

Los Rios Community College District Information & Communication Technology Accessibility Program

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Introduction

This document summarizes the Los Rios Community College District (LRCCD) *Information and Communication Technology (ICT) Accessibility Program*. The ICT Accessibility Program consists of the following components:

- ➤ **Accessibility Statement** a public statement affirming the institution's commitment to ICT accessibility and soliciting input and feedback.
- ➤ Accessibility Guidelines a summary of practical guidelines for building and maintaining an accessible institution at the District/Colleges.
- ➤ Accessibility Policies and Regulations formal statements of the institution's guiding principles related to ICT accessibility and explanations of the work processes and shared responsibilities of the LRCCD community to implement and maintain an accessible environment.

Each of these components is covered in their respective sections of this document:

ICT_Accessibility Statement

Accessibilty Guidelines

District Policies and Regulations

ICT Accessibility Statement

The ICT Accessibility Statement is a central and defining component of the *LRCCD Accessibility Program*. As such, it should be easily and visibly available from web pages, LMS courses, and document repositories. Faculty are encouraged to include accessibility information in their course syllabi.

ICT Accessibility Statement

The Los Rios Community College District (the "District") and its four Colleges are committed to creating an accessible community, that is, one that provides websites, course materials, documents, and applications that are accessible to all current and future students, faculty, staff, and other constituents.

The District's Information and Communications Technologies (ICT) adhere to accessibility standards such as the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 AA, Sections 504 and 508 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act.

For students with disabilities, the District/Colleges are committed to providing reasonable academic and administrative accommodations that support their educational programs through our Disability Services and Programs for Students (DSPS) offices. These reasonable academic and administrative accommodations shall not fundamentally alter the educational programs.

For employees with disabilities, the District/Colleges are committed to providing reasonable accommodations to ensure all employees can perform the essential functions of their job.

College	DSPS Website	DSPS Location	Phone
ARC	ARC DSPS Website	North Entrance of Student Services	(916) 484-8382
Natomas Center	ARC DSPS Website	ARC Main Campus, North Entrance	(916) 484-8382
		of Student Services	
CRC	CRC DSPS Website	BS-104	(916) 691-7275
Elk Grove Center	CRC DSPS Website	CRC Main Campus, BS-104	(916) 691-7275
FLC	FLC DSPS Website	Aspen Hall, FL1-36	(916) 608-6611
El Dorado Center	FLC DSPS Website	B-121	(530) 642-5630
Rancho Cordova	FLC DSPS Website	Building 1, First Floor	(916) 361-6312
Center			
SCC	SCC DSPS Website	Student Services	(916) 558-2087
Davis Center	SCC DSPS Website	SCC Main Campus, Student Services	(916) 558-2087
W. Sacramento	SCC DSPS Website	SCC Main Campus, Student Services	(916) 558-2087
Center			
Employees	GC's Website	District Office, Human Resources	(916) 558-3063

Table 1: Contact Information for DSPS Offices

While we strive to adhere to accepted guidelines and standards for usability and accessibility, it may not always be possible to do so. Should you experience difficulty accessing any District ICT, or wish to provide feedback or suggestions, please fill out the form below or call your DSPS Office listed above.

<<< Insert Form Here >>>

Accessibility Guidelines

Information and Communication Technology (ICT) accessibility relates to all electronic information and technology used to conduct academic and business functions. ICT includes information technology, electronic content, web pages, web-based applications, courses in the learning management system and supplemental systems, documents, forms, and application system screens from the College's Enterprise Resource Planning (ERP) systems (the student information system, financial system, human resources system, etc.) and their auxiliary systems.

Student access to inclusive educational opportunities is one of the District's highest priorities and requires a community of stakeholders to design, monitor, and uphold accessible practices. Offices across the District should work collaboratively to provide an environment free from discrimination and to protect the rights and dignity of students, faculty, and staff.

The District/Colleges adhere to the following standards and guidelines related to accessibility of ICT:

- > Sections 504 and 508 of the Rehabilitation Act of 1973:
- Title II of the Americans with Disabilities Act;
- Accessibility standards described in the Web Content Accessibility Guidelines (WCAG), version 2.0, levels A and AA, or the most current version approved by the Vice Chancellor of Education and Technology.
- Title 5 § for distance education courses offered by the colleges.

This section delineates a set of minimum and practical guidelines for building and maintaining an accessible institution at the Los Rios Community College District. Guidelines are divided into three sets:

- ➤ **Organizational and process guidelines** address general components necessary to build an accessible environment.
- **Content guidelines** address the basic details of building accessible content.
- **Procurement guidelines** address the acquisition of accessible products and services.

Organizational and Process Guidelines

This section lists guidelines addressing general components necessary to build an accessible environment.

1. Responsibilities

If electronic content is published on behalf of the District or is used to conduct District and College business, it is considered part of ICT. Consequently, all members of the Los Rios community who produce content for consumption by others will impact the District's overall accessibility and share responsibility for building and maintaining an accessible institution.

