

## Guidelines and Responsibilities for provision of Accessible Materials

This document explains where and when accessibility standards are applicable. The Purchasing and Procurement Guidelines for the acquisition of new systems and products are not covered in this document. The intent here is to describe where and when materials need to be provided in an accessible manner that complies with the EIT Accessibility Policy and the CSU Accessibility Standards.

### Definitions

**Accessible** means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, & enjoy the same services as a person without a disability in an equally effective & equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally & independently as a person without a disability.

**Electronic and Information Technology (EIT)** includes e-learning and information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, the internet and intranet websites, content delivered in digital form, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems (“clickers”), and office equipment such as classroom lecterns, copiers and fax machines. It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.

Eligible Person is a person with a disability who has standing to access the Electronic and Information Technology. For example a person that is considering to attend Cleveland State but is not actively enrolled would have standing to access publically available online information about academic programs.

Equivalent Access – Refers to methods of providing accessibility to people with disabilities that is equal to that of their peers.

Legacy refers to electronic systems or media that predates this policy and may not be actively updated.

Media Library – a collection of audio visual materials stored for occasional use

Archive - A Web page, document, or media which is no longer in use but subject to records retention plans.

## Electronic Documents

For all courses and university functions on campus we produce a great deal of content that needs to be distributed to students and the general public. The documents are created by staff and professors at Cleveland State and obtained from third-parties that we either use for education or use for service provision. Our students, people from the public, or other people with disabilities need access to these documents and by law are permitted to have equivalent access in method and timeframe similar to that of all other people that have access to the documents. The good news is that providing accessible documents is not difficult it mostly requires vigilance and the basic knowledge of what is accessible.

When does a document need to be made accessible?

- If it is available to the general public
- If all students have access to it
- If there is a student with a disability taking a class where that document is used
- If a specific document which is archived is requested by an eligible person to be made accessible

## Textbooks

For accessibility of physical textbooks that students are required to purchase for a course refer the student to the Office of Disability Services

Online modules and other electronic content for supplemental learning or for completing assignments or examination that are purchased with the textbook and used in courses are covered under the Electronic Documents, Web, and Media Accessibility Guidelines for course materials. All of these materials are subject to the EIT Accessibility Policy and our Accessibility standards. If that content is inaccessible and is used an accessible alternative will need to be produced by the faculty or department with accessibility features necessary to fulfill accommodations granted to the student with a disability.

Textbook content that is digitized and placed online under fair use for access by students enrolled in a course are subject to the guidelines for Materials Produced for Courses stated below.

## Documents Publically Available and for All Student Consumption

Documents available on demand to students and to the public must meet the General Document Accessibility Standards. This includes content that:

- Is posted or created for distribution by Cleveland State
- Is Distributed by a service that Cleveland State Pays for
- Is distributed as part of a CSU sponsored program
- Is required for participation in a program

## Materials Produced for Courses

All documents created at Cleveland State for our courses should comply with the General Standards for Accessibility of Documents. Information on how to apply the standards to a variety of file types is available on our website. If the documents that a faculty member uses for their classes are not accessible

at the time a student with a disability enrolls in their course they will be required to produce accessible versions of their materials.

When scanning print material it would be best to work with Electronic Course Reserve in the Michael Schwartz Library to ensure good quality accessible materials.

ECR Link <http://rsearchguides.csuohio.edu/ecr/faculty-guide>

Fair Use Policy <https://www.csuohio.edu/sites/default/files/3344-17-03.pdf>

### Third Party Content

Content that Cleveland State does not control but chooses to use in courses and programs must meet the minimally Accessible Document Standards. If an eligible person with a disability requests access to materials that do not meet the full list of General Standards for Accessible Documents the faculty, staff, or department requiring access must provide necessary accommodations to meet the individual's needs.

### Web Accessibility

All webpages that are hosted by Cleveland State need to be WCAG 2.0 compliant. All public Available content needs to be WCAG 2.00 Level AA compliant. Accessibility is required on all CSU websites, which includes content hosted through Blackboard, the Academic Servers, the main website, and other online hosted services of Cleveland State. Social Media and third Party webpages used for classes must also be accessible. Even in cases where we do not have direct control of a website there still needs to be some level of accessibility for the pages we choose to use.

### Web Pages Publically Available and for All Student Consumption

Content available on demand to students and to the public must be WCAG 2.0 Level AA compliant. This includes content that:

- Is hosted or created by Cleveland State
- Is paid for by Cleveland State
- Is required for participation in a program
- Is sponsored by Cleveland State

### Materials Produced for Courses

All webpages created at Cleveland State for our courses should comply with the WCAG AA accessibility criteria. Information on how to apply the standards through a variety of platforms is available on our accessibility website. If the web content that a faculty member has created for their course is not accessible at the time a student with a disability enrolls in their course they will be required to produce accessible versions of their materials.

