

Atlantic Cape Community College Corrective Action Strategy (CAS)

10/23/18

Accessibility Vision Statement

Within 3 years, the College will meet the requirements of the decree, integrating accessibility across the institution to address accessibility in procurement processes and procedures, in public-facing digital products, and in educational course materials used in both traditional and online learning environments.

The Center for Accessibility (CFA) at the College exists to ensure that students with disabilities have an equal opportunity to participate in educational and co-curricular offerings by providing reasonable and ethical accommodations consistent with ADA guidelines utilizing an individualized, student-centered approach; modeling best practices through training, collaboration and engagement within the campus communities.

The goal of the Corrective Action Strategy is to ensure that all individuals with disabilities can readily access applications, and electronic and information technology (EIT) products used across campus or as a critical transaction or requirement of the student academic career.

Success Criteria:

- Objective 1: All applicable, purchased, leased or contracted products, services and programs will meet the applicable College Purchasing Policy and Procedures guidelines designed to conform to all Accessibility Standard(s) and to remediate exceptions. All applicable IT products not meeting the applicable Accessibility Standard(s) will no longer be used by the College, or if such are being used, they will have an equally effective alternative action plan (EEAAP).
- Objective 2: Web pages used for core College business and academic activities will meet the applicable Accessibility Standard(s) by December 31, 2019 unless they were created before January 1, 2012. These include web pages that students, employees, or visitors must access to effectively participate in a program, service, or activity offered by the College.
- Objective 3: All instructional course materials including web content, video and multimedia, and electronic documents used in courses will meet the applicable Accessibility Standard(s) at the same time they are available to any other student enrolled in that program, if that course material was created or used after January 2012.
- All Faculty and staff who create EIT products will continue to be trained in accessibility as was started in the Fall 2015 semester. Training is a core component of all three Objectives.

Timelines/Outcomes:

The completion dates for certain remaining outcomes have been discussed between both parties to the Consent Decree (Section IV of the decree). While many of the outcomes specified in the Consent Decree have been completed (specifically - IV.11 – 19, 21, 24, 25, 26, 28-32), several remain and are enumerated below. Both parties to the Consent Decree have agreed that revised completion dates and timelines would be included in the agreed upon CAS. The recommended revised timelines are below:

1. Implementation of the CAS: **three (3) years from the date of adoption** of the CAS.
2. Students Training (IV.20): While all student orientation sessions have included training in ADA practices and resources, the College does not have mandatory orientation or on-boarding sessions for all students. Atlantic Cape plans to add a Student Orientation on Training and ADA Practices. This will be an online tutorial found in every course Blackboard shell. It will be developed in Fall 2018 and incorporated into every course shell for the Spring 2019 semester. The CFA staff have proposed the following “draft” outline.

Accessibility Fundamentals

- Types of Disabilities
- Guidelines
- Laws
- Myths and Misconceptions

Web Accessibility Initiative

- Inclusive Design
- Learning from accessibility design failures embracing diversity

Creating Accessible Content

- Microsoft Office
- Adobe
- Web

3. All EIT systems will either be accessible or all exceptions documented with timelines from vendors for complete remediation (Section IV.22). This is **part of this CAS 3-year implementation plan**.
4. The conversion of all instructional materials to accessible formats (Section IV.23) is also part of the CAS. However, given an original deadline of July 2018 (3 years from the issue of the Consent Decree), **it is recommended that over the three years of the implementation of the CAS the College provides semi-annual progress reports to the NFB for discussion and problem solving. As of July 2018, the College will provide an assessment of progress made to date as well as the most challenging issues in fulfilling this section of the decree.**
5. Accessibility of the public website and student information system (Section IV.27). Complete development of an accessible website for the College, including all attached documents: **December 21, 2019**. However, progress will be reported in the quarterly reports, such as January 1, April 1, July 1, and October 1, from Interactive Accessibility as well as in the annual progress report to the NFB. The College Purchasing Policy and Procedures address the progress in having student information systems made accessible and documents the on-going negotiations with vendors.

