

University of Cincinnati  
Electronic and Information Technology Accessibility Plan

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## I. EXECUTIVE SUMMARY

The University of Cincinnati is committed to providing individuals with disabilities equal access to its programs and activities, consistent with the requirements of Section 504 and 508 of the Rehabilitation Act of 1973 (“Section 504”) and the Americans with Disabilities Act of 1990, as amended (“ADA”). In furtherance of this commitment, the university has developed an Electronic and Information Technology (“EIT”) Policy, Contracting and Purchasing Policy & Procedure and an EIT Plan. Together, these documents set forth the University’s ongoing actions to promote accessibility when creating, procuring, or deploying EIT and lay the foundation for the sustainable accessibility of the University’s web and learning management environments.

The university entered into a resolution agreement with the U.S. Department of Education’s Office of Civil Rights (“OCR”) in December 2014. This agreement ensures that information provided through the University’s websites, online or eLearning environment, and course management systems (collectively, “electronic and information technologies” or “EIT”) are accessible to individuals with disabilities, particularly those with visual, hearing, or manual impairments. The University agreed that it would provide OCR with an EIT Plan that provides for the following:

1. An accessibility audit (EIT Audit) to be completed at regular intervals under the direction of the EIT Accessibility Coordinator during which information provided by the university through its electronic and information technologies is measured against the technical standard(s) adopted in the EIT Accessibility Policy;
2. A procedure to ensure that EIT and information obtained through provided by or developed by third parties is accessible. This procedure should direct administrators and staff to ensure that any university acquisition or use of EIT and third-party websites, services, or products will provide equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology; and
3. Annual professional development for any staff (e.g. administrators, faculty, support staff, student employees) responsible for creating or distributing information with EIT to students, employees, guests, and visitors with disabilities, including, but not limited to, training on the EIT Accessibility Policy, the EIT Plan, and their roles and responsibilities. This will ensure that web design, documents, and multimedia content are accessible.

Consistent with the University’s commitment to non-discrimination and terms of the OCR Agreement, the university proposes the following approach to EIT accessibility:

1. Prioritize first the accessibility of EIT most likely to be used as requested by individuals with visual, hearing, or manual impairments in the fall 2015 semester, with the goal of ensuring that individuals with the most immediate needs receive equal access to EIT;
2. Prioritize the accessibility of the most used webpages on the University's websites as determined by the EIT Accessibility Prioritization Matrix (see addendum A) ;
3. Prioritize the creation of processes and training to ensure that new or updated EIT is made accessible at the point of creation
4. Establish an EIT accessibility committee that identifies self-audit tools, such as surveys, analyzes the results of the self-audit, and develops a corrective action strategy for EIT accessibility;
5. Implement an audit of EIT accessibility;
6. Publicize a procedure and changes to existing purchasing processes and/or policies designed to ensure accessibility of acquired or procured EIT;
7. Put in place targeted training for relevant staff regarding EIT accessibility; and
8. Publicize the University's EIT Policy and notice of non-discrimination.

The university conducted a high-level order of magnitude assessment on its web presence, learning management system and supporting technology infrastructure. The university will need to provision resources to effectively support the accessibility compliance effort. More specifically, the university will need to invest in central hardware and software infrastructure, including Adobe web content management; create new support positions; and hire dedicated personnel. These required investments must coincide with the adoption of herein described policies and programs. Among the expected new positions are: User Interface/User Experience Developers; Middleware Application Developers; Content Strategists; EIT Support Personnel; eLearning Instructional Technologists and Designers; and Development Coordinators. A detailed EIT plan is set forth below.

## II. EIT ACCESSIBILITY COMMITTEE

The university has designated Heidi Pettyjohn as its EIT Accessibility Coordinator. The EIT Accessibility Coordinator will work in conjunction with the Office of Student Affairs – Disability Services, IT@UC, Governmental Relations and University Communications, Purchasing, Office of General Counsel and other support units to implement, manage, and update the Plan; develop and implement related policies; oversee training of relevant staff; and perform other related functions.

Under the direction of the EIT Accessibility Coordinator, the university will:

- Conduct periodic EIT accessibility audits;

- Develop and implement a corrective action strategy to address gaps identified by accessibility audits;
- Identify professional development opportunities for staff involved in EIT-related functions; and
- Conduct periodic review of the EIT accessibility policy.

Recognizing that the Coordinator will benefit from the collective knowledge and experience of multiple offices on campus, the university will form an EIT Accessibility Committee. Certain functions will be handled collectively or by EIT subcommittees, with guidance and support from an Executive Steering Committee and Executive Sponsors. See addendum B for the structure of the EIT Committee (named “The Accessibility Network”).

