

SUNY Broome Electronic and Information Technology (EIT) Accessibility Plan Introduction

To ensure equal and integrated access to all of its programs, services, and activities, particularly for individuals with disabilities, especially in the realm of electronic and information technologies, SUNY Broome Community College, in accordance with SUNY Electronic and Information Technology (EIT) Accessibility Policy, (SUNY EIT Policy), pursuant to the Board of Trustee's Resolution No. 2019-50, effective June 20, 2019, has enacted the following EIT Accessibility Plan.

Under direction from the Vice President for Academic Affairs, an EIT Accessibility Officer(s) was appointed, as of December 31, 2019. This person(s) is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy.

EIT Accessibility Officer

The EIT Accessibility Officer is responsible for:

- development, oversight, continuous monitoring, and assessment of the EIT Accessibility Plan.
- assisting with and ensuring relevant policies and procedures that support the College's obligation and mission to support an inclusive learning and working environment are established and maintained.
- assigning roles and responsibilities for achieving policy compliance.
- facilitating a communication and awareness and training program plan to promote and support a campus-wide EIT accessibility program.

The SUNY Broome EIT Accessibility Officer is Dr. Kimberly McLain, Dean of Institutional Effectiveness.

EIT Advisory Council

To assist in the collaborative development of an EIT Accessibility Plan, consistent with local shared and faculty governance processes, the EIT Accessibility Officer established an EIT Advisory Council, made up of representative members from key stakeholder areas on campus to develop the EIT Accessibility Plan. This Advisory Council is overseen by the EIT Accessibility Officer and meets regularly throughout the year.

EIT Advisory Council Work Group members include:

- Ciara Cable, Web Developer
- Amanda Hollister, Librarian
- Lisa Hughes, Sr. Accessibility Specialist/Coordinator of Accessibility Resources Office
- Kim McLain, Dean of Institutional Effectiveness, Chair EIT Advisory Council
- Stephanie Malmberg, Assistant Dean for Distance Learning & Professional Development
- Fermin Romero, Interim Director for Information Technology Services
- Noah Roth, Assistant Librarian

- Carine Surdey, Senior Instructional Designer/Adjunct Instructor
- Hans Van Houten, Environmental, Health & Safety Coordinator

Guiding Principles

In accordance with SUNY's EIT Accessibility Committee guiding principles, the guiding principles for the work of the EIT Advisory Council at SUNY Broome were:

1. To promote a more inclusive and welcoming digital environment, particularly for individuals with disabilities.
2. To enable the SUNY Broome campus to address current and future potential EIT accessibility barriers.
3. To reduce exposure to the types of legal risks made evident by recent Office of Civil Rights filings.
4. To empower our college students with disabilities to persist and complete their educational goals, due to an accessible EIT infrastructure.
5. To leverage the power of SUNY and SUNY Broome Community College to influence third party vendors to conform to technical accessibility standards.

Defining EIT Accessibility

These definitions are those set forth by the final report of the SUNY EIT Accessibility Committee Final Report and Recommendations (May 2019): <https://www.suny.edu/sunypp/docs/884.pdf>

Accessible: In the case of a program or activity, readily usable by a particular individual, with or without alternate formats; in the case of the web and electronic resources, accessible with or without the use of assistive technology.

Alternate formats: Refers to alternatives to standard print. Information presented in an accessible format (e.g., electronic, audio, large print, Braille).

Assistive technology: any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.

Classroom Accessibility Standards: A summary listing of all pertinent building code and classroom technology system features that should be included when constructing/renovating SUNY classrooms. These features draw heavily from the 2010 ADA building standards on federal and state property.

Digital Content Accessibility Standards: In addition to the Web Accessibility Standards (WAS), requirements and recommendations touch on documents, multimedia, and quality course-building that is inclusive of accessibility.

Electronic and Information Technologies (EIT): Information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. EIT includes, but is not limited to, information resources, such as the internet and intranet websites, content delivered in digital form, search engines and databases, learning management systems, classroom technologies, web, computer, and

mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

EIT Accessibility: is the practice of sustaining electronic and information technology environments that enable individuals to acquire information, engage in interactions, and enjoy services regardless of whether or not they have a disability. Examples include closed captions on videos, text descriptions for website images (alt text), and text-renderable (searchable) documents.

Equally Effective Alternate Access: The alternative format communicates the same information in as timely a fashion as does the original Web page. For interactive applications and hardware devices, “equally effective” means that the user action (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the user.

Exceptions: In certain cases, meeting the accessibility standards required by the SUNY guidelines may not be feasible due to an undue burden or doing so would result in a fundamental alteration. These assertions may only be made by the president or designee who has budgetary authority after considering all resources available for use, and must be accompanied by a written statement of the reasons why. These difficulties do not relieve University programs or services from meeting EIT accessibility obligations. Equally Effective Alternative Access must be provided upon request.

Library Accessibility Standards: Accessibility best practices and guidance as it pertains to critical library functions including services, collections, physical, and digital environments.

Procurement Accessibility Conformance Standards: Checklist for including accessibility as a requirement within the purchasing process for electronic information and technologies.

Web Accessibility Standards: Baseline requirements for compliance with the international web accessibility guidelines (Web Content Accessibility Guidelines-WCAG).

Why EIT Accessibility is Important

There have been numerous complaints, investigations, and litigations related to accessibility across college campuses nationwide over the last several years, in which EIT accessibility issues have come to light. In response to this and to SUNY specific complainant-initiated investigations by the Department of Education Office of Civil Rights (OCR), to comply with the Section 504 of the Rehabilitation Act of 1973 and with the Americans with Disabilities Act of 1990, and to become the most inclusive educational system in the nation, the SUNY EIT Accessibility Committee was initiated to address core EIT related areas and develop standards to be utilized SUNY-wide. Each campus within the SUNY system was then asked to develop an EIT Accessibility Plan and to follow the guidelines, requirements, and recommendations set forth by the SUNY EIT Accessibility Committee.

College Values

In addition to complying with SUNY policy, the meaning and intent behind the creation of the enclosed SUNY Broome EIT Accessibility Plan is to fully embrace the College values of: *inquiry, respect, integrity, trust, and equity* and to aid our College to more fully realize our mission.

College Mission

SUNY Broome Community College supports all members of the learning community by creating access to inclusive, diverse educational experiences. Success is achieved through the provision of innovative academics, transformative student support, and meaningful civic & community engagement.

College Strategic Plan

The EIT Accessibility Plan works to aid the college in fulfillment of its mission and strategic goals, as outlined within the Strategic Plan. The table below illustrates the alignment of the EIT Accessibility Plan with the Strategic Plan.

Strategic Plan Alignment with EIT Accessibility Plan	
SUNY Broome Strategic Plan	SUNY Broome EIT Accessibility Plan
Diversity & Inclusion	The purpose of the EIT Plan is to enhance the living/learning experience of students, staff, and faculty at the college by creating universally accessible experiences and environments. All aspects of campus life, and the learning/working environment are considered and addressed within the plan. The college is committed to embracing the diverse needs of its students, and the community, as reflected within its mission and outlined within the EIT plan.
Teaching & Learning	To ensure diverse student needs are met, courses should be designed with universal accessibility in mind. Standard 2 Digital Content Accessibility specifically addresses these needs.
Fiscal, Program Development, & Infrastructure Sustainability	To meet the needs of diverse students and promote an environment which supports wellness and long-term health, the EIT Plan provides for consideration of accessibility for its classroom and facilities planning. Standard 3 Classroom Accessibility , and Standard 5 Procurement Accessibility ,

	specifically addresses planning and procurement processes to ensure EIT purchases and the equipment, furniture, and spaces on campus are accessible and designed with universal access in mind.
Student Support & Success	To foster student growth, the EIT Plan incorporates accessible communication strategies and processes to ensure diverse student and employee needs are met. Standard 1 Web Accessibility specifically addresses these needs. To support student success, Standard 4 Libraries Accessibility specifically addresses accessibility of the materials, media, technology, equipment, and spaces students need to be successful within their studies.
Civic, Community Engagement & Service-Learning	The EIT Advisory Council works collaboratively with partners within the SUNY system to plan for accessibility to ensure students are prepared to be successful within their communities. The EIT Plan addresses the provision of accessible civic, community engagement, and service-learning experiences, to ensure experiences are accessible to all.
Strategic & Continuous Improvement	Best practices of student success as related to accessibility are researched and utilized to inform accessibility initiatives outlined in the EIT Accessibility Plan. Regular feedback from the campus community is sought to identify areas of need. Assessment of the plan utilizes data to provide evidence of plan achievements and to identify areas of improvement. The plan is regularly assessed at the end of each semester with action plan updates in order to work towards continuous improvement.

EIT Accessibility is a shared responsibility of all Trustees, administrators, faculty, and staff at SUNY Broome. As such, SUNY Broome has adopted an EIT Accessibility Plan to promote ongoing, inclusive access for individuals with disabilities.

The EIT Accessibility Plan and Action Plan

The EIT Accessibility Plan comprises 5 key areas (Standards) and 5 core elements. These standards will serve as a framework for EIT compliance and inclusion. They will be modified and updated over time in response to evolving technology and new requirements, user feedback, and the regular review of outcomes and effectiveness. The EIT Accessibility Officer will report to the Vice President of Academic Affairs on a regular basis the progress of the campus efforts and compliance with SUNY Policy. The Campus President will report annually to the Chancellor on the progress of these efforts.

The following Standards are those required by SUNY policy. Each of the Standards outlines core elements that must be addressed in enacting the requirements of the Standard. The SUNY EIT Accessibility Committee modeled them after federal law, international technical accessibility standards, and national best practices. The Standards allow our College to delineate a clear path toward meeting the “required” and “strongly recommended” items, as stated by SUNY. The Standards and core elements are addressed in detail throughout this document, within each Standard.

Accessibility Standards

1. **Web Accessibility**
2. **Digital Content Accessibility**
3. **Classroom Accessibility**
4. **Library Accessibility**
5. **Procurement Accessibility Conformance Standards**

To realize each standard, each Key area has five core elements, which have been adapted from the SUNY EIT Accessibility Committee template.

Core elements:

1. **Authority and Responsibility:** An assignment of roles, authority, responsibility, and accountability for achieving policy compliance.
2. **Awareness Raising/Training:** A campaign to communicate EIT accessibility across all campus divisions and departments, and a method for training campus personnel who develop, select, purchase, and maintain electronic and information technologies.
3. **Design:** A comprehensive approach to engrain accessibility into the creation of web and technology resources.
4. **Procurement:** A procedure to include accessibility as a requirement within purchasing processes, including centralized and decentralized purchasing activities.
5. **Monitoring Compliance:** A means for monitoring compliance with any standards listed in this document.

To assist in implementation of the EIT Accessibility Plan, and to have a reporting mechanism on progress, an EIT Accessibility Action Plan was developed, adapted from the SUNY template, to include the 5 Standards and 5 the core elements, including a rating of current progress, and a timeframe for which actions should be completed.

EIT Accessibility Action Plan Components:

For each Accessibility Standard, this Action Plan includes the following elements:

1. **Plan element:** The 5 core elements (Authority/Responsibility, Awareness Raising/Training, Design, Procurement, Monitoring Compliance).
2. **Actions:** The specific actions to be implemented within the “Plan element” area.
3. **Administrative oversight/Individual Responsibility:** Assignment of roles, authority, responsibility, and accountability for achieving policy compliance.
 - **Administrative oversight:** VP and direct supervisor of area is listed in the Authority & Responsibility row.
 - **Individual Responsibility:** Individuals who are responsible for the particular tasks listed would be included in the appropriate areas.
4. **Resources/Source for Resources:** Cost estimates, if applicable, including fiscal and human resources to implement the action.
5. **Outcome:** The outcome that will be achieved if the action is successfully implemented.
6. **Progress:** 1-5 should be selected based on the campus progress on the Action.
 - **No activity:** No activity has been taken yet=1
 - **Planning:** An approach to the action item is designed and/or preparation is underway=2
 - **Developing:** Substantive work is underway to complete the action item=3
 - **Operational:** There is a standard practice in place on campus. Procedures are consistent and formalized=4
 - **Accomplished/ongoing:** The campus has an established practice that is regularly reviewed to reflect the managed practice=5
7. **Status description:** A narrative regarding the status of the progress.
8. **Timeframe:** Projected time frame for completion of the action.

Assessment of the EIT Accessibility Plan

The EIT Accessibility Officer, in conjunction with the EIT Advisory Council, will regularly evaluate this plan, and make recommendations for policies and procedures, in response to changing requirements, evolving technology, feedback and review of outcomes, and effectiveness. This review will be conducted on at least an annual basis, but which will occur more frequently, as the need arises. The EIT Accessibility Plan serves as an accessibility action strategy and is expected to evolve and strengthen over time, to assist SUNY Broome to ensure equal and integrated access to its programs, services, and activities, particularly for individuals with disabilities, in alignment with the SUNY Broome mission.

As part of its ongoing efforts towards continuous improvement, end of the semester reports, as outlined in each of the Standards, will be provided to the EIT Accessibility Officer, who will share with the EIT Advisory Council and other campus stakeholders, as appropriate. These reports will allow the Council to gauge its efforts towards creating an inclusive, accessible campus at SUNY Broome.

References

1. The State University of New York (SUNY). (6/20/19). SUNY Electronic and Information Technology (EIT) Accessibility Policy. Document 6901
https://www.suny.edu/sunypp/documents.cfm?doc_id=883.
2. The State University of New York (SUNY). (May 2019). SUNY Electronic and Information Technology (EIT) Accessibility Committee Final Report and Recommendations. <https://www.suny.edu/sunypp/docs/884.pdf>.
3. The State University of New York (SUNY). (2020). SUNY Electronic and Information Technology <https://www.suny.edu/accessibility/eit/>.

Standard 1: Web Accessibility

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Authority and Responsibility

Web Accessibility Policy

An official SUNY Broome policy on web accessibility will be developed which will supersede the standards of this accessibility standard. The current goal is to have this policy developed and approved by February 2021. When this policy is approved, this document will be updated to reflect appropriate language and references.

Administrative Oversight

The Office of Marketing and Communications is responsible for ensuring the SUNY Broome website is accessible. The Vice President for Academic Affairs maintains oversight for this office, with direct oversight provided by the Director of Marketing and Communications and the Executive Enrollment Management Officer.

College Employees

All college employees share a responsibility in helping to keep the SUNY Broome website accessible. All college employees have access to and are encouraged to use the [Web Accessibility Reporting Form](#) if they find inaccessible content on the SUNY Broome website.

Content Creators

Any individuals who create text content, documents, files, or visual imagery that they intend to have published on the SUNY Broome website or shared on social media are responsible for making their content web accessible per SUNY Broome's accessibility standards.

Dean of Students

The Dean of Students at SUNY Broome is the ADA & Section 504 Compliance Officer and is responsible for handling accessibility exception requests. The Dean of Students may also be contacted when accessibility issues are not resolved within an appropriate time frame.

EIT Officer and Electronic Information Technology (EIT) Advisory Council

The EIT Officer is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy. The EIT Officer is responsible for ensuring the development of and continued review, revision, and effectiveness of the plan, based on changing requirements, evolving technology, feedback and review of outcomes. Under the appointment and direction of the EIT Officer, the EIT Advisory Council is responsible for reviewing, updating, and maintaining the accessibility standards for the College. The EIT Officer and Advisory Council will review current processes and policies on at least an annual basis, and in conjunction with reviewing student and employee accessibility needs and feedback, and changes in technology, will make recommendations to the appropriate offices and Vice Presidents who oversee those offices.

Office of Marketing and Communications (MarCom)

MarCom is responsible for maintaining SUNY Broome's website accessibility as well as fielding, documenting, and taking corrective action on all reported web accessibility concerns. Content produced by MarCom for the website, including but not limited to text, documents, layouts and imagery, will be created in accordance with SUNY Broome's accessibility standards.

MarCom will coordinate with the appropriate content stakeholder, creator, or web content editor to provide access to guidance on how they can make their content accessible if it is found to not be in accordance with SUNY Broome's accessibility standards, and may deny publishing inaccessible content on the SUNY Broome website until the content creator is able to provide an accessible version.