Current State of Accessibility Across Campus

The College entered into a decree with the National Federation of the Blind in 2015 to adopt a Corrective Action Strategy to bring the institution into compliance with all ADA rules and standards. Since that time, the College has:

- Assessed all of its IT systems for accessibility.
- Adopted an updated Policy (#4) and procedures to enforce the appropriate ADA standards and to implement the conditions of the decree.
- Trained and hired staff for the Center for Accessibility (CFA) to train, develop and advise the College on all accessibility issues.
- Trained all employees and introduced all available students to the tenants of ADA regulations, resources available at the College for those seeking an accommodation, and advised them of the grievance and complaint procedures if needed.
- Conducted extensive training to full-time and adjunct faculty members in the conversion of all instructional material to the accessibility standards agreed upon in the decree.
- Committed \$500,000 in funds to the purchase of consulting services, resources and staff to make the College and its activities accessible.
- Created an internal Decree Task Force which meets twice monthly to discuss and implement policies and procedures.
- Adopted a College Purchasing Policy and Procedures which is on the agenda for Board of Trustees approval on August 21, 2018.
- Committed to the total redevelopment of the College website using Cascade CMS as the platform.

As a result of the audit of EIT systems, there were many accessibility problems across campus. The problems identified fall into three key categories:

1. Third-party websites and third-party tools that the College utilizes but does not control, which have areas that do not meet the applicable Accessibility Standard(s).
2. Accessibility problems in the public-facing content and websites that the College directly manages and maintains.
3. Accessibility problems in course materials and sites maintained by the College departments and faculty.

Based on the findings from the accessibility audits, this action plan emphasizes the following three prioritized objectives necessary to achieve the College's accessibility vision:

The College will focus on following three key areas in the Corrective Action Strategy:

1. Ensure that any applicable IT products purchased are the most accessible in the marketplace.
2. Ensure that the websites and any content specific information or communications content meets Accessibility Standard(s).

3. Ensure that instructional materials designed or used meets applicable Accessibility Standard(s).
4. Continue to furnish quarterly updates on all EIT systems.

Supporting Documents

- Accessible Technology Policy
- Accessibility Process and Procedures
- College Purchasing Policy and Procedures

Objective 1: Ensure that any applicable IT products purchased are the most accessible in the marketplace.

Making technology accessible to everyone, especially in the digital era, is essential to ensuring equal access. Promoting equal access begins with the technology the College purchases and implements. Eliminating barriers in EIT benefits all users, not just those with disabilities. Gaining and sustaining support, along with continuing education is important to reach the goal of ensuring that procurement decision makers consider accessibility.

The College, with Interactive Accessibility, our Digital Accessibility consulting partner, conducted accessibility audits across different systems to provide a view into the overall accessibility support of the EIT typically used by students at the College.

The audit of the College systems found some functions within the systems that all users could perform, some functions that will cause challenges for some users, and some functions which certain user groups cannot perform at all.

Accessibility in procurement is an especially challenging problem for the College. The volume of IT procurements is large, not all of it goes through a central authority, and there are limited resources available to determine if all purchases are accessible.

To ensure that the IT products purchased are the most accessible in the marketplace, the College will have a College Purchasing Policy and Procedures for procurement workflow that include evaluating all applicable IT products. Staff will use the Policy to determine the level and complexity of the accessibility evaluation required for new purchases and renewals.

As per the College Purchasing Policy and Procedures, accessibility requirements will be incorporated into contracts, addendums and RFPs. Before purchasing an IT product, the College will ask for accessibility documentation, including a Voluntary Product Accessibility Template (VPAT), roadmaps, timelines and other documentation that illustrate how the product meets the applicable Accessibility Standard(s).

Purchases that have a significant impact on campus, especially on large portions of the student body, will be monitored and an exception process and procedures will be implemented for any EIT products that cannot meet or are working on meeting the applicable Accessibility Standard(s).

Policies and Procedures

The following policy and procedure changes are necessary for successful implementation of this objective.