- > Staff, administrators, and faculty are responsible for creating shared ICT that are accessible to their expected audiences.
- > Staff, administrators, and faculty adopters of ICT shall select and use ICT that is accessible to their expected audiences, unless to do so places an undue burden on the

District/College or to do so will fundamentally alter the nature of the educational program or service.

- Faculty writing a distance education addendum to a Course Outline of Record shall specify how the portion of instruction delivered via distance education will be accessible to all students.
- The District/College shall purchase new ICT that is accessible to its expected audiences and make all new or redeveloped ICT accessible to its expected audiences unless to do so places an undue burden on the District/College or to do so will fundamentally alter the nature of the educational program or service.

2. Communication

The District and Colleges are responsible for communicating their accessibility policies, regulations, and processes and for soliciting feedback and input from its user community.

- Every web page should contain a link to provide access to the District's Accessibility Statement and to allow users to report and/or provide feedback on accessibility issues.
- ➤ Every course site should contain a link to provide access to the District's Accessibility Statement and to allow users to report and/or provide feedback on accessibility issues.
- Faculty are encouraged to include accessibility information in their course syllabi.
- > The distance education addendum to a Course Outline of Record shall specify how the portion of instruction delivered via distance education will be accessible to all students.

3. Training

When electronic content is shared across the District or is used to conduct business, it needs to be accessible to all members of the District community. Consequently, all members of the community who produce content for consumption by others will impact the District's overall accessibility and need to be trained in creating accessible content.

The District and Colleges have the responsibility to provide timely and appropriate training to its constituents. Human Resources should include accessibility training in all new employee onboarding processes. Special care should be taken to ensure that adjuncts receive information and direction about accessibility. District and college administrators, staff, and faculty have the responsibility to take advantage of that training.

4. Support

Support should be readily available to all individuals who create content destined to be shared with others, specifically to faculty, staff, and webmasters. Support should include:

- > Clear accessibility guidelines.
- > Web-accessible documentation,
- > Just-in-time training modules, and
- Access to trained support staff.

5. Alternative Forms of Content

All digital content hosted on the District/Colleges web pages and Canvas courses should provide an alternative form to assist people with a visual, auditory, or learning disability. All video and audio material should provide an accompanying transcript and captions.

Wherever possible, textual material should provide audio/video versions of the content.

For Canvas courses, faculty can utilize the *Blackboard Ally* plug-in to automatically generate alternate forms of content. For example, Ally can create HTML, tagged PDF, ePub, electronic Braille, and audio versions of a given document.

Faculty can submit their audio/video content to services providing auto-generated captioning, such as *3C Media*. Faculty should verify their accuracy and edit the captions.

A good practice for those who create their own video content is to create a script prior to making the recording. Creating a script before recording the video allows for a more organized recording session and makes it easy to provide users with a transcript.

6. Accessibility Checkers

In recognition of the increasing importance of creating accessible documents, the current versions of most applications, such as Microsoft Word, PowerPoint, and Adobe Acrobat Pro, have built-in automated accessibility checkers. For Canvas courses, faculty can utilize the built-in Canvas accessibility checker as well as the *Blackboard Ally* checker. All individuals who create shared electronic content should incorporate this step into their content production processes.

7. Automated Website Checks

Because web page content is so dynamic, webmasters should run automated tests of important websites regularly. This quickly and easily alerts them to any major accessibility issues present on the website. Automated tools such as *SortSite* by *PowerMapper*, *Blackboard Ally*, TPG's *Accessibility Resource Center (ARC)*, or *SiteImprove* can comprehensively check broken links, compatibility, search engine optimization, privacy, usability and web standards. Automated website checks should be run against all websites at least every three months.

8. Keyboard- Only Analysis

Keyboard accessibility is an extremely important aspect of web accessibility, as manypeople who have motor disabilities cannot use a mouse and must rely solely on use of their keyboard. Simple keyboard checks can be performed by using the **Tab**, **Enter**, and **Spacebar** keys. **Tab** can be used to navigate forward to all links on a web page. **Shift + Tab** can be used to navigate backwards through links on a web page. **Enter**, **Spacebar**, and at times the **Arrow Keys** can also be used to visit links or navigate between links on a web page.

Keyboard-only testing should be routinely conducted against samples of web pages and course content to check for general navigability as well as the following:

- ➤ Navigation order should be logical and intuitive for the user who is exploring the web page.
- A visual focus, typically a small rectangular box (border), should appear around the selected linked content on the web page.
- > Drop-down lists on a web page should open automatically upon navigation orbe opened using the **Enter** key.

Content Guidelines

This section delineates content guidelines that address the basic details of building accessible content in the District/Colleges websites, documents, and course materials.

1. Provide Titles for All Pages and Documents

Screen readers can read the title property associated with any given document, providing a brief description of the document's content. The document title may be the only means that a person can determine the content of a document from a directory structure. Some content management systems, such as SharePoint, display this title property in their directories and can search for words within the title. Always provide a document title in the *properties* section of the document creation tool.

