



Web Accessibility Policy

In accordance with Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act, all persons are entitled to access the College's website and its content.

These guidelines establish accessibility requirements for web-based information and applications developed, procured, maintained, or used for all Suffolk County Community College web-based content and any and all content housed on any of the College's systems. The College is committed to providing access to all individuals seeking information on its website. The College is also committed to ensuring that people with disabilities have an equal opportunity to participate in the College's programs, services, and activities accomplished through web content.

For the most current accessibility guidelines and resources, consult the College's accessibility webpage: www.sunysuffolk.edu/accessibility.

I. Applicability

This policy applies to all web-based content and functionality, whether developed, maintained, or offered by Suffolk County Community College or through a third party vendor or open source on the College's behalf. This includes College department, program, and faculty websites that reside on a College server or reside on a server/platform maintained on the College's behalf. It also includes web content and functionality offered to students as part of a College program or in supplement thereto, as well as any service, or activity, such as an online video students are instructed to watch as part of a course at the College.

II. Web Accessibility

A website or web content is accessible if it has been designed so that individuals with disabilities can perceive, operate, navigate, interact with, and understand it. Web accessibility encompasses disabilities that affect individuals' ability to access online

content because of visual impairments (e.g., blindness or color-blindness), auditory impairments (e.g., deafness), and motor impairments (e.g., lack of fine motor control or difficulty using a mouse). With the use of accessible design features and tools, web content can be displayed in ways that are more accessible to individuals with disabilities. Headers, document formatting tools, alternative text for images, captions for videos, and the ability to navigate a page without using a mouse are examples of ways that web content and functionality can be made accessible to users with disabilities.

III. Accessibility Standards

The accessibility of online content and functionality will be measured according to the W3C's Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 where applicable for dynamic web content.

New or updated web-based content, including websites and applications, must be compliant with WCAG 2.0 Level AA and implement WAI-ARIA 1.0 where applicable for dynamic web content, unless an undue burden or fundamental alteration would be imposed. Where it is determined that an undue burden or fundamental alteration would be imposed, equally effective alternative access must be provided.

WCAG 2.0 includes four overarching principles for accessibility:

- Perceivable: information and user interface components must be presentable to users in ways they can perceive.
- Operable: user interface components and navigation must be operable.
- Understandable: information and the operation of user interface must be understandable.
- Robust: content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technology.

WCAG 2.0 includes 12 guidelines based upon these principles that address accessibility issues in finer detail. The WCAG 2.0 guidelines have three levels of conformance: A, AA, and AAA. Please note that in striving to meet Level AA compliance, Level A compliance must also be achieved; Level AA is more stringent than Level A. For more information on WCAG 2.0, please see: <http://www.w3.org/WAI/WCAG20/quickref/>.

WAI-ARIA addresses dynamic web content and functionality and how these interface with individuals using assistive technology such as screen readers or navigating webpages without a mouse. For more information on WAI-ARIA 1.0, please see: <http://www.w3.org/TR/wai-aria-1.0/>.

Adherence to these standards is necessary to ensure compliance with the College's obligation to ensure that people with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their non-disabled peers, with substantially equivalent ease of use.

All web content must be reviewed for compliance with these accessibility standards before publication (or going live).

a. Requests for Accessibility Exceptions based upon Undue Burden or Fundamental Alteration; Provision of Accessibility Accommodations to Provide Equally Effective Alternate Access

In certain cases, meeting the accessibility standards required by these guidelines may not be feasible due to an undue financial or administrative burden or because doing so would result in a fundamental alteration. In such instances, a written request for an accessibility exception in accordance with these guidelines may be made to the Office of Legal Affairs.

“Undue financial or administrative burden” (or “undue burden”) means significant difficulty or expense. In determining whether an action would result in an undue burden, all resources available for use in the funding or operation of the service, program, or activity must be considered. “Fundamental alteration” means a major change or modification of the critical function or nature of a program or service.

Examples of content that could be appropriate for an accessibility exception, depending on the circumstances and resources available at the time of the request, include (but are not limited to):

- Computational spreadsheets containing program modules or macros that were developed to perform automated analysis or draw data from external or legacy databases;
- Sites that are password-protected or that require authenticated log-in;

- Third-party licensed documents from scientific journals or conferences (e.g., where the license agreement does not allow the user to modify the file or where the files are hosted and updated by the journal on its server);
- Multi-lingual documents that use non-Western characters;
- Complex images and PDF tables, including static images and images that are supported by detailed narratives (e.g., scientific diagrams, anatomy charts, technical drawings, maps);
- Complex math, physics, and chemistry notations;
- Large or complex tables that warrant an exception because of the importance of the document, the size/nature of the intended audience, the complexity of the table, the size of the table, and/or the expectation that individuals with disabilities will need access;
- Complex dynamic visualizations such as medical diagnostic or research imaging technologies, 3D models, virtual environments, computer-aided design (CAD) software;
- Scanned written or poor image/text quality historical documents or publications that are in a digital archive;
- Archived historical legacy files;
- Translated files presented in a language other than English.