Policy	Procedures
Procurement office and key stakeholders must purchase the most accessible EIT products.	<ul style="list-style-type: none"> Complete the appropriate documentation for products that qualify for an exception. Endorse and implement the College Purchasing Policy and Procedures

Training Strategy

The following training courses are necessary to successfully implement this objective:

Course	Training Owner	Audience	Timeframe	Success Criteria
How to purchase accessible products and work with vendors	CFA and Purchasing Dept.	Everyone who purchases IT products	On-going	Buyers know how to incorporate accessibility into the purchasing process and collect and interpret information from vendors. They know when they need to engage the CFA to conduct independent audit.
Faculty Guide for Purchasing and Adopting 3rd Party Materials.	CFA and Purchasing Dept.	Faculty		Faculty know the necessary steps to procure the most accessible instructional materials, textbook and other 3rd party materials.

Communications Strategy

The following messages are necessary to successfully implement this objective:

Message	Who Communicates	Audience	Success Criteria
Announce College Purchasing Policy and Procedures and process changes for applicable EIT product purchasing.	CR	All	Purchasers are aware of the new EIT purchasing accessibility policy and procedures.

Message	Who Communicates	Audience	Success Criteria
Announce accessibility training for new employees with purchasing authority and the Accessibility Standard(s)	CR/HR	All	Purchasers understand applicable EIT purchasing accessibility policy and procedures and changes to them.
Include information on accessibility EIT procurement policies as part of HR onboarding	HR/Purchasing	New Employees	All new employees know the policies and procedures for IT procurement. Add to training in basic accessibility awareness.
Ongoing general campus communication that promotes EIT procurement awareness and knowledge of the exception process.	CR/HR/Purchasing	All current employees	All employees are aware that there are accessibility policies and procedures for EIT procurement.

Milestone and Timeline

Milestone	Objectives & Activities	Estimated Timeline
Accessible procurement policy in place.	<ul style="list-style-type: none"> Map applicable IT products to purchasing codes for tracking and monitoring. Include procurement policy as part of the College Digital Technology Accessibility policy. Create and post the procurement procedures, which will require that all applicable IT products meet the Accessibility Standard(s). 	Procurement policy will be adopted by December 2018.
Procurement language updated to include applicable Accessibility Standard(s)	<ul style="list-style-type: none"> Write procurement language for IT product contracts that requires conformance to the applicable Accessibility Standard(s) when applicable. 	Standard contract language will be updated and published by December 2018.

Milestone	Objectives & Activities	Estimated Timeline
Process developed to verify accessibility of EIT products	<ul style="list-style-type: none"> Document responsible parties for each component of the accessible procurement process. For example: <ul style="list-style-type: none"> Who creates the purchase request? Who interacts with the vendor on accessibility questions? Who evaluates the product accessibility? Develop a rubric or process to determine the level and complexity of accessibility evaluation required for new products and renewals Document a process to verify accessibility of products Identify process for purchasers and staff to ask questions and collect accessibility information vendors 	A process has been drafted and will be updated and published by June 2019.
Exception policy in place	<ul style="list-style-type: none"> Establish an exception granting process that conforms with Section IV.12.j of the consent decree. Determine who will sign off on exceptions Create a system to collect and track exception requests Create a form to respond to exception requests Create a process and documentation for an Equally Effective Alternative Access Plan (EEAAP) for all applicable EIT products with exception 	An exception process will be and published by June 2019.
Training program developed and deployed for procurement policies and procedures	<ul style="list-style-type: none"> Create a training roadmap and schedule Train all employees with purchasing authority Include procurement policies and procedures in HR onboarding Conduct annual refresher accessibility training on policies and procedures. 	Training plan created by June 2019.
Ongoing training plan created for retraining individuals and departments to refresh knowledge of the EIT procurement process	<ul style="list-style-type: none"> Create an ongoing-training roadmap and schedule Create ongoing-training materials If using online training, keep a log of who took the training 	On-demand training will be created by June 2019.

Milestone	Objectives & Activities	Estimated Timeline
Process and system is in place for monitoring and tracking EIT purchases	<ul style="list-style-type: none"> • Charge the Decree Task Force Committee with regularly discussing accessible procurement topics • Establish a process for communicating with vendors and purchasers on Corrective Action Plans for products that do not meet the applicable Accessibility Standard(s). • Identify recurring vendors and educate them on accessibility requirements (i.e., renewals, maintenance agreements and ongoing purchases) 	A Committee was formed on July 1, 2018 with these charges.

