# Accessibility Implementation Plan

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Introduction

This document outlines the Accessibility Implementation Plan for Louisiana State University and Agricultural and Mechanical College (LSU) in conformance with the standing agreement between LSU and the U.S. Department of Education - Office of Civil Rights (OCR). As the public Flagship institution of higher education for the state of Louisiana, LSU is committed to providing and maintaining an accessible online environment for all users.

The plan outlined below provides a high-level overview of the procedures, guidelines, and trainings LSU will implement that allow the University to create and maintain an accessible online presence. Where appropriate, it is noted how these changes will be phased in over time.

Online Accessibility Working Group

In response to the initial contacts with OCR, an Online Accessibility Working Group was established. This group is composed of representatives from across campus and includes an array of individuals ranging from executive leadership to hands-on web development professionals. This group was formed to evaluate the myriad issues associated with online accessibility and to provide a comprehensive path forward for the institution. The following units are represented on the working group:

- Academic Affairs
- Disability Services
- Division of Strategic Communications
- Faculty Senate
- General Counsel
- Human Resource Management
- Facility Services
- Information Technology Services
- LSU Libraries
- Procurement
- ADA Coordinator
- Staff Senate

Communication

A key element needed to ensure that the Accessibility Implementation Plan is appropriately disseminated to the campus community is a communication plan. With the assistance of the Division of Strategic Communication, updates regarding processes, policies, guidelines, trainings and more will be communicated via the following mechanisms:

- Broadcast email
- Email to applicable listservs
- Campus communicator meetings and emails
- Newsletters
- Accessibility website
- Employee hub website
- Faculty and staff training
LSU has a well-developed communications team with deep expertise in information dissemination. The multi-pronged approach outlined above will ensure appropriate coverage of campus stakeholders.

Scope

The scope of this plan is such that it covers all digital content considered both ‘old’ and ‘new’. While the main goal of this plan is to make all digital content accessible (ADA-compliant) by August 2019, there are different procedures for addressing ‘old’ and ‘new’ content. The corrective action/remediation plan addresses all ‘old’ material before August 2019. The plan for new content addresses all material from August 2019 onward. Material referenced in the remediation plan and new content plan applies to:

- Content in centrally controlled solutions
  - OU Campus
  - Wordpress (University’s multisite environment)
- Content in non-centrally controlled solutions
- Content in intranets
- Classroom technologies
- Videos
- Auditory content
- Web-based applications and online products
- Marketing emails
- Content posted in social media
- Content in online courses, generally defined

Benchmarks for Accessibility

LSU will formally adopt WCAG 2.0 Level AA and WAI-ARIA 1.0 standards.

Policies & Procedures

LSU will review, and, as appropriate, revise policies and procedures to comply with applicable Section 504 requirements, including but not limited to:

- PS-01 Equal Opportunity Policy
- PS-06.15 Use of Electronic Mail
- PS-10 Internal and External Communications / Advertising
- PS-26 Policy for Persons with Disabilities
- PS-29 Management of Courses and Classes
- PS-45 Courses and Curricula
- PS-107 Computer Users’ Responsibility
- ITS Governance Committee Procedure
- LSU Procurement Procedures
Each formal Policy Statement at LSU falls under the purview of an identified ‘Monitoring Unit’. As such, the Monitoring Unit is the default unit responsible for monitoring pertinent federal and state guidelines and initiating processes required to incorporate new guidelines into the university’s official policies and procedures as those updates occur.

Corrective Action/Remediation Plan

1. All online and digital material need to meet the benchmarks for accessibility (WCAG 2.0 Level AA and WAI-ARIA 1.0 standards) by August 15, 2019.

2. Resources to achieve corrective action are available on the Web Support Hub and the Accessibility Notice link at the bottom of all webpages.

3. Users are responsible for corrective action/remediation of their own content.

4. An Accessibility Compliance Team will be charged with maintaining and investigating compliance.

New Content Plan

New content in OU Campus
All users will receive accessibility training before they are given access to publish. All publishers will be approved by either the Webmaster or Web Content Strategist until all users have received training.

