

Accessibility Guidance for Digital Materials in the California Adult Education Field May 2024



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Introduction

In the modern digital age, accessibility and inclusivity have become crucial considerations in all aspects of our society. Recognizing the importance of providing equal access to information and resources for all individuals, including those with disabilities, various laws have been enacted to ensure that public organizations meet the accessibility standards. Within the California Adult Education System, there are specific laws that require public organizations to supply full 508 compliant documentsⁱ, videos, and other digital resources to adult learners. This ensures that individuals with disabilities can fully take part in educational programs and access materials without any barriers.

To support the implementation of these laws and provide guidance to organizations within the California Adult Education System, several entities are actively involved in offering training and support services. The Outreach and Technical Assistance Network (OTAN), California Adult Education Program (CAEP), California Adult Education Program - Technical Assistance Program (CAEP-TAP), California Adult Literacy Professional Development Project (CALPRO), and the California Department of Education, Adult Education Office work collaboratively to assist organizations in meeting the accessibility requirements. Adult educational agencies are encouraged to contact any one of these support organizations for additional assistance and information regarding accessibility issues.

One essential aspect of accessibility compliance is remediation for digital assets. Remediation refers to the process of modifying or adapting digital resources to meet the accessibility standards and guidelines, ensuring they are perceivable, operable, understandable, and robust for individuals with disabilities. This involves adjusting documents, videos, and other digital materials to make them compatible with assistive technologies such as screen readers, providing alternative text for images, captions for videos, and proper formatting for readability.

The importance of remediation lies in the principle of inclusivity and equal access. By ensuring that digital resources are fully accessible to individuals with disabilities, an inclusive learning environment is created where everyone has an equal opportunity to gain experience, grow, and succeed. Accessible materials empower adult learners with disabilities to participate fully in educational programs, access information independently, and engage with the content effectively. It helps remove barriers, promotes independence, and fosters an inclusive educational experience for all.

The collaboration between the California State Leadership projects (OTAN, CAEP, CALPRO), and the California Department of Education, Adult Education Office aims to provide the necessary training and support services to help organizations within California understand and implement the requirements of accessibility laws. These initiatives play a pivotal role in promoting awareness, providing guidance, and facilitating the remediation process for digital assets. By working together, we can ensure that adult learners with disabilities have equal access to educational materials and resources, fostering a more inclusive and equitable learning environment within the California Adult Education System.

Overview, Definition, and Process Guidance

This guidance ensures the distribution of and access to accessible digital materials. Accessible materials are a requirement under Section 508 of the Rehabilitation Act of 1973; California Administrative Code (CAC); Title II of the Americans with Disabilities Act Amendments Act (ADAAA) of 2008. Providing fully accessible digital materials decreases the probability that a person or persons files a complaint with the

Office for Civil Rights, Department of Education (Southwest ADA Center, 2020.) The Southwest ADA Center is the Southwest's leading resource on the Americans with Disabilities Act and related disability rights laws. The Center is part of the ADA National Network funded by the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR). Additional resources can be found through any of the nine (9) regional support centers of the ADA National Network. California falls within the Pacific ADA Center (Region 9) serving Arizona, California, Hawaii, Nevada, and the Pacific Basin

Digital Materials Definition: For purposes of this Accessibility Guidance for Digital Documents, digital materials are documents or files distributed electronically, including but not limited, to Microsoft Word documents, PowerPoint files, Adobe Acrobat Files (PDF) documents and flyers, Excel spreadsheets, and Google Workspace applications including docs, slides, forms and sheets, and other Workspace applications. Although video may not seem like a digital document, considerations should be put in place to provide accessible video. If agencies provide video recordings of teacher lectures, or other instructional video through web sites or learning management systems (LMS), those videos also need to be compliant with accessibility requirements.

This document addresses files that are distributed electronically in a digital format. This document **does not** address other information and communication technology (ICT), such as websites, that are required to meet *Web Content Accessibility Guidelines (WCAG) 2.1* as directed in applicable laws. Here are a few examples of WCAG 2.1 requirements for other types of ICT: proper website page headings, screen reader and keyboard only navigation capabilities for websites; closed captions and transcripts for prerecorded media when housed on a website or learning management system (LMS).

