The Complete Guide to Digital Accessibility Compliance for Colleges and Universities

WHITE PAPER
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Is an OCR letter in your school’s future?

To avoid legal action from the U.S. Department of Education’s Office for Civil Rights, it’s time to make sure that all pages on your college or university’s website meet accessibility guidelines for all people—and that means anyone who has a disability.

But how do you go about implementing such a broad, complex rule?

In this white paper, you’ll gain an understanding of what it means to be accessible, how to implement accessibility best practices, quick fixes to try as well as a long-term accessibility plan, and a list of tools to help you enhance your website accessibility efforts.

INTRODUCTION

Accessibility compliance is an ethical way to structure your digital presence, but keep in mind that greater accessibility means more people can access your website. In turn, this increases the potential size of your site’s audience, and greater audience size means more potential students—and ultimately an increase in enrollment.

Infographic courtesy of the Centers for Disease Control and Prevention

According to research from the Centers for Disease Control and Prevention, 61 million adults in the United States have some type of disability.
Background on Accessibility Laws

In 1998, The Rehabilitation Act of 1973 was amended by adding Section 508 to ensure that any recipient of federal money agreed to make their digital technology accessible to people with disabilities. These technical standards are enforced by the U.S. Department of Education’s Office for Civil Rights. In recent years, dozens of colleges and universities have been subject to legal actions resulting in stiff penalties for being out of compliance.

However, as early as 1996, the World Wide Web Consortium (W3C) promoted web accessibility as a vital component of its overall mission. W3C developed the Web Content Accessibility Guidelines (WCAG) as a technical standard outlining guidelines for making web content accessible to people with disabilities. Whereas Section 508 is a U.S. law and enforced by the government, WCAG is a set of best practices only and is updated as needed (updated to WCAG 2.1 in June 2018).

The W3C considers accessibility, usability, and inclusion as part of a three-pronged approach to making the web work for everyone. While each has a specific approach and outcome, there is some overlap between the three considerations.

WHAT IS THE DIFFERENCE BETWEEN ACCESSIBILITY, USABILITY, AND INCLUSION?

• **Usability** promotes effective, efficient, and functional design that enhances web use for all users. This can include design features that also make it easier for people with disabilities to use the web.

• **Inclusion** is the idea that the web should be available to all people regardless of economics, culture, age, language, geography, computer literacy, access to connectivity, and disabilities.

• **Accessibility** focuses on access for people with all types of disabilities. It means that they should be able to interact with, learn from, and contribute to the web without barriers.

While all three are valuable components to an accessible world wide web, it is this last component, accessibility, that is the most pressing concern to digital technologists.

Get a free scan of your college website with results highlighting accessibility, SEO, link, and spelling issues. Request a free scan today at [try.omniupdate.com/free-scan](http://try.omniupdate.com/free-scan).
What’s New in WCAG 2.1?

WCAG is constantly evolving and periodically new updates to the guidelines are published. The current standards, WCAG 2.1, focus on three major areas: cognitive or learning disabilities, low vision, and mobile.

There are also three levels of conformance. The higher the level, the more constraining it is on design:

1. **A** – This is the minimum suggested accessibility standards for websites and most closely resembles Section 508. All information on a page conforms or has a conforming alternate version. This is achieved with:
   - Character key shortcuts to give users the ability to turn off keyboard shortcuts.
   - Pointer gestures that avoid complex point gestures such as two-finger pinch/zoom.
   - Pointer cancellation that avoids accidentally triggering touch or mouse events.
   - Label in name, where labels contain visual text.
   - Motion actuation, where functionality that uses device or user motion is available in the user interface to enable the disabled.

2. **AA** – The entire page meets accessibility conformance standards:
   - Functionality and content available in both portrait and landscape.
   - Input purpose in forms identified.
   - Reflow to prevent scrolling.
   - Non-text contrast with images having a contrast ratio of at least 3:1 against adjacent colors.
   - Text spacing that lets users override spacing and line height.
   - Content on hover or focus, where new content appears only on focus or mouseover.
   - Status messages that indicate errors.