2. Provide Structure Using Headings

Headings are used to give documents and web pages structure and provide a visual indication of areas that are important on the page. They are typically formatted to stand out, so readers can visually understand the structure of the document or web page and navigate through all sections. For example, headings may use a larger, bold font and may be formatted with a larger-than-normal vertical space between paragraphs.

For purposes of accessibility, headings enable a reader to navigate the web page or document using a keyboard only, jumping from heading to heading, if desired. Headings also allow screen readers to function properly for an individual with vision limitations. In order to be usable, the text of headings must be defined with the *Heading* property, not just formatted to look like a heading.

3. Describe All Non- Textual Material

If non-textual objects are used to convey meaning in a document, those objects will not be understandable to a person who is blind unless the author provides a complete description that can be read by a screen reader application. As a rule, all pictures, images, shapes, charts, SmartArt, etc. must be described in the surrounding text or via *Alt text* (alternative text) that can be read by screen readers.

4. Use Accessible Fonts and Font Sizes

There are hundreds of different fonts to choose, but some can be very difficult to read for people with vision problems and should consequently be avoided. Some examples to avoid (from Microsoft Office) include:

- > Bauhaus 93 | 2 point.
- ➤ Bodini MT Poster Compressed 12 point.
- > Brush Script M7 12 point.
- SHOWCARD GOTHIC 12 POINT.
- > Snap ITC 21 point

Part of the process of selecting an appropriate font should consider whether the font contains serifs or not. Serifs are the small extra embellishments that appear at the ends of some letter components. Fonts without such embellishments are referred to as *sans serif* fonts.

Figure 1: Sans Serif versus Serif Fonts





Calibri (Body) This is a Sans Serif Font

Cambria This is a Serif Font

Early research in typography indicated that **serif** fonts, when printed on a high-quality offset press, were easier to read and enabled better retention and comprehension of the content than sans serif fonts. Theoretically, this is due to the extra information in the font face that makes it easier for the eye to quickly recognize letters and avoid the ambiguity between certain sans serif letters such as lower case "L" versus upper case "I" (for example, in the sans serif Candara font, "I" versus "I"). As low-resolution computer screens and printers came into play, the simpler sans serif fonts seemed to be superior. With today's highresolution screens, the equation has changed again.

This author selected the Calisto MT serif font for body text and often selects sans serif fonts for headings. It is best to select a simple, easy-to-read **serif font**, at least 12 points in size for the main text in a document.

5. Ensure Sufficient Contrast Between Text and Background

For text to be accessible to people with low vision, there must be sufficient contrast between the text and the background. The WCAG 2.0 level AA standard requires a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text. Large text is defined as 14-point bold or larger, or 18-point regular or larger.

As an example, the following table indicates the color contrast ratio for black text on grey backgrounds.

Contrast Level	Ratio	Description
Great Contrast	21.00 to 1	Black on white provides excellent contrast
Good Contrast	10.24 to 1	Black on light grey provides reasonable contrast
Borderline Contrast	5.10 to 1	Black on medium grey provides marginal contrast
Failed Contrast	3.00 to 1	Black on dark grey provides poor contrast

Table 2: Contrast Ratios for Different Combinations of Black Text on Grey Background

To check the contrast ratio of a given pair of colors, determine the Hex value of the foreground and background colors and input their values into a contrast calculator such as WebAIM's Color Contrast Checker available at https://webaim.org/resources/contrastchecker/.

If color is used as the only means to convey information, that information may not be available to a person with color blindness. It is important, therefore, to provide an alternate means of understanding the content.

It is also important to avoid the use of *vibrating* colors. These are highly saturated bold colors that seem to vibrate when placed in close proximity to one another. Some colors may cause an *after image* and be bothersome to some readers.

6. Set and Confirm Reading Order

When you insert an image or other non-text object into your document, you have options to control its placement. These options include placing the object *in line with text*, so it appears like a single large character. A second option is to *anchor* the image to a location on the page and wrap text around it. Anchored images may create complications in reading order for screen readers. Whenever possible, place images *in line with text* and format the paragraph containing the image with a centered paragraph style. Otherwise, you must explicitly set the *reading order* within your application. Check that the document's *reading order* is logical and consistent with the document's intent and structure.

7. Caption All Images, Figures, Charts, and Tables

Captions on images, figures, charts, and tables provide useful information to users of screen readers about the content of the captioned object.

In most applications, to insert a caption, right-click the object, select the *Insert Caption*... option from the list, and complete the caption dialog box. To invoke this option for a table in Microsoft Word, visit the *Table Properties* dialog box.

8. Format Lists Using List Attributes

Lists often provide the reader with a welcome relief to a solid block of text and can be effective in conveying related information. Lists can be either ordered or unordered. When creating lists, it is important to use the built-in features of your application rather than creating the list by manually inserting bullet-like characters or numbers before each line.

For example, in Microsoft Word, use the *Bullet* function on the *Home* tab of the ribbon to apply bullets to text. In HTML, use the unordered list () and ordered list () tags to designate lists and the list item () tags to designate each item in the lists. Screen readers can interpret this formatting as a list and read the content appropriately.