MarCom will provide training and guidance to web content editors on how best to maintain accessibility on web pages they have access to edit. MarCom will also create annual maintenance schedules with web content editors to review content for quality, accuracy, and accessibility.

Web Content Editors

Web content editors who create text content, documents, files, or visual imagery that they intend to have published on the website or shared on social media are responsible for making their content web accessible per SUNY Broome’s accessibility standards.

Web content editors must review [MarCom’s “Accessibility Practices for Web Content Editors”](#) guidelines before they’re granted access to edit, and must review these training guidelines annually as part of a mutually agreed upon [web maintenance schedule](#) with MarCom.

Web content editors are also responsible for supporting adherence to the College’s accessibility standards. If a web content editor has content intended to be published on the SUNY Broome website that they did not create, and that content is found to be inaccessible, the web content editor should request that the content creator adjusts their content to be accessible prior to it being published on the website.

Responsibility Table

Images	Required	Strongly Recommended	Responsibility	Currently Available
Provide meaningful alt text for all images, except cases described below:	x		Web Content Editor	Yes
Use null alt text for decorative images (alt="")	x		Web Content Editor	Yes
Images used as links (without accompanying text description) have alt text indicating link target	x		Web Content Editor	Yes
If the same visual presentation can be made using text alone, an image is not used to present that text		x	Web Content Editor	Yes
When a text link and image link with the same URL are grouped, use a single <a> element and a null alt tag for the image		x	Web Content Editor	Yes
Multimedia	Required	Strongly Recommended	Responsibility	Currently Available
Establish a timely process for requesting synchronized captions for multimedia	x		MarCom	No-In process
Provide synchronized captions for public-facing audio-video content	x		Content Creator	No-In process
Provide transcripts for audio-only content	x		Content Creator	No-In process
Provide descriptive audio for audio-video and video-only content, when needed	x		Content Creator	No-In process
Ensure audio and video does not begin playing on page load	x		Web Content Editor	Yes
Provide synchronized captions for live audio-video content		x	MarCom	No--In process

Color	Required	Strongly Recommended	Responsibility	Currently Available
Color is not the only means used to convey information	x		Web Content Editor	Yes
There is sufficient contrast between foreground and background text	x		Web Content Editor	Yes
There is sufficient contrast when color is used to convey information		x	Web Content Editor	Yes
Links	Required	Strongly Recommended	Responsibility	Currently Available
Link text describes the destination of the link	x		Web Content Editor	Yes
All links are distinguishable.	x		Web Content Editor	Yes
Structure	Required	Strongly Recommended	Responsibility	Currently Available
Heading structure is logical	x		Web Content Editor	Yes
Reading order is logical and intuitive	x		Web Content Editor	Yes
Information and relationships that are implied by visual or auditory formatting are conveyed in accessible ways.	x		Web Content Editor	Yes
Keyboard/Navigation	Required	Strongly Recommended	Responsibility	Currently Available
Provide a method to skip repetitive navigation	x		MarCom	Yes
All links are available using the keyboard	x		MarCom	Yes
There are no "keyboard traps"	x		MarCom	Yes
The tabbing order is logical	x		MarCom	Yes
Keyboard focus is visible	x		MarCom	Yes
Presentation, layout, and navigation are consistent for repeated content	x		MarCom	Yes
Heading structure includes an H1 tag and does not skip levels		x	Web Content Editor	Yes
The option to skip links is the first option when tabbing		x	MarCom	Yes
Labels/Titles	Required	Strongly Recommended	Responsibility	Currently Available
All form controls are properly labeled	x		MarCom / Web Content Editor	Yes

All tables are properly labeled	x		Web Content Editor	Yes
Frames and iFrames have appropriate titles	x		MarCom / Web Content Editor	Yes
Miscellaneous	Required	Strongly Recommended	Responsibility	Currently Available
If a page has a timing, the user is given options to turn off, adjust or extend the timing	x		MarCom	Yes
No content flashes more than 3 times per second	x		Web Content Editor / Content Creator	Yes
The page is readable and functional when text size is doubled	x		MarCom	Yes
The language of the page is identified using the HTML lang attribute	x		MarCom	Yes
Instructions do not rely solely on size, shape, color, or visual location	x		Web Content Editor	Yes
The page has a descriptive page title		x	Web Content Editor	Yes
Every page contains a link to an accessibility statement that provides contact information to get help if needed		x	MarCom	Yes
Multiple ways are available to find other web pages on the site		x	MarCom / Web Content Editor	Yes
When appropriate, the language of sections of content that are in different languages are identified, for example, by using the lang attribute		x	Web Content Editor	Yes

Awareness Raising & Training

SUNY Broome provides accessibility training and resources to build awareness of accessibility issues and how digital content and technologies can be made accessible to users with a variety of disabilities, including users with vision, motor, and auditory impairments. These training opportunities are communicated campus-wide through email and digital campus newsletters, and resources are made public on the SUNY Broome website. Accessibility-related seminar training is available multiple times per semester as well as in self-paced formats through BlackBoard.

Accessibility Practices for Web Contributors Guide

MarCom maintains an [“Accessibility Practices for Web Contributors” guide](#) published on their website. This guide is regularly updated with simple, practical tips that web content editors can follow and implement as they create or update their web content.

Web content editors are asked to review these practices on an annual basis in addition to when they are first granted access to edit SUNY Broome web pages.

Deque University

SUNY Broome Community College is participating in a one-year pilot through SUNY through February 2021, in which access to an educational platform, DeQue University, is available to all campus members, at no cost. It is designed to allow campus members to learn about accessibility at their own pace and to build accessibility expertise for all areas of the campus. This educational platform will provide varied training, including broad knowledge about disabilities and accessibility, as well as technical information related to specific areas of expertise, such as web, mobile app, and document accessibility and IAAP WAS Certification Preparation. Campus members will be requested to complete specific components of this educational platform, as assigned by their direct supervisor and as applicable to their role on campus. The entire platform is available for anyone registered to complete more than those required modules. Access to DeQue University will be provided by the Administrator at SUNY Broome, at the request of supervisors. The Administrator for SUNY Broome is the EIT Officer.

Related to Web Accessibility, modules about semantic structure and navigation, multimedia, custom widgets, and visual design are applicable content web content editors and multimedia content for web creators should complete.

Other Awareness Raising & Training Specific to Web Accessibility

See: [Monitoring Compliance > Annual Web Maintenance](#)

Design

The requirements outlined in this section apply to all web pages on SUNY Broome’s website, including new or updated web pages in the College’s WordPress installations, and new or updated content on web pages maintained or previously created on public Unified content management system pages (MyCollege pages).

Web pages on the College website that have been converted to WordPress web pages are designed to be accessible to users with disabilities. However, documents and content that are added by web content editors must be reviewed by the web content editor to ensure adherence to SUNY Broome’s accessibility standards.

Design Requirements

SUNY Broome web pages should be designed with consistent layouts and content structure. Main content and menus should be in the same location on all pages to create a consistent user experience across the SUNY Broome website.

Non-Academic Area Websites

SUNY Broome websites for non-academic offices, departments, initiatives and events should follow a consistent layout format in order to enforce the SUNY Broome brand and create a consistent user experience. When one of these websites is redesigned or modified, care should be taken to model it after the aesthetic of the majority of other SUNY Broome non-academic area websites that are already in existence.

Academic Division, Department and Program Websites

Academic division, department, and program websites each have a specific structure for what content should be present as well in a specific order. Each type of website (division, department, and program) should be consistent with each other in terms of structure, layout, banner sizes, navigation, and overall presentation/user experience. Desired changes to the current structure of any of these pages should first be brought to MarCom to be assessed for accessibility, then be agreed upon by the Academic Leadership Team, and communicated back to MarCom to be consistently changed across all websites of the same type.

Technical Requirements

As of July 1, 2017, all new and redeveloped web pages, web applications, and web content, created for the SUNY Broome website conforms to WCAG 2.0 AA standards. The following technical requirements are reflective of basic requirements and are not exhaustive of all WCAG 2.0 AA standards, and are provided to indicate SUNY Broome's strategy for adhering to these guidelines. As of summer 2020, the college is moving towards being in compliance with WCAG 2.1 AA standards.

Page/HTML Content

HTML is used to display information, presented as text. All new and modified Page/HTML content must be web accessible. 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 website style guide standards are available on the [MarCom website](#).

Images

Images on websites must provide meaningful alt text. If the image is purely decorative and does not contain information that is critical to the understanding of the content on the web page, use null alt text for decorative images (alt=""). If the same visual presentation can be made using text alone, an image should not be used to present that text. When a text link and image link with the same URL are grouped, use a single <a> element and a null alt tag for the image

Links

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." The verbiage/instruction "click here" should also be avoided as not all users navigate websites with a mouse. Link text should indicate the action that the user is being instructed to do, rather than the methodology by which they can access the content of the link. For example, "View the enrollment checklist" rather than "click here to see the enrollment checklist."

Documents

PDF and Microsoft Office files such as Word and Excel are acceptable formats for web content when they are 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 as HTML content is preferable for informational pages and instructions. PDF and Microsoft Office files are also acceptable formats for fill-in forms that require being printed or retained in such format for legal and/or security reasons.

See **Standard 2: Digital Content Accessibility** for more details regarding document accessibility.

Videos and Audio

All videos and audio files uploaded to, or embedded on, the College website must contain open or closed captioning, or a description and transcript must be provided, as necessary to meet the WCAG 2.1 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.

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 key on the keyboard to navigate the web page.

Accessibility Exceptions

In order for inaccessible content to remain live on the website after it has been deemed inaccessible, an accessibility exception must be requested and granted. To request an accessibility exception for web content, contact the Dean of Students.

All avenues for creating an accessible version of the content must be exhausted by the content creator, and the intent of the content must be found to not be critical to any educational, enrollment, registration, emergency communication, or administrative activity understanding before the exception is granted.

Tools used to assess and test accessibility

- Manual testing
- [SiteImprove](#)
- [WebAIM Contrast Checker](#)
- [WAVE Evaluation Tool Chrome extension](#)

Testing

SUNY Broome ensures its website is accessible by testing all major design or technical changes in a staging environment prior to deploying the changes on the live website. During this testing phase, the Office of Marketing and Communications checks to make sure the changes adhere to WCAG 2.1 AA standards using the tools and resources as outlined in this standard.

Social Media Accessibility Guidelines

When posting content on a social media platform via an account representing SUNY Broome, all available accessibility supported features of the social media platforms should be utilized if the deliverable content is related to education, event information, registration, enrollment, and/or administrative activity information. These guidelines are not applicable when reposting or sharing content that is published by students, employees, non-university organizations, or external sources that do not conduct core College-related activities.

It is the responsibility of the individual who originally creates the content intended to be posted, regardless of format (text, image, document, video, audio, etc), to ensure the content's accessibility as outlined in SUNY Broome's accessibility guidelines.

See SUNY Broome's [Social Media Guidelines](#) for guidelines on creating an account representing SUNY Broome on social media.

Alternative Text Descriptions for Images

Alternative text and/or image descriptions should be provided when social media platforms allow for it. Text descriptions of images will be read aloud to non-sighted or low-sighted users who rely on screen readers to consume social media content.

Captioning of Videos

Captions should be provided of any audio content for the benefit of those without hearing, who are hard-of-hearing, and who are non-native speakers. Captions can be either closed captions (where a user can turn them on and off) or open captions (where the text is embedded into the video and cannot be turned on or off). Check the social media platform's accessibility support features to determine which captioning type (closed or open) must be employed for captions to appear when a video plays.

Context for Animated GIFs

At this time, the animated GIF format has either very limited or no accessibility support on most social media platforms. This makes the animated GIF content difficult for individuals who rely on screen readers to perceive. Therefore, you should not rely solely on animated GIF content in a social media post to convey important information. When using animated GIFs, confirm that the post can be understood through its text content alone.

CamelCase Hashtags

When authoring hashtags that are made up of multiple words, use initial capitalization, also known as CamelCase. Utilizing this simple technique makes the hashtag easier to read for all users and is more consumable by screen readers since their synthesized voices can recognize and pronounce individual words, and won't concatenate and garble them. For example: #GoHornets instead of #gohornets.

Emojis and Emoticons

Emojis displayed on a screen will be described by a screen reader. The 🙌 emoji, for example, will be read aloud as "clapping hands." Please be considerate of screen reader users by using emojis judiciously and by placing spaces between them.

When creating emoticons with text, consider the experience for screen reader users. In this example, this visual experience of "shruggie" `¯_(\ツ)_/¯` will be read aloud by a screen reader as: "Macron, backslash, underline, katakana, underline, slash, macron."

Use both of these conventions sparingly.

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.

SUNY Broome will ensure an ongoing and secured funding source for SiteImprove through the Office of Marketing and Communications budget.

See **Standard 5: Procurement** for more details regarding procuring web-accessible technologies.

Monitoring Compliance

In order to ensure compliance with these guidelines, the Web Accessibility Standard will be published on the College website and informs users with disabilities how to report and request

access to content that is not accessible. See [“Reporting Accessibility Issues”](#) for details. These guidelines are effective upon publication.

While MarCom is the primary point of contact identified to receive accessibility inquiries, MarCom may forward inquiries or reports to the pertinent department or stakeholder for review and response if the content in-question was not created by MarCom. Receipt of and responses to inquiries regarding the accessibility of the College web content should be documented and maintained.

"Official" department, faculty, and student organization web pages residing on a College server or residing on a server/platform maintained/contracted on the College behalf and any other legacy web-based content on the College web properties will be reviewed for adherence to the College web accessibility requirements as part of MarCom's web maintenance schedule. Following the review, MarCom will notify stakeholders of inaccessible content and perform corrective actions, or work with the stakeholder to develop a corrective action plan for the content if it was not developed by MarCom. Inaccessible content must be remediated to be compliant with the College accessibility standards, or the inaccessible content/page will be subject to removal.

Notice is hereby given that any "unofficial" faculty and student organization web pages—those that do not reside on a College server or on a server/platform/website maintained/contracted on the College behalf with the College 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 programs, services, and activities and which are being enhanced for accessibility. Faculty are encouraged to utilize these resources for conducting College business.

Annual Web Maintenance

MarCom works with stakeholders for each portion of the website to arrange for an annual review of its content and accessibility. A member of MarCom scans the stakeholder's portion of the website for any accessibility issues, corrects them, and communicates corrections that were performed to the stakeholder. If there are accessibility issues with content on a website that has not been created by MarCom such as, but not limited to, videos or documents, MarCom will request that the stakeholder work with the creator of the content to develop an accessible version.

Automatic and Manual Accessibility Scans

Pages created on SUNY Broome's WordPress installations are automatically scanned by SiteImprove for accessibility errors. MarCom will monitor SiteImprove's accessibility reports and correct accessibility issues as they are detected in a timely manner.

The Online Web Accessibility Evaluation (WAVE) Tool can be used to check accessibility on SUNY Broome web pages. To run an accessibility check of a page through the WAVE tool, go to the [WEBAIM WAVE site](#), and enter the web page 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. Errors found through this tool that present an accessibility barrier may be reported using the [Web Accessibility Reporting Form](#) on MarCom's website.

Each semester, a report on SiteImprove's detection of accessibility issues and a summary of accessibility issues reported and their resolution will be submitted to the EIT Accessibility Officer, who will share with the EIT Advisory Council to review and make recommendations, as necessary.

Reporting Accessibility Issues

If any content on the SUNY Broome website has been found to be inaccessible, the following steps should be taken:

1. Report the issue using one of the following methods. Please include the URL of the page(s) where issue(s) are found, and what accessibility barriers were encountered.
 - a. Fill out the [Web Accessibility Reporting Form](#) available on the Office of Marketing and Communications website.
 - b. Email the Office of Marketing and Communications at marcom@sunybroome.edu.
 - c. Call the Office of Marketing and Communications at +1 (607) 778-5296
 - d. Call the Accessibility Resources Office at +1 (607) 778-5150 who will report the issue(s) to the Office Marketing and Communications.
2. A MarCom team member will address the issue in a timely manner and follow-up accordingly.