3. **AAA** – Web pages meet all guidelines, whether A, AA, or AAA, and pages that are part of a larger process or series of pages all conform. They must:
   - Identify purpose, where purpose of content is programmatically determined.
   - Include timeouts that warn users of inactivity and subsequent data loss.
   - Allow animations from interactions to be disabled, unless it is essential to functionality.
   - Target size, with pointer inputs at least 44 by 44 CSS pixels.
   - Include concurrent input mechanisms where web content does not restrict use of input modalities.

Watch our webcast on Accessibility Compliance: Making Sense of ADA, 504, 508, and WCAG to hear Robert Heyser from Tarrant County College explain the differences in ADA, Sections 504 and 508, and WCAG guidelines.
What Does “Accessibility” Mean?

There are two approaches to college and university accessibility: a campus-wide effort that applies to all aspects of university life, and a narrower approach that focuses on digital technologies. This paper addresses the latter.

Digital accessibility compliance means that your website must be accessible to everyone—even if they have a disability. These standards, set by the W3C, provide four guiding principles (known as POUR) to gauge the usability of your website:

Is your website **PERCEIVABLE**?
- Do all images have alternative text (ALT text) or descriptive text that can be read with a screen reader to explain what the images show?
- Do you have headings, subheadings, lists, and other elements that outline the structure of your web page?
- Do forms include labels and prompts?

Is your website **OPERABLE**?
- Can all text within your website be reached using a keyboard as well as a mouse?
- Can you access content from two or more ways on a page such as a link, navigation menu, search, or site map?
- Does content have descriptive titles that convey its topic or purpose?

Is your website **UNDERSTANDABLE**?
- Does your website make sense in format and structure so that a screen reader can follow topics?
- Does your website identify the language it’s written in so that screen readers can recognize text?
- Does your website follow expectations for tasks such as clicking a link or completing a form field that moves users through an assumed path on your site?

Is your website **ROBUST**?
- Can your website content be interpreted by a wide variety of assistive technologies such as a screen reader?
- Does your site use valid HTML language that works in different browsers?
- Have you used current technologies according to specification to “future proof” your accessibility efforts?
What Is “UDL”?  

Universal Design for Learning (UDL) are principles that champion accessibility for all students by reducing and ultimately removing any barriers that inhibit learning. Together with accessibility, UDL is designed to enhance equity in education.4

A website’s primary purpose is to inform; when there are barriers to this information, communication is lost. That’s why UDL operates under the principle that digital usability should not be a barrier for differently-abled people and those with different processing styles.

Eliminating accessibility barriers benefits all people. UDL, when implemented, should do away with the need for individual accommodations since all technology will be accessible. Doing so also reduces any costs associated with implementing accessibility.

In a perfect world, your college or university website is comprised solely of accessible HTML pages and is devoid of PDFs and Word docs. If your school is struggling to bring your website documents into compliance, watch our webcast on How to Make PDFs Accessible for Your Website.5

UDL GUIDELINES

Apply the UDL Guidelines6 framework to improve and optimize your website, but also make sure that you educate your campus7 about capitalizing on UDL principles. This includes these three UDL guidelines:

1. **Provide multiple means of engagement.** Minimize distractions and optimize individual choice. Foster collaboration and community.

2. **Provide multiple means of representation.** Present information in different formats such as text and video. Highlight critical features within a topic.

3. **Provide multiple means of action and expression.** Help students with goal-setting, planning, and strategy development. Vary methods of response and navigation.

*Image courtesy of CAST*

*Graphic is an overview of Universal Design for Learning guidelines version 2.2.*
Accessibility Best Practices

The technical aspects of making your website accessible involve implementing design standards that boost the user experience for differently-abled people. Web Accessibility in Mind⁸ (WebAIM) identifies the following 12 key principles of accessible design:

1. **ALT text**
   Alternative text describes what is happening in a chart or image so that a screen reader can share the information. ALT text is especially helpful for blind people.

