Big Bend Community College

IT/Accessibility Procedures, and Workflow

# Purpose

The following procedures are established to meet the requirement for implementing the Accessible Technology Policy as adopted by the State Board for Community and Technical Colleges on March 24, 2016, which was “established to support the community and technical colleges in Washington State in their obligation to provide equal, effective, and meaningful access to the benefits of technology for individuals with disabilities.” Big Bend Community College (BBCC) intends to purchase technology and other goods/services accessible and compliant with state policy and federal law, per our [Electronic and Information Technology Access (EITA) BP 6111](http://www.bigbend.edu/wp-content/uploads/2019/02/BP-6111-Electronic-Information-Technology-Access-EITA.pdf).

Examples of inaccessible technology include videos without closed captioning, web applications that cannot be read by a screen reader, or computer kiosks that cannot be accessed by those in a wheelchair.

# Purchasing Technology

All technology products or services purchased by BBCC **require** vendors to submit a “Voluntary Product Accessibility Template” (VPAT), documenting the accessibility of a product in accordance with Section 508 standards of the Rehabilitation Act of 1973. The VPAT review will be coordinated by the BBCC Information Technology (IT) Department to verify accessible compliance and accuracy. The Accessibility Coordinator will inform the requestor within two weeks of receiving a VPAT if the product is in compliance with accessibility regulations and standards. When a product is considered accessible with the VPAT, the requestor may continue with the procurement process following Washington State and BBCC policies and procedures.

# Procedures

## Requesting a technology purchase:

* If purchasing software or a hosted application, request a VPAT from the vendor. The “Request to Vendors for Accessibility Compliance” can be used for this purpose.
* Complete the BBCC Technology Request Form and submit it to Big Bend Technology (BBT).
* Work with BBT to obtain approval.
* Submit the completed, approved form and a purchase request to the Director of Purchasing for processing.

## Requesting a technology accessibility exemption:

When a VPAT demonstrates a lack of accessibility, an exemption may be requested by the BBCC department or employee initiating the technology request by utilizing the following procedure.

A written request for exemption may be made to the Accessibility Coordinator following review and endorsement by the appropriate director, division chair, or supervisor. Exemption requests should detail what accessibility requirements cannot be met by the technology product. The request should also detail why attempting to meet accessibility requirements would cause an undue burden to college resources, employees, and/or students. Requests should indicate other options or vendors considered and why they were not selected. The respective vice president, in consultation with the Disability Services Department and Accessibility Coordinator will evaluate the request based on the following criteria:

* What solutions (technology or otherwise) are currently in place? Will this technology improve or hinder accessibility?
* What constituent groups will this service affect?
* Can accommodations be made to overcome barriers to accessibility?

The final decision on exemptions will be made by the respective vice president. The Accessibility Coordinator will notify the requestor of the final decision within 30 days of receiving the request. The IT Department will maintain documentation of all approved exemptions.

# Definitions

* Voluntary Product Accessibility Template – an “information tool” that describes exactly how the product or service does or does not meet Section 508 standards.
* Section 508 – an amendment to the United State Workforce Rehabilitation Ace of 1973, a federal law mandating that all electronic and information technology developed, procured, maintained, or used by the federal government be accessible to persons with disabilities. Technology is deemed to be “accessible” if it can be used effectively by all persons.

# Relevant laws and other resources

* [Voluntary Product Accessibility Template](http://www.itic.org)
* [SBCTC Accessible Technology Policy](https://www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-3.aspx)
* [BBCC EITA BP 6111](http://www.bigbend.edu/wp-content/uploads/2019/02/BP-6111-Electronic-Information-Technology-Access-EITA.pdf)

Big Bend Community College

Technology Request Form

All technology purchases for Big Bend Community College must be approved by the IT Department, to ensure compatibility, support, purchasing and accessibility requirements are met. The business office will not approve technology purchase requisitions without IT approval. In some instances, requester may need to obtain a current VPAT (Voluntary Product Accessibility Template) from the vendor to determine accessibility of the product and that it meets WCAG 2.0 Level AA requirements. Information on the policies and requirements are located at the end of this form.

Please complete the form in its entirety, providing as much information and detail as possible. Completed forms should be submitted to the Help Desk, bigbendtechnology@bigbend.edu. Evaluation of requests may take up to two weeks. Requester will be notified of the selection decision and results of the accessibility evaluation.

Today’s date: MM/DD/YY Building and room: Enter building and room number here

Full Name: Enter full name here Phone number: Enter phone number or extension here

Requested completion date: MM/DD/YY Technology Type: Choose an item.

If technology type is software or a hosted application, attach a VPAT obtained from the vendor.

Describe your request: Enter your technology request here. Provide as many details as possible, including contact information for the vendor.

From which budget code will this be paid? Enter budget code here

If no budget code and budget signature is given, then only a cost estimate will be provided.

