Texas A&M University-San Antonio

29.01.04.O0.01 Accessibility of Electronic and Information Resources
Approved: June, 2012
Next Scheduled Review: June, 2014

Procedure Statement

This Procedure establishes the processes that Texas A&M University-San Antonio will follow to comply with the accessibility and translation portions of the requirements for state Web sites as stated in Texas Administrative Code, Title 1, Ch. 206, State Web Sites. The privacy, linking, and indexing requirements are covered in TAMU-SA University Procedure 29.01.01.O0.01 Information Resources- State Web Sites.

This Procedure also establishes the processes TAMU-SA will follow to comply with the accessibility requirements of Texas Administrative Code, Title 1, Ch. 213, Electronic and Information Resources.

Reason for Procedure

This Procedure is required by System Regulation 29.01.04 Accessibility of Electronic and Information Resources.

Process and Responsibilities

1. The Multimedia &Web Coordinator oversees the University’s Web Accessibilities compliance. His/her responsibilities are as follows:

   1.1. Develop and maintain a plan for achieving accessibility including metrics to measure progress in plan implementation;

   1.2. Monitor compliance in achieving accessibility through reports using automated 508 validation software;

   1.3. Distribute 508 validation reports to Web Content Creators that indicate the accessibility level of the various Web pages and overall progress towards accessibility in their respective areas;

   1.4. Coordinate with the Director of Information Services in approving or disapproving an exception for Web accessibility.
2. Responsibilities for Web Content Creators include technical support to the Multimedia &Web Coordinator as follows:

2.1. Consult with the Multimedia & Web Coordinator in developing and maintaining the Web accessibility plan;

2.2. Perform Web site scanning with an appropriate 508 validation tool;

2.3. Prepare and interpret reports based on Web site scanning, including reports to be provided to Web Content Approvers or supervisor;

2.4. Serve as a contact point for technical questions and provide informational and tutorial/instructional resources (e.g., links) for their own department.

3. Responsibilities for Web Content Approvers include:

3.1. Review and assess Web accessibility reports for progress;

3.2. Communicate and reinforce achievement of Web accessibility goals.

4. The Web Content Creator has overall responsibility for their Web sites. Web Content Creators and Approvers will ensure all Web pages are created and maintained to contain accessible, timely, and accurate information.

5. All new or redesigned Web pages/content must comply with the requirements of

1 Texas Administrative Code § 206 and this procedure, unless an exception is approved through the Exception Request Process, pursuant to § 2054.460, Texas Government Code.

6. New and modified Web page templates are to be tested by Multimedia & Web Coordinator using one or more § 508 or equivalent validation tools in conjunction with manual procedures to validate compliance with State (1 Tex. Admin. Code § 206.70) and Federal requirements, unless an exception is approved through the Exception Request Process, pursuant to § 2054.460, Texas Government Code.

7. New and modified Web pages are to be tested by the Web Content Creator using one or more § 508 or equivalent validation tools in conjunction with manual procedures to validate compliance with State (1 Tex. Admin. Code § 206.70) and Federal requirements unless an exception is approved through the Exception Request Process, pursuant to § 2054.460, Texas Government Code.

8. All TAMU homepages and key public entry points must include an “Accessibility” link, or a “Site Policies” link to a Web page that contains the University’s accessibility policy; site validation standard (i.e., § 508); contact information for the University’s Web Accessibility Coordinator; and a link to the Governor’s Committee on People with Disabilities Web site.
9. All Web pages shall avoid vendor specific, “non-standard” extensions and shall comply with applicable internet standards. For example, use: IETF for internetworking technology or methodology (e.g., SSL); and W3C for markup/style sheet languages (HTML, XML, CSS, etc.).

10. All Web pages must implement the following:

10.1. Metadata, following the TRAIL Meta-tagging Standards (see http://www.tsl.state.tx.us/trail/about.html for more information). The descriptors of TRAIL Meta tags must describe the specific Web page or publication in which they are included. Use of a generic set of descriptors for every publication is not acceptable. The following Meta tags must be implemented:

10.1.1. DC.Subject.Keyword

10.1.2. DC.Description

10.1.3. DC.Subject

10.1.4. DC.Type

10.1.5. HTML TITLE Tag

11. Translation – Web Content Creators must make a reasonable effort to ensure that individuals of limited English proficiency can meaningfully access institution of higher education Web site information in accordance with provisions of Texas Government Code §2054.116. They should consult with the Multimedia &Web Coordinator to determine the parts of the Web site that should be translated into Spanish and/or other languages, in addition to English.

12. University campus homepages must contain the following:

12.1. Links to the following State of Texas resources:

12.1.1. State of Texas homepage

12.1.2. Texas Homeland Security Website

12.1.3. Statewide Search Website

12.1.4. Site Policies page

12.2. Individual links to the following or to the Site Policies page with links to the following:

12.2.1. Privacy and Security Policy
12.2.2. Accessibility Policy

12.2.3. Institution of higher education contact information

12.2.4. Description of policy/procedures related to the Open Records/Public Information Act

12.2.5. Compact with Texans:
http://www2.dir.state.tx.us/SitePolicies/Pages/compactwithtexans.aspx#overview

12.3. COMPLIANCE EXCEPTIONS

12.3.1. If after careful evaluation of all available resources and options, a University department determines that compliance with any provision of the accessibility procedure imposes a significant difficulty or expense, the department may request an exception by completing and submitting the EIR Accessibility Exception Request Form.