9. Format Tables Using Table Attributes

To enable a screen reader to correctly interpret and read data in tables, always include a header row defining the data in each column. In web pages, this requires the use of the table header (TH) and table data (TD) HTML elements.

In documents, the header row should be formatted to reappear on top of the table if it is split across pages. In Microsoft Word, this can be done by first selecting the top header row, then right-clicking and selecting *Table Properties*, and checking the *Repeat as header row at the top of each page* option under the *Rows* tab.

Procurement Guidelines

This section lists guidelines addressing the District and College's procurement of:

- 1. Content Creation Tools
- 2. Educational Software
- 3. Course Materials

4. Professional Services

The District and its Colleges strive to provide Information and Communication Technology (ICT) that is accessible to its current and future students, faculty, staff, and other constituents and to make the District/Colleges accessible institutions. To that end, the District and its Colleges are committed to procuring and using ICT that is accessible to their expected audiences, unless to do so places an undue burden on the District/College or will fundamentally alter the nature of the educational program or service.

1. Content Creation Tools

Content creation tools, such as the *Canvas Learning Management System*, the *Microsoft Word* processing program, and the *Adobe Acrobat* PDF document system, must be capable of producing electronic content that complies with the District accessibility standards. See *Policy 7136 ICT Accessibility* for details.

The District procurement policies require the tool vendor to provide an Accessibility Conformance Report (ACR) based on the Voluntary Product Accessibility Template (VPAT) version 2.2. The ACR should be validated by either a hands-on demonstration, a trial period, or an independent third party. See *Policy 8321 Contracts and Contract Procedures* and *Regulation 8321 Contracts and Contract Procedures* for details.

2. Educational Software

Educational software, such as *Wolfram Mathematica*, *Hawkes Learning*, and *Pearson's MyMathLab* must be capable of being effectively used by all students, i.e., it must meet the District's accessibility standards. See *Policy 7136 ICT Accessibility* for details.

The District procurement policies require the software vendor to provide an Accessibility Conformance Report (ACR) based on the Voluntary Product Accessibility Template (VPAT) version 2.2. The ACR should be validated by either a hands-on demonstration, a trial period, or an independent third party. The educational software vendor should indemnify the District against any accessibility-related claims and any required accommodations. See *Policy 8321 Contracts and Contract Procedures* and *Regulation 8321 Contracts and Contract Procedures* for details.

3. Course Materials

Third-party course materials, such as publisher-provided PowerPoint presentations and quiz banks, as well as audio and video materials, must comply with the District's accessibility standards. See *Policy 7136 ICT Accessibility* for details.

Procurement decisions should be conditional upon successful accessibility using automated (Blackboard Ally) and manual (keyboard-only and screen-reader) testing procedures. See *Policy 7136 ICT Accessibility, 6.0 Selection of ICT* for details.

4. Professional Services

The District and Colleges occasionally hire third party consultants and professional services companies. The work of these parties must comply with the District' accessibility standards. See *Policy 7136 ICT Accessibility* for details.

The District procurement policies require consultants to indemnify the District against any accessibility-related claims and any required accommodations related to their products and services. See *Policy 8321 Contracts and Contract Procedures* and *Regulation 8321 Contracts and Contract Procedures* for details.

District Policies and Regulations

This section contains an explanation of the institution's guiding principles related to ICT accessibility. The Los Rios Community College District and its four Colleges are committed to providing websites, course materials, documents, and business applications that are accessible to all current and future students, faculty, staff, and other constituents.

Student access to inclusive educational opportunities is one of the College's highest priorities and requires a community of stakeholders to design, monitor, and uphold accessible practices. Offices across all campuses work collaboratively to provide an environment free from discrimination and to protect the rights and dignity of students, faculty, and staff. The Accessibility Task Force recommends the following draft policies and regulations for vetting and approval through the participatory governance process.

Policy 7136 ICT Accessibility

The LRCCD Accessibility Policy applies to all official information and communication technology (ICT) used to conduct academic and business functions. ICT includes information technology, web pages, web-based applications, learning management system courses, documents, and application system screens from the PeopleSoft and auxiliary systems. If electronic content is published on behalf of LRCCD or is used to conduct College business, it is subject to the Accessibility Policy.

1.0 Intent

- 1.1 It is the policy of the Los Rios Community College District and its Colleges to work to provide Information and Communication Technology (ICT) that is accessible to current and future students, faculty, staff, and other constituents, and to make the District/Colleges accessible institutions.
- 1.2 The District/Colleges are committed to working to provide websites, learning management systems, documents, and business applications that are usable by all current and future students, faculty, staff, and other constituents.
- 1.3 Student, faculty and staff access to inclusive educational opportunities is one of the District/Colleges' highest priorities and requires a community of stakeholders to design, monitor, and uphold accessible practices. Offices across all campuses must work collaboratively to provide an environment that protects the rights and dignity of students, faculty, and staff.