Vendor Milestones & Timeline

The College already has contracts with numerous vendors. Interactive Accessibility conducted a technical audit of these platforms. The College will work with the vendors to make the products accessible. The College will follow these steps with each vendor:

- Assign stakeholders (Academic Affairs and the CFA) to work with the vendor.
- Present and discuss the accessibility audit findings.
- Determine the corrective action plan and timeline for remediation.
- Document the vendor's plan and timeline, noting any possible issues and challenges.
- Monitor progress bi-monthly until the Corrective Action Plan is complete.
- Verify accessibility of the product after the vendor remediates the issues.

Platform	Status and Action Items	Estimated Timeline
Blackboard	<ul style="list-style-type: none"> • Blackboard lacks monitoring capability for content uploaded by faculty. Blackboard Ally has a reporting feature to document accessibility efforts on a server level. • Faculty is using Blackboard Ally to assist in making content accessible. • Having inquired about version 9.1 accessibility, the majority of issues were to be resolved mid-2018. 	Beginning Fall 2018, all courses have a Blackboard shell.

Platform	Status and Action Items	Estimated Timeline
Ellucian Colleague	<ul style="list-style-type: none"> • Accessibility findings have been prioritized • Ellucian is migrating from WebAdvisor as its primary student access tool and has replaced much of its functionality with Self-Service modules: Student Planning, Student Finance, and Student Financial Aid. Self-Service has increased accessibility support over WebAdvisor but parts of the system still lack or have partial accessibility support. 	Modules Student Planning, Finance, and Financial Aid or in production; Ellucian updates VPATs as product accessibility features are added and refined.
SirsiDynix	<ul style="list-style-type: none"> • The College does not have a direct relationship with the vendor. Atlantic County Library System (ACLS) is the buyer for the College. The College pays the county an annual fee in exchange for utilizing the SirsiDynix catalog and participating in a system of shared resources with the county's 11 libraries and 5 public school libraries. • The College cannot directly contact the vendor. 	The college has hired a new director of Academic Support who will be charged with researching accessible alternatives to the SirsiDynix card catalog when our current contract expires. The college will follow up with NFB after investigating accessible alternatives to the SirsiDynix card catalog.

Platform	Status and Action Items	Estimated Timeline
EBSCO	<ul style="list-style-type: none"> EBSCO accessibility findings have been prioritized and provided to the EBSCO development team. The College suggested potential eBook formats to EBSCO in December 2017 and requested information about accessibility deficiencies and suggested alternative formats. 	<p>EBSCO was contacted on September 11, 2018 and an updated VPAT was submitted dated May 10, 2018. EBSCO completed a full product audit in April 2017 by Interactive Accessibility and updates based on enhancements were provided. Additional progress will be monitored on a semiannual basis.</p>
Pearson MyMath Lab	<ul style="list-style-type: none"> Pearson MyMath Lab accessibility findings have been prioritized and provided to Pearson. The College will work to ensure they select accessible quiz questions. Company goal is to be WCAG 2.0 AA compliant by 2020. 	<p>Pearson will remediate the key accessibility by the end of January 2019.</p>
Cengage MindTap	<ul style="list-style-type: none"> Accessibility findings have been prioritized and provided to Cengage. Atlantic Cape will determine if this product is subject to the exceptions process. All new pages and features are accessible. 	<p>In April 2018 in response to an audit, Cengage sent a response detailing remediation plans. A follow-up call was made on August 27 and Instructional Technology was told a new accessibility team was in place. IT will contact Cengage for additional progress by November 15, 2018.</p>