If the issue(s) is not resolved in an appropriate time frame, the Dean of Students should be contacted at +1 (607) 778-5681 or dos@sunybroome.edu.

Standard 2: Digital Content Accessibility

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Authority and Responsibility

Faculty Developers

The vast majority of the digital course content made available to students is the intellectual property of the faculty member who created the content. The Learning Management System utilized at SUNY Broome (currently Blackboard Learn) is, as a platform, accessible. It is the responsibility of faculty, however, to ensure that the materials they create in and upload to the platform meet accessibility standards.

Instructional Designers/Teaching Resource Center (TRC)

Faculty are ultimately responsible for ensuring that the digital content they provide to students meets accessibility standards. With that said, the Instructional Designers in the Teaching Resource Center (TRC) are available to:

- Provide guidance in the utilization of the Open SUNY Course Quality Review (OSCQR) standards for course design and development. The OSCQR standards focus on best practices and accessibility of digital content.
- Deliver basic training in digital content accessibility and use of the Blackboard Ally GUI within Blackboard course sections. Blackboard Ally is the accessibility tool that we have integrated into our LMS which can not only be used by instructors to make their content more accessible to students through a feedback dashboard, it will automatically make alternative formats of existing files in the course available for students. Use of the dashboard tool within Blackboard courses is currently optional and at the discretion of the individual instructor for individual course sections.
- Assist faculty in learning how to make their content more accessible by working with them one-on-one.
- Provide resources and how-to documentation regarding digital content accessibility via the Online@SUNYBroome website (<http://www3.sunybroome.edu/online/faculty-online/>).
- Conduct periodic reviews of courses for usability and accessibility (upon faculty request).
- Populate Blackboard course shells with the newly adopted SUNY Broome template to facilitate a consistent and accessible structure for new courses developed in the Learning Management System.

Administrative Oversight

The Dean of Institutional Effectiveness and Enrollment Planning provides oversight for the TRC with direct oversight of the Instructional Designers provided by the Assistant Dean of Institutional Effectiveness.

EIT Officer and Electronic Information Technology (EIT) Advisory Council

The EIT Officer is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy. The EIT Officer is responsible for ensuring the development of and continued review, revision, and effectiveness of the plan, based on changing requirements, evolving technology, feedback and review of outcomes. Under the appointment and direction of the EIT Officer, the EIT Advisory Council is responsible for reviewing, updating, and maintaining the accessibility standards for the College. The EIT Officer and Advisory Council will review current processes and policies on at least an annual basis, and in conjunction with reviewing student and employee accessibility needs and feedback, and changes in technology, will make recommendations to the appropriate offices and Vice Presidents who oversee those offices.

Dean of Students

The Dean of Students at SUNY Broome is the ADA & Section 504 Compliance Officer and is responsible for handling accessibility exception requests. The Dean of Students may also be contacted when accessibility issues are not resolved within an appropriate time frame.

Accessibility Resource Office (ARO)

In addition to the support provided by the Instructional Designers, assistance in creating and checking the accessibility of digital content is available to faculty through the Accessibility Resources Office.

The Accessibility Resources Office coordinates ADA/Section 504 access for students and collaborates with faculty to eliminate barriers to access. Accessibility issues not resolved through ARO are addressed by the Dean of Students as the ADA/Section 504 Compliance officer.

Responsibility Table for Digital Content Accessibility Standards (DCAS)

Text Alternatives	Required	Strongly Recommended	Responsibility	Currently Available
A text equivalent for every non-text element is provided ("alt" tags/text, captions, transcripts, etc.).	x		Faculty Developer	Yes
Link text describes the destination of the link (No "click here" or "learn more")	x		Faculty Developer	Yes
All links are distinguishable (must be able to differentiate links from non-link text)	x		Faculty Developer	Yes
Graphs, charts and maps include contextual or supporting details in text surrounding the image		x	Faculty Developer	Yes

Color	Required	Strongly Recommended	Responsibility	Currently available
Color is not the only means used to convey information	x		Faculty Developer	Yes
There is sufficient contrast between foreground color and background color	x		Faculty Developer	Yes
Typograph	Required	Strongly Recommended	Responsibility	Currently available
Use readable fonts and sizes, color contrast, and keep number of fonts used to a minimum	x		Faculty Developer	Yes
Data Tables	Required	Strongly Recommended	Responsibility	Currently available
Table header rows and columns are assigned	x		Faculty Developer	Yes
When possible, information is displayed in a linear format not as a table		x	Faculty Developer	Yes
Avoid split cells, empty cells, merged cells, and embedded tables		x	Faculty Developer	Yes
Images	Required	Strongly Recommended	Responsibility	Currently available
Provide meaningful alt text for all images, except as described below:	x		Faculty Developer	Yes
Use null alt text for decorative images (alt= "")	x		Faculty Developer	Yes
Images used as links (without accompanying text description) have alt text indicating link target	x		Faculty Developer	Yes
If the same visual presentation can be made using text alone, an image is not used to present that text.		x		Yes
Formulas	Required	Strongly Recommended	Responsibility	Currently available
For web pages, use an equation editor that outputs MathML. (e.g., MathType)	x		Faculty Developer	Yes
For documents and presentations, use an equation editor that supports accessibility (e.g., MathType)	x		Faculty Developer	Yes
Structure and Navigation	Required	Strongly Recommended	Responsibility	Currently available
Fillable documents (forms) are labeled appropriately	x		Faculty Developer	Yes
Machine readable (ensure doc is not an image and text is renderable)	x		Faculty Developer	Yes
Keyboard navigable	x		Faculty Developer	Yes

Reading order is logical and intuitive (Verify reading order using tab key)	x		Faculty Developer	Yes
The document contains a descriptive page title that makes sense	x		Faculty Developer	Yes
Use source (original) document when possible - apply accessibility features within source document		x	Faculty Developer	Yes
Heading structure includes an H1 tag and does not skip levels (is sequential)		x	Faculty Developer	Yes
Use the built-in features, styles, and templates (including predefined slides) of software to align spacing and designate lists		x	Faculty Developer	Yes
Use different titles for each presentation slide		x	Faculty Developer	Yes
Multimedia	Required	Strongly Recommended	Responsibility	Currently available
Establish a timely process for requesting synchronized captions for multimedia	x		Faculty Developer	Yes
Provide synchronized captions for newly created or adopted audio-video content	x		Faculty Developer	Yes
Provide transcripts for audio-only content	x		Faculty Developer	Yes
Provide descriptive audio for audio-video and video-only content, when needed	x		Faculty Developer	No
Ensure video player controls are available and accessible via keyboard	x		Faculty Developer	Yes
Ensure audio and video does not begin playing on page load	x		Faculty Developer	Yes
Provide synchronized captions for live audio-video content		x	Faculty Developer	When needed
Accessibility Awareness & Verification	Required	Strongly Recommended	Responsibility	Currently available
Course syllabi contain an accessibility statement to inform students of available campus resources	x		Faculty Developer	Yes
Use built-in accessibility checkers in various software tools (e.g., Microsoft Office, Adobe Acrobat)		x	Faculty Developer	Yes
Newly developed courses undergo accessibility review		x	Faculty Developer	Yes
Recurring existing courses undergo accessibility review		x	Faculty Developer	Yes

Awareness Raising and Training

SUNY Broome provides accessibility training and resources to build awareness of accessibility issues and how digital content and technologies can be made accessible to users with a variety of disabilities, including users with vision, motor, and auditory impairments. These training opportunities are communicated campus-wide through email and digital campus newsletters, and resources are made public on the SUNY Broome website. Accessibility-related seminar training is available multiple times per semester as well as in self-paced formats through Blackboard.

Training in the accessibility of digital content is provided to faculty by the Instructional Designers in the TRC. Training is provided both in a face-to-face and online format. Additional documentation and resources for faculty are also available on the Online@SUNYBroome Faculty Resource Area at <http://www3.sunybroome.edu/online/faculty-online/>.

SUNY Broome Community College is participating in a one-year pilot through SUNY, through February 2021, in which access to an educational platform, DeQue University, is available to all campus members, at no cost. It is designed to allow campus members to learn about accessibility at their own pace and to build accessibility expertise for all areas of the campus. This educational platform will provide varied training, including broad knowledge about disabilities and accessibility, as well as technical information related to specific areas of expertise, such as web, mobile app, and document accessibility and IAAP WAS Certification Preparation. Campus members will be requested to complete specific components of this educational platform, as assigned by their direct supervisor and as applicable to their role on campus. The entire platform is available for anyone registered to complete more than those required modules. Access to DeQue University will be provided by the Administrator at SUNY Broome, at the request of supervisors. The Administrator for SUNY Broome is the EIT Officer.

Modules specific to Document Accessibility are available for those who work within Instructional Design and for faculty and staff who create content.

Design

Beginning with Accessible Design

Courses that begin with the SUNY Broome Template will start with a consistent and accessible structure from which faculty developers can add content. In addition, Faculty should adhere to the standards of the Open SUNY Course Quality Review (OSCQR) rubric while designing and developing their content and courses in the Learning Management System and work with an Instructional Designer during the course design and development process. The OSCQR standards focus on best practices and accessibility of digital content and the Instructional Designers can provide guidance to faculty in making their content accessible.

Design Requirements

At a minimum, digital content within online courses should meet the following accessibility standards:

Course Layout

- A logical, consistent, and uncluttered layout is established for the course. This includes a logical order for the Course Menu.
- The course is easy to navigate (consistent color scheme and icon layout, related content organized together, self-evident titles).
- The course can be navigated easily with the keyboard alone.
- Course content can be printed in addition to reading on the computer screen.
- The course does not contain pdf images of text-based documents. All pdf documents must be readable by a screen reader. You should be able to highlight individual text in the document, not only entire blocks. This is what is meant by a document being "OCRRed."

Syllabus and Course Information

- Syllabi contain an accessibility statement.
- Students are provided with information or links to relevant campus policies regarding disability accommodation.
- Contact information for the Accessibility Resources Office is provided.
- Course information area contains a clear outline for course content and expectations.

Text

- Built-in Heading levels are used for formatting text on pages.
- Simple, sans-serif fonts are used with a size of at least 12 pts.
- No blinking or animated text is present.
- Text color is used sparingly.
- Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.
- Sufficient contrast exists between the text and background.

Links

- Links make sense out of context. Phrases such as "click here," "more," "click for details," and so on are ambiguous when read out of context.
- Link text is kept to a minimum. The point is to make sense without being redundant or overwhelming.
- Link text is meaningful and avoids using URLs with combinations of numbers, letters, ampersands, dashes, underscores, and other characters.
- Links use the underlining convention. Removing the underline from the link text is usually a bad idea. Users are accustomed to seeing links underlined.

Tables

- Simple tables are used, without merged or split cells.
- Tables have defined header rows.
- Tables contain alternative text.
- Tables do not contain blank rows or columns

Images

- Alternative text is added to images, clipart, tables, shapes, and other objects so people who use assistive technology understand the image content.
- Images with specific functions (buttons, thumbnails etc.), contain alternative text that describes what the button will do when selected, such as Search, Submit, Place your order, etc.
- Decorative images are marked as such or contain a blank space (" ") as the alt text to tell the screen reader to skip the image.

Formulas

- Documents use an equation editor that outputs MathML to allow utilization of adaptive technology.
- Equation editors to convert documents from various input formats to an accessible output is used.
- For equations or notations that cannot be made accessible, alt-text is utilized to create meaningful descriptions of the equation.
- For documents and presentations, an equation editor that supports accessibility is used.

Audio and Video

- All videos in the course are captioned.
- Audio files contain associated transcripts.
- Audio descriptions are used for necessary elements in video files that an individual with a visual disability would not be able to see.

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. Software and tools that integrate within the LMS need to be verified for accessibility. Examples include third party publishers' websites, remote proctoring solutions, video recording and storage, and synchronous communication tools.

SUNY Broome will ensure an ongoing and secured funding source for Blackboard Ally or another comparable accessibility checker within the LMS the College is utilizing, through the Information Technology Services budget. In addition, funding would need to be secured for captioning of both recorded audio and video content and live captioning (when accommodation

is requested by the student.) Short term funding source was secured through ARO to accommodate live captioning for students moved to remote instruction due to the pandemic. Long term, budget allocation will need to be reviewed to determine a sustainable ongoing funding source.

Any documents, web-based information and applications development, or programming delivered, pursuant to the contract or procurement must comply with SUNY Broome's Web Accessibility Policy, as that policy may be amended, modified, or superseded, which requires that the College 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 SUNY Broome'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. These requirements will be communicated to individuals responsible for purchasing and procurement.

Specific guidelines and procedures for procurement at the College are detailed in the Procurement Accessibility Standard.

Monitoring Compliance

Blackboard Ally

Blackboard Ally is a tool that integrates into our Blackboard Learn courses to assist faculty in making their courses more accessible to all learners. It also provides reports for monitoring compliance at the course and system levels.

Course Level Ally

There are three main components of Blackboard Ally at the course level.

1. **Accessibility Score:** Ally currently checks content that has been uploaded to courses and assigns each file an Accessibility Score based on WCAG (Web Content Accessibility Guidelines) 2.1 AA standards. The individual scores of each content item are compiled and included in an overall Course Accessibility Report which is available to the faculty member.
2. **Accessibility Feedback Panel:** Ally provides an instructor access to the Accessibility Feedback Panel which will list the issues that are affecting the accessibility score. The feedback panel is designed to teach instructors about the key components of accessibility to help improve their current and future documents posted to Blackboard. Ally automatically brings up the most significant issue impacting the score first, but gives

the option to list all issues it found in the file.

3. **Alternative Formats:** Students that enter the online classroom have a diverse set of needs and offering them the greatest selection of options will allow them to better engage with the course. Ally will automatically take uploaded content and present it in alternative formats to make it more accessible for everyone, not just those with a disability. Alternative Formats provided include: HTML, ePub, Electronic Braille, Audio, and BeeLine Reader.

The Blackboard Ally GUI has been enabled in all Blackboard course shells in the LMS starting Summer 2020, so that it can be used by faculty to determine the level of compliance for their own courses and make adjustments to content to improve the accessibility score of each document they upload to the LMS. Students also have access to the alternative formats generated by Ally in addition to the original file type uploaded by the faculty member.

System Level Ally

At the system level, Ally provides the system admin with an overall compliance score for all content uploaded to Blackboard. Since the score includes all content in the Blackboard Learning Management System, including content that is not utilized in active courses or accessed by students, it is meant to be used as a benchmark for evaluating trends and assessing overall progress. This overall compliance score for the institution will be assessed and provided to the EIT Accessibility Officer at the end of each semester.

Other Accessibility Verification Tools

In addition to Ally, faculty also have access to the accessibility verification tools that are included in the Microsoft Office and Adobe Suites to create accessible digital content and verify compliance. Checklists for faculty to verify digital content and online course compliance can be found on the Online@SUNYBroome website:

- [Accessibility Checklist for Online Courses](#)
- [Microsoft Word Best Practices for Accessibility](#)
- [Accessibility Checklist for Microsoft Word Documents](#)
- [Microsoft PowerPoint Best Practices for Accessibility](#)
- [Accessibility Checklist for Microsoft PowerPoint Presentations](#)

Reporting Accessibility Issues

If students are experiencing issues related to accessibility within their courses and/or related to digital content, faculty or students may contact the Accessibility Resource Office at +1 (607) 778-5150 to discuss accommodations and accessibility needs, or to report a complaint related to inaccessibility.

If the issue(s) is not resolved in an appropriate time frame, the Dean of Students should be contacted at +1 (607) 778-5681 or dos@sunybroome.edu.

Standard 3: Classroom Accessibility

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Authority and Responsibility

College Employees

All college employees share a responsibility in helping to keep the SUNY Broome classrooms accessible. Employees who utilize lecture halls, classrooms, assembly areas, etc., for teaching, presenting, or meeting with students should be knowledgeable of the federal, state, and local laws regarding classroom accessibility.