2.0 Scope of the Policy

2.1 This District Policy applies to all ICT used to conduct official District/College academic and business functions.

3.0 Definitions

3.1 To make ICT "accessible" means to design the ICT to provide a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the

- information as fully, equally, and independently as a person without a disability.
- 3.2 An "accessible institution" is one that is committed to the goal that all students, faculty, staff, and constituents can access the institution's ICT. Specifically, they can perceive, understand, navigate, interact, and contribute to ICT because its content and content-creation tools have been proactively designed to be accessible.
- 3.3 "Accommodation" is an alteration of environment, curriculum format, or equipment that allows an individual with a disability to gain access to content and/or complete assigned tasks. Accommodations must be reasonable and not place an undue burden on the District/College or fundamentally alter the nature of the educational program or service.
- 3.4 An "adopter" of ICT is the faculty, staff or administrator that chooses to use ICT in conjunction with official academic or business functions of the District/College.
- 3.5 "Americans with Disabilities Act (ADA)" refers to the Americans with Disabilities Act of 1990.
- "Disability Services and Programs for Students (DSPS)" provides a variety of academic support services to students with disabilities. DSPS's goal is to provide students the opportunity to participate fully in all aspects of College programs and activities through appropriate and reasonable accommodations.
- information and Communication Technology (ICT)" refers to any information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information. Examples of ICT are electronic content, telecommunications products, computers and ancillary equipment, software, information kiosks and transaction machines, videos, IT services, and multi-function office machines which copy, scan, and fax documents.
- 3.8 "Legacy ICT" is ICT created prior to the adoption of this policy that is not currently accessible.
- 3.9 "Remediation" refers to the process of making legacy ICT accessible. A remediation plan is one that successfully modifies legacy ICT (document, website, etc.) so that it is accessible over a period of time.
- **3.10** "Section 504" is a part of the Rehabilitation Act of 1973 that prohibits discrimination based upon disability.
- 3.11 "Section 508" is a part of the Rehabilitation Act of 1973 that governs accessibility of information technology (IT) in the Federal government, and in any state or locality that accepts federal funding.
- 3.12 "WCAG 2.0" or Web Content Accessibility Guidelines (WCAG) 2.0 defines how to make Web content more accessible to people with disabilities.

Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.

4.0 Standard and Guidelines

- **4.1** The District/Colleges will adhere to the following standards and guidelines related to accessibility of ICT:
 - 4.1.1 Sections 504 and 508 of the Rehabilitation Act of 1973;
 - 4.1.2 Title II of the Americans with Disabilities Act;
 - 4.1.3 Accessibility standards described in the Web Content Accessibility Guidelines (WCAG), version 2.0, levels A and AA, or the most current version approved by the Vice Chancellor of Education and Technology.

5.0 Accommodations

- 5.1 Student requests for accommodations regarding ICT or legacy ICT shall be resolved by the DSPS offices.
- **5.2** Appeals of student requests for accommodations shall be resolved pursuant to Administrative Regulation 2731.
- 5.3 Appeals of faculty, staff or public requests for accommodation shall be resolved by the College's 504 Officer in consultation with Human Resources.

6.0 Selection of ICT

- Within 36 months of the adoption of this policy, all new (i.e., non-existent until after this policy was adopted) or redeveloped (i.e., existing before this Policy was adopted but substantially changed in terms of its functionality or structure after the policy was adopted) ICT shall be made accessible to its expected audiences unless to do so places an undue burden on the District/College, or to do so will fundamentally alter the nature of the educational program or service.
- 6.2 The District Policy for faculty selection of textbooks and academic materials for courses are set forth in District Policy and Administrative Regulation 7134. However, faculty adopters of ICT shall select and use ICT that is accessible to their expected audiences, unless to do so places an undue burden on the District/College, or to do so will fundamentally alter the nature of the educational program or service.
- 6.3 The District/Colleges shall make ICT accessible to its expected audiences in a timely manner and in such a way as to protect the privacy and independence of persons with disabilities.
- 6.4 Upon request by a qualified person with a disability, Legacy ICT shall be made accessible unless to do so constitutes an undue burden on the District/Colleges or result in fundamental alterations of the educational programs or services of the District/Colleges.
- Where ICT is identified that is not accessible, the District/College shall promptly render the ICT accessible unless to do so constitutes an undue

- burden on the District/Colleges or results in fundamental alterations of the educational programs or services of the District/Colleges.
- 6.6 Where ICT cannot be made accessible, the District/Colleges shall provide equally effective alternative access to the student, faculty, staff or administrator.

Policy 8321 Contracts and Contract Procedures

1.0 Authorization to Contract

1.1 The Chancellor is authorized and empowered to contract in the name of Los Rios Community College District subject to provisions of law and to approval or ratification by the Los Rios Community College District Board of Trustees. (Ed. Code, §§ 81655 and 81656)

2.0 Non-Discrimination and Affirmative Action for Contract Compliance

- 2.1 Any contractor performing work or providing services for the Los Rios Community College District must certify that there is no discrimination in the company's hiring or employment practices because of ethnic group identification, race, color, sex, gender, gender identity, gender expression, pregnancy or childbirth-related condition, sexual orientation, sexual identity, religion or religious creed, age (over forty), national origin, ancestry, physical or mental disability, medical condition, political affiliation or belief, military and veteran status, or marital status.
- 2.2 All contractors, subcontractors, vendors, and suppliers shall be notified of the District's employment policy (compliance with Executive Orders 11246 and 11375) and shall be requested to take appropriate action on their part. On all contracts and bids, contractors, subcontractors, vendors, and suppliers shall be asked to sign a notice of compliance, unless exempted by law.
- 2.3 The Chancellor shall ensure that District purchasing procedures shall comply with state regulations on Minority, Women, and Disabled Veteran Business Enterprise Participation Goals. (Title 5, § 59500)
- 2.4 The Chancellor shall ensure that District purchasing procedures comply with the District's conflict of interest Administrative Regulations.

