

Florida Coastal School of Law

Web Accessibility Policy

Approval Authority:	President
Responsible Executive(s):	President & MARCOM
Responsible Office:	MARCOM
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Policy Statement

All Web pages within the Florida Coastal School of Law Web space must be accessible to the widest range of users, including those with the more common sensory, motor and cognitive disabilities, by adopting as a minimum the requirements of Section 508 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794d, Subpart B §1194.22 "Web-based intranet and internet information and applications" (referred to as "Section 508").

Reason for Policy

Florida Coastal School of Law recognizes the need to better serve Web users with and without disabilities. This, along with the school's overall commitment to a diverse and inclusive educational and work environment that anticipates a changing technological and regulatory environment, merit a comprehensive policy on Web accessibility.

Scope

This Policy applies to the entire Florida Coastal School of Law Web Space and its associated websites. In addition, Florida Coastal School of Law will ensure third-party content providers are aware of this Policy and will favor providers based on their accessibility conformance claims.

Who Should Read This Policy

All members of the Florida Coastal School of Law community, including faculty and staff should read, understand and comply with this Policy.

Where is this Policy Located?

This Policy can be found in the following locations:

<http://www.fcsl.edu/student-life-student-affairs-ada-accomodations.html>

<https://sharepoint.infilaw.com/marcom/Policies/Forms/AllItems.aspx>

Contacts

Subject	Contact	Telephone Number	E-Mail Address
Policy Clarification	Nikki Cassis	904-256-1269	ncassis@fcsl.edu
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Definitions

The definitions below apply to terms as they are used in this Policy.

Term	Definition
Archival Web Site	A web site that is (a) intended to represent a historical snapshot of a course, research project, or other Web information, and (b) not used to gather or disseminate information about any current course, currently active research project, or current administrative function of the school.
Assistive Technologies	Adaptive, rehabilitative devices, whether acquired commercially or off the shelf, modified, or customized, that promote greater independence for individuals with disabilities by changing how these individuals interact with technology. Assistive technologies include special input devices, such as a head or foot mouse, and screen-reading software, which can read aloud for the user the details of material displayed on a monitor.

Florida Coastal Web Space	The entire collection of Web sites as specified in the Procedures section of this Policy, whose purpose for existence can be legitimately connected with Florida Coastal activities, including academic, research, and outreach activities.
Florida Coastal Official Web Site	A web site that has been created or sponsored by the law school, departments, units, or other administrative offices and that is used in the process of conducting official school business.
MARCOM	The Marketing and Communications organization.
Section 508 Standards for Accessibility	Web design standards established through federal law and regulation under the Rehabilitation Act of 1973. See the “Web Accessibility Standards” Section of this document for a detailed list of those standards.
Unit	A department, program, research center, business service center, office, or other operating unit.
Unofficial Web Site	<p>A site published by an individual such as a student or a school employee, or by a non-school organization, which is hosted on the school servers but does not conduct school business. These include:</p> <ul style="list-style-type: none"> • Student, faculty, and staff personal pages • Pages created by students to fulfill academic requirements that do not fall within one or more of the categories of “official websites” • Sites that reside on school servers that do not conduct school business, e.g., mirror sites • Pages hosted on servers that do not fall within the official web site categories listed above • Student organization pages • Affiliate web pages
Web Accessibility	The practice of making web pages more accessible to a wide range of users by applying specific design standards and programming that offers alternative forms of access and that enables assistive technologies to function effectively.
Web Application	Any software that delivers dynamically generated content intended to be rendered in a web browser.
Web Page	A (web) document rendered by a markup language, (e.g., xhtml, html), independent of its transmission protocol (e.g., http) and user agent (browser/reader).

Web Site	Any collection of Web pages residing under a single domain and whose content is centered around a single organizational unit or workgroup, a school course, a research or business activity, or an area of academic content.
Web Site Redesign	Any phase during the development or maintenance of a web site in which significant alteration or update is made to the visual design, institutional branding, information architecture, or technical functionality of the site. Minor content updates are not considered Web site redesign projects.