Facilities

The Vice President for Administrative and Financial Affairs oversees Facilities, with direct oversight provided by the Director of Facilities Management. The Director of Facilities Management reviews all construction and renovation projects on campus. The review process consists of a design professional ensuring that all ADA requirements are met. This person would be responsible for also sharing SUNY EIT accessibility standards with third party vendors. The Director of Facilities oversees Campus Projects Advisory Committee (CPAC). This group manages and coordinates campus facility projects.

Environmental Health and Safety

The Vice President for Student Development and Chief Diversity Officer oversees Health and Safety, with immediate, direct oversight provided by the Director of Health and Safety. The Environmental Health and Safety Coordinator develops and reviews activities, programs and policies to ensure compliance with all federal, state and internal health and safety rules and regulations.

Information Technology Services

The Vice President for Academic Affairs oversees Information Technology Services, with direct oversight provided by the Director of Information Technology Services. An Assistant Director for Technology Services provides oversight for all classroom technology.

Accessibility Resource Office

The Vice President for Academic Affairs maintains oversight for the Accessibility Resource Office (ARO), with direct oversight provided by the Director of Learning Resource Center/Learning Assistance Department. ARO manages assistive listening systems on campus. ARO discusses and makes arrangements for accommodations with and for students and provides guidance to faculty related to accommodations and accessibility in the classroom. ARO also handles student and staff complaints related to accessibility issues.

Library and Learning Assistance Departments

The Vice President for Academic Affairs maintains oversight for the Library and Learning Assistance Department, with direct oversight provided by the Director of Learning Resource Center/Learning Assistance Department. The Library is responsible for ensuring accessibility of the SUNY Broome Library website, all library materials, including print, digital, and electronic materials, databases, and library/learning assistance department classrooms. See Standard 4: Library Accessibility for complete details.

Student Village

The Vice President for Student Development & Chief Diversity Officer maintains oversight for the Student Village, with direct oversight provided by the Director of Housing. The Student

Village staff is responsible for maintaining an accessible classroom/programmatic space. The Student village staff should work closely with facilities, ARO, and ITS to ensure all standards are being addressed. As of now, the student village classroom has 70 chairs stacked and available, but only use 25-30 at a given time. Both the classroom space, and 3rd floor computer lab are wheelchair accessible. Signage and assistive listening systems can be addressed through working with facilities and ITS. Braille is on the sign outside of the classroom.

Multicultural Student Center

The Vice President for Student Development & Chief Diversity Officer maintains oversight for the Multicultural Student Center, with direct oversight provided by the Dean of Students. For this physical space, they should work closely with facilities, ARO, and ITS to ensure all standards are being addressed. The space is wheelchair accessible.

EIT Officer and Electronic Information Technology (EIT) Advisory Council

The EIT Officer is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy. The EIT Officer is responsible for ensuring the development of and continued review, revision, and effectiveness of the plan, based on changing requirements, evolving technology, feedback and review of outcomes. Under the appointment and direction of the EIT Officer, the EIT Advisory Council is responsible for reviewing, updating, and maintaining the accessibility standards for the College. The EIT Officer and Advisory Council will review current processes and policies on at least an annual basis, and in conjunction with reviewing student and employee accessibility needs and feedback, and changes in technology, will make recommendations to the appropriate offices and Vice Presidents who oversee those offices.

Responsibility Table

Assistive Listening Systems Availability*	Required	Strongly Recommended	Responsibility	Currently Available	Reference
For spaces less than or equal to 50 seats = 2 receivers	x		ARO	Yes	Section 219 of the 2010 ADA Standard
51 - 200 seats = 2 receivers plus 1 receiver per every 25 seats over 50	x		ARO	TH101, TH102, AT200, BB110	Section 219 of the 2010 ADA Standard
201 - 500 seats = 2 receivers plus 1 receiver per every 25 seats over 50	x		ARO	N/A	Section 219 of the 2010 ADA Standard
501 - 1000 seats = 20 receivers plus 1 per every 33 seats over 500	x		ARO	N/A	Section 219 of the 2010 ADA Standard

1001 - 2000 seats = 35 receivers plus 1 per every 50 seats over 1000	x		ARO	N/A	Section 219 of the 2010 ADA Standard
2001 and over = 55 receivers plus 1 per every 100 seats over 2000 seats	x		ARO	N/A	Section 219 of the 2010 ADA Standard
Assisted Listening Systems shall be capable of providing audio at a sound pressure range between 110dB to 118dB, with a volume sweep of 50dB	x		ARO	Yes - This is standard performance of modern headsets	Section 706 of the 2010 ADA Standard
Hearing Loop installation		x	N/A	No - Loop technology is only required for larger venues than even our largest learning space	NYC Hearing Loop Mandate
Summed audio output available in room AV system		x	ITS	Yes - This is our standard classroom build to sum all audio	
Classroom Controls – Color Blindness	Required	Strongly Recommended	Responsibility	Currently Available	Reference
Color choices on control systems should reflect universal design for common color blindness accommodation (Top choices would be black, yellow/orange, blue)		x	ITS	Yes	http://jfly.iam.u-tokyo.ac.jp/color/#pallet
Emergency Notifications in Classrooms should reflect universal design for common color blindness accommodation (Top choices would be black, yellow/orange, blue)		x	Public Safety	Yes	http://jfly.iam.u-tokyo.ac.jp/color/#pallet

*Assisted Listening Systems come in many shapes and delivery methods. Wi-Fi, FM, RF, and Bluetooth systems can be leveraged in order to keep costs low. Systems specific to individuals can be used in lieu of installed systems, and still meet the regulations.

Non-EIT Appendix: Classrooms

Classroom Seating and Access	Required	Strongly Recommended	Responsibility	Currently Available	Reference
Classrooms with 4 - 25 seats, 1 wheelchair space required	x		Public Safety	Yes	Section 221 of the 2010 ADA Standard

Classrooms with 26 - 50 seats, 2 wheelchair spaces required	x		Public Safety	Yes	Section 221 of the 2010 ADA Standard
Classrooms with 51 - 150 seats, 4 wheelchair spaces required	x		Public Safety	Yes	Section 221 of the 2010 ADA Standard
Classrooms with 151 - 300 seats, 5 wheelchair spaces required	x		Public Safety	N/A	Section 221 of the 2010 ADA Standard
Classrooms with 301 - 500 seats, 6 wheelchair spaces required	x		Public Safety	N/A	Section 221 of the 2010 ADA Standard
Classrooms with 501 - 5000 seats, 6 wheelchair spaces plus 1 for each 150 above 501.	x		Public Safety	N/A	Section 221 of the 2010 ADA Standard
Classrooms with 5001 and over, 36 wheelchair spaces plus 1 for each 200 over 500.	x		Public Safety	N/A	Section 221 of the 2010 ADA Standard
A single wheelchair space is defined as 36" x 48", making provisions for space entry, turnaround, and knee/toe clearance	x		Public Safety	Yes	Section 221 of the 2010 ADA Standard
Wheelchair spaces shall have similar lines of sight to instructor as other student stations	x		Public Safety	Yes	Section 221 of the 2010 ADA Standard
Accessible pathways in to and out of classrooms shall be 36" wide, with no less than 32" of passing clearance based on wall features	x		Public Safety	Yes	Section 403 of the 2010 ADA Standard
Doors and doorways to Classrooms shall conform to section 403 standards based on how the classroom is set up (entry & exit points, hallways, door opening direction, double doors, etc.)	x		Public Safety	Yes	Section 403 of the 2010 ADA Standard
Wheelchair turnaround space shall be accommodated based on space needs of wheelchair spaces, including instructor area. Various provisions exist based on room layouts.	x		Public Safety	Yes	Section 304 of the 2010 ADA Standard
Bariatric seating options should be made available wherever possible		x	Public Safety	No	No-In process
Signage	Required	Strongly Recommended	Responsibility	Currently available	Reference
Accessible Room features like Assisted Listening Systems shall include appropriate signage indicating their availability and information on how to obtain them (or responsible office contact information). Signage shall be conspicuously placed.	x		Public Safety	Portable devices used; no Assisted Listening Systems in place.	Section 216 of the 2010 ADA Standard

Doors at exit passages shall include tactile signage at 48" above finished floor	x		Public Safety	Yes	Section 216 of the 2010 ADA Standard
Wheelchair accessible student stations are to be identified by common symbol	x		Public Safety	Space available/signs to be consistently marked	Section 216 of the 2010 ADA Standard

Awareness Raising and Training

SUNY Broome provides accessibility training and resources to build awareness of accessibility issues and how digital content and technologies can be made accessible to users with a variety of disabilities, including users with vision, motor, and auditory impairments. These training opportunities are communicated campus-wide through email and digital campus newsletters, and resources are made public on the SUNY Broome website. Accessibility-related seminar training is available multiple times per semester as well as in self-paced formats through BlackBoard.

SUNY Broome Community College is participating in a one-year pilot through SUNY, through February 2021, in which access to an educational platform, DeQue University, is available to all campus members, at no cost. It is designed to allow campus members to learn about accessibility at their own pace and to build accessibility expertise for all areas of the campus. This educational platform will provide varied training, including broad knowledge about disabilities and accessibility, as well as technical information related to specific areas of expertise, such as web, mobile app, and document accessibility and IAAP WAS Certification Preparation. Campus members will be requested to complete specific components of this educational platform, as assigned by their direct supervisor and as applicable to their role on campus. The entire platform is available for anyone registered to complete more than those required modules. Access to DeQue University will be provided by the Administrator at SUNY Broome, at the request of supervisors. The Administrator for SUNY Broome is the EIT Officer.

Depending on the role of persons involved in classroom accessibility, modules including Customer Service for People with Disabilities, which includes effective communication skills, Accessibility Fundamentals-Disabilities, Guidelines, and Laws, and technical modules related to accessibility are available for campus employees in the roles listed in the Authority/Responsibility section.

Design

The guidelines, recommendations, and standards outlined in this document apply to each of our general purpose classrooms. A number of other spaces exist on campus in which learning occurs. Accessibility standards for these classrooms also apply. Spaces include, but are not limited to: the Learning Assistance Department classrooms (e.g. Tutoring, Math Lab, Writing Lab), the Library classroom, the Student Village classroom, and the Multicultural Center

classroom. The College is committed to ensuring an accessible learning and living environment for our students and staff.

Accessibility standards for all new classroom builds will consider both federal and state guidelines during the design process. ADA considerations are included during the design phase of all new construction as a part of the building and room design. For older construction classroom renovations, the campus will design and fund the project in order to meet these guidelines, recommendations, and standards.

Tools and Resources Used to Assess Accessibility:

Section 219, 221, 308, 306, 403, 706, 802 of the 2010 ADA Standard:

<https://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm#pgfld-1010597>

Please see the Classroom Accessibility Responsibility Table for guidance.

Procurement

The 2010 ADA Standards for State and Local Government facilities (hereafter, “the 2010 ADA Standards”) provides the backbone for our accommodation requirements in State University of New York classrooms. Per the compliance information in the 2010 ADA Standards, should construction begin after March 15, 2012 (IE, new construction), the 2010 ADA standards should be followed. Buildings with no renovations post March 15, 2012 can follow the 1991 standards OR the 2010 standards; both of which make similar provisions.

For additional information, please review the following reference: [2010 ADA Standards for Accessible Design](#) may be reviewed at this website. To add, a comprehensive comparison of the standards may be found at [Comparison of the 2010 and 1991 ADA Standards for Accessible Design](#) (PDF).

Accessibility requirements will be incorporated into all purchasing and procurement policies and processes for the procurement of all physical attributes of campus and facility buildings or areas that must meet ADA Standards. These requirements will be communicated to individuals responsible for purchasing and procurement.

Specific guidelines and procedures for EIT related procurement at the College is detailed in the Procurement Standard document.

Monitoring Compliance

CPAC, Facilities, and EH&S will continually review all campus projects for compliance with ADA and other accessibility requirements. CPAC meets monthly or as needed. Building and design plans are reviewed as they are submitted. The review process may take more than one meeting to complete as multiple regulatory agencies may need additional time to evaluate

plans. Starting February 2021, a member of the EIT Advisory Council will serve on CPAC to aid in ensuring facilities planning incorporates accessibility within the planning process.

On an ongoing basis, as needs arise, the Accessibility Resource Office will review student accommodation needs and assist students who are eligible for reasonable accommodations. ARO will collaborate with all applicable areas to ensure accommodations are appropriately provided.

On at least an annual basis, ITS, Facilities, and the ARO will review each classroom for compliance and accessibility utilizing a spreadsheet developed to track compliance within each classroom across campus. The completed inventory will be submitted to the EIT Accessibility Officer, who will review and share with the EIT Advisory Council and other stakeholders, as appropriate.

Reporting Accessibility Issues

If students or faculty/staff are experiencing issues related to accessibility within the classroom, they may contact the Accessibility Resource Office at +1 (607) 778-5150 to discuss accommodations and accessibility needs, or to report a complaint related to inaccessibility.

Environmental, health & safety concerns, and those related to facilities/classroom spaces, may also be addressed to the Environmental, Health & Safety Coordinator, at:
vanhoutenhh@sunybroome.edu

If the issue(s) is not resolved in an appropriate time frame, the Dean of Students should be contacted at +1 (607) 778-5681 or dos@sunybroome.edu.

Standard 4: Library Accessibility

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Authority and Responsibility

Administrative Oversight

The Library is responsible for ensuring accessibility of the SUNY Broome Library website, all library materials, including print, digital, and electronic materials, databases, and classrooms within the library and the Learning Assistance Department classrooms. The Vice President for Academic Affairs maintains oversight for the Library and Learning Assistance Department, including Tutoring, the Math Lab, the Writing Center, and the Testing Centers with direct oversight provided by the Director of Learning Resource Center/Learning Assistance Department. Learning classrooms exist within the Library and within the LAD areas.

Library Content Creators

Any individuals who create text content, documents, files, or visual imagery that they intend to share in print or electronic formats are responsible for making their content accessible per SUNY Broome's accessibility standards. The Library shall ensure that documents and forms digitized or hosted by the library are accessible, or can be made accessible upon request.

The Library's Systems Librarian is responsible for maintaining the Library's website accessibility as well as fielding, documenting, and taking corrective action on all reported web accessibility concerns. The Systems Librarian will provide guidance to library content creators on how best to maintain accessibility on web pages they have access to edit, as well as creating a library accessibility web page.

The Library's Electronic Resources Librarian is responsible for ensuring that all electronic resources procured by the Library meet the digital accessibility compliance as described in Standards 2 and 5.

The Access Services Librarian is responsible for ensuring that physical access to Library resources is accessibility compliant and to follow good practices when converting print formats to accessible digital content. The Access Services Librarian is also responsible for providing accommodations for the physical collections.

The Access Services Librarian and Electronic Resources Librarian works closely with the ARO office in providing students alternate textbooks which meet the digital content standards described in Standard 2. The ARO office provides guidance to the library in the procurement of Assistive Technologies that support student success. The Library provides students access to these technologies and specialized equipment through the circulation and tracking of these technologies via the Library's Library Services Platform.

EIT Officer and Electronic Information Technology (EIT) Advisory Council

The EIT Officer is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy. The EIT Officer is responsible for ensuring the development of and continued review, revision, and effectiveness of the plan, based on changing requirements, evolving technology, feedback and review of outcomes. Under the appointment and direction of the EIT Officer, the EIT Advisory Council is responsible for reviewing, updating, and maintaining the accessibility standards for the College. The EIT Officer and Advisory Council will review current processes and policies on at least an annual basis, and in conjunction with reviewing student and employee accessibility needs and feedback, and changes in technology, will make recommendations to the appropriate offices and Vice Presidents who oversee those offices.

