PROCEDURE

TITLE: Procurement of Accessible Technology
NUMBER: 745
AUTHORIZED BY THE PRESIDENT   May 3, 2016; Amended March 14, 2017

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The following procedures are established to meet the requirements for complying with both Federal and State accessibility policies and requirements. Whatcom Community College (WCC) intends to purchase and use technology and other goods/services accessible and compliant with state policy and federal law.

Examples of technology not accessible include videos without closed captioning, web applications and websites that cannot be read by use of assistive technology, or technology furniture that cannot be accessed by those in a wheelchair.

Purchasing Technology: All technology products or services purchased or utilized by the College will meet minimum accessibility requirements as per Federal and State regulations and policies. Products **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. Products may also be required to meet other accessibility standards as required by Federal or State policies and regulations.

The VPAT and accessibility standards review will be coordinated by the WCC Information Technology (IT) Accessibility Coordinator to verify accessibility compliance and accuracy. The IT Director will inform the requestor <u>within four weeks</u> of receiving a VPAT and access to the product for review if the product is in compliance with accessibility regulations and standards. When a product is considered accessible, the requestor may continue with the procurement process following Washington State and WCC policies and procedures.

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

EXEMPTION PROCESS
Requesting a technology accessibility exemption: A written request for exemption may be made to the IT Director and the IT Accessibility Coordinator following review and endorsement by the appropriate director, division chair, or supervisor.

Exemption requests should detail what specific 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, along with how equivalent access will be granted to those with disabilities. The respective vice president, in consultation with the Office of Access and Disability Services and IT Director 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 to provide equivalent access?

The final decision on exemption requests will be made by the respective vice president. If an exemption is granted, the IT Accessibility Coordinator will coordinate a formal waiver request per Federal and State policies and guidelines. The IT Accessibility Coordinator will notify the requestor of the final decision within 14 days of receiving the response to the waiver request from the approving agency. The IT Accessibility Coordinator will maintain documentation of all approved exemptions.

DEFINITIONS
- Voluntary Product Accessibility Template (VAPT) – an "informational tool" that describes exactly how the product or service does or does not meet Section 508 standards.
- Section 508 – an amendment to the United States Workforce Rehabilitation Act of 1973, a federal law mandating that all electronic and information technology developed, procured, maintained, or used by the federal government be accessible to people 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/
- Washington State Office of the Chief Information Office Policy 188: https://ocio.wa.gov/policy/accessibility
- Policy 103 Waiver requirements: https://ocio.wa.gov/policy/technology-policy-standards-waiver-request
- Section 508 and Federal procurement: http://www.evengrounds.com/articles/section-508-and-federal-procurement
- SBCTC Policy 3.20.30 Access for students with disabilities: http://www.sbctc.edu/colleges-staff/policies-rules
- SBCTC Accessible Technology Policy: Vision, Mission, Policy Statement and Recommendations for Adoption adopted March 2016 http://www.sbctc.edu/online-accessibility.aspx
- Whatcom Policy 496 Accessible Information Technology Policy: http://whatcom.edu/about-the-college/policies-procedures/policies