Platform	Status and Action Items	Estimated Timeline
WebAdvisor	<ul style="list-style-type: none"> The College has moved away from WebAdvisor as its primary student planning tool and has begun the implementation of Student Planning and Student Finance Self-Service, Ellucian products, which have many accessibility features embedded in it. 	Ellucian has not declared WebAdvisor end-of-life to date. However, the College is using Ellucian Colleague for student planning as of January 1, 2018.
Admissions	<ul style="list-style-type: none"> Accessibility findings for the online application system have been prioritized and remediation efforts are underway. 	Admissions application will be accessible by December 2019, the same timeline as completion of the website
Accuplacer	<ul style="list-style-type: none"> Accuplacer includes significant accessibility support, including support for accessible math, however there are some significant problems with it. The findings have been prioritized and shared with the vendor. 	The Testing Office is in contact with Accuplacer. Accuplacer will be introducing their NextGen product, but at this point, there are no immediate plans for accessibility enhancements according to Keith Henry from Accuplacer. The last VPAT received is dated August 6, 2017.
Student Handbook PDF	<ul style="list-style-type: none"> The accessibility findings in the Student Handbook have been prioritized and will be corrected in the 2018-19 version. 	To be completed September 2018.

Objective 2: Ensure that websites and any content-specific information or communications content meets Accessibility Standard(s).

The College websites contain many pages, and content can be added, deleted, and modified by multiple authors. To maintain accessibility over time, the College will regularly monitor and define processes to ensure that changes and additions to the site meet the applicable Accessibility Standard(s).

The first step in ensuring that public-facing digital communications meet the Accessibility Standard(s) is to address the website issues identified in the accessibility audits. The College will remediate issues based on the priority and impact each has on a person with a disability. This will ensure that the most impactful and blocking issues are addressed and that the College is continually improving the level of accessibility. The College is redesigning the primary website and accessibility will be considered throughout the development lifecycle, including design, development, and testing. That redesign will be completed in December 2019. As the redesign continues, the following objectives will be met:

- For content provided by a third-party vendor, the College will ensure that the content is accessible. If the third-party vendor content is subject to the exception process, the College will work with that vendor to create a remediation timeline and will monitor the vendor's progress in meeting those goals.
- All new content must be accessible prior to posting and if that is not possible, an exception must be granted prior to the content being added to the site. The College will implement automated checking to warn content managers of accessibility issues prior to posting.
- To ensure long-term accessibility, the College will assign responsibility for evaluating sites within each unit, establish regular monitoring schedules using both automated and manual testing, and require annual self-reviews from each unit to be submitted to the CFA.
- Regular training will be conducted for all staff who have access to add or modify content on the website. Accessibility training for new employees with responsibility for website content will be part of the HR onboarding process in conjunction with CFA. CFA has created a section on the website to host resources and guides for creating accessible digital content and will purchase training materials as needed.
- The College will create a governance model to determine the state and direction of accessibility across all public-facing sites. The model will include processes and procedures for performing manual evaluations and a prioritization rubric to determine how content should be remediated.

Policies and Procedures

The following policy and procedure changes are necessary to successfully implement this objective:

Policy	Procedures
All public-facing content must meet the applicable Accessibility Standard(s).	<ul style="list-style-type: none"> When designing and building the web pages, identify and incorporate accessibility requirements into the development process. All third-party content incorporated into the website must meet the applicable Accessibility Standard(s). Authors must make their content accessible. Include accessibility in the test criteria when testing web pages. The CFA monitors accessibility changes, collects self-reported data from content groups, and tests and validates that the content is accessible.

Training Strategy

The following trainings are necessary to successfully implement this objective:

Course	Training Owner	Audience	Timeframe	Success Criteria
How to develop an accessible website	CFA/ College Relations	Web developers		All developers know how to make accessible web pages.
How to create accessible documents and forms	CFA/ College Relations	Web publishers, document authors		All publishing staff know how to create accessible documents.
How to create accessible multimedia	CFA/ College Relations	Web publishers, media authors		All publishing staff know how to create accessible multimedia.
Deque University	CFA/ College Relations	CFA Staff; Webmaster	On your own time	Self-help material usage will be tracked and monitored. Staff will report that they have taken required courses.