3.0 Information and Communication Technology Accessibility

3.1 Intent

- 3.1.1 It is the policy of the District and its Colleges to work to provide Information and Communication Technology (ICT) that is accessible to its current and future students, faculty, staff, and other constituents and to make the District/Colleges accessible institutions.
- 3.1.2 The District/Colleges are committed to working to provide websites, learning management systems, documents, and business applications that are usable by all current and future students, faculty, staff, and other constituents.

3.1.3 Student, faculty and staff access to inclusive educational opportunities is one of the District/Colleges' highest priorities and requires a community of stakeholders to design, monitor, and uphold accessible practices. Offices across all Colleges must work collaboratively to provide an environment that protects the rights and dignity of students, faculty, and staff.

3.2 Scope

3.2.1 This District Policy applies to all ICT used to conduct official District/College academic and business functions.

3.3 Definitions

- 3.3.1 To make ICT "accessible" means to design the ICT to provide a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.
- 3.3.2 An "accessible institution" is one that is committed to the goal that all students, faculty, staff, and constituents, including those with visual, auditory, physical, speech, cognitive, and neurological disabilities, can access the institution's ICT. Specifically, they can perceive, understand, navigate, interact, and contribute to ICT because its content and content-creation tools have been proactively designed to be accessible.
- 3.3.3 "Accommodation" is an alteration of environment, curriculum format, or equipment that allows an individual with a disability to gain access to content and/or complete assigned tasks. Accommodations must be reasonable and not place an undue burden on the District/College or fundamentally alter the nature of the educational program or service.
- 3.3.4 An "adopter" of ICT is the faculty, staff or administrator that chooses to use ICT in conjunction with official academic or business functions of the District/College.
- 3.3.5 "Americans with Disabilities Act (ADA)" refers to the Americans with Disabilities Act of 1990.
- 3.3.6 "Disability Services and Programs for Students (DSPS)" provides a variety of academic support services to students with disabilities. DSPS's goal is to provide students the opportunity to participate fully in all aspects of College programs and activities through appropriate and reasonable accommodations.
- 3.3.7 "Information and Communication Technology (ICT)" refers to any information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control,

- display, switching, interchange, transmission, reception, or broadcast of data or information. Examples of ICT are electronic content, telecommunications products, computers and ancillary equipment, software, information kiosks and transaction machines, videos, IT services, and multi-function office machines which copy, scan, and fax documents.
- 3.3.8 "Legacy ICT" is ICT created prior to the adoption of this policy that is not currently accessible.
- 3.3.9 "Remediation" refers to the process of making legacy ICT accessible. A remediation plan is one that successfully modifies legacy ICT (document, website, etc.) so that it is accessible over a period of time.
- 3.3.10 "Section 504" is a part of the Rehabilitation Act of 1973 that prohibits discrimination based upon disability.
- 3.3.11 "Section 508" is a part of the Rehabilitation Act of 1973 that governs accessibility of information technology (IT) in the Federal government, and in any state or locality that accepts federal funding.
- 3.3.12 "WCAG 2.0" or Web Content Accessibility Guidelines (WCAG) 2.0 defines how to make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.

3.4 Standards and Guidelines

- 3.4.1 The District/Colleges shall adhere to the following standards and guidelines related to accessibility of ICT:
 - 3.4.1.1 Sections 504 and 508 of the Rehabilitation Act of 1973:
 - 3.4.1.2 Title II of the Americans with Disabilities Act;
 - 3.4.1.3 Accessibility standards described in the Web Content Accessibility Guidelines (WCAG), version 2.0, levels A and AA, or the most current version approved by the Vice Chancellor of Education and Technology.

3.5 Accommodations

- 3.5.1 Faculty or staff requests for accommodations regarding ICT or legacy ICT shall be resolved by the Vice President of Administration at the College in consultation with Human Resources.
- **3.6** Selection of ICT and Technology Procurement
 - 3.6.1 Within 36 months of the adoption of this policy, all new (i.e., non-existent until after this policy was adopted) or redeveloped (i.e., existing before this Policy was adopted but substantially changed in terms of its functionality or structure after the policy was adopted) ICT shall be made accessible to its expected audiences, unless to do so places an undue burden on the District/Colleges, or to do so will fundamentally alter the nature of the educational program or service.

