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IT Accessibility Program
University of California Office of the President

October 30, 2015

The University of California Office of the President (UCOP) is committed to creating a welcoming and inclusive environment, and is equally committed to ensuring that the technology environment is accessible to everyone, especially people with disabilities.

Under the UC Information Technology Accessibility Policy, each UC location must establish a program to address IT accessibility in a systematic fashion. Achieving IT accessibility is an ongoing and evolving process as needs, products, and services change; as technologies are updated; and as we simply learn over time how to do it better. The goal of the UCOP program is not to create checklists for compliance but to encourage deep awareness that our programs, services, and opportunities should be available to everyone and, in fact, benefit from the inclusion of different perspectives and abilities.

The UCOP IT Accessibility Program puts in place the structure and processes to support UCOP departments in complying with UC policy and upholding the spirit of accessibility and inclusion.

Authority and Responsibility

- **Oversight**. At UCOP, the Ethics and Compliance Risk Committee (ECRC) authorizes and oversees the UCOP IT Accessibility Program, and promotes compliance with the UC Information Technology Accessibility Policy.

- **Implementation**. Reporting to the ECRC, the UCOP IT Accessibility Work Group is composed of representatives from various functional areas, including information technology, communications, human resources, procurement, compliance, and the California Digital Library. The Work Group implements the program at UCOP. It also coordinates activities with the systemwide Electronic Accessibility Leadership Team, a subcommittee of the UC Information Technology Leadership Council, to promote consistent policy interpretation and implementation, and to encourage the adoption of best practices as well as resource sharing.

Funding

- **Startup Funding**. Limited, temporary funding is available in 2015 through Information Technology Services to help departments cover unanticipated costs related to IT Accessibility Policy compliance. Departments should proactively budget for IT accessibility in future budget years.

- ***Planning and Budgeting***. For projects initiated in 2016, departments are fully responsible for costs associated with policy compliance and for making sure that the electronic programs, services, or products they develop or procure are accessible to individuals with disabilities. (Examples include websites, applications, vendor software, and equipment and devices.)

  When addressed early in the project planning/development or procurement processes, accessibility does not significantly increase project costs. Departments should consult with Information Technology Services for guidance on appropriately planning for accessibility and minimizing the budgetary impact, whether ITS is managing the IT aspects of the project or a third party vendor is being used.

  Departments should review the checklist in Appendix A, which covers the basic steps they must take to address accessibility.

Compliance

- ***Prioritization***. Ideally, all UCOP electronic resources should be accessible. However, departments may need to stage and prioritize accessibility effort over time for a variety of reasons. UC policy provides guidance for such prioritization, stating that "new development and purchases, including development and purchases for major revisions and updates of existing electronic information resources, must receive higher priority over the retrofit of existing electronic information resources."

  Starting in 2015, UCOP departments must give highest priority to *new* programs, services, or products, as well as any requests for accommodation. Beyond that, prioritization should take into account the composition of the target audience (broad vs. small), the implementation timeframe, and the availability of effective alternative methods of access, etc. For example, programs or services that target a broad audience have a higher priority when compared to those that target a very small in-house team.

  The UCOP IT Accessibility Work Group is available to consult with departments about prioritization decisions. A tool to help with prioritization is also available.

- ***Alternative Solutions***. Departments must implement whenever possible the approach to accessibility that is considered best practice. At times, however, it may be necessary to provide an alternative means of access. Departments should consult with the UCOP IT Accessibility Work Group, which will help determine what the best practice is and recommend appropriate alternative or temporary accessibility solutions. If an alternative solution is implemented, departments are required to document it, providing the rationale for the decision and a plan and timeframe for achieving a more optimal approach to accessibility.

- ***Accountability***. Departments are responsible for policy compliance. Anyone who has concerns about accessibility compliance should discuss them first with the relevant department, and staff should work within their supervisory structure to address accessibility concerns. To the extent that concerns about compliance persist after discussion within the department, individuals may report a concern through the confidential EthicsPoint hotline or website: https://secure.ethicspoint.com/domain/media/en/gui/23531/location.html?cid=23944. This can

be done anonymously. These concerns will be reviewed by the UCOP Compliance and Ethics Officer.

- **Evaluation of Departmental Compliance**. The ECRC addresses UCOP accessibility compliance through its risk assessment process. The IT Accessibility Work Group conveys information about IT accessibility risks to ITS, which includes the topic in the annual UCOP Risk Assessment process. As necessary, ECRC designates an appropriate party within UCOP to conduct random reviews of departmental compliance with accessibility requirements. Departments found to have products that are not in compliance are required to modify their programs appropriately.