Make Accessibility Part of the Initial Planning and Design Process:

The recommendations below are a guideline of how an agency may approach remediation of the digital documents referenced above. Video remediation is included as many organizations need to ensure instructional videos are also accessible for deaf or hard of hearing learners. Be sure to review the <u>Resources section</u> for additional information and additional links from other organizations and agencies on their processes to ensure accessibility for all.

Remediating documents, slide decks, videos, spreadsheets, and other digital materials to comply with Section 508 of the Rehabilitation Act of 1973 involves a systematic planning and procedural strategy to ensure that these resources are accessible to individuals with disabilities. The following steps can help an agency or organization in the planning and execution of a remediation process internally.

1. Assessment and Planning: The first step is to assess the existing digital materials and identify any accessibility issues or barriers. This may involve conducting an accessibility audit or using automated accessibility evaluation tools. Based on the assessment, a plan is developed to address the identified accessibility issues and bring the materials into compliance with Section 508 standards. An initial recommendation is to take a representative sampling of the materials currently available publicly and use available tools (see the list of resources at the end of this section) to determine the level of compliance of that sample. From those results, an agency can form a process for both remediating documents found not in compliance while also developing a standard process for future digital assets.

- 2. Document Accessibility: For documents such as PDFs, Word documents, or slide decks, remediation includes making them compatible with assistive technologies. This involves adding alternative text to images, ensuring proper heading structure, providing descriptive links, and ensuring sufficient color contrast. Complex tables and graphs may need to be reformatted or made accessible using appropriate techniques, such as providing alternative representations.
- 3. Video Accessibility: Videos need to be captioned to make them accessible to individuals who are deaf or hard of hearing. Captions provide synchronized text that appears on screen, representing the spoken content. In addition to captions, providing audio descriptions of visual elements in videos is necessary for individuals who are blind or have low vision. These descriptions explain the key visual details and actions happening on the screen. The ability to add these audio descriptors is difficult for most agencies to complete. However, with practice, teachers can learn to be fully descriptive in their online lectures, tutorials, and online meetings to help ensure audio descriptors are not needed. This involves using direct language to describe what is happening on-screen. An example could be something like this: "On the left side of the screen, choose the button labeled 'download'." Rather than saying: "Click the button." A visually impaired or blind person would have no reference where the button would be.
- 4. Spreadsheet Accessibility: Spreadsheets often contain complex data tables or charts. Remediation involves ensuring that the data is organized and structured for assistive technologies to interpret. This may include using appropriate headers, cell merging techniques, and providing alternative text for charts or graphs within the spreadsheet.
- 5. Training and Tools: Staff responsible for remediating digital materials may require training in accessibility standards, techniques, and tools. Supplying the necessary training helps them understand the requirements and effectively remediate the materials. Accessible authoring tools and software can also help in creating and verifying accessibility compliance. Look to your state leadership projects to help with this aspect of your accessibility process. More resources are listed below.
- 6. Quality Assurance: Once the remediation process is complete, a thorough quality assurance check is performed to ensure that the digital materials meet the accessibility standards. This may involve evaluating the materials with assistive technologies, conducting user testing, and verifying compliance with Section 508 guidelines.
- 7. Ongoing Maintenance: Accessibility is an ongoing effort, and it is important to ensure that newly created or updated digital materials also follow Section 508 standards. Establishing processes and guidelines for creating accessible content, and integrating accessibility considerations into the content creation workflow, can help support accessibility standards over time.

By following this planning and process, organizations can ensure that their documents, slide decks, videos, spreadsheets, and other digital materials are accessible to individuals with disabilities, thus meeting the requirements of Section 508 of the Rehabilitation Act of 1973. This commitment to accessibility helps create an inclusive environment where all learners can fully engage with the educational resources provided.