2. **Document structure**
   A thoughtful, straightforward structure⁹ to information not only aids in the navigation of your website, but it makes it easier for a person to follow along. For example, using > and – to indicate a list is not compliant. Using numbers and bullets is.

3. **Easy-to-follow forms**
   Boxes in forms should be labeled with clear instructions such as “passwords should be six characters.”

4. **Table headers**
   Tables must also have headers and fields labeled to identify data structure. This allows screen readers to read what is happening in the table.

5. **Links**
   Do not use directions for links such as “click here” or “learn more.” Instead, add links to descriptive text that explains where the link is going.

6. **Captions**
   Videos and audios should have captions and, if possible, transcripts that complement them.

7. **PDFs and PowerPoints**
   All non-HTML content must be accessible, including presentations and PDFs.¹⁰

8. **Color**
   Color¹¹ should not be used for navigational or structural purposes. Some people cannot distinguish between various shades and blind people cannot see color to direct and move them through your website.

9. **Content**
   Write clearly and use properly nested headings and subheadings to organize content.

10. **Jumps**
    Jumps within a web page allow the user to move more easily through your website. For example, including a “skip to main content” link at the top of a page allows users to skip navigation to other parts of the site.

11. **JavaScript**
    JavaScript event handlers should be device independent, and your web pages shouldn't rely on the program to function.

12. **Design standards**
    Accessible pages that are HTML-compliant and use Cascading Style Sheets¹² (CSS) let you separate content from design, providing your website with more flexibility and accessibility. Also remember to enable keyboard navigation so that all pages can be accessed in this way.
<table>
<thead>
<tr>
<th>WebAccessibility for Designers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Great web accessibility starts in the design.</td>
</tr>
</tbody>
</table>

| **Plan Heading Structure Early** |
| Ensure all content and design fits into a logical heading structure. |

| **Consider Reading Order** |
| The reading order should be the same as the visual order. |

| **Provide Good Contrast** |
| Be especially careful with light shades of gray, orange, and yellow. |

| **Use True Text Whenever Possible** |
| True text enlarges better, loads faster, and is easier to translate. Use CSS to add visual style. |

| **Watch the Use of CAPS** |
| All caps can be difficult to read and can be read incorrectly by screen readers. |

| **Use Adequate Font Size** |
| Font size can vary based on the font chosen, but 10 point is usually a minimum. |

| **Remember Line Length** |
| Don’t make it too long or too short. |

| **Make Sure Links are Recognizable** |
| Differentiate links in the body of the page with underlines or something other than color alone. |

| **Design Link Focus Indicators** |
| Ensure keyboard users can visually identify links when navigating with a keyboard. |

| **Design a “Skip to Main Content” Link** |
| A keyboard accessible link for users to skip navigation should be at the top of the page. |

| **Ensure Link Text Makes Sense on Its Own** |
| Avoid “Click Here” or other ambiguous link text, such as “More” or “Continue”. |

| **Use Animation, Video, and Audio Carefully** |
| Provide a play/pause button. Avoid flashing or strobing content that could cause seizures. |

| **Don’t Convey Content with Color Alone** |
| Users often can’t distinguish or may override page colors. |

| **Design Accessible Form Controls** |
| Ensure form controls have descriptive labels, instructions, and validation/error messages. |

WebAIM’s infographic outlines how great web accessibility starts with the design.
DESIGN FLEXIBILITY AND CONTROL

A quality content management system (CMS) offers a true separation of content from design, which increases the flexibility of design options and gives you more control. If a CMS purchase is in your future, consider these factors that affect flexibility:

- Will the templates be compliant for people with disabilities?
- Does the CMS allow for centralized management, which makes the code consistent throughout your site and prone to fewer issues?
- Does the CMS have accessibility checks that specify what pages fail accessibility tests and exactly where those fails are located on the pages?
- Does the CMS have a “final” check that runs at publish time to flag accessibility errors and prevent publishing them?
- Will CMS updates and new releases be documented and reliable?
- Does the CMS provider have accessibility experts that you can contact should problems arise?
- Does the CMS have an active user community that has the same accessibility concerns as your institution?
- Will there be technical support and training to guide you through the maze of accessibility issues and other concerns?
- If considering an open source system, will your contributors be able to change the code, making it possible for your accessibility framework to disappear?
- Is the underlying code for the CMS overly complicated, making it difficult to make changes (especially if it is an open source system)?
- Will the CMS be automatically updated? If not, will you be required to re-implement accessibility fixes with each manual update?
- Does the CMS provider have reliable customer service?

Your CMS should have accessibility checks that specify what pages fail accessibility tests and where those falls are on each page.
Developing a Long-Term Digital Accessibility Plan

Accessibility isn’t a project—it’s a long-term commitment to bring your campus into accessibility compliance in all aspects of campus life. Digital accessibility is only one small piece that should be integrated into the bigger plan.

Even as your school works to become compliant, you should create a separate long-term digital accessibility plan to ensure that your website meets all WCAG and ADA compliance standards.

1. **Form a collaborative planning team.** Not only should you form a committee, but everyone should know about and contribute to accessibility in the long term. Look for people who can provide valuable input and direction such as:
   - Administrators
   - Content contributors
   - Community organizations
   - Web designers with universal design experience
   - Accessibility experts on campus
   - Differently-abled faculty, staff, and students

   Establish member guidelines and the commitment needed from all to successfully implement a plan. If needed, get members accessibility training from established groups such as WebAIM.

   Depending on the size of your institution, it might be prudent to invest in an accessibility officer who’s fulltime job is to oversee all things accessibility—including your website’s accessibility compliance.

2. **Assess needs and challenges.** Begin with educating your team about what is required by law, then have a frank discussion about how you envision accessibility on campus. The result should be a checklist of goals that will guide you toward accessibility on your campus. Rather than reinventing the wheel, review accessibility plans that other schools have developed for ideas and to ensure that you are on the right path toward accessibility compliance.

   Finally, identify challenges. Lack of time, resources, money, and buy-in from campus influencers are common obstacles.
Integrate accessibility into your school’s procurement process. As soon as possible, your school should include accessibility as a requirement in the procurement of all new technology. Some schools even require in-house or third-party testing before purchase to ensure that accessibility needs are met.

Likewise, having accessibility requirements in place will help your accessibility team as they evaluate various tools and systems to aid compliance. For example, a quality content management system will have built-in accessibility check features that require users to work within accessibility-compliant web pages and prohibit publication of content that is not accessible. Having a procurement plan in place means that you can move forward without having to stop and create a plan in the middle of your accessibility initiatives.

Determine who owns what. It is essential for you to figure out who will oversee certain aspects of accessibility compliance. You may find that having one central office or accessibility officer to oversee accessibility works for your school. Or perhaps each department has someone monitoring accessibility. The important thing is that there is someone taking ownership for all digital content created and produced by your college or university.

Perform an accessibility audit. Request a scan of your website using our free Web Accessibility Checker. The scan will audit your site for a quick inventory of pages that need attention.

Develop goals and objectives. Marry benchmarks for addressing compliance issues to realistic timelines so that you have an actionable plan in place.

Remediate or replace inaccessible web pages and other technology on campus. If your school has thousands of web pages, it’s likely that you can feel overwhelmed about where to start. Begin by revising the pages on your existing website that get the most traffic or that convey the most popular information. This can be done simultaneously with the implementation of a new content management system or other tools that will help your long-term accessibility efforts.

Introduce cross-campus training. Set up an ongoing training plan for content contributors and anyone else who disseminates information on your website. It is important that these users understand what tools are at their disposal and what limitations there might be to the content they wish to share.

Get buy-in from across campus. Share your plan campus-wide along with its importance in complying with accessibility law. If needed, educate stakeholders about financial, educational, and ethical implications of having a strong accessibility plan.