Roles & Responsibilities

The following table outlines the roles and responsibilities of various roles and/or organizations at Florida Coastal School of Law.

Functional Area	Responsibility
President	Provide education, training, leadership, guidance, and support resources to school community members on compliance with this Policy.
Dean	Provide education, training, leadership, guidance, and support resources to school community members on compliance with this Policy.
Human Resources	Provides annual training to school community members on this Policy.
Department Heads	When possible, provide necessary support within the department for compliance with this Policy.
Web Site Editor	Reviews and updates content on the web site.
Web Site Owner (MARCOM)	<p>The overall web site owner serves as the school’s liaison to the web site vendor, developers, and editors.</p> <p>Provide education, training, and support resources to school community members on compliance with this Policy.</p> <p>Ensures all internally designed, developed and maintained Web spaces are compliant.</p> <p>Considers web accessibility issues when purchasing software or licenses.</p> <p>Ensures that the semi-annual compliance check, meeting and associated processes are followed.</p>

Web Site Developer (or anyone responsible for the creation, review, or update of a Web page)	Design or revise web sites in accordance with this Policy.
Information Technology (IT)	Consider web accessibility issues when purchasing software or licenses.
3rd Party Web Site Vendor (or anyone responsible for the creation, review, or update of a Web page)	<p>Design or revise web sites in accordance with this Policy.</p> <p>Provide education, training, and support resources to school community members on compliance with this policy.</p> <p>Be a proactive participant in the semi-annual compliance checks.</p>

Principles

Overview

The federal government requires its agencies and all private entities receiving federal funds to comply with Section 508 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794d, Subpart B §1194.22 “Web-based intranet and internet information and applications” (“Section 508”). This section includes 16 specific standards designed to ensure that the web sites can be processed and interpreted by assistive technology (AT) (hardware for software that increases or maintains functional capabilities of individuals with disabilities) such as screen readers. Florida Coastal School of Law aspires to make its Web Pages as accessible as is practicable in keeping with its founding, and enduring, philosophy of accessibility in its many forms. Toward that end, this Policy sets forth a requirement to, at a minimum, comply with Section 508. While the minimum requirement is Section 508 compliance, Florida Coastal School of Law will strive to be compliant with the AA level of the Web Content Accessibility Guidelines (WCAG) 2.0.

Florida Coastal School of Law reserves the right, in its sole discretion, to monitor and review, without prior notice, any and all aspects of the Web Accessibility Policy compliance. Any repetitive and ongoing violations of the Policy may subject the employee, temporary employee, contractor or consultant to sanctions ranging from disciplinary action, including, without limitation, termination of employment or service contract.

Procedures

This Policy applies to all new, updated and existing web content on:

- www.fcsl.edu
- All department sites constructed for the public information and school business functions.
- Outreach program sites not designed for collaboration.

The following areas of the Florida Coastal School of Law Web Space are not required to adopt Section 508 standards:

- Unofficial Web sites (see the “Definitions” Section of this document).
- Vendor-obtained web applications.
- Wufoo forms (3rd party app) since this vendor is not Section 508 compliant yet.
- Sites and Web pages created to conduct research or experiments in developing or utilizing new technologies and applications for the Web.
- Archived sites or pages.
- Sites and Web pages created to experiment with new workflow processes that involve Web tools.
 - Note: Once a tool moves beyond an experiment and becomes an accepted part of a workflow process, that tool must comply with this Policy.
- Whole-course capture sites (automated videotaping or audio recording of every class session)
- Archival sites

The ability to design, develop, maintain, or update content on the Florida Coastal School of Law Web Space will be limited to only those individuals who have been given authority to do so and have been fully trained on how to comply with Section 508. This would include individuals within the following organizations.

- 3rd Party Vendor hired to provide web site services
- MARCOM
- Admissions
- Employees, consultants, or contractors given express permission to update the web site by MARCOM.
- IT

A list of active users who have the authority to maintain or update the Web space will be maintained by MARCOM.