Additionally, once the EIT Plan is adopted, the EIT Accessibility Coordinator will establish a regular schedule for reviewing campus assessments and progress reports and delivering management briefings for all accessibility initiatives to the IT governance structure, university senior leadership, and OCR.

### III. EIT ACCESSIBILITY AUDIT

The university will conduct an audit of its EIT to determine the institution’s accessibility needs. The university will take the actions listed below as part of the EIT Audit.

- The university will task a subcommittee or subcommittees of the EIT committee with reaching out to larger university departments and the Office of Student Affairs – Disability Services to understand their use of EIT and related accessibility needs. The EIT Audit will test the accessibility of EIT using the accessibility standards set forth in the EIT Policy.
- The EIT Audit subcommittee will obtain information about topics including, but not limited to, staff use of online learning and course management systems, software, graphs, headings and charts; PDFs; knowledge of accessibility features of documents; and familiarity with procedures that ensure the accessibility of EIT used in classes. The university will mine its learning management system for much of this data; however, when necessary, surveys will serve as the data collection mechanism.
- The university will conduct a review of the accessibility of its web pages. The initial review will focus on the top 20% accessed webpages as identified by analytics. The university will review the accessibility of these frequently used websites and a random selection of departmental websites, administrative websites, selected websites from each university campus, and selected websites for large programs such as the Law School and Medical

School. In reviewing these webpages, the university will review whether the webpages meet the WCAG 2.0 Level AA guidelines for accessibility.

- Documents and media posted to websites and webpages: the university will test the accessibility of a sampling of these documents and media and utilize findings to inform actions taken following the audit.
- Beyond websites, course syllabi and the learning management system (Blackboard Learn) will also require prompt attention due to the integral nature of these items to the eLearning experience. The university also recognizes, however, that certain online or eLearning pages such as <https://canopy.uc.edu/webapps/portal/frameset.jsp>, Blackboard Learn, may take longer to remedy because these programs involve third party providers. It is worth noting that the vendor for UC's LMS, Blackboard Inc., is "fully committed to ensuring that our platform contains no barriers for users with disabilities and is both usable and accessible by everyone, regardless of age, ability, or situation." Blackboard Learn was independently audited in 2012 and was found to be in compliance with the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. Blackboard Learn was the first, and remains the only, LMS to have received Gold level certification for nonvisual access, issued by the National Federation of the Blind (NFB).
  - The university will first prioritize the remediation and accessibility of course content or other course related EIT that are identified by users with disabilities through a request for accommodation
  - The university will conduct a comprehensive review of the accessibility of the content within Blackboard Learn by testing only active courses. This audit will include the accessibility of features such as chat rooms and forums that are part of the online classroom experience.

Following the completion of the audit, the EIT Accessibility Committee will review the audit results and develop a corrective action strategy to address identified concerns. The corrective action strategy will include reasonable timeframes for completion that are consistent with the University's Resolution Agreement with OCR.

#### IV. EIT POLICIES

##### Notice of Non-Discrimination

The University's notice of non-discrimination was previously provided to OCR. The notice of non-discrimination is widely disseminated – a webpage has been created that contains the notice and a link to this webpage is included at the bottom of the University's websites. Information about the need to include the notice of non-discrimination in relevant publications has been shared

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University-wide and the notice is now included in many documents, including admissions and employment documents. The text of the notice of non-discrimination is set forth below:

The University of Cincinnati does not discriminate on the basis of disability, race, color, religion, national origin, ancestry, medical condition, genetic information, marital status, sex, age, sexual orientation, veteran status or gender identity and expression in its programs and activities. The university does not tolerate discrimination, harassment, or retaliation on these bases and takes steps to ensure that students, employees, and third parties are not subject to a hostile environment in university programs or activities.”

The university responds promptly and effectively to allegations of discrimination, harassment, and retaliation. It promptly conducts investigations and takes appropriate action, including disciplinary action, against individuals found to have violated its policies and provides appropriate remedies to complainants and the campus community. The university takes immediate action to end a hostile environment if one has been created, prevent its recurrence, and remedy the effects of any hostile environment on affected members of the campus community.

UC is committed to the ideal of universal Web accessibility and strives to provide an accessible Web presence that enables all university community members and visitors full access to information provided on its websites. Every effort has been made to make these pages as accessible as possible in accordance with the applicable guidelines.