Implementation

The UCOP IT Accessibility Work Group is responsible for coordinating activities to fulfill program components required by policy and, in general, to support IT accessibility at UCOP. Annual activities include the following:

- **Planning**. Each fiscal year the UCOP IT Accessibility Work Group establishes a plan for priority activities to improve UCOP's policy compliance and ensure that the program's implementation activities are addressed each year.

- **Design of Web-based Projects**. For projects that they manage, Communications and Information Technology Services (ITS) use a project review, design, and development process for addressing accessibility throughout all stages of web-based projects, from planning to testing.

  Departments that manage web-based projects themselves, or through a third-party vendor, should request IT accessibility consultation to help them comply with policy. See http://www.ucop.edu/information-technology-services/services/ucop-it-services/application-and-web-services/web-accessibility.html .

- **Procurement**. The Procurement Department utilizes a standard RFP process and standard contract language for addressing the accessibility of IT products and services. All RFPs for systemwide projects, as well as for local UCOP procurement projects, must use this process. UCOP IT purchases that fall below the monetary threshold for RFPs also must be accessible, and departments making such purchases should consult with UCOP Procurement for assistance on incorporating accessibility requirements into their purchase considerations.

- **Communications**. Each fiscal year the UCOP IT Accessibility Work Group develops a plan for building awareness among UCOP personnel about the IT Accessibility Policy, associated processes and procedures, and available resources. Strategies include feature stories in the Link newsletter, targeted meetings with department personnel, and presentations to appropriate UCOP committees.

- **IT Staff Training**. Each fiscal year the UCOP IT Accessibility Work Group arranges and promotes accessibility training for UCOP information technology (IT) staff. In addition to external training, the work group organizes internal training or awareness building for applications teams and for departments that manage their own web-based project work.

- ***Resources Development***. The UCOP IT Accessibility Work Group develops and documents best practices and other materials to help both technical and nontechnical staff implement IT accessibility. These resources are shared with the systemwide Electronic Accessibility Leadership Team for possible inclusion in the systemwide accessibility resources website and use by all UC locations. See http://www.ucop.edu/electronic-accessibility/index.html.

Evaluation

The UCOP IT Accessibility Work Group pursues a variety of ways to evaluate the effectiveness of its activities. Each year, evaluation strategies are planned for each activity.

UCOP also participates in the annual systemwide inventory of accessible websites, conducted by the Electronic Accessibility Leadership Team. This inventory provides comparative data from year to year about the accessibility of the main public websites at each location.

Reporting

- ***Annual Report***. The UCOP IT Accessibility Work Group submits an annual report of activities to the ECRC by July 30.

Appendix A – Checklist for Departments

1. **Conduct inventory**. Review planned projects (websites, application/software development or purchase, RFPs, equipment or device purchase) and consider the need for accessibility.

2. **Get expert help**.

    a. <u>For IT projects</u>. Consult with Information Technology Services about accessibility for planned projects, as well as current websites, applications, etc., even if ITS isn't managing the IT aspects of the project.

    b. <u>For purchases</u>. Work with UCOP Procurement to ensure that local and systemwide RFPs and purchases follow the standard processes for addressing accessibility.

3. **Review existing contracts**. Consider whether amendments should be added to contracts to require accessibility – especially for systemwide services and other services with large audiences. Consult with UCOP Procurement.

4. **Train staff**. Send staff to accessibility awareness training or to IT accessibility technical training, as appropriate.

5. **Budget for accessibility**. In the annual budget planning process, ensure that any necessary costs related to accessibility, including staff training and IT development and testing, are accounted for appropriately.

6. **Document alternative solutions**. If after appropriate consultation a decision is made to implement an alternative or temporary solution, document the decision, providing the rationale as well as a plan and timeframe for implementing a more optimal or "best practice" solution for accessibility.

Resources
- **UC IT Accessibility Policy**
  http://www.ucop.edu/electronic-accessibility/initiative/policy.html
- **Systemwide website on IT accessibility**
  http://www.ucop.edu/electronic-accessibility/index.html
- **Web accessibility consulting**
  http://www.ucop.edu/information-technology-services/services/ucop-it-services/application-and-web-services/web-accessibility.html
- **Survey evaluation**
  http://www.ucop.edu/information-technology-services/services/ucop-it-services/application-and-web-services/survey-evaluation.html

Related Groups
- **UC Electronic Accessibility Leadership Team**
  http://www.ucop.edu/electronic-accessibility/initiative/index.html
- **Information Technology Leadership Council**
  http://www.ucop.edu/information-technology-services/initiatives/information-technology-leadership-council.html