### Third Party Content

Content that Cleveland State does not control but chooses to use in courses and programs must meet the Minimally Accessible Web Content Standards. Materials that do not meet these criteria should be remediated for use at Cleveland State or not required. If an eligible person with a disability requests

access to web content that does not meet WCAG AA standards the person or department requiring access must provide necessary accommodations to provide equivalent access to the individual. Equivalent access may be difficult in these cases because most web based resources are available 24/7.

### Remediation of Legacy Content

Legacy content is required to be remediated if the following is true

- If that legacy page or content is updated or redesigned
- If the page is linked to other active pages with a high probability of use
- If its duration of use is projected to last beyond 2017

Legacy pages that do not meet the above criteria and are inaccessible are only required to be remediated by the office that is the custodian of the information upon specific request from an eligible person

### Media Accessibility

Media in this section refers to audio and/or video materials. For audio by itself people who are hard of hearing or deaf may not be able to consume it its typical form. An appropriate accommodation will usually be providing a transcript or, if the player permits, a closed caption. For videos accommodations may need to be provided for people that cannot hear the accompanying audio or cannot see the video. For people that are deaf or hard of hearing we need to provide closed captioning. Closed captioning is different than English subtitles because the closed captioning will also include reference to important sounds that are relevant to the video. For people that cannot see the video it is important to provide description of what is happening visually in the video. This usually takes the form of audio description which is an accompanying audio track where a description is read in time with the video.

In classes and services provided by Cleveland State there is a lot of audio and visual media used both in the classroom and posted through our web based services. This content must be accessible under the following conditions.

- If it is available to the general public
- If all students have access to it
- If there is a student with a disability taking a class where that media is used
- If a specific media file which is in a media library, legacy, or archived is requested by an eligible person to be made accessible

## Purpose of the Media

The purpose of the media used may affect the type of accessible version which is created. This can sometimes require creative solutions because the media used may be intended to prompt for a response that the media's accessible version would give the answer. These situations are not uncommon.

An example would be using audio files in a foreign language course. If an audio file played someone saying a vocabulary word and the person was expected to spell the word then having a transcript or closed caption would spell that word giving the person the answer. In such situations alternatives that provide equivalent access would be necessary. However if that audio clip was intended to give a vocabulary word and the student would answer in English what it means having a transcript or caption would be appropriate. These types of solutions need to be assessed on a case by case basis.

## Web Based Media

Media included on webpages follows the guidance under the Web Accessibility sections for when the media is required to be made accessible. If there is legacy content that is contained in an online archive or media library it will observe the guidelines for Publically Available Legacy and Archived Media. All new materials added to an online media library must follow the standards for Minimally Accessible Media.

## Media in Hard Copy

Hard Copies of Media include but are not limited to

- Optical storage like DVD Blu-Ray, and CD
- Read only Cartridges
- taped Recordings such as VHS, audio cassette, or reel to reel

Hard copies of media that are obtained by Cleveland State are required to be purchased with accessible elements such as Closed Captioning, transcripts, or descriptive video when such elements are available. Inaccessible versions of this media must be remediated upon request from an eligible person. If the media is archived any created accessible version should be stored in archive with the inaccessible copy or replace it entirely.

Accessible versions of hard copies of media will need to be created or accessible replacements purchased under the following situations.

- If shown in a course with a student with a disability which needs such an accommodation
- If displayed to the general public
- If shown to large groups of the student body
- If related to safety training
- If sold as a product through affiliation with Cleveland State to other educational institutions

## Media used in Courses

Audio visual course content will be required to have accessibility features such as closed captioning, transcripts, or described audio if a student with a disability that requires such features is enrolled in a course.

If the course is developed as a Massive Open Online Course (MOOC) then it must comply with the General Standards for Web Accessibility and include closed captioning for videos and transcripts for audio files.

At the time of a student enrolling who requires accessible media, all media must have the accessibility features needed by that student before it is permitted for use in the course.

Captioning and transcription has a 3 to 5 business day turnaround, so please consider this when planning first week use of media.

For media that is being submitted for captioning or transcripts the instructor must submit a list of terminology or proper nouns used in the media for the transcribers notes. Transcriber's notes are submitted to the transcriptionist and help them to produce accurate content for the viewer.

## Interactive Media

Interactive media is an application that responds to the user's actions by displaying audio, video, text, or games. This could include content like Flash media on webpages that require selection of options to proceed or online classes that provide virtual simulations. In cases like this not only the accessibility of the audio visual media would need to be considered but also the interactions that are involved in participating in the experience. Such media, aside from the basic accessibility options required with static forms of media, may also need to adhere to standards of web accessibility or software accessibility.

Interactive Media would need to be made accessible if it falls under the same situations as other media. If it is a product that is purchased or procured from outside the university it may be required to follow the Accessible EIT Purchasing and Procurement Guidelines like other software applications.

## Publically Available Legacy and Archived Media

If there is publically available media that is considered legacy content then that media will only be required to have accessible features upon request from an eligible person. The custodian of that media will be responsible for coordinating the remediation of those materials. If the legacy media has a high probability of use it is recommended that it be scheduled for remediation and contain at least transcripts or closed captioning.