Responsibility Table

Library Services	Required	Strongly Recommended	Responsibility	Currently available
Establish policies and procedures for making library materials accessible in a variety of formats (e.g., requests for accommodation, alternative format, OCR scans)	x		ARO / Electronic Resources / Systems Librarian / Access Services	In Process
Designate a liaison or contact within the library to provide EIT-related support	x		ARO/Library	Yes
Provide instructions, documentation, and handouts available in an accessible digital format upon request		x	Content Creators	In Process
Provide access, resource, and service information on a library accessibility webpage (see the Non-EIT Appendix for additional web page recommendations)		x	Systems Librarian / Electronic Resources Librarian	Yes
Provide training to library staff on available assistive technology and EIT best practices		x	ARO / Library	In Process
Provide assistive technologies and equipment in computer labs, particularly in specialized spaces such as makerspaces		x	ARO / Library	Yes
Digitizing Content	Required	Strongly Recommended	Responsibility	Currently available
Ensure documents and forms digitized or hosted by the library are accessible, or can be made accessible upon request	x		ARO / Electronic Resources / Systems Librarian	Yes
Perform high quality source document scans	x		ARO / Access Services Librarian / Electronic Resources Lib.	Yes
When scans for instructional and research materials are requested (e.g., course reserves, ILL), conduct basic OCR scans (text-renderable). Purchasing a new digital document, physical book, or processing by an	x		ARO / Access Services Librarian / Electronic	Yes

external vendor may be required to achieve basic accessibility.			Resources Librarian	
Identify and purchase materials that are captioned, or allow and promote the use of interlibrary loan to request captioned titles if your library owns the (uncaptioned) item	x		Access Services / Electronic Resources	Yes
Include transcripts for any media recordings	x		Content Creators	No-In process

Non EIT Appendix: Libraries

Webpage for Library Accessibility (Includes the Following Information)	Required	Strongly Recommended	Responsibility	Currently available
Liaison or contact person within the library for general accessibility support, if different from EIT-accessibility liaison	x		Systems Librarian	Yes
Information about adaptive software or technology available through the library	x		Library / ARO	Yes
Elevator, entrance, and restroom access		x	LRC Director / Facilities	Yes
Information about circulating adaptive technology, if available		x	ARO / Access Services Librarian	In Process
Additional Library Services	Required	Strongly Recommended	Responsibility	Currently available
Consider accessibility when making furniture and layout choices (i.e. height of furniture, adjustable or not, leaving wide enough paths, placement/storage of tools) - refer to Classroom Technology and Design standards for further guidance	x		LRC Director / Facilities	Yes
Collection development should include materials with accurate and current information on the spectrum of disabilities, issues, and services.	x		Health Science / Liberal Arts librarians	Yes
Provide clear signage for scanner and print stations		x	Access Services Librarian	Yes
Event materials have an equal access statement to provide patrons an opportunity to request accommodations		x	Library Instruction & Outreach Librarian	No-In process
Assistive Technology	Required	Strongly Recommended	Responsibility	Currently available
Accessible technology is made readily available to students, faculty, and staff using library resources	x		Library / ARO	Yes

Clearly advertise where and how to access assistive software or hardware (e.g. webpage for library accessibility)	x		Library / ARO	Yes
Incorporate induction loop technology in rooms where events/speakers are hosted - refer to Classroom Technology and Design standards for further guidance		x	Currently not available	No-portable devices are provided to students as needed.
Basic Technology (free or low cost):				
Screen magnification (Zoom Text)	x		Yes Assistive Technology Lab - ARO	Yes
Text magnification - hard copy (CCTV)	x		ARO	Yes
Screen reader	x		Read & Write - ARO	Yes
Large type/contrast keyboard; alphabet-order keyboards	x		ARO	Yes
Furniture at appropriate height for wheelchairs	x		ARO / Library / Facilities	Yes
Advanced Technology (paid licenses or higher cost):				
Speech-to-text (Dragon Naturally) and text-to-speech (Kurzweil 3000, JAWS, Read&Write GOLD)		x	ARO- Read & Write Gold. in Process of Purchasing JAWS but waiting on Request for Additional Funding	Yes
Braille embosser/printer with conversion software		x	Cooperation w/BU, AVRE	In process
Specialized hardware (noise reduction headphones, trackball mouse, microphones, etc.)		x	ARO	Yes
Separate Assistive Technology Labs/Spaces and Other Accommodations:				
Scent-free		x	ARO / LRC Director	Yes-as needed basis
Quieter/reduced stimulus space		x	ARO / LRC Director	Yes
Adjustable tables and/or chairs		x	ARO / LRC Director	Yes
Access to more specialized software and equipment (paid licenses)		x	ARO / LRC Director	Yes
Provide assistive technology kits that can be borrowed, include items such as trackball mouse, large type keyboard, magnifiers		x	ARO / Access Services Librarian	Yes

Awareness Raising and Training

SUNY Broome provides accessibility training and resources to build awareness of accessibility issues and how digital content and technologies can be made accessible to users with a variety of disabilities, including users with vision, motor, and auditory impairments. These training opportunities are communicated campus-wide through email and digital campus newsletters, and resources are made public on the SUNY Broome website. Accessibility-related seminar training is available multiple times per semester as well as in self-paced formats through BlackBoard.

Staff will become familiar with SUNY EIT Library Accessibility Guidelines. They will know where to find training opportunities for accessibility. They will become comfortable with accessibility techniques for adding content in LibGuides, recordings, documents, etc. We will add a page to track accessibility training opportunities like Deque university, library webinars, and training websites like W3 schools to assist in in-house training.

SUNY Broome Community College is participating in a one-year pilot through SUNY, in which access to an educational platform, DeQue University, is available to all campus members, at no cost, through February 2021. It is designed to allow campus members to learn about accessibility at their own pace and to build accessibility expertise for all areas of the campus. This educational platform will provide varied training, including broad knowledge about disabilities and accessibility, as well as technical information related to specific areas of expertise, such as web, mobile app, and document accessibility and IAAP WAS Certification Preparation. Campus members will be requested to complete specific components of this educational platform, as assigned by their direct supervisor and as applicable to their role on campus. The entire platform is available for anyone registered to complete more than those required modules. Access to DeQue University will be provided by the Administrator at SUNY Broome, at the request of supervisors. The Administrator for SUNY Broome is the EIT Officer.

Modules specific to Document Accessibility are available for those who create content, and modules such as Accessibility Fundamentals: Disabilities, Guidelines, and Laws, Disability Etiquette Basics, and Effective Communication are available for Librarians who work with staff and students who have disabilities.

Library Accessibility Practices

The Library will create accessibility and accommodation policies, procedures, guidelines and best practices. These documents will address various aspects including: the Library website, Library physical spaces, document accessibility, and accommodative technologies.

MarCom maintains an [“Accessibility Practices for Web Contributors” guide](#) published on their website. This guide is regularly updated with simple, practical tips that web content editors can follow and implement as they create or update their web content. Library content creators will follow this guide.

Other Awareness Raising & Training Specific to Web Accessibility

See: [Monitoring Compliance > Web Review](#)

Design

Library Services

The Library will work to establish policies and procedures for making library materials accessible in a variety of formats (e.g. requests for accommodation, alternative format, OCR scans), to be implemented. Upon approval of policies by the Board of Trustees, and procedures by the Executive Council, the Librarians will be trained on the new policies and procedures.

A liaison within the library has been designated to provide EIT-related support, with contact information on the library website. In addition, a library EIT/ADA team has been established to ensure accessibility issues are fully resolved.

All librarians will be trained on available assistive technology and EIT best practices with a focus on universal design-- inclusive service, developing accessible content, and assistive technologies and ensure all library personnel know how to create accessible content. This training is available through DeQue University and will be required of Librarians to complete. Training is also available through the ARO.

As the Library updates furniture and its space, accessibility will be considered when making furniture choices and layout choices, including the height and adjustability of furniture, wide pathways, and the placement and storage of tools. The Library classroom will follow all classroom accessibility standards as outlined in Standard 3 and will work with Facilities to ensure ADA compliance with classroom space.

The Library will work to ensure that there is clear signage for scanner and print stations, as well as adaptive software or technology available through the library. This information is included on our Library website.

Efforts will be made to ensure our Library collection includes materials with accurate and current information on the spectrum of disabilities, issues, and services. An inventory of our current collection will commence this academic year to determine needs and items which should be purchased.

Any event occurring or advertised through the Library will include an equal access statement to provide patrons an opportunity to request accommodations.

Digitizing Content

All content created by the Library is designed to be accessible to users with disabilities. The Library works extensively with the ARO to identify student accessibility needs and to ensure

students are provided with the appropriate accommodations and that Library research materials are accessible.

Upon request, physical instructions, documentation, and handouts will be made available in an accessible digital format. The Library will ensure any digital content is accessible or can be requested to be made accessible. This includes conducting basic OCR scans for instructional and research materials upon request (e.g. course reserves, ILL). Scans performed will be high quality source document scans.

The Library will identify and purchase materials that are captioned, or allow and promote the use of interlibrary loan to request captioned titles if the library owns the (uncaptioned) item. They will ensure collection management policies of multimedia resources (audio, video, text, or animation) include captioning as a selection criteria. If a captioned copy is not available, users will be able to submit requests via ILL for accessible copies. All videos hosted by the library will include transcripts.

Webpage for Library Accessibility

An accessibility web page was built into the Library's website to provide access, resource, and service information. The Library web pages are designed with consistent layouts and content structure. The Library will ensure that main content and menus are in the same location on all pages to create a consistent user experience across the Library website and compliant with Standard 1. The Library is continuing to work with MarCom to ensure appropriate web accessibility standards are followed.

This webpage provides information about circulating adaptive technology, adaptive software and technology available through the Library and through ARO. The EIT-related Librarian contact information will be posted on the Library website. Information about the locations of the elevator, entrance/exit and restroom access are posted on this website.

Assistive Technology

Assistive technology and equipment is available upon request for students in Library computer labs. More information about accessibility services is available on the accessibility page of the library website. Future design of classroom spaces or purchases of furniture will consider accessibility. Accessible technology will be made readily available, as requested and needed. There will be clear signage and information posted on where and how to access assistive software and hardware on the Library Accessibility website as well as within the Library, as applicable. Loop technology is not currently available in the Library, but portable assistive listening devices are available for student/staff use through ARO. The Library will coordinate with ARO to provide these devices as students/staff need.

Basic technology such as Smart Pens, C-Scan Pens, are circulated through the Library. Read & Write., Dragon Natural Speaking and Zoom Text are available in the Assistive Technology Lab in L207 of the Library. Advanced technology needed by students such as Speech-to-text and

text-to-speech, Read & Write, FM Units, Screen Magnification, Text magnification, screen readers, large type/contrast keyboards, alphabet orders for keyboards are available through the Accessibility Resources Office, L017 . The Library collaborates with ARO and various funding sources such as Technology Fees and Perkins Grants to obtain these items.

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.

SUNY Broome will ensure an ongoing and secured funding source for accessibility-related needs through a number of different funding sources. Working with ARO, the Director of Learning Resource Center/Learning Assistance Department ensures that money is available to meet current student needs. Funding sources through Technology Fee and Perkins are often utilized to purchase materials not able to be covered within the operating budget of ARO or the Library. The Director will work with ARO to discuss the establishment of a Supply Budget line for Assistive Technologies and software applications. This would allow for replacement equipment and any new equipment needed throughout the year to meet accessibility needs of current students and staff. Working with ARO, the Director will discuss each semester current student needs and request requisitions as needed early in the semester to ensure funds are available.

Monitoring Compliance

Accessibility Review

The Library Systems Librarian, Electronic Resources Librarian, Access Services Librarian, and the LRC Director will continuously monitor compliance of all accessibility standards related to Library resources. The following tools and processes will be used to monitor this compliance:

- A comment form is in place and linked to a ticketing system to track accessibility issues and concerns.
- Annual review of the Library's accessibility and accommodations policies and procedures.
- Creation of a plan for annual review of VPATs is in process for medium and low-impact resources. Shared, high impact resources are in the process of having VPATs reviewed by SUNY Library Services Accessibility Cohort and stored in a VPAT repository.

The Library is in the process of obtaining licenses for SiteSort to automatically scan for accessibility issues. SiteSort will provide a summary of accessibility issues reported and their resolution will be submitted to the EIT Accessibility Officer, who will share with the EIT Advisory Council to review and make recommendations, as necessary.

Reporting Accessibility Issues

The following tools and processes will be used to monitor this compliance:

- Form to report accessibility issues to a ticket system
- VPAT issues will be reported to third party vendors
- Complaints received in person will be entered into the ticket system

The Library Liaison/Team will provide a report each semester to the EIT Accessibility Officer, addressing accessibility complaints or issues that arose. The EIT Officer will share with the EIT Advisory Council and other stakeholders, as appropriate.

Web Review

MarCom works with stakeholders for each portion of the website to arrange for a regularly scheduled review of its content and accessibility. The Systems Librarian shall meet with MarCom to review the Library website. The Library website and Accessibility website will follow Web Accessibility Standards as outlined in Standard 1.

Reporting Web Accessibility Issues

If any content is found inaccessible on the Library website, the following steps should be taken:

1. Report the issue using one of the following methods. Please include the URL of the page(s) where issue(s) are found.
 - a. Fill out the [Web Accessibility Reporting Form](#) available on the Office of Marketing and Communications website.
 - b. Email the Office of Marketing and Communications at marcom@sunybroome.edu.
 - c. Call the Office of Marketing and Communications at +1 (607) 778-5296
 - d. Call the Accessibility Resources Office at +1 (607) 778-5150 who will report the issue(s) to the Office Marketing and Communications.
2. A MarCom team member will address the issue in a timely manner and follow-up accordingly.

If the issue(s) is not resolved in an appropriate time frame, the Dean of Students should be contacted at +1 (607) 778-5681 or dos@sunybroome.edu.

Reporting Classroom Accessibility Issues

A Library liaison will be selected and contact information displayed on the Library web site. This person will serve as a direct contact for the Library and handle accessibility issue concerns.

If students or faculty/staff are experiencing issues related to accessibility within the classroom, they may contact the Accessibility Resource Office at +1 (607) 778-5150 to discuss accommodations and accessibility needs, or to report a complaint related to inaccessibility.

Environmental and safety concerns, and those related to facilities/classroom spaces, may also be addressed to the Environmental Health & Safety Coordinator, at:
vanhoutenhh@sunybroome.edu

If the issue(s) is not resolved in an appropriate time frame, the Dean of Students should be contacted at +1 (607) 778-5681 or dos@sunybroome.edu.

Standard 5: Procurement Accessibility

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Authority and Responsibility

College Employees

All members of the College community with responsibility for creating, selecting, procuring, developing, implementing, and maintaining electronic and information technologies share a responsibility in helping to ensure purchases and EIT utilized are accessible for all students and employees. All employees are responsible to comply with SUNY Broome policies and procedures related to EIT and procurement.

The department or individual seeking to make EIT purchases is responsible for completing the EIT Accessibility Review Form for submission to the EIT Procurement Committee. They are also responsible for obtaining necessary Voluntary Product Accessibility Templates (VPATs) or other information/documentation related to ensuring accessibility from product vendors. The department or individual seeking to make the purchase also retains the responsibility to provide additional documentation as requested by the EIT Procurement Committee. If a product is deemed to not be fully accessible, the department/individual is responsible for completing the EIT Accessibility Exception & Alternative Access Form to submit for review to the EIT Procurement Committee, which will also be reviewed by the EIT Officer. These individuals are also responsible for retaining all documentation, including an Alternate Access Plan, should a product be provided an exception.

Administrators

Administrators, such as the Vice Presidents of each area will ensure that purchasers within their respective areas are aware of and follow all EIT Accessibility Procurement policies and procedures. Communication within divisions will occur about the new processes and department/division heads will ensure that accessibility checks are conducted prior to EIT related purchases.

EIT Officer and Electronic Information Technology (EIT) Advisory Council

The EIT Officer is responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY Policy. The EIT Officer is responsible for ensuring the development of and continued review, revision, and effectiveness of the plan, based on changing requirements, evolving technology, feedback and review of outcomes. Under the appointment and direction of the EIT Officer, the EIT Advisory Council is responsible for reviewing, updating, and maintaining the accessibility standards for the College. The EIT Officer and Advisory Council will review current processes and policies on at least an annual basis, and in conjunction with reviewing student and employee accessibility needs and feedback, and changes in technology, will make recommendations to the appropriate offices and Vice Presidents who oversee those offices.