Submitted by signature:

Budget Approval Signature:

Evaluation of Technology Request

\*Completed by IT Department\*

Date request received by IT: MM/DD/YY

Is a current VPAT attached: [ ] Yes [ ] No Date VPAT reviewed: MM/DD/YY

# Review VPAT for accuracy and compliance with WCAG 2.0 Level AA:

Enter information found during review of VPAT here

Accessible Product? [ ] Yes [ ] No Meets 2.0 [ ] A [ ] AA [ ] AAA

# Comments of product compatibility with BBCC technology standards:

Enter comments of product compatibility

Is product compatible with BBCC technology standards? [ ] Yes [ ] No

# Miscellaneous Comments:

Enter miscellaneous comments here

User notified of findings Date: MM/DD/YY

Purchase Requisition created: [ ] Yes [ ] No

Final notes:

Enter final notes here

Request to Vendors for Accessibility Compliance

# Requesting documentation for compliance review

To comply with the [Washington State Office of the Chief Information Office Policy 188](https://ocio.wa.gov/policy/accessibility) and the [Washington State Board for the Community Technical Colleges Accessible Technology Policy](https://www.sbctc.edu/resources/documents/sbctc-accessible-technology-policy.docx), Big Bend Community College (BBCC) is required to receive a vendor completed [Voluntary Product Accessibility Template (VPAT)](http://www.itic.org/policy/accessibility/). For BBCC to verify the accuracy of the submitted VPAT along with verifying the product meets [WCAG 2.0 Level AA](http://webaim.org/standards/wcag/#wcag2) accessibility requirements, please send a completed VPAT and a document stating compliance of [WCAG 2.0 Level AA](http://webaim.org/standards/wcag/#wcag2).

All electronic resources must be evaluated for compliance for new product acquisition, renewal of usage, or continuation of usage by the college. Even if the product is acquired, procured, developed, substantially modified or substantially enhanced, including resources available at no cost, it still needs to be evaluated for compliance.

If you have questions, please contact accessibility@bigbend.edu**.**

# Resources

VPAT [www.itic.org/policy/accessibility/](http://www.itic.org/policy/accessibility/)

WCAG 2.0 Level AA <http://webaim.org/standards/wcag/#wcag2>

OCIO Policy 188 <https://ocio.wa.gov/policy/accessibility>

SBCTC Accessible Technology Policy <https://www.sbctc.edu/resources/documents/sbctc-accessible-technology-policy.docx>

SBCTC Policy 3.20.30 Access for students with disabilities <https://www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-3.aspx>

Sample Contract Language

**Accessibility.**

**Vendor represents that it is committed to promoting and improving the accessibility of all its products and will remain committed throughout the term of this Agreement. If the Products and Services are not in conformance with all applicable federal and state disability laws, policies, and regulations as of the Effective Date, Vendor shall use reasonable efforts to update the Products and Services so as to be in conformance therewith. In the event any issues arise regarding Vendor’s compliance with applicable federal or state disability laws, policies and regulations, Customer may send communications to Vendor as specified in the “Notices” provision of this contract and Vendor will assign a person with accessibility expertise to reply to Customer.**

# ****Letter of Understanding****

**{Date}**

**To: {Vendor Name}**

**Subject: Product non-compliance for accessibility standards and pilot**

**Big Bend Community College (BBCC) is interested in using your {PRODUCT}. {Why did you choose this software and what are the important aspects this software meets for your requirements and accreditation?}**

**BBCC would like to pursue purchasing and utilizing this product(s), however, this product(s) does not currently meet the accessibility requirements for:**

* **Section 508 of the Rehabilitation Act of 1973**
	+ <http://www.section508.gov/>
* **Washington State Board of Community and Technical Colleges (SBCTC) Policy 30.20.30B**
	+ <http://www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-3.aspx>
* **Washington Office of the Chief Information Officer (OCIO) Policy 188**
	+ <https://ocio.wa.gov/policy/accessibility>

**Per the above listed requirements, BBCC cannot pursue this purchase at this time.**

**However, if {VENDOR NAME}’s intention is to pursue making this product accessible and a roadmap can be provided for this work, BBCC would like to move forward with its purchase on a time-restricted pilot. This would allow BBCC to use the product and make sure it will meet the institution’s long term needs. Further, a pilot phase allows {Vendor Name} the time needed to make accessibility improvements. BBCC’s intention is to work with {Vendor Name} collaboratively, including beta testing, accessibility testing using adaptive technologies, and providing feedback and reports on successful improvements and issues found within reason.**

**This pilot would last a maximum of one year from the date of acceptance. At the completion of the pilot, an accessibility audit based on the above listed requirements would be completed. If the product meets those requirements, and there is still a desire to use the product by BBCC, then a new contract can be implemented with the requirement of a termination clause pertaining to meeting 508 and WCAG standards. In the case that at the end of the pilot the product does not meet the accessibility requirements or demonstrated significant progress towards meeting these requirements, BBCC would be unable to continue use of the product.**

**Thank you for your consideration,**

**Name and Title here**