Communications Strategy

The following messages are necessary to successfully implement this objective:

Message	Who Communicates	Audience	Success Criteria
Announce policy and process changes for website development and publishing content. Include contact information for person assigned to help with accessibility as needed.	College Relations, CFA	Developers and content managers	All developers and content managers are aware of accessibility requirements. Content authors know how to fix accessibility issues reported by Cascade CMS prior to submitting the content.
Maintain a webpage resource on how to create accessible digital content.	CFA	Developers faculty and content managers	Webpage is created and regularly maintained.

Milestone and Timeline

Milestone	Objectives & Activities	Estimated Timeline
ITS, Academic Affairs and College Relations accessibility responsibilities are assigned.	<ul style="list-style-type: none"> • Inventory all campus websites and identify unit owners. • Distribute prioritized accessibility findings to unit owners. • Assign responsibility for accessibility to content managers in ITS, Academic Affairs and College Relations including quarterly self-reporting of accessibility status. 	Responsibilities and a plan for remediation will be completed by Fall 2019.
Content managers are trained on how to create accessible digital content.	<ul style="list-style-type: none"> • Train content authors on using the Cascade CMS content accessibility checker and how to create accessible digital content • Train content managers and developers on how to conduct manual testing of websites • Train content managers on the self-reporting template 	Content manager training will be conducted and all units will be trained by Fall 2019.
Website accessibility governance position filled	<ul style="list-style-type: none"> • Hire or assign a College employee for the Senior Manager, Adaptive Technology position • Define job duties and performance metrics for the position • Communicate job responsibilities and ensure that content managers and developers know who to contact for help. 	Senior Manager of Adaptive Technology was filled on Jan. 25, 2017.

Milestone	Objectives & Activities	Estimated Timeline
Communicate accessibility policies and procedures for websites	<ul style="list-style-type: none"> College Relations and the CFA will communicate to all content managers and developers the policies and procedures for digital content as per the communication plan. 	There is ongoing communication of website accessibility policies and procedures with final implementation by Fall 2019.
Tools for monitoring accessibility are acquired	<ul style="list-style-type: none"> Purchase SortSite for automatic scanning of the website Updated main site to Cascade CMS to provide automatic accessibility check warnings to content managers for all pages prior to posting 	SortSite was purchased in 2016. Cascade CMS automated accessibility checker will be implemented by Fall 2019.
Process and system is in place for monitoring the accessibility of the website	<ul style="list-style-type: none"> Create a testing plan and prioritization matrix for monitoring accessibility. Customize SortSite to optimize testing and to minimize false positives. Set up regular SortSite scans on monthly basis. Create yearly self-reporting form for content managers to report on the level of accessibility achieved and changes made since the last report. 	Processes and procedures for monitoring accessibility will be implemented by Fall 2019.
Training program developed and delivered for creating accessible digital content for content creators and developers	<ul style="list-style-type: none"> Create a training roadmap and schedule for training Assign training responsibilities Train all content editors in creating accessible content Conduct regular training based on gaps in knowledge of content editors identified through website monitoring 	Training programs are ongoing and by Fall 2019 all content creators and developers will be producing accessible content.
Accessibility training incorporated into the orientation process for new staff	<ul style="list-style-type: none"> Work with HR to add digital accessibility training as part of HR orientation appropriate for all employees. Track who has taken the training. 	Accessibility training is part of new employee onboarding process since 2016.
Process established for granting exceptions.	<ul style="list-style-type: none"> Create a process for granting exceptions. 	An exception process is in place and will continue to be monitored.

Milestone	Objectives & Activities	Estimated Timeline
Established metrics for determining, as well as a process and system to monitor the state and direction of accessibility	<ul style="list-style-type: none"> • Determine metrics for assessing accessibility. • Ensure that the systems and processes and procedures are in place to allow the collection of the metrics. • Create a testing plan and prioritization matrix for monitoring accessibility. • Customize SortSite to optimize testing and to minimize false positives. • Set up regular SortSite scans on monthly basis. • Create yearly self-reporting form for content managers to report on the level of accessibility achieved and changes made since the last report. 	<p>Metrics for determining, as well as a process and system to monitor the state of accessibility will be in place by Fall 2019.</p> <p>Worked with Interactive Accessibility to customize SortSite and began monthly optimized testing in May 2018.</p>
Website meets the WCAG 2.0 AA Accessibility Standard(s)	<ul style="list-style-type: none"> • Move the existing main site to a new backbone, Cascade CMS • Remediate critical and high priority issues • Address accessibility issues in the site redesign during design, development, and quality assurance. A vendor will be required to deliver WCAG 2.0 AA conformant website. 	<p>Beacon Technologies has been hired to redesign the website on April 24, 2018. The website will be accessible by end of 2019.</p>

Objective 3: Ensure that instructional materials designed or used meets applicable Accessibility Standard(s).

