# LENAWEE INTERMEDIATE SCHOOL DISTRICT WEBSITE ACCESSIBILITY POLICY

# **Background Information**

Federal<sup>1</sup> and state<sup>2</sup> law as well as LISD Board Policy<sup>3</sup> prohibit the discrimination against persons with disabilities who wish to access LISD programs and services, including information contained on the LISD's public websites – <a href="www.lisd.us">www.lisd.us</a> and <a href="www.lisdtechcenter.com">www.lisdtechcenter.com</a>. To the extent that such does not create an undue burden or fundamentally alter the content, the LISD will take steps to ensure that the District's websites and their content are as equally accessible to persons with disabilities as they are to nondisabled persons.

These efforts should 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 nondisabled persons, with substantially equivalent ease of use; and that persons with disabilities are not excluded from participation in, or denied the benefits of, or otherwise subject to discrimination in any LISD program, service, or activity delivered online and that they received effective communication of the LISD's programs, services, and activities delivered online.

## **Website Accessibility Coordinators**

The LISD's Website Accessibility Coordinators are:

Andrew Munson Kyle Hoffman

Community Relations Coordinator Director, Legal Services, Grants, & Development

4107 N. Adrian Highway Adrian, Michigan 49221 Adrian, Michigan 49221

517-264-9840 517-266-4832

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## **Standards for Accessibility**

The accessibility and functionality of the LISD's website and other public LISD online content shall be measured according to the <u>W3C's Web Content Accessibility Guidelines (WCAG) 2.0</u> Level AA and the <u>Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0</u> for web content.

<sup>&</sup>lt;sup>1</sup> Section 504 of the Rehabilitation Act of 1973 and Americans with Disabilities Act of 1990

<sup>&</sup>lt;sup>2</sup> Michigan's Persons with Disabilities Civil Rights Act

<sup>&</sup>lt;sup>3</sup> LISD Board Policy 2260.01 Section 504/ADA Prohibition Against Discrimination Based on Disability

# **Website Content Monitoring and Assessment**

Website content monitoring and assessment will be ongoing with content assessments performed at regular intervals. Reports identifying those items which are not compliant with the LISD's accessibility standards will be sent to the LISD's website content managers not less than one time per month. Website content editors are responsible for correcting the identified accessibility issues within 10 business days of their receipt of the report.

# **Third-party Linked Websites and Content**

The LISD may link third-party produced and/or hosted content to its public website. Third party produced and/or hosted content includes, but is not limited to, YouTube® videos, the District's online employment application system provider, and the District's online Board Policy website.

The LISD's website accessibility coordinators shall ensure that all third-party content that is linked to or obtainable through the LISD's public website complies with the requirements of this policy.

Prior to linking any third-party website(s) and/or content to the LISD website, the LISD staff member responsible for the linked website and/or content must contact one or both of the LISD's website accessibility coordinators and must inform them of the third-party website(s) and/or content to be linked to the LISD website and must describe how the website(s) and/or content will comply with the requirements of this policy. Third-party website(s) and/or content will not be linked to the LISD website until such time as the website(s) and content complies with the requirements of this policy.

Additionally, all contracts with vendors supplying information that is accessible from the LISD's public websites shall include the following language:

"Contractor understands and agrees that the LISD must maintain public websites that comply with the requirements of applicable law, administrative regulation, and other requirements as it relates to accessibility to website content for all persons, regardless of disability. Contractor agrees that it will not make changes to the LISD's public websites or to any Contractor owned or provided website and/or content linked to or otherwise made available through the LISD's public websites, including, but not limited to, Contractor's content management system, hosting, and other related programs and systems which would result in the LISD's public websites and any third-party websites and content, including, but not limited to Contractor's websites and content not being in compliance with the then-current website accessibility standards adopted by the LISD and generally recognized by the US Department of Education and other applicable standards and requirements."

# **LISD Web Content Requirements**

The following information summarizes the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA requirements. This information is provided for convenience purposes and is not intended to replace information found on the WCAG website. For additional information, including techniques for how best to meet the guidelines, visit: <a href="http://www.w3.org/TR/WCAG20-TECHS/">http://www.w3.org/TR/WCAG20-TECHS/</a>.

#### Non-text Content

Non-text content shall have a text alternative that serves the same purpose and provides the same information, unless the non-text content is used for pure decoration, visual formatting, or is not presented to users of the website.

#### Audio Content

Audio content which plays automatically for more than three seconds must include either a mechanism to pause or stop the audio or a mechanism to control the audio volume level independently from the overall system volume level.

## Prerecorded Audio-only and Video-only

Prerecorded audio-only and video-only media shall have an alternative that presents equivalent information, unless the audio-only or video-only media is an alternative for text and clearly labeled as such.

Captions must be provided for all prerecorded audio content, except when the media is a media alternative for text and clearly labeled as such.

An alternative for time-based media or audio description of the prerecorded video content must be provided, except when the media is a media alternative for text and clearly labeled as such.

An audio description must be provided for all prerecorded video content.

#### Live Audio and/or Video

Captions must be provided for all live audio and video content.

## Text Content

All text content must be readable and understandable.

The default human language of each web page can be programmatically determined<sup>4</sup>.

The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text.

<sup>&</sup>lt;sup>4</sup> When content is properly marked up in HTML, its semantic structure and relationships are in the markup itself. That is, they can be "programmatically determined." Because this information is in the code, as it were, supporting technologies can programmatically retrieve it and present it to users in different ways. The information can be transformed into different sensory formats or styles of presentation needed by individual users.