EIT Procurement Committee

The EIT Procurement Committee will assist with development of and review of accessibility related documentation for all EIT purchases on campus. This committee reports to the EIT Officer. Committee members will be selected by the EIT Officer, with input from the EIT Advisory Council and campus stakeholders, as appropriate. The committee will be chaired by an individual appointed by the EIT Officer, with input from the EIT Advisory Council. Individuals serving on this committee will have expertise related to accessibility, technology, procurement, and/or student accessibility needs. The committee will meet on a scheduled regular basis during the semester, and less frequently throughout the summer months to review documentation submitted by campus members. The committee will provide regular reports to the EIT Officer. In conjunction with the Purchasing Office and EIT Advisory Council, this committee will create and maintain all related Accessible EIT Procedures and documents. This committee will also provide guidance and training to campus members about completion of the necessary documentation and engage in discussions with campus members about accessibility related to requested products, as appropriate. This committee will conduct a review about the accessibility of products, taking into consideration their expertise about technology, knowledge of student accessibility needs, and knowledge of procurement processes and compliance. The EIT Officer and EIT Procurement Committee Chair will maintain documentation of all procurement activities, submissions, and decisions. The committee will also maintain an annual list of all accessibility improvements from vendors, as well as updated VPATs.

All EIT purchases are structured in Banner, our student information system, to require approval from the Director of Information Technology Services (ITS) before they can be purchased. Upon receipt of a requisition for an EIT purchase and prior to approval, the Director of Information Technology Services will send the department or individual seeking to make the purchase the EIT Accessibility Review Form to complete and submit to the EIT Procurement Committee. This form collects information about the EIT product to be purchased such as basic demographics of the target audience and asks that the purchaser collect a VPAT or other accessibility related information from the vendor if a VPAT is not available. Once the submitted documentation and product has been reviewed, the committee will submit to the Director of ITS and the individual/department requesting the EIT purchase a decision on whether or not the product meets SUNY Broome's accessibility standards.

Should the committee find that the product does not meet SUNY Broome's accessibility standards, the committee retains the right to request the individual/department complete the EIT Accessibility Exception and Alternative Access form. Submissions for this form will be reviewed by the EIT Procurement Committee, EIT Officer, and potentially the college lawyer, if necessary, and deemed appropriate by the EIT Officer and Purchasing Office, for final review and decision.

Purchasing Office

The Purchasing Office is responsible for the oversight of all procurement processes. The Vice President for Administrative and Financial Affairs maintains oversight for this office, with direct oversight provided by the Associate Vice President and Controller.

The Purchasing Office will follow the EIT Accessible Procurement Policy, which will be an extension of the to-be-created EIT Accessibility Policy, along with its related procedures. EIT related purchases will be approved by the Director of ITS upon approval by the EIT Procurement Committee to ensure products are accessible, or have an approved Alternate Access Plan in place prior to Purchase. This will ensure that all purchases submitted to the Purchasing Office have been reviewed for accessibility. The Purchasing Office will work with the EIT Officer to ensure that any EIT related purchases which have been deemed to be inaccessible have completed the EIT Accessibility Exception and Alternate Access Form, and if needed, forms have been reviewed by the college lawyer.

The Purchasing Office will retain oversight for the accessibility review for all competitive bids or Request for Proposals (RFPS) and coordinate the communication to vendors about the Web Accessibility Policy and the Accessible EIT Policy of the College, as well as the requirements for Voluntary Product Accessibility Templates (VPATs). The Purchasing Office will provide training and sample VPATS to potential vendors to ensure awareness of and compliance with college policies and procedures as related to accessibility and procurement. The Purchasing Office will maintain a list of annual vendor accessibility improvements as related to RFPs and contracts.

Responsibility Table

Preliminary Steps	Required	Strongly Recommended	Responsibility	Completed
Gauge potential impact on the University of a particular product or service's accessibility	x		Purchaser	In process
Gathering Information	Required	Strongly Recommended	Responsibility	Completed
Include accessibility in pre-purchase documents/questionnaires	x		Purchasing Office	In process
Commitment to accessibility is reflected in RFP language	x		Purchasing Office	No-to be developed Spring 2021
Collect documentation verifying EIT accessibility conformance (Voluntary Product Accessibility Template)	x		Purchasing Office / Accessible EIT Purchasing Review Committee	In process
Obtain Accessibility Roadmap - document which addresses all [application] interface accessibility gaps,	x		Purchaser	In process

describe the timelines by which these accessibility gaps will be remediated, as well as recommendations regarding interim workarounds.				
Review Product/Service	Required	Strongly Recommended	Responsibility	Completed
High impact EIT products and services should be evaluated by an appropriately qualified individual or entity. This evaluation should be documented and can be performed by campus personnel or through third-party vendors. Cost for an external evaluation can be deferred to the prospective vendor(s).	x		Purchaser	In process
Conduct Exceptions on a case-by-case basis	x		Purchasing Office / College Legal Counsel	In process
Prepare an Equally Effective Alternate Access Plan for non-conforming EIT	x		Purchaser	In process
Evaluate RFP EIT finalists through live accessibility demonstration		x	Purchaser	No-to be completed Spring 2021
Place Order	Required	Strongly Recommended	Responsibility	Completed
Include accessibility assurances in purchase agreements; add milestones to remediate accessibility gaps identified in accessibility roadmap	x		Purchasing Office	No-to be completed Spring 2021
Set a calendar date to check in with vendor on accessibility improvements (e.g., annually)		x	Purchasing Office	No-to be completed Spring 2021

Awareness Raising and Training

SUNY Broome provides accessibility training and resources to build awareness of accessibility issues and how digital content and technologies can be made accessible to users with a variety of disabilities, including users with vision, motor, and auditory impairments. These training opportunities are communicated campus-wide through email and digital campus newsletters, and resources are made public on the SUNY Broome website. Accessibility-related seminar training is available multiple times per semester as well as in self-paced formats through Blackboard.

SUNY Broome Community College is participating in a one-year pilot through SUNY, through February 2021, in which access to an educational platform, DeQue University, is available to all campus members, at no cost. It is designed to allow campus members to learn about accessibility at their own pace and to build accessibility expertise for all areas of the campus. This educational platform will provide varied training, including broad knowledge about disabilities and accessibility, as well as technical information related to specific areas of expertise, such as web, mobile app, and document accessibility and IAAP WAS Certification

Preparation. Campus members will be requested to complete specific components of this educational platform, as assigned by their direct supervisor and as applicable to their role on campus. The entire platform is available for anyone registered to complete more than those required modules. Access to DeQue University will be provided by the Administrator at SUNY Broome, at the request of supervisors. The Administrator for SUNY Broome is the EIT Officer. Related to Purchasing, modules about Customer Service for People with Disabilities, Section 508: Fundamentals of the Law and Technical Standards, and Accessibility Fundamentals: Disabilities, Guidelines and Laws are applicable content Purchasing Office personnel and those who seek to make EIT purchases should complete.

In conjunction with the EIT Advisory Council, the EIT Procurement Committee will provide training and guidance to campus members throughout the purchasing process to help ensure that individuals and departments are aware of and understand the processes related to accessibility review for all electronic and technology purchases, including the applicable policies and procedures. Prior to the Spring 2021 implementation of the new purchasing processes, the EIT Advisory Council and EIT Procurement Committee will engage the campus in training on these new processes. The Purchasing Office will provide training to potential vendors about the college's accessibility policies and procedures for contracts and RFPs.

Throughout the accessibility review of products, the EIT Procurement Committee will provide guidance to campus members about completion of the necessary accessibility purchasing documentation and engage in discussions with campus members about accessibility, related to requested products, as appropriate.

Design

The requirements outlined in this section apply to all EIT or online/web-based product purchases after the date of January 1, 2021. Purchases made prior to this date will be subject to the new policies and procedures upon renewal of the contract/license.

Starting Fall 2020, a campus-wide educational campaign will be conducted by the EIT Advisory Council and EIT Procurement Committee. Campus members who make purchases will be informed about and trained on the new College Web Accessibility Policy, Accessible EIT Policy (an extension of the Web Accessibility Policy), and related Accessibility EIT Purchasing forms (EIT Accessibility Review Form, EIT Accessibility Exception and Alternate Access Form).

Documents to be Developed:

- Web Accessibility Policy
- Accessible EIT Policy
- Accessible EIT Purchasing Procedures

By January 1, 2021, all EIT purchases must go through an accessibility review and submit the required documentation to the EIT Procurement Committee. This committee will review all relevant paperwork, including VPATs, and notify the Director of ITS and the individual/department submitting the purchasing request if the product/service is found to be in compliance with SUNY Broome's accessibility standards

Competitive Bid and Requests for Proposals (RFPs)

The Purchasing Office will retain oversight for the development and maintenance of processes related to accessibility review for all competitive bids or Request for Proposals (RFPs). The Purchasing Office will coordinate the communication to vendors about the Web Accessibility Policy and the Accessible EIT Policy of the College, as well as the requirements for VPATs. All Requests for Proposals will include language that reflects the commitment to accessibility in all procurement solicitations. The Purchasing Office will draft language related to accessibility requirements, the Accessible EIT Policy, and required VPATs to utilize with all vendors. Vendors will be provided with copies of the Web Accessibility and Accessible EIT Policies.

License Agreements

All license agreements related to EIT and online/web-based products will include accessibility assurances and milestones with specified dates to address any accessibility gaps.

Voluntary Product Accessibility Template (VPAT)

Starting Spring 2021, SUNY Broome Community College will require all electronic purchases to obtain a VPAT from vendors to submit with purchase requests. Unless the purchase is one coordinated through the Purchasing Office (e.g. a competitive bid or Request for Proposal), the individual/department completing the purchasing request will be required to provide the potential vendor with a copy of the Web Accessibility Policy and any VPAT guidance developed by the EIT Advisory Council, to assist vendors.

If the vendor does not have a VPAT, the purchaser will ask the vendor to provide an Accessibility Roadmap, which includes information such as accessibility testing results, standards used to measure accessibility, and accessibility product support. The EIT Procurement Committee will maintain an inventory of VPATS and annual accessibility improvements from vendors.

EIT Accessibility Review Form

The EIT Accessibility Review Form must be completed for all EIT purchasing requests prior to the Director of IT approving the purchase before it moves through normal Purchasing Office procedures. It is the responsibility of the individual or department who wishes to make an EIT request to complete this form, obtain all necessary information and documentation and to submit it to the EIT Procurement Committee for review so that the committee may conduct an evaluation of accessibility of products that will be used at the College. Individuals/departments completing the form must have an understanding of the features of the product they anticipate

using and the intended audience/users of the product, and other products reviewed or considered for purchase.

The EIT Procurement Committee will review all submitted documentation and determine the level of impact the product has, as well as any accessibility issues the product presents. The committee will then make a determination, after considering all the evidence related to accessibility, about whether or not the purchase can move forward to the Purchasing Office. If stipulations exist, they will be documented within this form. If the committee makes the determination that the product has inaccessible features and should not move forward for purchase, they will provide the rationale, as documented on this form to the individual/department making the request and to the EIT Officer, who will discuss with the Purchasing Office, and potentially legal council.

EIT Accessibility Exception and Alternative Access Form

If a product is deemed that it should not move forward due to inaccessibility, the individual/department may complete the EIT Accessibility Exception and Alternate Access Form to submit to the EIT Procurement Committee.

The Accessibility Exception and Alternate Access Form allows individuals/departments to provide detailed information and exception criteria they believe applies to the product. They must outline why an exception is needed, what other comparable products are available, why the comparable products weren't chosen, the audience(s) who will be excluded by the accessibility issue(s), how equally effective alternative access will be provided, and the name(s) and title(s) of the campus employee(s) who will be responsible for ensuring equally effective alternate access.. This will allow determination of impact the product will have on students and consumers who require accommodations. Copies of the VPAT and/or accessibility documentation received from the vendor should also be submitted.

This form also allows users to describe how equally effective alternate access to the product will be provided to individuals with disabilities if their submission is approved. This form allows individuals/departments to provide "accessibility accommodations" to individuals who need them to ensure individuals with disabilities have equal access to products in the instance in which it is not feasible to apply the accessibility standards in the College's Web Accessibility Policy. The EIT Exception and Alternate Access Form links to resources designed to assist individuals and departments in completing a plan which will ensure the College's commitment to serving individuals of all abilities. In addition to providing information about where the product will be used, which groups are potentially affected, and a description of known accessibility issues of the product, individuals/departments will also report about accessibility barriers for specific groups, and solutions for alternate access.

Levels of Impact

In making the determination for accessibility review by the EIT Procurement Committee, levels of impact of EIT products will be determined by the below criteria.

High impact: Public-facing EIT or online/web-based products; enterprise-level software; software/technology required as part of core requirement for a class, activity, or program.

Medium impact: Product is used to support but not directly provide a core activity; Technology used, but not required for a class; technology required or used in a class for which a need for accommodations exist.

Low impact: Technology that is not for recurring use by employees or for students in a class; product is to be used in a class for which there are no current registered students with disabilities; technology to be used by a very small number of employees.

Procurement

Accessibility requirements will be incorporated into all purchasing and procurement policies and 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, web-based information and applications development, or programming delivered, pursuant to the contract or procurement must comply with SUNY Broome's Web Accessibility Policy, as that policy may be amended, modified, or superseded, which requires that the College 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 SUNY Broome'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.

Specific guidelines and procedures for procurement at the College is detailed in the Design section of this document.

Accessibility Exceptions

All avenues for ensuring electronic and web-based/online technology is accessible must be exhausted by the individual or department seeking to make a purchase. There may be instances in which a product without a VPAT or a product which has inaccessible features is necessary to purchase. For example, if conformance to the standards 1) Fundamentally alters a program, service, or activity, 2). Creates an undue administrative burden, or 3) Is not technically feasible.

In situations where the above exceptions can be documented, equally effective alternative access must still be provided. In these instances, an EIT Accessibility Exception and Alternate Access Plan must be created and simultaneously submitted, to the EIT Procurement Committee, who will review exceptions and alternate access plans with the EIT Officer. The Alternate Access Plan must describe how equally effective alternate access to the product will be provided to individuals with disabilities if the Request for Accessibility Exception is granted. Exception requests and alternate access plans may be reviewed by the college lawyer, as deemed appropriate by the EIT Officer and Purchasing Office.

Tools and Resources Used to Assess Accessibility:

- EIT Accessibility Review Form
- EIT Accessibility Exception and Alternate Access Form
- Section 508 Information about VPATs and Sample Templates:
<https://www.section508.gov/sell/vpat>
- Sample VPAT Email Request to Vendors (to be developed)
- RFP language for contracts (to be developed)

Monitoring Compliance

The EIT Procurement Committee will assist with monitoring compliance of campus adherence to procurement and accessibility policies and procedures as they conduct their review of purchasing requests. As related to competitive bid contracts and RFPs, the Purchasing Office will also monitor compliance with accessibility guidelines and ensure purchasing requests have completed the necessary accessibility checks and obtain required VPATs or information related to accessibility testing, standards, and product supports, in the case of no existing VPAT. The EIT Officer and EIT Procurement Committee Chair will maintain all documentation related to accessibility, including EIT Accessibility Exception and Alternate Access Forms, as well as documentation of all reviews and decisions. As deemed appropriate and necessary, exception requests and alternate access plans will be forwarded to the Purchasing Office for review by the college lawyer.

No purchases will be processed for any EIT product for which the EIT Accessibility Review Form has not been completed and reviewed by the EIT Procurement Committee and for which a VPAT is not obtained, or at the very least, when a VPAT does not exist, an accessibility roadmap is not obtained from the vendor.

On at least an annual basis, the EIT Accessibility Officer and the EIT Advisory Council will review relevant policies, procedures, changes in technology and guidelines, and any staff or student accessibility concerns, and make recommendations to the Purchasing Office. The EIT Procurement Committee will provide a report to the EIT Officer each semester, detailing reviews conducted and recommendations for future accessibility reviews, as appropriate. The EIT Officer will share summaries of this report with the EIT Advisory Council and other campus stakeholders as appropriate.