New content in LSU Wordpress sites
All new users will receive accessibility training to publish on a Wordpress site. Existing users will be trained and provided with tools to help check new content. Initial training will be conducted by Usablenet, and subsequent training will be conducted in-house.

New pages in non-centrally controlled solutions
- The Online Accessibility Working Group will designate an Accessibility Compliance Team to monitor non-centrally controlled websites.
- Such websites must register with Division of Strategic Communications and Information Technology Services and designate an individual or team to participate in accessibility training.
- Site designees will validate sites against benchmark accessibility standards and revise content as needed before publishing.
- Site designees will report progress as requested to the Online Accessibility Working Group.

New content in intranets
All publishers will receive accessibility training and audits will be run on a scheduled basis to catch accessibility errors.
New classroom technologies and course content

New classroom technologies will need to go through the University-wide IT Governance Council or a sub-committee of that group and be screened for compliance. New online course content will be vetted by appropriate online instructional designers in conjunction with their originating unit.

New video and audio content

All new marketing and communications videos will be closed captioned. Videos created by an outside vendor will be required to be closed captioned.

Supplemental instructional videos will be vetted by online instructional designers under the appropriate originating unit (such as LSU Online).

New web-based applications and online products

- In-house website and application developers will receive accessibility training. Change management and deployment procedures will require a scan to ensure compliance with adopted standards.
- Online applications and web-based products secured through a vendor will be vetted by ITS-Portfolio Management Office (PMO)/IT Governance prior to purchase. VPATs will be secured when available.
- When vendor contracts come up for renewal, the ITS PMO and Procurement will review for accessibility and obtain VPATs prior to contract renewals.

New marketing emails

Emails sent through Omni Email Campaign Manager will only be sent by users who have received accessibility training. Until that time, emails will only be sent by the Webmaster, Web Content Strategist, or Internal Communications Content Coordinator.

Marketings emails sent outside of centrally-controlled solutions will adhere to email accessibility guidelines provided by the Division of Strategic Communications.

New social media content

Social media content posted to LSU’s main channels will only be posted by users who have received accessibility training.

Social media content posted outside of LSU’s main channels will adhere to social media accessibility guidelines provided by the Division of Strategic Communications.

Equally Effective Alternate Access

In the rare instance new content cannot meet all benchmarks for measuring accessibility, LSU will document issues, alert stakeholders, and provide an equally effective alternate access as stipulated in revised Policy Statement 26.
Quality Assurance Procedures

Division of Strategic Communications
The Division of Strategic Communications will audit centrally-controlled websites, YouTube channels, and primary social media channels on an annual basis. If content is found to be non-compliant, Division of Strategic Communications will meet with the managing unit to walk through the errors, provide additional training, and assist the unit with remediation. Division of Strategic Communications will conduct a secondary audit four weeks after the meeting to ensure corrections have been made.

The Accessibility Compliance Team
The ACT will audit non-centrally-controlled websites. If content is found to be non-compliant, ACT will meet with the managing unit to walk through the errors, provide additional training if necessary, and assist the unit with remediation. ACT will conduct a secondary audit four weeks after the meeting to ensure corrections have been made.

Information Technology Services
ITS will audit new content for centrally managed intranets and web applications. If the new content is found to be non-compliant, ITS will notify the managing unit and be available to walk through the errors and provide additional training. ITS will conduct a secondary audit four weeks afterward to ensure corrections have been made.

Academic Affairs
Academic Affairs will provide annual updates and reminders to the Chief Academic Officers of each academic college (‘The Deans’) on the importance of adhering to compliance guidelines.

Procurement
Procurement Services will review IT procurements purchased by LSU departments to ensure accessible products are procured. Procurement Services will provide training on making decisions on procurement of products as it relates to accessibility as one of the criteria for procurement and recommended language for technology-related bids/proposals.