# *Information and Relationships*

All information, structure, and relationships conveyed through presentation must be able to be programmatically determined or must be available in text.

When the sequence in which content is presented affects the meaning of the content, a correct reading sequence must be programmatically determined.

# Sensory Characteristics

Instructions provided for understanding and operating content must not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound.

## *Use of Color*

Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing visual element.

#### Contrast

The visual presentation of text and images of text shall have a contrast ratio of at least 4:5:1, unless the text or image is incidental or the text is part of a logo or brand name.

Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content of functionality.

If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text unless the image of text can be visually customized to the user's requirements or the particular presentation of text is essential to the information being conveyed.

#### **Functionality**

All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.

If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away.

Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.

When any component receives focus, it does not initiate a change of context.

Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.

Components that have the same functionality within a set of web pages are identified consistently.

In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.

For all user interface components, the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.

### **Timing**

If a time limit is set for content, the user must be able to turn off the time limit before encountering the limit; or the user must be allowed to adjust the time limit before encountering the limit and the adjustment must allow for a limit that is at least 10 times the length of the default setting.

For moving, blinking, scrolling, or auto-updating information that start automatically, lasts more than five seconds, and is presented in parallel with other content, there must be a mechanism for the user to pause, stop, or hide it, unless the movement, blinking, or scrolling is part of an activity where is essential.

For auto-updating information that starts automatically and is presented in parallel with other content, there must be a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.

#### Flashes

Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.

#### Content Blocks

A mechanism is available to bypass blocks of content that are repeated on multiple web pages.

#### Web Page Titles

Web pages have titles that described a topic or purpose.

#### Locating Web Pages

More than one way is available to locate a web page within a set of web pages except where the web page is the result of, or a step in, a process.

## Web Page Sequence

If a web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in order that preserves meaning and operability.

#### Links

The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general.

# Headings and Labels

All headings and labels describe a topic or purpose.

### Site Navigation

Navigational mechanisms that are repeated on multiple web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.

### User Inputs

Labels or instructions are provided when content requires user input.

If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. If suggestions for the error are known, then the suggestions should be made to the users unless providing such would jeopardize the security or purpose of the content.

For web pages which cause legal commitments or financial transactions for the user, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following must be present: (1) submissions must be reversible; (2) data entered by the user must be checked for input errors and the user must be provided an opportunity to correct the errors; or (3) a mechanism is available for reviewing, confirming, and correcting the information before finalizing the submission.

#### **Undue Burden or Fundamental Alteration**

The LISD shall take all reasonable steps to ensure that all public LISD web content including, but not limited, to the content on its public website is accessible to persons with disabilities to the same extent as nondisabled persons. However, in certain circumstances accessibility may create an undue burden on the District or fundamentally alter the content. In these instances, the District will provide equally effective alternate access to the information with the intent of providing persons with disabilities equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.

A determination as to whether or not making web content accessible presents an undue burden or fundamentally alters the content may only be made by the LISD's Director of Legal Services, Grants, & Development in consultation with the LISD Superintendent and other applicable LISD personnel after consideration of all resources available for use in the funding and operation of the service, program, or activity. If a determination is made that making web content accessible presents an undue burden or fundamentally alters the content, the LISD will prepare and make available upon request a written statement describing the reasons for reaching that conclusion.

# **Training**

At least annually, the LISD will provide website accessibility training, which may be provided through online training programs, to all appropriate personnel, including, but not limited to: content developers, webmasters, distributers of online content, and others responsible for developing, loading, maintaining, or auditing web content and functionality.

Training will minimally address this Website Accessibility Policy and the participant's roles and responsibilities to ensure that web design, documents, and multimedia content are accessible. Training will also provide resources on how to ensure that website content is accessible.

Training will be facilitated by an individual with sufficient knowledge, skill, and experience to understand and employ the website accessibility standards adopted by the LISD.

# Implementation Responsibility

The LISD's Website Accessibility Coordinators shall generally be responsible for ensuring compliance with these Web Accessibility Guidelines and applicable law and Board Policy. However, each LISD program and service is responsible for ensuring that its public web content complies with the requirements of such.

# **Complaint Procedures**

Concerns about the accessibility or lack of accessibility of LISD website content or other public LISD online content may be directed to accessibility@lisd.us. The complaint should be as specific as possible identifying the content which the complainant believes is not accessible and providing a link or other identifier. If the complainant desires to be provided with updates on the steps taken by the LISD to investigate and resolve the complaint, the complainant should provide his/her name and contact information. However, such is not necessary and all complaints, whether anonymous or not, will be investigated equally.

The LISD will investigate all complaints and will take action to correct those complaints which are determined to be valid.

Complaints may also be directed to one or both of the LISD's Website Accessibility Coordinators identified in this Policy.

Complaints about the accessibility or lack of accessibility of LISD website content or other public LISD online content may, at any time, be filed with the <u>US Department of Education's Office of Civil Rights</u>. A complainant is not required to notify the LISD prior to filing a complaint with the US Department of Education's Office of Civil Rights.

Office for Civil Rights, Cleveland Office U.S. Department of Education 1350 Euclid Avenue, Suite 325 Cleveland, OH 44115-1812

Telephone: 216-522-4970 Fax: 216-522-2573

TDD: 800-877-8339 E-mail: OCR.Cleveland@ed.gov