Download College and University Website Redesign: The Ultimate Guide, which has a detailed section on how a quality content management system can help your school reinforce consistency, accessibility, and brand design throughout your website.
**Conduct ongoing evaluations.** Set up a system for soliciting ongoing feedback and how you will implement suggestions and review parts of the plan that don’t work. Consider the following:

- Does your website utilize universal design principles in its design?
- Have you tested your website’s accessibility with its target audience?
- Are there new tools you can use to maintain and strengthen your website’s accessibility?
- Are there new experts on campus or in your community who can contribute to your ongoing accessibility initiatives?
- How are you measuring your success?
- Do all users report that your website is usable?
- With your plan in place, are there ways that your fully-accessible website can benefit other areas and initiatives on campus?
- Have you shared your failures and successes with the greater higher education community so that others can benefit from your hard work?

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**A ROUNDUP OF COLLEGE AND UNIVERSITY DIGITAL ACCESSIBILITY PLANS**

Curious to see accessibility plans from other colleges and universities? Check out the plans from the schools below for ideas to make your own school’s stronger:

- California State University System
- Davidson University
- University of Minnesota
- Penn State University
- University of Washington
- Stony Brook University Libraries
- Harvard University
- University of Georgia
Solving Common Accessibility Issues: 5 Steps to Take Now

Even as you plan and implement a long-term digital accessibility plan, there are steps you can take now to get your school on the path to being digitally accessible. Here are five:

1. **Scan your website with our free Web Accessibility Checker.** You can use this website checker to audit your site for a quick inventory of pages that need attention. Likewise, run the WAVE Web Accessibility Evaluation Tool to evaluate individual pages for accessibility issues.

2. **Post an accessibility notice** on your website stating that your college or university is working diligently to address accessibility issues.

3. **Institute a policy moving forward** that prohibits posting PDFs, presentations, and other content that is not accessible.

4. **Evaluate your content management system (CMS)** and determine whether you need a new one to assist in your accessibility efforts. A quality CMS should have built-in accessibility checks that alert users when content is not accessible.

5. **Start an email or blog** about accessibility and circulate to internal content contributors to begin the education process.
TOOLS AND RESOURCES TO HELP YOUR WEBSITE BECOME AND STAY ACCESSIBLE

There are many useful tools available to help you assess and remedy accessibility issues and maintain compliance:

- **OU Campus Final Check**
- **OU Insights**
- **AChecker**
- **WAVE Web Accessibility Evaluation Tool**
- **Google Chrome Accessibility Developer Tools**
- **Google Chrome View Image Info** (properties)
- **Formstack's 508 Checker**
- **NoCoffee** (visual simulator)
- **Chrome Vox**
- **iOS VoiceOver**
- **Android TalkBack**
- **Bureau of Internet Accessibility's A11Y Compliance Platform**
- **W3C's Accessibility Evaluation Tools List**
- **W3C's How to Meet WCAG Quick Reference Guide**
- **National Federation of the Blind's Creating Nonvisually Accessible Documents**
- **Center on Technology and Disability's Digital Accessibility Toolkit: What Education Leaders Need to Know**
- **Section508.gov Accessibility Training**
- **National Center on Accessible Educational Materials: Accessibility Standards, Specifications & Guidelines**
- **Texas School for the Blind and Visually Impaired School Web Accessibility**
- **Inside Higher Ed: Helping Institutions Reach Accessibility**
- **HHS.gov: HHS Section 508 Accessibility Checklists**
- **EDUCAUSE Review: Universal Design for Learning and Digital Accessibility: Compatible Partners or Conflicted Marriage**
Conclusion

Web accessibility compliance is a complicated, complex process that benefits anyone who uses your website. The legal implications mean that you can no longer wait to enforce accessibility, so the sooner you can implement a plan, the better.

Furthermore, greater accessibility means that more people can access your website, which will increase the potential size of your site’s audience. Greater audience size means more potential students—and that ultimately increases enrollment.