Standard 1: Web Accessibility Action Plan

Plan Element	Actions	Administrative Oversight/ Individual Responsibility	Resources / Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	Establish roles and responsibilities: college employees, content creators, DOS, EIT Advisory Council, MarCom, web content editors.	VPAA, DOS	n/a	Everyone at SUNY Broome will fit within a role.	5	Formally completed once Web Accessibility Standard was reviewed and approved by Executive Council.	June 2020: Completed.
	Write official policy for web accessibility.	MarCom	Web Developer	The College will have an official policy to help enforce web accessibility.	5	Approved by BOT.	August 2021: Completed.
Awareness Raising / Training	Advertising professional development workshops and self-paced Blackboard trainings. Educating web content editors on best practices.	Professional Dev team / TRC / MarCom / IDs	Blackboard, SUNY Broome TODAY emails, Professional Development team, Web Accessibility Guide for Content Contributors	College employees will be aware of accessibility training opportunities and have access to view or sign up for them.	5	Ongoing with a process in place; whenever a training opportunity comes up, it gets sent out campus wide, added to calendar, and in SUNY Broome TODAY emails. TRC already has process/form for allowing employees to sign up. All web content editors are provided with a web accessibility guide with practical implementation tips on an annual basis.	Completed/ongoing. No start/end time, it's been ongoing all along.
	Enroll appropriate personnel in Deque university courses.	EIT Advisory Council	Deque University	All appropriate personnel will have an account with Deque and go through assigned courses.	5	Collecting appropriate personnel & figuring out which courses they should take	Completed/On going through May 2022

Design	Update the SUNY Broome website to comply with WCAG AA 2.1 standards.	MarCom	Siteimprove, W3.org website, Web Developer	SUNY Broome's website will adhere to the most current web accessibility standards.	5	SUNY Broome's website adheres to 2.0 standards; all content & theme elements need to be reviewed and updated for 2.1 standards.	Completed & ongoing January 2022
	Articulate need for consistency in design for user experience.	MarCom, IE	n/a	All pages of similar type will have a consistent layout and user experience.	5	Majority of websites of a similar type are now on a consistent layout; agreed upon and maintained through Institutional Effectiveness, Academic Leadership Team, and MarCom. Ongoing	February 2021: Completed & ongoing
	Define technical requirements for basic web accessibility.	MarCom	Government ADA toolkit, Deque trainings, WCAG guidelines	SUNY Broome employees will have a defined and concise set of technical web accessibility guidelines to follow when developing and publishing web content.	5	Completed and defined in Web Accessibility Standard.	June 2020: Completed.
	Establish process for inaccessible content exceptions.	MarCom/DOS	n/a	There will be a consistent procedure in place for employees to request an accessibility exception.	5	Part of Web Accessibility Policy; approved by BOT August 2021.	August 2021: Completed.
	Publish list of tools used to assess design & technical accessibility on the website.	MarCom	n/a	SUNY Broome will make public its resources for assessing accessibility	5	Completed and listed in Web Accessibility Standard; tools also published on MarCom website.	June 2020: Completed.
	Define technical requirements for social media posts from official SUNY Broome accounts	MarCom	n/a	Employees who post content via an official college social media account will have accessibility guidelines in place to follow.	5	Completed and defined in Web Accessibility Standard.	June 2020: Completed.

	Establish a timely process for requesting synchronized captions for multimedia; Provide synchronized captions for public-facing audio-video content; Provide transcripts for audio-only content; Provide descriptive audio for audio-video and video-only content, when needed; Provide synchronized captions for live audio-video content.	MarCom	n/a	A process will be established to evaluate the need for different multimedia to have captions, transcripts, and/or descriptive audio.	5	An option for reporting inaccessible audio-visual content and requesting an accommodation has been built into the Web Accessibility Reporting Form. This will channel all inaccessible, web-related content reports to a single form. The MarCom Staff Associate for Photo & Video has also built multimedia accessibility into their process & professional development.	August 2021: Completed.
Procurement	Define language to be included when requesting a quote on web technologies, default to Procurement standard for official process	EIT Advisory Council	EIT Advisory Council expertise	All RFQs for web technologies will include consistent language stating accessibility requirements of the technology in question	4	Language is written and defined in Web Accessibility Standard. Needs to be incorporated into purchasing processes.	Target: July 2022
Monitoring Compliance	Maintain annual maintenance schedule for all SUNY Broome websites to review for quality and accessibility.	MarCom	Responsible stakeholders for each section of website	Every area of the website is reviewed at least annually for quality and accessibility.	5	Majority of SUNY Broome websites are on the maintenance schedule with a process to add new ones and existing ones in place.	Dec. 2019: Completed/ongoing
	Monitor automatic SiteImprove accessibility scans, establish priorities of items to fix, provide report each semester to EIT Advisory Council	MarCom	SiteImprove (approx 8k annually)	All major accessibility issues will be promptly detected, MarCom will be accountable for showing how these issues have been addressed.	5	MarCom already monitors this and the first official report was provided to the EIT Advisory Council on Dec. 15, 2020.	Dec. 2020: Completed/ongoing
	Create a resource for how anyone can manually scan	MarCom	WebAIM Wave (page or Chrome plugin)	Anyone will have access to scan a SUNY Broome page for accessibility.	5	Completed and published in Web Accessibility Standard.	June 2020: Completed

	a page for accessibility issues						
	Document all reported accessibility issues, correct them in a timely manner, provide report to EIT Advisory Council of reported issues	MarCom	Web issues reporting form, Wufoo	A process will be in place for anyone to report an issues, MarCom will have accountability for showing a timeline for fixing the issue	5	MarCom has begun providing these reports to EIT Advisory Council in Fall 2020.	Dec. 2020: Completed/ongoing

Standard 2: Digital Content Accessibility Action Plan

Plan Element	Actions	Administrative Oversight/ Individual Responsibility	Resources/Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	Faculty are responsible for making sure that their digital content is accessible to their students.	Vice President for Academic Affairs/ Academic Deans	Instructional Designers Online@SUNYBroome Faculty Resources website (http://www3.sunybroome.edu/online/faculty-online/) Blackboard Ally Training offered through the TRC OSCQR website and rubric	Content provided digitally through the Learning Management System is accessible to all learners.	3	There is no required course review for design or accessibility. Adherence to the OSCQR rubric and standards is encouraged but not mandatory. Ally GUI are now automatically enabled for all Blackboard courses. DLSC Recommendation Spring 2021 for OSCQR/ Accessibility Review Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions). CAI voted to not endorse policy	June 2021 -- Ally Enabled Completed Target for Distance Learning Course Review Policy adoption - end of Fall 2022

<p>EIT Advisory Council will draft and submit a memo with recommendations to require all new, recurring, and existing courses undergo an accessibility review; all newly developed online courses follow the OSCQR rubric. The Distance Learning Steering Committee will make a formal recommendation about the OSCQR rubric.</p>	<p>EIT Advisory Council</p>	<p>Council members</p>	<p>All new, recurring, and existing courses will complete an accessibility check and work with Instructional Designers to address issues. All new courses will utilize the OSCQR rubric to ensure accessibility.</p>	<p>3</p>	<p>BlackBoard Ally has been enabled for all courses on Blackboard; a memo from EIT Advisory Council was sent to recommend all courses utilize the OSCQR rubric.</p> <p>DLSC Recommendation Spring 2021 for OSCQR/ Accessibility Review</p> <p>Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback</p> <p>Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions).</p> <p>CAI voted to not endorse policy</p>	<p>Fall 2020 memo from EIT Advisory Council sent; March 2021 target date for DLSC recommendation regarding OSCQR Accessibility review.</p> <p>Target for Distance Learning Course Review Policy adoption - end of Fall 2022; not yet met</p>
<p>An accessibility statement policy for the College, and which requires incorporation of this statement with a list of accessibility resources on campus into all course syllabi is submitted to the BOT and approved.</p>	<p>EIT Advisory Council</p>	<p>Council members/ BOT/Faculty</p>	<p>All course syllabi have an accessibility statement.</p>	<p>2</p>	<p>The College does not have an accessibility statement or a requirement to have one on syllabi. The Advisory Council has actively researched sample statements and is in process of drafting a policy.</p>	<p>Initial target: Fall 2020 (Not met)</p> <p>New Target: By End of Spring 2022</p> <p>Standard Accessibility Statement and syllabus requirement still in progress (Fall 2021)</p>

<p>Awareness Raising/ Training</p>	<p>Resources and training opportunities have been advertised to faculty who utilize the LMS to provide digital content to students.</p>	<p>VPAA Academic Deans</p>	<p>Online@SUNY Broome Faculty Resource Website (http://www3.sunybroome.edu/online/faculty-online/) Professional Development email</p>	<p>Faculty will participate in accessibility related trainings.</p>	<p>4</p>	<p>Optional for faculty. Numerous training opportunities exist. Fall 2021 Update: Several Accessibility Workshops have been offered to faculty (participation reports in "Standard 2 Action Plan Supporting Documentation" folder) "Strive for 85" campaign launched September 2021 (see Supporting Doc folder)</p>	<p>June 2022 Ongoing for new initiatives</p>
	<p>Faculty are encouraged to utilize the SUNY Broome Template in Blackboard and adhere to the standards outline in the OSCQR rubric and website when developing course content in the LMS</p>	<p>VPAA Academic Deans</p>	<p>DLSC recommendation regarding adherence to OSCQR rubric and use of the Blackboard Ally tool in course shells.</p>	<p>A requirement will be initiated to mandate that faculty will utilize the built in template in Blackboard and adhere to the OSCQR rubric when developing new online courses.</p>	<p>3</p>	<p>Optional for faculty. No current mandate. DLSC Recommendation Spring 2020 -- All new development shells will utilize the template. DLSC Recommendation Spring 2021 for all new courses follow OSCQR/ Accessibility standards Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions). CAI voted to not endorse policy</p>	<p>June 2022 new target date Target for Distance Learning Course Review Policy adoption - end of Fall 2021; not yet met</p>

<p>Faculty have access to training provided by the Instructional Designers as well as accessibility resources and documentation</p>	<p>VPAA Academic Deans</p>	<p>Blackboard 1-2-3 training has a module on the Accessibility of Digital Content</p> <p>Making the Transition to Online Workshop</p> <p>Blackboard Ally Workshop</p> <p>Accessibility 101 workshop</p> <p>Online@SUNYBroome Faculty Resource page (http://www3.sunybroome.edu/online/faculty-online/)</p>	<p>Faculty will complete available Blackboard Ally Workshops.</p>	<p>5</p>	<p>All training is optional for faculty with the exception of the Blackboard 1-2-3 training. Bb 1-2-3 is mandatory for all faculty who will be using the LMS to provide digital content to students.</p>	<p>Fall 2020</p> <p>Completed; ongoing</p>
<p>Faculty will have access to DeQue University.</p>	<p>EIT Advisory Council</p>	<p>DeQue University</p>	<p>Faculty will complete the available DeQue University training on Document Accessibility.</p>	<p>4</p>	<p>DeQue University has been activated. Formal communication went to campus. Participation in training endorsed by Shared Governance.</p> <p>Deque Stackable credentials organized and offered/ advertised to campus</p> <p>Availability of DeQue extended through August 2022</p> <p>Stackable credentials included in Strive for 85 Campaign</p>	<p>Ongoing through May 2022</p>

Design	<p>Courses should be designed with accessibility in mind.</p> <p>New course content should be created in accessible formats to minimize remediations needed in the future, following guidelines set forth in this standard.</p>	<p>VPAA Academic Deans</p>	<p>OSCQR Website standards and rubric</p> <p>Ally GUI tool</p>	<p>All new online courses will utilize the OSCQR rubric. All new and existing courses will conduct an accessibility check and work with Instructional Designers to make corrections.</p>	<p>2</p>	<p>Optional for faculty. Faculty are not required to adhere to accessibility guidelines.</p> <p>This will be addressed in the upcoming Distance Learning Strategic plan currently being developed by the Distance Learning Steering Committee.</p> <p>DLSC Recommendation Spring 2021 for all new courses follow OSCQR/ Accessibility standards</p> <p>Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback</p> <p>Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions).</p> <p>CAI voted to not endorse policy</p>	<p>June 2022</p> <p>Target for Distance Learning Course Review Policy adoption - end of Fall 2021; not yet met</p>
	<p>Courses will enable Blackboard Ally to check for accessibility and provide alternative formats to students.</p>	<p>VPAA Instructional Designers Faculty Association</p>	<p>Ally GUI tool</p>	<p>All Blackboard courses will enable the Ally GUI tool.</p>	<p>5</p>	<p>Blackboard courses now automatically enable Ally GUI.</p>	<p>Completed</p>
	<p>Provide descriptive audio for audio-video and video-only content, when needed</p>	<p>Instructional Designers Faculty</p>	<p>LMS resources</p>	<p>Descriptive audio will be added to audio-video content within courses to ensure accessibility.</p>	<p>1</p>	<p>A process needs to be established that this becomes part of course development and faculty responsibility.</p>	<p>June 2022</p>

Procurement	Tools that integrate into the LMS should be verified for accessibility.	Departments purchasing or implementing software tools.	Purchasing Policy, procedures, training	Tools that integrate into the LMS are accessible or an alternate plan of access is established.	3.5	<p>Procurement accessibility review process is in place with target soft date Jan.</p> <p>Fall 2021 Update: Software purchases covered through the Procurement process.</p> <p>Publisher's integrated software reviewed through procurement process. SUNY is looking at the central process for collecting reviews of publisher content.</p>	Publisher Content review Ongoing
	VPAT should be requested for all currently available tools.	Departments purchasing or implementing software tools	Purchasing Policy, procedures, training, vendor collaboration	All tools have an existing VPAT or accessibility roadmap.	3	No current College requirement for VPATs. This is part of the new procurement process to be rolled out in Spring.	June 2022
Monitoring Compliance	Accessibility checkers within software used to create content should be utilized by faculty to verify compliance of individual content items created.	VPAA	Word, PowerPoint, Acrobat accessibility checkers Blackboard Ally GUI	Faculty will utilize the Blackboard Ally accessibility checker and work with instructional designers to address issues.	3	<p>Optional for faculty to utilize accessibility checkers and remediate issues.</p> <p>Blackboard Ally GUI has been enabled in all courses in the LMS starting summer 2020.</p> <p>Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback</p> <p>Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions).</p> <p>CAI voted to not endorse policy</p>	June 2022 Target for Distance Learning Course Review Policy adoption - end of Fall 2021; not yet met

<p>Instructional Design review of the overall course should be requested by faculty to identify issues and monitor compliance.</p>	<p>Instructional Designer/</p>	<p>OSCQR rubric and Instructional Designer course review</p>	<p>Faculty request review of courses and implement changes to ensure accessibility and quality of courses.</p>	<p>3</p>	<p>Blackboard Ally GUI has been enabled in all courses in the LMS. Ally Workshops are offered routinely.</p> <p>Faculty invitations to have Accessibility review by Instructional Designer have gone out to campus -- 27 reviews completed so far.</p> <p>Spring 2021 Update: Proposed Distance Learning Course Review Policy presented to CAI for feedback</p> <p>Fall 2021 Update: Proposed policy revised based on feedback and brought back to CAI (9/15 and 9/28 revisions).</p>	<p>June 2022</p> <p>Target for Distance Learning Course Review Policy adoption - end of Fall 2021</p>
<p>Overall compliance score for the institution submitted to the EIT Officer and increases each year.</p>	<p>EIT Advisory Council</p>	<p>Faculty collaboration</p>	<p>Accessibility score will improve by 5%</p>	<p>3</p>	<p>Saw an increase of 3% in Blackboard Digital Content Accessibility over the Fall 2019 - Spring 2021 time period.</p> <p>Increase of 10 percentage points between Academic Years (all semesters combined):</p> <p>2020-2021: Overall Accessibility Score = 76.4%</p> <p>2021-2022: Overall Accessibility Score: 86.4%</p>	<p>Ongoing</p>

