



# Digital Accessibility Review

How to prepare for possible online accessibility issues before they arise



# Outline

- The Presenters
- Process Timeline
- Background (key terms, legal frameworks, etc.)
- Our Review Process

# THE PRESENTERS



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# Process Timeline

ACR requested  
& received

Deficiencies  
communicated  
internally

Public note in  
ILS

Equity  
Compliance &  
Education  
Manager  
reviews

Vendor contact  
about  
deficiencies

Mitigation  
(looking ahead)

# Legal Background

Disclaimer: Not a lawyer; not your lawyer

- Rehabilitation Act of 1973, as amended 1987
  - 503: Federal Contractors
  - 504: No otherwise qualified individual with a disability in the United States...shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
  - Sec. 508: Federal agencies; specific guidelines
- Americans with Disabilities Act of 1990, amended 2009
  - Employers (Title I), Public Entity (Title II), and Public Accommodation (Title III)

# Key Terms

- Accessibility Conformance Report (ACR): a completed VPAT
- Voluntary Product Accessibility Template (VPAT): a document that explains how information and communication technology conform to specified accessibility standards
  - [Rev 508](#), [Rev EN](#), [Rev WCAG](#), [INT](#)
  - Most recent version is 2.4 (Mar. 2022);
- WCAG: Web Content Accessibility Guidelines
  - Most recent version is 2.1; 2.2. anticipated in May 2023
  - Incorporated into Rev 508 standards by reference

# WCAG 2 Standards\*

- Perceivable - Information and user interface components must be presentable to users in ways they can perceive.
  - The information being presented can't be invisible to all their senses.
- Operable - User interface components and navigation must be operable.
  - The interface cannot require interaction that a user cannot perform.
- Understandable - Information and the operation of user interface must be understandable.
  - The content or operation cannot be beyond their understanding.
- Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
  - Users must be able to access the content as technologies advance; as technologies and user agents evolve, the content should remain accessible.

\*W3C, [Introduction to Understanding WCAG](#)

# Accessibility

- “Accessible” means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally and independently as a person without a disability." - OCR
- Accessibility: providing equitable access so that individuals, regardless of ability status, can fully and independently use programs, services, resources, and facilities.



# Vendors



- Keep communication open throughout process
- Be clear and direct about your needs and organization policies
- Ask every year (minimum) for ACR creation or updates
- Have supplemental information available

# ACR Review

- Verify basic information:
  - Was the review recently completed?
  - Is it for the correct product?
  - Does it use the correct VPAT?
- Look at Ch. 3: Functional Performance Criteria (FPC) of Revised Section 508 Report
  - If you don't have time to look at anything else, look at this! (and the basic information)
- Identify the criteria that have "Does not Support" or "Partially support"
  - Remember, you can use the hyperlinks for more information about a criterion

# Examples

- [Microsoft](#) and [Adobe](#) ACRs
- Springshare's LibGuides

# Deficiencies

- Common deficiencies
  - Barriers to screen reader use
  - Insufficient contrast
  - No captioning
  - Keyboard navigation
- Should we proceed?
  - Are there alternatives?
  - Impact:
    - Who will be using the product?
      - Number and audience (e.g. public vs aviation students)
    - How can we provide equally effective alternative access?

# Alternative Accessibility Plan

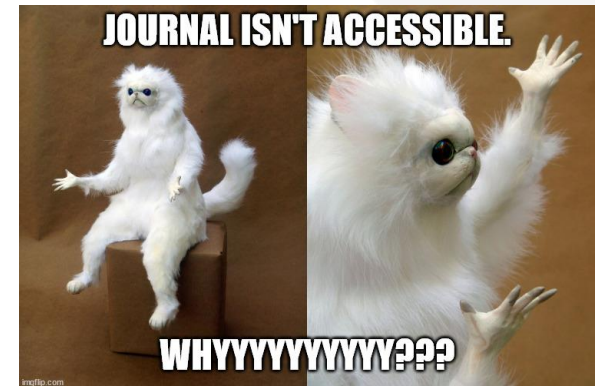
- How will you provide equally effective alternative access to the product/software/service/etc. for individuals who are unable to use the product because of its accessibility barriers?
- How will you let users know about alternative access?