The following person has been designated to handle inquiries regarding discrimination, harassment, or retaliation based on disability, race, color, religion, national origin, ancestry, medical condition, genetic information, marital status, age, and veteran status:

Tamie Grunow  
Sr. Associate Vice President & Chief Human  
Resources Officer  
Section 504, ADA, Age Act Coordinator  
340 University Hall, 51 Goodman Drive  
Cincinnati, OH 45221-0039

Phone: 513-556-6381  
Email: [tamie.grunow@uc.edu](mailto:tamie.grunow@uc.edu)

The following person has been designated to handle inquiries regarding the accessibility of electronic and information technology:

Heidi Pettyjohn

EIT Accessibility Coordinator and Director of Strategic Priorities

Division of Student Affairs

630 Steger Student Life Center, 2801 UC Main Street,

Cincinnati, OH 45221-0638

Phone: 513-556-9791

Email: [pettyjhc@ucmail.uc.edu](mailto:pettyjhc@ucmail.uc.edu)

The following person has been designated to handle inquiries regarding discrimination, harassment, or retaliation based on sex, sexual orientation, gender, and gender identity or expression:

Karla Phillips

Interim Title IX Coordinator

3115 Edwards 1, 45 Corry Blvd

Cincinnati, OH 45221

Phone: 513-556-3349

Email: [karla.phillips@uc.edu](mailto:karla.phillips@uc.edu)

#### EIT Policy

The university has developed a draft EIT Policy for OCR's review. Upon receipt of feedback from OCR, the university will finalize and publish the EIT Policy. The EIT Policy will be widely disseminated, including through posting on the University's website. Information about the EIT Policy will be included in training of relevant employees.

#### Procurement Process

The university has updated the existing purchasing manual to ensure that EIT purchases, leases, lease purchases, licensing, deployments and consultations meet or exceed university objectives for accessibility. A position has been created within the Central Purchasing Office to ensure compliance with the EIT policy and accompanying procedures. Additionally, the university will:

- Develop language to be included in all purchasing contracts to establish the vendor's responsibility for the accessibility of purchases of software and third-party systems
- Update existing purchasing training to include the responsibilities of the purchasing unit in ensuring accessibility of procured or purchased EIT

Ensuring the accessibility of EIT is long-term process that requires a sustainable, university wide commitment to ensure technology accessibility is built into the ways the university acquires IT. At a minimum, this will assure that as enterprise systems are replaced, every attempt will be made to replace them with systems in which accessibility is a basic requirement.

## V. PROFESSIONAL DEVELOPMENT

The EIT Accessibility Coordinator, through attendance at periodic trainings offered online and by third party institutions, will maintain the requisite knowledge, skills, and experience to understand and assist the university in the adoption of the technical standards identified in the EIT Accessibility Policy. The university will identify all individuals holding some responsibility for creation and/or distribution of EIT. This list will include all faculty and staff who contribute to the university EIT. The EIT Accessibility Coordinator will then employ his/her skills and annually train these individuals on the Plan; the school's EIT policy; and generally their roles, responsibilities, and strategies to ensure and improve accessibility of websites, documents, and multimedia content. The university also will offer trainings on how to make documents and other course materials accessible; the process for reporting barriers to accessibility; and the EIT Policy.

## VI. CONCLUSION

The university takes seriously its obligation to provide equal access to its programs and activities for individuals with disabilities. The university is committed to ongoing compliance with Section 504 and the ADA and looks forward to working with OCR during the University's implementation of the EIT Plan.