Standard 3: Classroom Accessibility Action Plan

Plan Element	Actions	Administrative Oversight/ Individual Responsibility	Resources/Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	Ensure classrooms, including traditional classrooms, and those located throughout the SUNY Broome campus, in which learning/living occurs (e.g. Library, LAD, Student Village) are accessible to students.	VP for Academic Affairs; VP for Administrative & Financial Affairs; VP for Student Development & CDO Facilities Environmental Health & Safety ITS	ADA Requirements Facilities Environmental Health & Safety ITS Personnel	All classrooms on campus meet ADA requirements and are accessible to students.	3	Classrooms are undergoing a review of accessibility. Technology needs are met by portable assistive listening devices.	Ongoing
	Ensures new classrooms meet ADA 2010 requirements are met.	Facilities CPAC ITS ARO	Facilities CPAC ITS ARO	New classrooms are built with accessibility design in mind. All relevant parties are consulted in the planning process.	5	Newest classrooms have been built following ADA 2010 requirements and with accessibility in mind.	Ongoing
Awareness Raising/ Training	Resources and training opportunities related to classroom accessibility will be provided to the campus.	EIT Advisory Council ARO Facilities/Environmental Health & Safety/ITS	Committee members/ARO/ Facilities/Environmental Health & Safety/ITS personnel	Campus members will be knowledgeable about ADA and legal requirements for classroom design.	3	Accessibility training is offered through the TRC; specific training related to classroom accessibility and ADA laws will be planned and delivered to campus.	June 2022
	College personnel will have access to DeQue University.	EIT Advisory Council	DeQue University	Personnel involved in making classroom furniture, layout, technology choices for classrooms will be educated about	4	DeQue University has been activated. The system was introduced to the campus Fall 2020 and	Ongoing through May 2022

				legal requirements of ADA and accessibility.		endorsed by Shared Governance.	
Design	Accessibility standards for all new classroom builds will consider both federal and state guidelines during the design process.	Facilities EH & S ITS	Facilities CPAC ITS ARO	New classrooms are built with accessibility design in mind. All relevant parties are consulted in the planning process.	4	Newest classrooms have been built following ADA 2010 requirements and with accessibility in mind.	Ongoing
	Assistive listening systems will be provided to students.	ARO ITS	ARO & ITS personnel	Students requiring assistive listening devices will have access.	5	All students will have access to an assistive listening device as appropriate.	Ongoing
	Color choices on classroom controls and emergency notification systems will reflect universal design	ITS Facilities EH & S	ITS, Facilities, EH & S personnel	Controls and emergency notification systems will reflect universal design.	2	All classrooms will be assessed for universal design and updates provided as needed. A plan will be developed to outline procedures for ensuring faculty needs are met.	June 2022
	Appropriate wheelchair spaces, depending on seat capacity will be available in each classroom. Accessible pathways will be 36" wide, and there will be appropriate turnaround space	Facilities EH & S	Facilities and EH & S personnel	Each classroom will have designated wheelchair spaces with appropriate turnaround.	2	Classrooms are able to be reconfigured to have wheelchair spaces; not all have designated spaces or signage to reflect this.	June 2022
	Signage for assisted listening systems, tactile signage at exits, wheelchair stations	Facilities, EH & S, ITS	Facilities and EH & S, ITS personnel	All classrooms will have signage for assistive listening systems, tactile signage at exits, and wheelchair stations	2	Some, but not all classrooms have appropriate signage. Classrooms will be assessed and updates completed.	June 2022

	Bariatric seating options should be made available wherever possible	Facilities	Facilities and EH & S, ITS personnel	Bariatric seating options will be reviewed for purchase with long-term plans established.	2	Discussions are occurring; some options available.	September 2022
Procurement	Accessibility requirements will be incorporated into all purchasing and procurement policies and processes for the procurement of all physical attributes of campus and facility buildings or areas that must meet ADA Standards.	Facilities EH & S	Facilities EH & S personnel, vendors	All new classrooms will be accessible and built with accessibility needs in mind. Vendors will be provided the EIT Accessibility Purchasing Policy; appropriate parties will be consulted to ensure ADA compliance.	2	Newest classrooms were built following ADA 2010 guidelines. Accessibility needs will be incorporated into facilities purchasing. A member of the EIT Advisory Council joined the CPAC Committee Spring 2021 to aid in these efforts. Purchasing requirements need to be built into procurement processes.	June 2022
Monitoring Compliance	All campus projects will be reviewed for accessibility.	Facilities CPAC EH & S	Facilities CPAC EH & S personnel	All new campus projects after Fall 2020 will have an accessibility review process built in.	2	Steps have been taken to ensure new projects consider accessibility with a designer consulted. An accessibility review process will be incorporated into Facilities planning.	Fall 2020-not completed. New target date June 2022.
	A spreadsheet will be developed which lists all classrooms and current compliance related to accessibility, including square footage, seat capacity, wheelchair spaces, listening devices, and signage.	Facilities EH & S and IT	Facilities, EH & S and ITS personnel	An inventory list will be completed and the campus assessed.	2	A working list is in progress and will be completed.	Fall 2020-spreadsheet developed. Target date for thorough review and remediation June 2022.

	Campus classrooms will be reviewed on an annual basis to ensure compliance with ADA and the guidelines within this standard.	Facilities EH & S and IT EIT Advisory Council	Facilities, EH & S and ITS personnel EIT Advisory Council members	An assessment of the campus will be completed and then annually thereafter, with results provided to the EIT Officer.	2	A working list is in progress and will be completed.	Fall 2020-list completed; final review to be done with steps to address issues to be completed by June 2022 .
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Standard 4: Library Accessibility Action Plan

Plan Element	Actions	Administrative Oversight/ Individual Responsibility	Resources/ Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	All content, documents, files or visual imagery in print or digital form will be made accessible upon request.	Vice President of Academic Affairs Director of Learning Resource Center/Learning Assistance Department	Director Librarians	All print and electronic library content and databases will be accessible upon request.	4	Librarians have been working on making content accessible following these guidelines and will continue to do so. Procedures will be developed for ensuring new content is accessible.	June 2021 Ongoing
	Library website will be made accessible and provide information about accessibility, technology/ equipment and services available at the library.	Library Content Creators	Library staff MarCom	A library website will be in place to provide information about accessibility, including availability of assistive technology/ equipment	5	A Library Accessibility web page has been created and published.	October 2020 Completed
Awareness Raising/ Training	Librarians will become familiar with SUNY EIT Library Accessibility Guidelines.	Director of LRC/LAD	Library personnel SUNY EIT Resources	Librarians will be trained in EIT accessibility guidelines.	5	Librarians have reviewed EIT webinars. A Librarian is part of the SUNY Library Accessibility Cohort.	February 2021 Completed
	Librarians will be trained about disabilities and accessibility.	EIT Advisory Council	DeQue University	Librarians will have basic knowledge about disabilities and accessibility.	4	Access to DeQue University has been given to Library staff who are completing modules.	May 2022 Nazely provided list of modules based on librarian role.
Design	Accessibility policies, procedures, and guidelines will be developed.	Director of LAC/LAD EIT Advisory Council	Library personnel EIT Advisory Council	The Library will have accessibility policies and procedures, and Library staff will have guidelines and best practices to follow.	4	Library accessibility policy was approved by the BOT October 2021. staff are developing awareness of EIT accessibility requirements and working towards development of policies and procedures.	October 2021 Policy Approval Completed Procedure target date: May 2022

	An accessibility web page to provide access, resource, and service information for the Library will be developed.	Director of LAC/LAD Librarians	Library personnel MarCom	The Library accessibility web page will provide important information related to accessibility to our patrons.	5	A Library Accessibility web page was developed and is in the process of refinement.	October 2020 Completed
	Assistive technology and equipment will be made available to students. Clear signage and information will be readily available on where and how to obtain needed hardware/software.	Library ARO	Library & ARO personnel	Students and staff who require assistive technology and equipment will be aware of how to obtain assistive technology/software.	3	The Library & ARO collaborate to ensure student needs are met. Clear signage is in process; additional information will be added to the website.	Some progress made with webpage and signage; complete by new target date of March 2022 .
	All Library content will be made available upon request in accessible digital format.	Library	DeQue University training, document accessibility training	All library content will be accessible upon request in a digital format.	4	Library staff have begun working on making current content accessible. Guidelines for accessibility for future content need to be developed.	May 2022 Existing library produced content made accessible. Guidelines need development. New target date end of the academic year. A-Z database list with tips in progress.
Procurement	Collection management policies will include captioning as a selection criteria for multimedia.	Library	Library personnel	A Library accessibility procedure will be developed.	4	Discussions are in progress regarding library accessibility procedures.	Semi-Completed June 2022 procedures developed, collection policies need development.
	As updates are made to library/LAD spaces, accessibility will be considered with the design. The current space will be assessed to	Library Facilities/EH & S, ITS	Library, LAD, ARO, Facilities, EH & S and ITS staff Facilities	Future renovations to library/LAD spaces will include an accessibility review. The current space will undergo an accessibility inventory and	2	Accessibility checks will be built into Facilities purchasing procedures. Facilities/EH & S is completing an inventory spreadsheet of all classrooms on campus, including the library and LAD spaces.	June 2021

	determine accessibility compliance.		ADA guidelines	to ensure accessibility compliance with ADA.			
	Explore ongoing funding sources and establish a Supply Budget line within ARO for Library accessibility needs.	Library ARO	Director LAC/LAD, ARO, funds within the budget	An explicit funding source will be identified for assistive technologies and software.	2	The Library and ARO work together to ensure student accessibility needs are met. They have begun discussing ways to ensure a funding stream.	June 2021
Monitoring Compliance	Utilize a ticketed reporting system to track complaints and concerns.	Library	Library staff	Accessibility issues and concerns will be reported and tracked to ensure they have been resolved.	5	A ticketed system does exist and queue are in place. Further streamlining is in progress.	October 2020 ticketed system completed. Target date of May 2021 Completed and ongoing to track complaints.
	Explore obtaining a license for SiteImprove or other resources to regularly review accessibility on the Library website.	Library	Library staff Funds for SiteImprove or SiteSort license MarCom	The library website will undergo regular accessibility checks.	5	The Library is in the process of obtaining a license for SiteImprove. In addition an annual meeting with MarCom is held to discuss web accessibility.	June 2021 Completed
	A Library Accessibility liaison will be identified.	Library	Library staff	A Library Accessibility Liaison will be identified and contact information published to handle accessibility issues and concerns.	5	The Library accessibility liaison is Amanda Hollister. The Library Accessibility Liaison will consult with a library EIT/ADA team.	October 2020 Completed
	A plan will be developed for annual VPAT review.	Library EIT Advisory Council Purchasing Office	Library staff Vendors	A plan will be established to conduct an annual VPAT review for Library EIT.	5	High impact shared VPATs are currently under review by SUNY Libraries Accessibility Cohort. A plan is place to review medium/low impact VPATs. Purchasing policies requiring a VPAT for EIT purchases and vendor sample emails have been developed which will be used in this process.	June 2021 Completed

Standard 5: Procurement Action Plan

Plan Element	Actions	Administrative Oversight/ Individual Responsibility	Resources/ Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	Establish roles and responsibilities: Purchasers, Purchasing Office.	VPAF/ AVP Controller	All college employees	All purchasers on campus will follow procurement policies and procedures.	5	Roles and responsibilities have been established for campus employees with oversight provided by the appropriate VP.	Fall 2020 Completed
	Accessible EIT Policy and associated procedures developed.	EIT Advisory Council in conjunction with Purchasing Office	EIT Advisory Council in conjunction with Purchasing Office staff	EIT related procurement policies and procedures for the campus will be developed.	3	A plan for establishing policies and procedures has been developed; outline drafted.	Fall 2020-procurement procedures developed. New target date March 2022 for associated policies.
	Establish Accessible EIT Procurement Committee.	EIT Officer/EIT Advisory Council	Committee members for Accessible EIT Procurement Committee	A committee to review EIT related purchases has been established and forms developed for reviewing purchases.	5	Committee has been established; soft roll out began Jan 2021. Committee has been revamped to a Testing Task Force to streamline testing now that procedures have been finalized.	Fall 2020- committee and forms established; revised target date: Fall 2021
Awareness Raising/ Training	Enroll appropriate personnel in Deque university courses.	EIT Advisory Council/Direct supervisors	DeQue University	All appropriate personnel will have an account with Deque and go through assigned courses	5	DeQue rolled out to campus.	October 2020-completed; Ongoing
	Training provided to campus about new purchasing policies and procedures.	EIT Advisory Council/ Accessible EIT Purchasing Review Committee	EIT Advisory Council and Purchasing Office personnel/Committee members	All campus purchasers will be trained on new policies and procedures related to procurement and accessibility.	4	Forms and materials were shared with the campus and feedback has been utilized to refine forms. Continued training will be provided as testing and procurement review is refined.	Dec. 2020-introduction began; final target date June 2022.

Design	Develop and implement Web Accessibility Policy.	MarCom	MarCom staff	The College will have an official policy to help enforce web accessibility	5	Web Accessibility Policy approved by BOT.	March 2021 Completed
	Develop and implement Accessible EIT Policy & Accessible EIT Purchasing Procedures.	EIT Advisory Council and Purchasing Office	Purchasing staff	The College will have an official policy/ procedures to ensure accessibility reviews are conducted for EIT Purchases	3	A plan for establishing policies and procedures has been developed. Continued refinement of the procedure is occurring; there is a need to incorporate the RFP process into procurement policies and procedure development.	Fall 2020 procedures set; new target date June 2022
	Develop and implement Accessibility EIT Review Forms, Accessibility Exception Form and Alternate Access Form.	Purchasing Office/ EIT Advisory Council/ Accessible EIT Purchasing Review Committee	Purchasing staff/ EIT Advisory Council members	Appropriate forms will be developed and in place for training and the start of a new process 1/1/21.	5	Forms have been developed, refined based on user feedback and continued maturity of the process.	February 2021 Completed
	Competitive bid/RFP accessibility language developed and implemented into required purchasing forms.	Purchasing Office	Purchasing Office staff	All competitive bids and RFPs will undergo an accessibility check and provide VPATs as appropriate.	1	Discussions for the need for this have occurred. This is a continued area that needs attention.	June 2022
	A review of EIT related purchases to ensure accessibility is conducted.	Accessible EIT Purchasing Review Committee	Committee members	All EIT related purchases undergo an accessibility review to ensure access to students/employees is equal	4	Plan for process and documents is completed. Committee has been reviewing EIT related purchases this past year and is working on refining the accessibility exemption process.	February 2022 Ongoing
Procurement	Develop VPAT templates to utilize with vendors and a list of accessibility questions for an accessibility roadmap if no VPAT exists.	Purchasing Office	Purchasing Office staff	VPAT templates are available for campus use with vendors.	4	A draft VPAT has been developed. Further refinement and a process for VPAT requests is needed.	Fall 2020 draft completed. Finalized new target date Feb 2022.

	Accessibility assurances included in purchase agreements.	Purchasing Office	Purchasing Office staff	Accessibility assurances included in purchase agreements.	1	Discussions about the need for this have taken place. Language needs to be developed.	January 2021-not completed. New target date June 2022.
Monitoring Compliance	Monitor purchases to ensure accessibility review is conducted prior to requisition approval.	EIT Purchasing Review Committee	EIT Review Committee	All EIT related purchases are reviewed for accessibility to ensure equal access for campus students/employees.	3	Plan for the process and documents is completed with the testing stage underway. Testing process continues to be developed and refined but lacks the maturity the campus would like.	January 2021 soft roll out; Testing of products began Fall 2021 and continues. Ongoing
	EIT products deemed inaccessible are reviewed for exceptions and Alternate Access Plans developed.	EIT Purchasing Review Committee EIT Officer, Purchasing Office/Legal Counsel as needed	Purchasing/Legal Counsel	Any product deemed inaccessible and is approved for an exception for purchase has an alternate access plan in place to ensure equal access.	3	Plan for the process and documents is completed with the testing stage underway. Exemption process needs further refinement; rubric has been developed but needs to be tested.	January 2021 soft roll out. Ongoing
	Maintain annual schedule for vendor accessibility improvements.	Purchasing Office in conjunction with the EIT Advisory Council	Purchase Office staff and EIT Advisory Council	An accessibility schedule is in place to ensure continued review of all EIT products regarding accessibility improvement.	2	EIT products reviewed have been put on a schedule. Further education to campus needed; further implementation of additional products to ensure this list is inclusive.	June 2022