Offices, individuals, or departments seeking an exception must be able to provide an accessibility accommodation to provide the information or services outside of common web accessibility standards designed to assist users with disabilities, so that users with disabilities will be provided with equally effective alternate access to the content, service, program, or activity. "Accessibility accommodation" means a method or means of providing information and services to users with disabilities in instances where the application of the accessibility standards required by these guidelines is neither feasible nor helpful. "Equally effective alternate access" means some other action that would not result in a fundamental alteration or undue administrative/financial burden but that would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits or service provided by the College as their non-disabled peers. Please note that even where an exception is granted and an accessibility accommodation is made, any associated content that can reasonably be made accessible must still be made accessible.

While appropriate accessibility accommodations must be determined on a case-by-case basis, accessibility accommodations could include, but are not limited to:

- A statement acknowledging that there is an accessibility issue with regard to the content or functionality at issue and providing a phone number or email address

to contact for support, in order to assist users with disabilities in obtaining the content or functionality through alternative means. Where an accessibility statement is used as an accessibility accommodation, the office or department must establish priorities, assign resources appropriately, and monitor communications to ensure that requests are processed quickly. However, please note that this accommodation may not be appropriate when timeliness of access is critical to equal and fair treatment; in this case, priority should be given to remediating the content into an accessible format.

- Providing the web content in an alternate format that is useful to the inquiring user. For example, providing a text-only version of an inaccessible document.
- Identifying a source for creating or obtaining, for example, a Braille print copy of the corresponding web content.

For any technology-related requirement for which a department or office requests an exception to these guidelines based upon an undue burden or fundamental alteration, the department or office must submit a written request to the Office of Legal Affairs and the Vice-President for Information Technology which addresses all of the following:

- A description of the content, functionality, program, service or activity that is the basis for the request;
- The location where the content, functionality, program, service or activity will be posted/hosted;
- Which accessibility requirements cannot be met without undue administrative or financial burden or a fundamental alteration;
- The rationale for why an accessibility exception is needed;
- The cost of meeting the applicable accessibility requirements, including, as appropriate, manpower and monetary costs;
- What resources are available for use in the funding and operation of the service, program, or activity, including, as appropriate, manpower and monetary resources;
- What accessibility accommodation(s) will be made in order to provide equally effective alternate access to users with disabilities;
- What, if any, accessibility requirements can and will still be met if the requested exception is granted.

Absent extraordinary circumstances, requests must be made at least five business days before the scheduled “go-live” date for the content. Requests that do not include all of the above information will be rejected and sent back to the requestor for completion.

A request for an accessibility exception may not be granted when timeliness of access is critical to the principle of equal and fair treatment. For example, an accessibility exception request for posted content that requires submission of an application or proposal by a specific date may not be granted where an accommodation would place disabled users at a disadvantage.

IV. Requirements for New/Updated College Webpages and New/Updated Uploaded Documents

These requirements apply to all web content, including department webpages redesigned in the Omni Update content management template, and new or updated content on webpages maintained or previously obtained in Red Dot. All web content must be reviewed for compliance with these accessibility standards before publication (going live).

Webpages on the College's website that have been converted to the Omni Update content management template are designed to be accessible to users with disabilities. However, documents and content that are uploaded by the department or a department user must be reviewed by the department/user to ensure adherence to the accessibility requirements in these guidelines before publication. PDF documents in particular can be problematic if they are not designed and reviewed for adherence to accessibility requirements.

a. Webpage Design Requirements

Design of sites needs to consider when it is appropriate to post content on a page (HTML) or in a document such as a PDF or Microsoft Word file. PDF and Word files are acceptable formats for fill-in forms, manuals, brochures, handbooks, reports which contain data and calculations, large publications, documents for printing, and policies/procedures, provided the PDF and Word files are accessible. Content posted on a page (HTML) is preferable for informational pages and instructions. Page/HTML content is to be web accessible.

b. Webpage Technical Requirements

i. Page/HTML Content

HTML is used to display information, presented as text. All new and modified Page/HTML content must be web accessible. Text can contain images, provided they are

tagged with alternate text. Link text should be meaningful enough to make sense when read out of context—i.e., “Read more information about the College” instead of “click here.” Page layout should be optimized for viewing on as many devices and screen resolutions as possible. Header elements should be used and ordered properly. Color should be used judiciously; avoid using color only to convey meaning. The College’s website style guide standards are available upon request from the College’s Office of Institutional Advancement.