# Mitigation Resources

- Vendor – have they remediated deficiencies they noted on the ACR?
- Internal
  - IT
  - Accessibility/compliance office
- Websites
  - Accessibility Experts/Resources (e.g., [JAN](#), [PEAT](#))
  - Listservs or community boards
- Software
  - Captioning Software
  - Optical Character Recognition (OCR)
  - PDF Editors

# Library Tracking

- Add all information that is useful to your tracking
- I track the following items:
  - Status
  - ACR creation date
  - Notes (when we received it, etc.)
  - Copy of file
  - Insufficiencies noted
  - Date assessment was received internally
  - Workarounds given by the vendor



☰ ACR Status	A ACR Date	Ab ACR Notes	📄 ACR	Ab Insufficiencies	📅 Date Assessed	Ab Workaround given
On file - Insufficient Check yearly until suffice...	17 May 2021	<ul style="list-style-type: none"> <li>• Rec'd 2022-10-12</li> <li>• 2022-10-20 Publisher is checking with Atypon about updated VPAT</li> </ul>		<ul style="list-style-type: none"> <li>• missing alt text</li> <li>• barriers to screen reader use</li> <li>• barriers to keyboard navigation</li> <li>• does not support so...</li> </ul>	2022-10-12	none

# Public Notices

- Users notified at point of need
- Notice added to Primo
  - When last reviewed
  - List of known issues
  - How to contact us
- Accessibility Statement on library website

## National Academy of Sciences (U.S.)

Available from 1915.

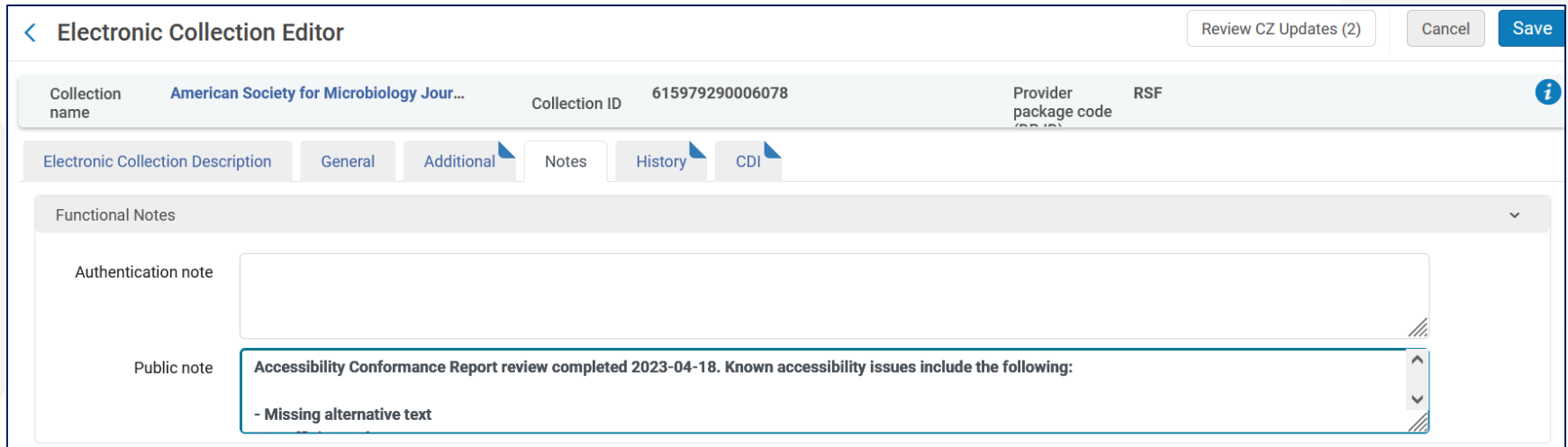
■ *Accessibility Conformance Report review completed 2022-10-12. Known accessibility issues include the following:*

- *missing alt text*
- *barriers to screen reader use*
- *barriers to keyboard navigation*

*For more information, see our [Accessibility Statement](#).*



# Alma Notes



The screenshot shows the 'Electronic Collection Editor' interface. At the top, there are buttons for 'Review CZ Updates (2)', 'Cancel', and 'Save'. Below this, the collection details are displayed: 'Collection name: American Society for Microbiology Jour...', 'Collection ID: 615979290006078', and 'Provider package code: RSF'. The 'Notes' tab is selected, and the 'Public note' field contains the following text: 'Accessibility Conformance Report review completed 2023-04-18. Known accessibility issues include the following: - Missing alternative text'.

Add public note in Alma to allow end users to view accessibility deficiencies at the point of need:

1. Select the "Edit Collection" option
2. Click on the "Notes" tab
3. Enter your information in the "Public note" box

# Resources

- [Job Accommodations Network \(JAN\)](#)
- [Partnership on Employment & Accessible Technology \(PEAT\)](#)
- Office for Civil Rights, Dept. of Ed., [Digital Accessibility Video Series](#)
- [TRLN Guide to Negotiating Accessibility in E-Resource Licenses](#)
- U.S. Access Board, [Revised 508 and 255 Guidelines](#)
- Repositories:
  - [CUNY](#)
  - [Texas A&M - Kingsville](#)

## Questions?

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