Accessibility Policy

Scenario

Administrators at Greenvale State University recently decided to develop a comprehensive accessibility policy. Institutional leaders recognized a need to bring more clarity and cohesiveness to a pastiche of accessibility policies in various departments and offices. They also wanted to avoid finding themselves in the same situation as a nearby college that received a “Dear Colleague” letter from the Education Department’s Office for Civil Rights sanctioning that institution for insufficient accessibility across much of its learning-related information technology. Greenvale convened a task force that included administrators, faculty, students, staff, and community members. After auditing the university’s existing accessibility policies, the task force discovered that while some institutional departments and programs have long maintained accessibility policies, they are inconsistent and poorly executed. Meanwhile, some areas of the university have no such policy.

After working diligently over the past academic year, the task force unveiled a university-wide accessibility policy. The policy starts by defining the rationale—couched in terms of the institution’s values and mission—and the scope of its applicability across campus. Several sections detail expectations for accessibility in the classroom, for information technology, and across the institution’s physical facilities. The report specifies expected outcomes for compliance, as well as accommodation procedures for students, staff, and visitors. It details remedies for noncompliance. The policy places the provost in charge of compliance but names other individuals, including the CIO, as having specific responsibilities for components of the policy.

Since implementation, the plan has been applied to help answer specific questions around accessibility. It has been praised for having brought needed consistency and clarity to a critical dimension of university operations. Among other benefits, the plan has proven helpful as a tool to help Greenvale administrators explain the university’s accessibility requirements to software vendors, and it has been cited by some incoming students and new faculty as a factor in their decision to come to Greenvale.

Greenvale believes that its work on accessibility must be ongoing and that the policy must evolve over time. Accordingly, the task force meets quarterly to review how well the policy works and has recommended amendments to make the policy even stronger and more useful.

1 What is it?

Accessibility policies frame standards and expectations for how a college or university’s programs, services, and facilities serve the needs of people with disabilities. Under that rubric, specific institutional policies vary greatly in scope and intent. Some policies are aspirational in nature and relatively short on specific mandates, while others are much more prescriptive in stating standards, rules for compliance, and sanctions for behaviors that fall short. Some accessibility policies apply to the entire institution, while others pertain to a certain area, such as information technology. Regardless, accessibility policies constitute a statement of values that the institutional community subscribes to, and they serve as guidelines for how the institution intends to ensure the equitable treatment of all members of the campus community.

2 How does it work?

Accessibility policies could include a statement of commitment, assignment of executive responsibility, definitions of roles and responsibilities by institutional unit, clarification of the scope of the policy (e.g., facilities, classroom, IT, institution-wide), identification of standards, a glossary, and guidelines for compliance. Some policies also contain procedures for monitoring and reviewing performance and compliance. In developing accessibility policies, individual institutions need to determine how specifically the policy should operationalize compliance procedures. A statement of explicit “ownership” of the policy by a senior institutional leader or unit is often critical to the policy’s success. Accessibility policies need to speak to many audiences, including students and faculty as well as administrators and other staff. Developing accessibility policies is an ongoing process that can be strengthened through regular reflection and review to ensure alignment with institutional values, as well as evolving developments in technology and relevant laws and regulations.

3 Who’s doing it?

Websites from the Accessible Technology Initiative (ATI) of the California State University, Penn State, the University of Virginia, and the Web Accessibility Initiative feature rich content related to IT accessibility policies. A California State University memorandum outlines specific responsibilities and reporting guidelines in support of CSU’s Policy on Disability Support and Accommodations. Cornell University developed a multiyear
Accessibility Policy

“Disability Access Management Strategic Plan.” Specific examples of accessibility policies focused on electronic communication and information technology can be found at Penn State, Purdue University, Yale University, and the University of Wisconsin–Madison. Having entered into a voluntary agreement with the National Federation of the Blind to improve accessibility, Wichita State University offers substantial accessibility-related resources for its community, including specific standards for ensuring accessibility in face-to-face instruction.

4 Why is it significant?

Higher education accessibility policies are important tools that build awareness of and compliance with accessibility guidelines and related legal obligations. Beyond that, such policies are important statements about how an institution values diversity and inclusion. By framing procedures to help ensure equal access to institutional services and facilities, such policies outline expectations in ways that are appropriate to each institution’s culture, beliefs, and mission. These policies also help leaders and others clarify their thinking about how the institution ensures accessibility for digital resources relative to efforts to guarantee physical accessibility, such as for buildings and parking. Functioning as guidelines to show students, staff, and vendors what they need to do to ensure accessibility, these policies can serve as a strategic plan documenting the operational behaviors that will help the institution maintain, improve, and adequately resource effective accessibility practices.

5 What are the downsides?

Like any policy, accessibility policies are only effective if they are enforced. Some accessibility policies are worded in ways that make them difficult to enforce, such as when they are vague or, conversely, when they are highly specific and seen as restrictive. The very existence of an accessibility policy can raise expectations about what the institution will do to ensure equal access to all facilities and programs, possibly eliciting criticism if the stipulations of the policy are not met. Approval of an accessibility policy can sometimes be viewed as just another procedural box to check, and some members of the community might be satisfied with simply having the policy rather than working to enforce it. The nature of accessibility policies can make them difficult to write in ways that meet the needs of all stakeholders, and consensus can therefore sometimes prove elusive.

6 Where is it going?

Increased attention to cultural and legal expectations about diversity and inclusion will likely drive more institutions to engage more deeply and intentionally in developing accessibility policies. Efforts in some states to develop statewide policies concerning accessibility in such institutions as colleges, universities, and prisons will be the impetus for more institutions to work on their accessibility policies. Students and other consumers of institutional resources will likely become increasingly aware of such policies and may become more vocal in their demands for compliance. Institutions may come to view the need to regularly revisit and hone such policies as an opportunity to strengthen the policies and clarify institutional values about ensuring accessibility for all.

7 What are the implications for teaching and learning?

Teaching a diverse student body, including those with disabilities, enriches the learning experience by encompassing a variety of perspectives in the educational environment. The same is true for having diversity among faculty and staff as well. Instructors and support staff who understand that value can adopt practices that help create inclusive learning environments as they design curricula and adopt accessible course materials. For example, incorporating principles of universal design in the development of learning spaces, as well as building universal instructional design into the practice of teaching and learning, can help ensure that all students will be able to engage fully in the educational experience. Ensuring such accessibility is particularly important in an era when we increasingly rely on technology and online education to facilitate learning. Indeed, building accessibility into curricula and pedagogy can be seen as a means to extend the value of technology for teaching and learning to all learners and instructors, regardless of their abilities, in support of student success in an environment that is truly diverse and inclusive.