Web Accessibility Requirements

For non-exempted Florida Coastal Web Space, the following will be required of Web developers. This list is taken verbatim from the Section 508 Subpart B §1194.22, which can be found at: https://www.access-board.gov/guidelines-and-standards/communications-andit/about-the-section-508-standards/section-508-standards#subpart_a.

- (a) A text equivalent for every non-text element shall be provided (*e.g.*, via “alt”, “longdesc”, or in element content).

- (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.
- (d) Documents shall be organized so they are readable without requiring an associated style sheet.
- (e) Redundant text links shall be provided for each active region of a server-side image map.
- (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
- (g) Row and column headers shall be identified for data tables.
- (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.
- (m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).
- (n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
- (o) A method shall be provided that permits users to skip repetitive navigation links.
- (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

Note to §1194.22:

1. The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5, 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium:

Section 1194.22 Paragraph WCAG 1.0 Checkpoint

(a)	1.1
(b)	1.4

Section 1194.22 Paragraph WCAG 1.0 Checkpoint

(c)	2.1
(d)	6.1
(e)	1.2
(f)	9.1
(g)	5.1
(h)	5.2
(i)	12.1
(j)	7.1
(k)	11.4

2. Paragraphs (l), (m), (n), (o), and (p) of this section are different from WCAG 1.0. Web pages that conform to WCAG 1.0, level A (*i.e.*, all priority 1 checkpoints) must also meet paragraphs (l), (m), (n), (o), and (p) of this section to comply with this section. WCAG 1.0 is available at <http://www.w3.org/TR/1999/WAI-WEBCONTENT-19990505>.

The Section 508 Compliance Checklists can be found in the Appendix. These checklists are to be used to ensure Section 508 compliance whenever changes are made to the Web Space.

Conformance Timeline

The Florida Coastal School of Law Web space will be in compliance with this Policy effective October 1, 2017.

Compliance Policy Training

Given the importance of this Policy, all Florida Coastal School of Law employees (permanent or temporary) will be required to review and acknowledge understanding of this Policy every calendar year.

All consultants or third party vendors hired to design, develop, maintain, support or update the Florida Coastal School of Law Web space are required to comply with this Policy.

All employees, consultants, or third party vendors responsible for designing, developing, or updating the Florida Coastal School of Law Web space are required to attend a mandatory training class on how to ensure that any Web space changes are compliant with Section 508. A record of this training will be maintained per the InfiLaw System Records Management Policy.

Compliance Auditing & Reporting

Given the priority and focus on ensuring Section 508 Compliance, a semi-annual audit of the Florida Coastal School of Law Web Space will be performed to identify any out-of-compliance areas and to take corrective action. The Section 508 compliance check will be performed by tools readily available to either the school or the third party vendor such as “A Checker” (<https://achecker.ca/checker/index.php>) or similar product. A formal report will be produced showing the results for each audit including the planned corrective actions. If there are business reasons for not taking a corrective action then that decision and supporting data will also be captured in the semi-annual report. This report and planned corrective action will be reviewed at the next semi-annual meeting to ensure that the corrective action plan has been fully implemented. All audit reports, findings, action plans, and meeting minutes will be retained per the InfiLaw System Records Management Policy.

Also on a semi-annual basis, an audit will be performed to validate the list of users that can create or update the Web space are authorized to do so. This will include removal of employees, contractors, temporary employees and consultants who are no longer working for Florida Coastal School of Law or whose roles have changed.

The MARCOM organization is responsible for ensuring ongoing compliance and that the yearly audits are held.

Appendix Items

1. Website 508 Checklist.
2. Adobe PDF 508 Checklist.
3. Microsoft Word 508 Checklist.
4. Microsoft Excel 508 Checklist.
5. Microsoft PowerPoint 508 Checklist.
6. HTML 508 Checklist.
7. Multimedia File 508 Checklist.
8. Section 508 Compliance Training Material.