- 3.6.2 Staff and administrator adopters of ICT shall select and use ICT that is accessible to their expected audiences, unless to do so places an undue burden on the District/College, or to do so will fundamentally alter the nature of the educational program or service.
- 3.6.3 The District/Colleges shall make ICT accessible to its expected audiences in a timely manner and in such a way as to protect the privacy and independence of persons with disabilities.
- 3.6.4 Where ICT cannot be made accessible, the District/Colleges shall provide equally effective alternative access to the student, faculty, staff or administrator.
- 3.6.5 The District/Colleges shall purchase ICT that is accessible to its expected audiences, as long as the technology is available for purchase and does not constitute an undue burden on the District/Colleges or result in fundamental alterations of the educational programs or services of the District/Colleges.
- 3.6.6 Upon request by a qualified person with a disability, legacy ICT shall be made accessible unless to do so constitutes an undue burden on the District/Colleges or results in fundamental alterations of the educational programs or services of the District/Colleges.
- 3.6.7 Where ICT is identified that is not accessible, the District/College shall promptly render the ICT accessible unless to do so constitutes an undue burden on the District/Colleges or results in fundamental alterations of the educational programs or services of the District/Colleges.
- 3.6.8 Where ICT cannot be made accessible, the District/Colleges shall provide equally-effective alternative access to the student, faculty, staff or administrator.

Regulation 7136 ICT Accessibility

1.0 Determination of Undue Burden/Fundamental Alteration

- 1.1 The determination of whether making ICT accessible will place an undue burden on the District/College, or fundamentally alter the nature of the educational program or service, shall be made in accordance with the procedures of Board Policy and Administrative Regulation 2731.
- 1.2 Any determination that making the ICT accessible will place an undue burden on the District/College, shall be made in consultation with the Vice President of Student Services and the General Counsel.

Regulation 8321 Contracts and Contract Procedures

1.0 Construction Contract Change Orders Associated with Bids

- 1.1 Changes to bids will be in conformance with Public Contract Code.
- 1.2 Change orders that do not exceed fifteen thousand dollars (\$15,000) or ten percent (10%) of the contract price shall be approved by the Chancellor or designee and ratified by the Los Rios Community College District Board of

Trustees. Change orders that exceed bid limits or ten percent (10%) of the original contract price (whichever is higher) shall be bid.

2.0 Changes to Purchase Orders and Requisitions

- 2.1 A change to the authorized amount of a purchase order or requisition that is seven hundred fifty dollars (\$750.00) or less can be processed by purchasing staff without additional authorization from the Chancellor or College/District designee.
- A change to a purchase order or requisition over seven hundred fifty dollars (\$750.00) must be authorized by the Chancellor or College/District designee.

3.0 Emergency Purchases

- 3.1 For Contracts that fall under the California Uniform Public Construction Cost Accounting Act (CUPCCAA), in cases of emergency, when repair or replacements of public facilities are necessary, the Board of Trustees may proceed at once to replace or repair any public facility without adopting plans, specifications, strain sheets, or working details, or giving notice for bids to let contracts. The work may be done by day labor under the direction of the governing body, by contractor, or by a combination of the two. The notices to be given and the procedures to be followed shall follow Public Contract Code section 22050.
 - 3.1.1 In cases of emergency, the Board of Trustees by four-fifths vote shall delegate to the Chancellor or designee the authority to enter into emergency contracts, subject to report to the Board of Trustees within 7 days or at its next regularly scheduled meeting which shall be no more than 14 days after the action was taken.
 - 3.1.2 The Chancellor or designee must report at each subsequent meeting until the contract is completed or terminated.
 - 3.1.3 During each regularly scheduled meeting after entering into an emergency contract, the Board of Trustees shall determine, by a four-fifths vote, that there is a need to continue the action and shall terminate the action at the earliest possible date.
- In emergencies not covered by CUPCCAA, in order to prevent work stoppage with respect to any building program, the Chancellor or designee shall be authorized to use individual judgment, subject to a later report to the Board of Trustees and ratification of that action by the Board of Trustees. A unanimous vote of the Board of Trustees is required for emergency purchases. (Pub. Contract Code, § 20654)

4.0 Stop Notices

If a District contractor or subcontractor submits a stop notice or any documentation related to a stop notice, the District shall follow the Stop Notice Procedure attached to this Administrative Regulation as Attachment A.

5.0 Determination of Undue Burden/Fundamental Alteration

- 5.1 The determination of whether making ICT accessible will place an undue burden on the District/College, or fundamentally alter the nature of the educational program or service, shall be made in accordance with the procedures of Board Policy and Administrative Regulation 2731.
- 5.2 Any determination that making the ICT accessible will place an undue burden on the District/College shall be made in consultation with the Vice President of Student Services and the General Counsel.

6.0 Purchasing Accessible Technology

- **6.1** As part of the purchasing process of ICT, the vendor shall supply:
 - 6.1.1 A verified Accessibility Conformance Report (ACR) based on the Voluntary Product Accessibility Template (VPAT) version 2.2;
 - 6.1.2 A statement that provides an evaluation of the product's accessibility; and,
 - 6.1.3 Test results showing the product is accessible.
- 6.2 The District/College making the purchase will provide the following to their IT Department:
 - 6.2.1 Documentation regarding accessibility supplied by the vendor;
- 6.3 In the event that that no suitable product can be found that meets minimum accessibility requirements, a description of the reason the product was selected should be submitted to the Vice President of Administration at the College or the Associate Vice Chancellor of Finance at the District Office.