Faculty, adjunct faculty, and other staff regularly post class materials online for students. Third-party publishers and vendors provide some content.

The CFA and staff of Academics Division will train all staff who are procuring, uploading, creating, and modifying instructional materials in accessibility and staff must ensure that materials meet the applicable Accessibility Standard(s). All new content posted must be accessible and CFA will work with Faculty and adjunct faculty to remediate all content currently used in courses as content procured and created prior to training might not be accessible.

The College Purchasing Policy and Procedures address the purchase and lease of instructional materials. In addition, the development of new materials by the instructional staff will be governed by the newly adopted policies and procedures of the College assuring conformance to ADA standards.

The College will develop a process for regularly monitoring accessibility of online course materials, will provide faculty with training guides and assistance in creating accessible content, and will regularly train faculty and other staff who post class materials online for students.

The CFA will integrate the Blackboard accessibility tools to help ensure that materials are accessible prior to posting.

Disability services will help students when required course materials cannot be made accessible. A process for ensuring timely adoption of textbooks and other instructional materials will be implemented to ensure all students have access to the materials they need for course. As per Section IV.23 of the decree, the college will post its conversion plan on the department, program, unit, or professor's website and update the plan as implementation proceeds. For students with print disabilities currently enrolled at ACCC or enrolled for any semester prior to completing implementation of the plan, ACCC shall timely provide such materials in accessible format for every class in which such a student is enrolled.

Policies and Procedures

The following policy and procedure changes are necessary for successful implementation of this objective:

Policy	Procedures
All instructional materials, co-curricular materials, EIT, and online courses created or used by a College department or professor in connection with any the College course offering must be Accessible to individuals with disabilities at the same time they are available to any other student enrolled in that program.	<ul style="list-style-type: none"> • Train all individuals as necessary for accessibility. • Teach staff how to use Blackboard Ally to check for document accessibility.
The CFA will monitor accessibility.	<ul style="list-style-type: none"> • Manually audit assets proactively when possible • Audit an asset when someone reports an issue
Each unit responsible for instructional material will report the results of an annual self-assessment to the CFA. The College will assess the progress in making instructional material accessible and units can report changes in resource commitments, priorities, and approaches over the course of the year.	<ul style="list-style-type: none"> • Units will fill out the annual self-assessment and email it to the CFA. • The CFA will review the annual self-assessments and will work with the units to ensure that timelines and goals are met. • The plans for providing accessibility will be posted on the website of the Academics division in conformance with Section IV.23 of the Consent Decree.

Training Strategy

Training should be on a set schedule with a yearly refresher. Creating an on-demand version would accelerate training of adjunct faculty. The following trainings classes are necessary to successfully implement this objective:

Course	Training Owner	Audience	Timeframe	Success Criteria
How to purchase accessible textbooks, supplemental material, and products	CFA	All purchase rs.	Guide adopted in 2017	Faculty will utilize a guide for Purchasing and Adopting 3rd Party Materials
How to create accessible multimedia.	CFA	Faculty	On-going	Staff responsible for creating multimedia will know how to create accessible multimedia.

Course	Training Owner	Audience	Timeframe	Success Criteria
How to create accessible electronic documents	CFA	Faculty	On-going	All staff will know how to create accessible documents.
Deque University	College Relations/CFA	CFA, Webmaster	On your own time	Self-help material usage will be tracked and monitored. Staff will report that they have taken required courses.