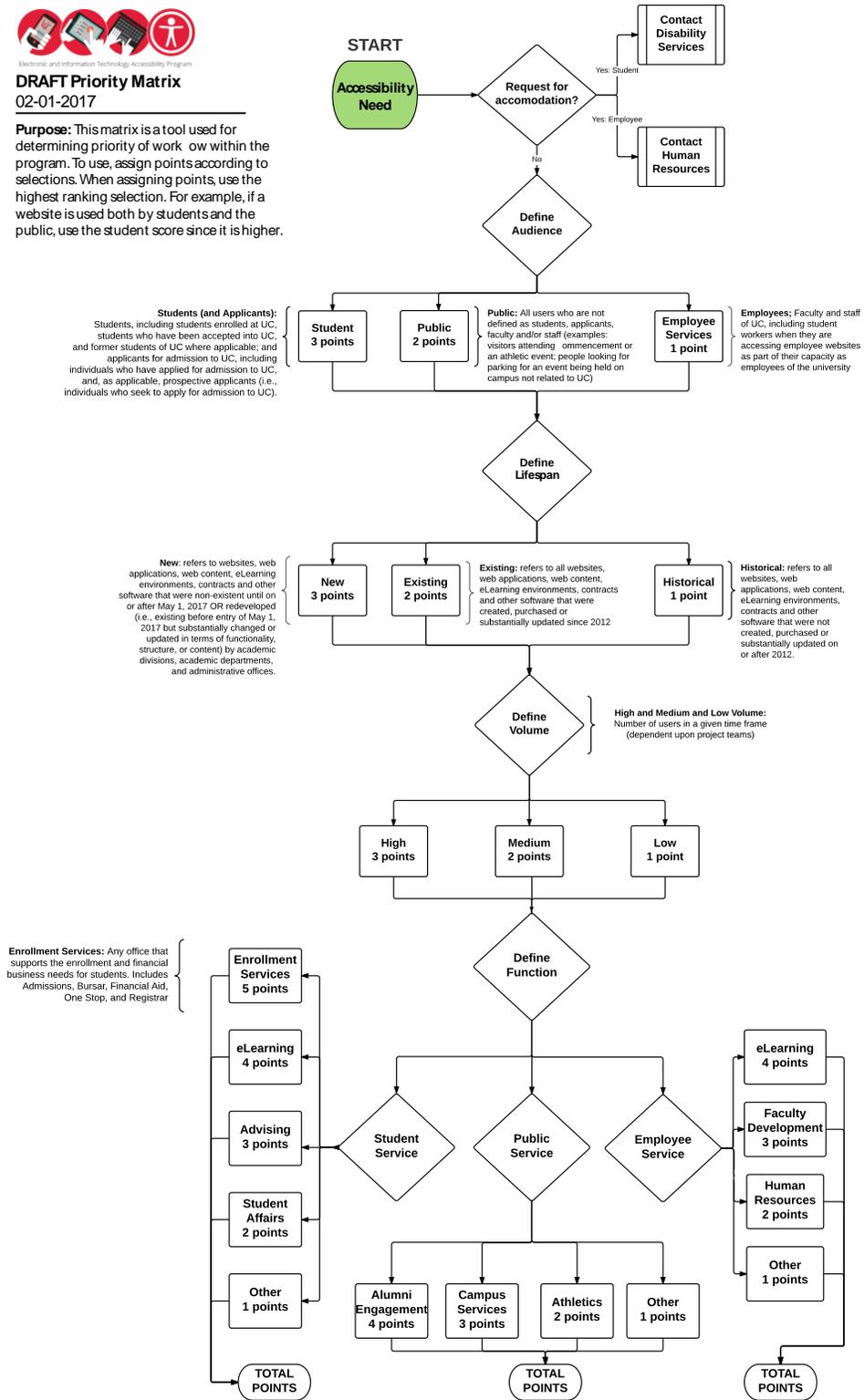
# VII. ADDENDUM

## Prioritization Matrix



**DRAFT Priority Matrix**  
02-01-2017

**Purpose:** This matrix is a tool used for determining priority of work within the program. To use, assign points according to selections. When assigning points, use the highest ranking selection. For example, if a website is used both by students and the public, use the student score since it is higher.



## Accessibility Governance Structure

### **A. Executive Sponsors**

- a. **Co-Sponsors:** **Bob Ambach Sr.** *VP Administration & Finance*, **Kristi Nelson** *Sr. VP and Provost Academic Affairs*
- b. **Members:** **Bleuzette Marshall** *VP Equity & Inclusion*, **Debra Merchant** *VP Student Affairs*, **Sally Moomaw** *Faculty Senate Chair*, **Greg Vehr** *VP GRUC*, **Nelson Vincent** *VP & CIO IT@UC*

### **B. Executive Steering Committee**

- a. **Co-Sponsors:** **Nelson Vincent** *VP & CIO IT@UC*, **Debra Merchant** *VP Student Affairs*
- b. **Co-Chairs:** **Annette Ready** *Associate VP IT@UC*; **Heidi Pettyjohn**, *Interim EIT Coordinator*
- c. **Members:** **Gigi Escoe** *Vice Provost Undergraduate Affairs*, **Paul Foster** *Assistant VP of Enterprise Learning Technology IT@UC*, **Pam Goines** *Director of Accessibility Resources, UC Blue Ash*, **Tom Guerin** *Associate VP Administration & Finance*, **Tamie Grunow Sr** *VP Chief HR Officer Human Resources*, **Anita Ingram** *Assistant Vice President, Chief Risk Officer Enterprise Risk Management*, **Patrick Kowalski** *VP Administration & Finance*, **Matt Olovson** *Executive Director Office of Equal Opportunity & Access*, **Michele Ralston** *Director of Communications Office of the Provost*, **Josette Riep** *Associate Director Information Technology IT@UC*, **Rob Rokey** *Instructor Lindner College of Business, Faculty Senate Representative*, **Nicola Ziady** *Assistant Vice President, GRUC*

### **C. Core Team**

- a. **Members:** Project Manager(s), Accessibility Network Lead Team, Program Members

### **D. Project Teams**

- a. **Members:** Project Manager(s), Project Lead, Program Members, Subject Matter Experts