Summary

The Los Rios Community College District aspires to create and sustain an accessible community, that is, one that provides websites, course materials, documents, and applications that are accessible to all current and future students, faculty, staff, and other constituents.

The District/Colleges will accomplish this by adhering to accepted guidelines and standards for usability and accessibility. Where it is not possible to immediately do so, the District/Colleges will provide students with disabilities with appropriate academic and administrative accommodations that support the fundamental nature of their educational programs through our Disability Services and Programs for Students (DSPS) Offices. For employees with disabilities, the District/Colleges are committed to providing appropriate accommodations to ensure all employees can perform the essential functions of their job.

Appendix A

Person filling out this Checklist:

Component/Agency:

Name: Title:

Telephone: Fax number: E-mail address:

Software application under review:

Title/Version:

Developer:

Customization: choose the most appropriate description:

- (a) commercial off-the-shelf software (used "as is")
- (b) commercial software, but modified for agency use
- (c) custom software developed under contract
- (d) custom software developed in-house

Description: choose the most appropriate:

- (a) word processor
- (b) spreadsheet
- (c) database
- (d) groupware
- (e) e-mail
- (f) Internet browser
- (g) other Internet access
- (h) online database access
- (i) other (describe):

Used by approximately [blank] members of the public and [blank] employees on a weekly basis.

Category	Question	Y	N :	N/A
Keyboard Access	1. Does the software provide keyboard equivalents for all mouse actions, including buttons, scroll windows, text entry fields, and pop-up windows?			
Keyboard Access	2. Does the program provide clear and precise instructions for use of all keyboard functions as part of the user documentation?			
Keyboard Access	3. Are instructions regarding keyboard use widely available for all users in your component?			

Keyboard 4. Does the software have a logical tabbing order among Access fields, text boxes, and focal points? 5. When navigating screens and dialog boxes using the Keyboard Access keyboard, does the focus follow a logical tabbing order? Keyboard 6. Is there a well-defined focal point that moves with Access keyboard navigation? (e.g., can you use the arrow keys to navigate through a list followed by pressing the ENTER key or space bar to select the desired item)? Keyboard 7. Are shortcut keys provided for all pull-down menus? Access 8. Does the software support existing accessibility features Keyboard Access built into the operating system (e.g., sticky keys, slow keys, repeat keys in Apple Macintosh OS or Microsoft Windows 95)? **Timing** 9. If timed responses are present, does the software allow the user to modify the timing parameters of any required timed responses? Screen 10. Are all descriptions or labels for fields positioned immediately to the left or directly above the control, and do Elements they end in a colon, so that it is easy for screen reading software to associate the labels with the corresponding fields? Screen 11. Does every window, object, and control have a clearly Elements named label? Screen 12. Does the software application use standard controls Elements rather than owner-drawn or custom controls? **Icons** 13. Does the software have a user selectable option to display text on icons, i.e., text only icons or bubble help? Icons 14. Is the use of icons consistent throughout the application? **Icons** 15. Are menus with text equivalents provided for all icon functions or icon selections on menu, tool, and format bars? Sounds 16. If there are audio alerts, are visual cues also provided? Note: Most operating systems handle this issue in the client/server environment; the question is most relevant in a dumb terminal environment. Sounds 17. Does the software support the "show sounds" feature where it is built into the operating system? Sounds 18. Can the user disable or adjust sound volume? Sounds 19. If information is provided in an audio format, is it also capable of being displayed by the user in a visual format?

Display 20. Is the software application free of patterned backgrounds

used behind text or important graphics?

Display 21. Can a user override default fonts for printing and text

displays?

Display 22. Can a user adjust or disable flashing, rotating, or moving

displays?

Color 23. Does the software ensure that color-coding is never used

as the only means of conveying information or indicating an

action?

Color 24. Does the application support user-defined color settings

system-wide?

Color 25. Is highlighting also viewable with inverted colors?

Size 26. If the software application draws its own screen elements,

does it pick up the size settings that the user has selected in

the Control Panel?

Documentation 27. Are all manuals and documentation provided in

electronic format as well as ASCII text files, including text descriptions of any charts, graphs, pictures, or graphics of

any nature?

Documentation 28. Can a user choose to have any report generated by the

software made available in a "print to ASCII file" format?

Training 29. Is special training provided for users with disabilities that

will enable them to become familiar with the software and learn how to use it in conjunction with assistive technology

provided as an accommodation?

30. After you have evaluated this application using the Checklist, test it by running the application with a sampling of the common assistive technologies used by persons with disabilities (including, at a minimum, screen readers, and, if possible, alternate input devices, screen enlargement software, and voice recognition software and devices). Describe the accessibility successes and problems you encountered during these testing exercises, as well as your plans for addressing any problems: [space provided for answer]