Communications Strategy

The following messages are necessary to successfully implement this objective:

Message	Who Communicates	Audience	Success Criteria
Announce policy and process changes for accessibility and instructional content purchasing.	College Relations/ Purchasing	Faculty and staff creating course materials	Ensure all faculty are aware of questions to ask vendors to ensure they are selecting the most accessible textbooks and supplemental material
Announce accessibility trainings.	CFA	Faculty and staff creating course materials	All faculty, adjunct faculty, and staff are aware of accessibility trainings.

Milestones and Timeline

Milestone	Objectives & Activities	Estimated Timeline
Process in place for timely adoption of accessible textbooks and other instructional materials	<ul style="list-style-type: none"> The College will develop and implement accessibility requirements for selecting, creating, and adopting accessible multimedia curricular materials 	Course material processes will be communicated and implemented by July 2018.

Milestone	Objectives & Activities	Estimated Timeline
Process in place to ensure posting of accessible materials in Blackboard	<ul style="list-style-type: none"> The College has formally documented a process to promote or require the posting of Instructional Materials to the campus LMS Require all courses to be in a Blackboard shell to promote standardization incorporating accessibility materials Establish specific guidelines and procedures for submitting course and curricular materials hosted in Blackboard Develop and integrate accessibility requirements into the academic curriculum review process for new course adoptions and existing course reviews Formally document faculty responsibility for selecting and authoring accessible curricular materials 	Process for posting course materials to Blackboard will be implemented by Fall 2018.
Instructional accessibility testing tool in place	<ul style="list-style-type: none"> Acquire Blackboard Ally to assist users in developing instructional materials which are accessible from their inception 	Blackboard Ally was implemented in Fall 2017.
Assistant in place to assist with creating accessible instructional materials	<ul style="list-style-type: none"> Academics will hire a Part Time assistant to help faculty members implement the needed steps to make their material accessible. Communicate to all faculty, adjunct instructors and other staff creating instructional materials that this person is available to help. 	Part time clerical assistant will remain on staff to assist faculty throughout the Fall 2018 semester
A plan created remediating existing educational material	<ul style="list-style-type: none"> Inventory inaccessible instructional materials that need remediation. Inventory, prioritize, and plan remediation of existing inaccessible multimedia materials. Establish specific measures of success (e.g., number of courses that have undergone accessibility review) for incorporating accessibility into the curricular review and approval process Create and implement an exception process for inaccessible instructional materials. 	An "Exception Form" has been developed and will be implemented in Fall 2018.

Milestone	Objectives & Activities	Estimated Timeline
Training material and resources created for creating accessible digital content	<ul style="list-style-type: none"> • Develop an online resource for creating accessible online content. • Create a faculty training plan • Create training materials • Create guidelines for faculty selecting accessible materials • Develop and disseminate examples of accessible curricular materials and practices (e.g. accessible syllabus template, faculty exemplars) 	Training and resources for creating online accessible content was launched by Fall 2016 and training is ongoing
Awareness campaign communicated to faculty and other staff creating instructional materials	<ul style="list-style-type: none"> • Communicate policy and procedures for creating instructional content • Announce training schedule for faculty to increase knowledge of accessibility issues and responsibilities 	Policies and procedures were communicated and a resource website available in Fall 2017.
Instructional materials created or used since January 2012 are accessible	<ul style="list-style-type: none"> • Check and remediate materials used in courses with Blackboard Ally. • Review new materials submitted in Blackboard for accessibility. 	Instructional materials will be accessible by July 2018.
Notice is posted with course materials to tell students how they can report accessibility issues.	<ul style="list-style-type: none"> • The course accessibility language will be added to each course and will be part of the Blackboard course templates. • The link within the course materials to this information will be part of the course menu and will be called "Accessibility Information." The statement will be as follows: <ul style="list-style-type: none"> ○ Atlantic Cape is committed to providing instructional materials that are accessible to all students and adhere to Web Content Accessibility Guidelines (WCAG) 2.0 Level AA standards. If you encounter materials with accessibility issues please contact our Center for Accessibility at cfa@atlantic.edu. You will receive a response within 72 hours. 	Language will be included in all courses starting in the Spring 2019