Fortunately, there is technology available that will assist you in your journey to full web accessibility as well as plentiful resources from higher education organizations and peer colleges and universities. With the tips, guidelines, information, and tools provided in this white paper, you are well on your way to transforming your college or university’s website into a fully accessible site.

OmniUpdate is the definitive partner of choice among web content management system (CMS) providers in higher education. Backed by award-winning training and support, OmniUpdate’s OU Campus® CMS is the easiest to use with features and modules designed to meet higher ed’s unique needs.

When you partner with OmniUpdate, you become part of the OmniUpdate community, a nationwide group of hundreds of likeminded higher ed professionals and industry experts. For more information, visit omniupdate.com.

To learn more about our high-performance, feature-rich OU Campus CMS, schedule a demo today at try.omniupdate.com/demo-2!

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1https://www.w3.org/WAI/WCAG21/quickref/?currentsidebar=%23col_overview#concurrent-input-mechanisms
2http://try.omniupdate.com/compliance-webcast
3https://www.washington.edu/accessibility/checklist/
4https://er.educause.edu/articles/2018/9/universal-design-for-learning-and-digital-accessibility-compatible-partners-or-a-conflicted-marriage
5http://try.omniupdate.com/pdfs-webcast
6http://udlguidelines.cast.org
7https://cea.uark.edu/faculty/understand_access.php
8https://webaim.org
10https://webaim.org/techniques/acrobat/
11https://www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast-contrast.html
12https://webaim.org/techniques/css/
13 http://try.omniupdate.com/guidelines-webcast
15 http://try.omniupdate.com/free-scan
16 https://www.w3.org/WAI/business-case
17 http://try.omniupdate.com/ultimate-guide
18 http://teachingcommons.cdl.edu/access/index.html
19 https://www.davidson.edu/accessibility
20 https://accessibility.umn.edu/tutorials/planning-accessibility-start
21 https://accessibility.psu.edu/guidelines/wcag2/
22 https://www.washington.edu/accessibility/requirements/example-policies/
23 https://library.stonybrook.edu/web-accessibility/
24 https://accessibility.huit.harvard.edu
25 https://eoo.uga.edu/policies/electronic-information-technology-accessibility
26 http://try.omniupdate.com/free-scan
27 http://wave.webaim.org
28 https://law.justia.com/cases/federal/district-courts/florida/flisdce/1:2016cv23020/488749/63/
29 http://www.uccs.edu/accessibilitystatement
30 https://support.omniupdate.com/learn-ou-campus/pages-files/publish/#publishoptions
31 https://omniupdate.com/products/modules.html#ouinsights
32 https://achecker.ca/checker/index.php
33 http://wave.webaim.org
34 https://chrome.google.com/webstore/detail/accessibility-developer/tfpkknklcjclfnenbgkbgehkipljfl
35 https://chrome.google.com/webstore/detail/view-image-info-properties/jldijhjihpdpmligecogandjojpdpagn?hl=en
36 http://www.508checker.com
37 https://chrome.google.com/webstore/detail/nocoffee/jjeeggmbnhckmgdhdmgdckegajgbgd);
38 https://chrome.google.com/webstore/detail/chromevox/kgejhbhjhpiefppelpmljcsldhcphfl
39 https://www.apple.com/accessibility/iphone/vision/
40 https://support.google.com/accessibility/android/answer/6283677
41 https://www.boia.org/w3c-tools-services-a11y
42 https://www.w3.org/WAI/ER/tools/
43 https://www.w3.org/WAI/WCAG21/quickref/?versions=2.0
44 https://nfb.org/blog/creating-nonvisually-accessible-documents
46 https://www.section508.gov/training
47 http://aem.cast.org/creating/accessibility-standards-specifications-guidelines.html#.XUyaNS2ZPs2
48 https://www.tsbvi.edu/web-accessibility/2426-school-web-accessibility
51 https://er.educause.edu/articles/2018/9/universal-design-for-learning-and-digital-accessibility-compatible-partners-or-a-conflicted-marriage