12.3.2. Exception Request Process

12.3.2.1. Determine need for exception:

12.3.2.1.1. Significant difficulty – No department staff or contractor available qualified to complete the project in an accessible manner.

12.3.2.1.2. Cost prohibitive – Include cost analysis of cost to achieve accessibility compared with the cost of creating or purchasing an inaccessible resource. This analysis should include the cost of providing and maintaining alternative access.

12.3.2.2. Complete exception request form and submit to the Office of Information Technology for initial review and forwarding to the University President.

12.3.2.3. The University President or designee evaluates request to determine if the exception should be approved.

12.3.2.4. The President approves or denies the request. The President’s decision may not be appealed.

12.3.2.5. If the exception is approved, an alternative method of access must be provided. (Examples are provided in the next section.)

12.3.2.6. Approved exceptions will be assigned an expiration date, not to exceed one year, at which time the department must resubmit an exception request or have become compliant

12.3.2.7. All processed exception requests will be retained in the Office of Information Technology following established retention of state records policies.
12.3.2.8. When an exception has been approved, users with disabilities must still be able to access the content or functionality of the inaccessible resource. This may be accomplished by providing one or more of the following alternative methods of access:

12.3.2.8.1. Alternative accessible document types (e.g., PDF, Word, Text, HTML).

12.3.2.8.2. Create a second version of the document in a more accessible format.

12.3.2.8.3. Braille

12.3.2.8.3.1. A Braille version of the resource may be created to provide access for users who are visually impaired and who read Braille.

12.3.2.8.3.2. This method should not be used alone to provide access for users with visual impairments and should usually be accompanied by large print versions.

12.3.2.8.4. Teletypewriter (TTY) - TTY services may be used to provide access to users with hearing impairments.

12.3.2.8.5. Captioning - Closed or open captions may be added to multimedia presentations for users with hearing or cognitive impairments.

12.3.2.8.6. Transcripts

12.3.2.8.6.1. Transcripts may be used to provide access to audio and audio/visual presentations.

12.3.2.8.6.2. These transcripts must include all dialog, and any meaningful information this is presented visually.

12.3.2.8.7. Text-to-speech (TTS) synthesis - TTS may provide access for users with visual or cognitive impairments.

12.3.2.8.8. Recorded audio - Providing a recording of print-based information may provide access to users with visual or cognitive impairments, and can also provide access to some users with limited English proficiency.

12.3.2.9. When choosing to create multiple versions of documents to provide accessibility for users, a plan should be developed for ensuring that these alternative versions are kept current with the standard version. Departments should consider the cost of creating and maintaining alternative versions when developing a request for an exception to the accessibility procedure.
12.3.2.10. Departments must use the Web-based “Buy Accessible Wizard” tool (https://app.buyaccessible.gov/baw/), provided by the General Services Administration (GSA), as a preliminary means of assessing the commercial availability of EIR products and services which support accessibility.

12.3.2.11. As a general exception, this procedure does not require the installation of specific accessibility-related software or the attachment of an assistive technology device at a workstation of a University employee who does not have a disability.

Related Statutes, Policies, Procedures, or Requirements

Texas Administrative Code, Title 1, Ch. 206, State Web Sites
Texas Administrative Code, Title 1, Ch. 213, Electronic and Information Resources
Texas Government Code §2054.116
System Policy 29.01 Information Resources
System Regulation 29.01.04 Accessibility of Electronic and Information Resources
TAMU-SA University Procedure 29.01.01.00.01 Information Resources - State Web Sites

Definitions

508 validation tool - A software application that can scan Web pages and provide information to assist in determining if the Web pages meet the Section 508 standards. These 508 validation tools provide reports that help to ensure Web sites are accessible to persons with disabilities.

Accessibility - Web design criteria which support access that is not dependent on a single sense or ability, such as vision or hearing.

Information Resource Owner - An entity responsible for a business function and determining controls and access to information resources (e.g., Web pages) supporting that business function.

Key Public Entry Point (KPEP) - A Web page that a state agency or institution of higher education has specifically designed for members of the general public to access official information (e.g., the governing or authoritative documents) from the agency or institution of higher education. A list of these pages can be found at http://itaccessibility.tamu.edu/kpeps.html.

Metadata - Data about data; index-type data used to identify, describe, locate, or preserve (other) data over time.
TRAIL - The Texas Records and Information Locator and Electronic Depository Program (TRAIL/EDP) is an automated system used to collect, index, and preserve electronic state publications. To ensure that publications are appropriately harvested and indexed, a publishing entity must include metadata in its online publications.

University Campus Homepage - The main page for Texas A&M University-San Antonio.

Texas A&M University-San Antonio (TAMU-SA) Web Site - A TAMU-SA owned, operated by/or for, or funded Web site connected to the Internet, including the home page and any key public entry points.

Usability - Web design criteria that support user performance, ease of navigation, and understandability.

W3C - World Wide Web Consortium

Contact Office

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