For pages in Omni Update, Omni Update’s accessibility review tool should be utilized before new content or page updates go live.

The Online Web Accessibility Evaluation (WAVE) Tool can be used to check webpage accessibility on all webpages, including Red Dot pages. To run an accessibility check of a page through the WAVE tool, go to the WEBAIM WAVE site, <http://wave.webaim.org/>, and enter the webpage address of the page you need to check for accessibility. The WAVE tool will check the accessibility of the page’s content and functionality and will display the page with tags to show what items passed the accessibility check and which did not pass the check. The WAVE tool also explains why an element did not pass the accessibility check, why it matters, and how to fix it. Follow up with any fixes and run the check again. Zero WAVE tool accessibility errors for the new/updated content should be identified before it goes live.

ii. PDFs

PDF files are to be web accessible unless an accessibility exception has been granted in accordance with these guidelines. Adobe Acrobat DC needs to be installed on the computer that will be used to review and remediate a PDF document for accessibility. (Contact the Help Desk if Adobe Acrobat DC is not installed.) At a minimum:

- PDF documents must be tagged.
- Title, author, and language metadata properties must be set.
- OCR text recognition must be run to recognize image-based or scanned text and provide a text alternate.

Preferred PDF accessibility criteria and procedures are as follows:

- Run the Adobe Acrobat DC “Accessibility” tool on the PDF. Review and correct any identified errors.
- Perform a manual check on any items which cannot be checked through the Accessibility tool.

For more information on the creation of accessible PDFs, review the ADA Compliant Design Short Guide developed by the College's Center for Innovative Pedagogy at: <https://sunysuffolk.edu/accessibility/documents/ada-compliant-design-short-guide.pdf>. Additional instructions and resources will be maintained and updated on the College's accessibility webpage: www.sunysuffolk.edu/accessibility.

For more resources and information on the creation, testing, and remediation of PDFs for accessibility, users can review:

- The New York State Education Department's *Create Web Accessible PDF Files* webpage at: <http://www.nysed.gov/webaccess/create-web-accessible-pdf-files>.
- The W3C's PDF Techniques for WCAG 2.0 webpage at: <http://www.w3.org/TR/2014/NOTE-WCAG20-TECHS-20140408/pdf.html>.

iii. Microsoft Word, Excel, and PowerPoint Documents

Microsoft Word, Excel, and PowerPoint documents must present with zero accessibility errors when utilizing the Microsoft Office Accessibility Checker tool before they are uploaded to a College webpage. The Microsoft Office Accessibility Checker tool is accessed from the File menu within the Microsoft program. From the File menu, select Info, then select Check for Issues, and then select Check for Accessibility. The tool will generate a report of possible accessibility issues found within the document. The tool finds and explains why each issue may pose a problem for a user with a disability and provides instructions on how to fix the issue.

For more information on the creation of accessible Microsoft Word documents, review the ADA Compliant Design Short Guide developed by the College's Center for Innovative Pedagogy at: <https://sunysuffolk.edu/accessibility/documents/ada-compliant-design-short-guide.pdf>. Additional instructions and resources will be maintained and updated on the College's accessibility webpage: www.sunysuffolk.edu/accessibility.

For additional resources and information on the creation, testing, and remediation of Microsoft Office documents for accessibility, users can review:

- The New York State Education Department's Microsoft Office Accessibility Checker webpage at: <http://www.nysed.gov/webaccess/microsoft-office-accessibility-checker>.

- Microsoft's online support information and instructions for the Microsoft Office Accessibility Checker tool: <https://support.office.com/en-us/article/Use-the-Accessibility-Checker-on-your-Windows-desktop-to-find-accessibility-issues-a16f6de0-2f39-4a2b-8bd8-5ad801426c7f?ui=en-US&rs=en-US&ad=US>.
- Microsoft's online instructions for the creation of fillable forms in Microsoft Word: <https://support.office.com/en-us/article/Create-a-fillable-form-39a58412-107e-426b-a10b-ac44937e3a9f?ui=en-US&rs=en-US&ad=US>.

iv. Videos and Audio

All videos and audio files uploaded to the College's website must contain closed captioning, or a description and transcript must be provided, as necessary to meet the WCAG 2.0 Level AA standards. Auto-captioning and speech recognition tools such as those made available by YouTube can assist with the creation of captions but must be checked and edited for accuracy. Importing a video into a caption editing tool and manually transcribing or composing the captions is a good option for short videos.

v. Keyboard Accessibility

A user must be able to navigate to and from all navigable page elements using only a keyboard. To test navigability of a page with a keyboard in a web browser, click inside the web address in the browser and then use the Tab button on the keyboard to navigate the menu choices on the webpage.

vi. Accessibility Exceptions

An accessibility exception must be requested and granted for any new or updated page content or functionality that cannot meet the above accessibility requirements before it goes live.

