group of Community Based Organizations (CBO's) that serve persons with disabilities across the State. Staff from the CSU Office of the Chancellor, CSU campuses (CSU Northridge, CSU Channel Islands, Cal Poly Pomona, and CSU Long Beach), and the Center for Usability in Design and Accessibility

at CSU Long Beach conducted 14 sessions covering a variety of topics and produced a collection of training materials to accompany these sessions. The CSU intends to share these training materials publicly later this year.

### **ALEKS® Product Accessibility project**

In an effort to develop and distribute web-based course products that are fully accessible to blind and low vision students, ALEKS Corporation<sup>17</sup> will be engaging the consulting, testing and research capabilities of the CSU. This project will result in significant improvements to accessibility support for their widely-deployed mathematics application—particularly for those with visual impairments. The improvements made to ALEKS will benefit postsecondary institutions and students across the nation.

### **National Federation of the Blind**

The CSU recognizes that postsecondary institutions share common goals with disability advocacy groups regarding the removal of technology accessibility barriers. To that end, the CSU has established relationships with executives at the National Federation of the Blind. This partnership, while young, has led to several collaborations including a CSU presentation on eTextbook Accessibility at the NFB eBook Symposium in 2011 and a shared presentation to be delivered at the CSU Northridge Annual International Technology and Persons with Disabilities Conference in March, 2012, as well as extended discussions regarding future joint projects.

### **Suggestions for Federal Policy**

As the testimony above has outlined, the level of accessibility support provided by educational technology products is inadequate. The CSU certainly recognizes that Section 508 accessibility requirements apply to those who adopt technology (rather than those who produce it); however, our experience operating the ATI for the past 7 years suggests that this model of driving vendor accessibility improvements via procurement activities has not resulted in sufficient progress. We therefore offer the following suggestions.

First, CSU campuses commonly hear from technology vendors that other customers including Federal and State government entities across the country are adopting products despite the presence of serious accessibility barriers. This suggests that their Section 508 implementation is insufficient to drive market changes. We therefore suggest that federal entities be charged with ensuring that Section 508 procedures are revised to more adequately address accessibility including:

- Validating product accessibility documentation;
- Conducting conformance testing prior to adopting high-impact products; and
- Sharing test results with other government and education entities to reduce redundant efforts.

Next, the CSU would also ask that Congress require recipients of Federal grant funds to ensure that technology products developed as components of these grants conform to Section 508 standards and would urge the Department of Justice to send a 'Dear Colleague' letter to the 100 largest IT vendors, reminding them of the importance of ensuring that their products are accessible to persons with disabilities.

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<sup>17</sup> ALEKS (<http://www.aleks.com/>)

Finally, the CSU also strongly supports the recommendations from the AIM Commission report<sup>18</sup> including revising the scope, effectiveness, and function of the Copyright Act as amended (Section 121, the Chafee Amendment) to broaden the definition of individuals eligible for specialized formats, and authorizing the United States Access Board to establish guidelines for accessible Instructional Materials that will be used by government, the private sector, and postsecondary institutions.

The CSU applauds the Committee's devotion to ensuring equal access to a quality education for all Americans, and appreciates your interest in technology as a promising tool in meeting that goal. We welcome the opportunity to be a resource to you as you continue to explore ways to ensure access and success in higher education.

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<sup>18</sup> Report of the Advisory Commission on Accessible Instructional Materials in Postsecondary Education for Students with Disabilities (<http://www2.ed.gov/about/bdscomm/list/aim/publications.html>)