V. Procurement

Accessibility requirements will be incorporated into all purchasing and procurement processes for the procurement of online or web-based content and software, including web properties maintained by a third party on behalf of the College. These requirements will be communicated to individuals responsible for purchasing and procurement.

Any documents created or otherwise delivered to the College by a vendor pursuant to a contract or other written agreement shall be produced with the expectation that the College may, in its sole discretion, elect to place such content on its website. Therefore, any such materials must be created and delivered in a manner consistent with this Web Accessibility Policy, compliant with WCAG 2.0 Level AA, and implement WAI-ARIA 1.0 where applicable for dynamic web content.

All solicitation documents, contracts, and any amendments thereto executed on or after February 15, 2018, shall include the following clause:

Any documents, web-based information and applications development, or programming delivered pursuant to the contract or procurement must comply with Suffolk County Community College's Web Accessibility Policy, as that policy may be amended, modified, or superseded, which requires that the College's web-based information, including documents and applications, are accessible to individuals with disabilities. Documents, web-based information, and applications provided or delivered by the vendor to the College must conform to the College's Web Accessibility Policy. Vendors must provide a VPAT, accessibility testing results, or acceptable alternative for any preexisting software, including third party software, that the vendor is delivering to the College. Vendors must cooperate with the College to address accessibility issues that are identified or arise after execution of the contract or after procurement and must promptly resolve any accessibility issues identified by the College.

VI. Quality Assurance and Compliance

These guidelines are effective upon publication and will be published on the College's web accessibility webpage: www.sunysuffolk.edu/accessibility.

Electronic document creators/authors are responsible for the accessibility of the content they create if the content will be uploaded to a College webpage or will be used to deliver College programs, services, and activities online. Department webmasters and content approvers are responsible for supporting adherence to the College's web accessibility guidelines. Department workflows should be created or updated to include an accessibility review.

In order to ensure compliance with these guidelines, the College's Website Accessibility Notice (available at: <http://www.sunysuffolk.edu/accessibility/>) is published on the College's website and informs users with disabilities how to report and request access

to content that is not accessible. Reference and a link to this Notice must be included on official department and faculty pages. Suggested language is as follows:

Suffolk County Community College is committed to ensuring accessibility of its website for students, faculty, staff, and other members of the College community, as well as the general public, including individuals with disabilities. For more information, please refer to the College's Website Accessibility Notice at:
<http://www.sunysuffolk.edu/accessibility/>.

While the Web Services team is the primary point of contact identified to receive accessibility inquiries in the College's Website Accessibility Notice, the Web Services team will forward inquiries or reports to the pertinent department or page author for review and response. Receipt of and responses to inquiries regarding the accessibility of the College's web content should be documented and maintained.

"Official" department, faculty, and student organization webpages residing on a College server or residing on a server/platform maintained/contracted on the College's behalf and any other legacy web-based content on the College's web properties will be audited for adherence to the College's web accessibility requirements as part of the College's effort to enhance the accessibility of its online content. Following the audit, a corrective action plan will be developed, and the owners, managers, and/or content creators of these pages will be required to remediate any identified accessibility issues in order to be compliant with the College's accessibility standards, or the inaccessible content/page will be subject to removal.

Notice is hereby given that any "unofficial" faculty and student organization webpages—those that do not reside on a College server or on a server/platform/website maintained/contracted on the College's behalf with the College's approval—are not sanctioned by the College. The College makes available a variety of web-based and online environments and resources that support delivery of the College's programs, services, and activities and which are being enhanced for accessibility. Faculty are encouraged to utilize these resources for conducting College business.

To support content creators, content managers, and content approvers in ensuring adherence to the College's web accessibility standards, the College makes available accessibility resources and training, as described in these guidelines and on the College's web accessibility webpage: www.sunysuffolk.edu/accessibility.

VII. Accessibility Resources

Resource documents that explain how to ensure webpages and online documents/content can be made accessible for users with different disabilities will be developed, reviewed, and updated as necessary, and will be made available for use by College employees on the College's accessibility webpage: www.sunysuffolk.edu/accessibility.

The College also offers web accessibility training to provide awareness of common accessibility issues and how online content and documents can be made accessible to users with disabilities, including users with vision, motor, and auditory impairments.

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Board of Trustees
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