Many resources are available to help with the remediation process. The Outreach and Technical Assistance Network (OTAN) provides a long list of <u>resources</u>, <u>links</u>, <u>and training videos</u> to guide agencies and educators in this process. Find these resources on the OTAN website under Resources. The California Adult Education Program (CAEP) also provides <u>resources on accessibility</u>, including quick

links and other valuable information. Additional training and guidance are available through Microsoft's <u>Disability Desk</u>, <u>Improve Accessibility with the Accessibility Checker</u>, and through the <u>Microsoft Enable YouTube channel</u> (MSFTEnable). Google supplies initiatives and products toward inclusion, accessibility, and innovation. Learn more about these efforts through their <u>Belonging</u> site. Additionally, Google provides specific resources for accessibility on all their products, including <u>Google Docs</u>, <u>Sheets</u>, <u>and more</u>.

However, these tools available in Microsoft and Google products may not meet the needs of assuring full accessibility. There are third-party tools and applications that can enhance the features of these productivity tools. Here are examples of those tools for both Microsoft and Google.

For Microsoft Products:

- CommonLook Office: <u>CommonLook Office</u> is a third-party software that integrates with Microsoft Office Suite, including Word, PowerPoint, and Excel. It supplies advanced accessibility features, automated checks, and remediation capabilities specifically designed to meet accessibility standards. (Paid software)
- 2. PAC 3: PAC 3 (PDF Accessibility Checker) is a tool specifically designed for checking and remediating PDF documents for accessibility, including those created with Microsoft Office applications. It shows accessibility issues and offers guidance for remediation. (Free software)

For Google Products:

- 1. <u>Grackle Docs</u> for Google Docs: Grackle Docs is a Google Docs add-on that helps in making Google Docs accessible. It includes accessibility checks, offers suggestions for improvements, and supplies features like alternative text management, table structure fixes, and more. (Paid software)
- 2. <u>Grackle Slides</u> for Google Slides: Like Grackle Docs, Grackle Slides is a Google Slides add-on that helps improve the accessibility of presentations. It offers automated accessibility checks, shows potential issues, and provides remediation suggestions. (Paid software)
- 3. AXE Accessibility Testing for Google Chrome: AXE is a browser extension available for Google Chrome that can be used to evaluate the accessibility of web content, including Google Docs, Slides, and Sheets. It performs automated accessibility checks and highlights potential issues for remediation. Find this extension in the Google Chrome Store under axe DevTools-Web Accessibility Testing. (Paid software)

These are just a few examples of the many tools available to enhance the accessibility of Microsoft and Google productivity tools. It is important to explore and evaluate various products based on your specific needs and requirements. Additionally, staying up to date with the latest accessibility features and updates from Microsoft and Google is crucial, as they continuously improve the accessibility of their products and may introduce new built-in features over time. With the influx of artificial intelligence tools, it is likely these efforts will be significantly reduced through automated tools.

Commitment for Change

Accessibility for all individuals is not just a legal obligation but a moral imperative. Acknowledging the importance of accessibility and committing to action is the right step forward for all organizations

within the California Adult Education System. Ensuring that our digital resources, including documents, slide decks, videos, and other materials, are fully Section 508 compliant is a commitment to inclusivity, equal access, and empowerment of learners with disabilities.

To fulfill this commitment, added training and support from the Outreach and Technical Assistance Network (OTAN) can be instrumental. OTAN can supply specialized training on accessibility guidelines, techniques, and best practices for remediating digital materials. This training can be tailored to meet the specific needs of individual adult schools, ensuring that staff members responsible for remediation have the necessary knowledge and skills. By hosting training at the individual school level or organizing consortia-level events open to all, we can maximize participation and provide a comprehensive understanding of accessibility requirements.

Furthermore, it is crucial to address the specific needs of English Learners (ELs) within the California Adult Education System. One suggestion is to collaborate with OTAN and the EL Civics exchange to create shared, accessible EL Civics Modules. These modules would be designed with full accessibility in mind, making them inclusive and accessible to all learners, including those with disabilities. By providing shared, accessible resources, we not only ensure compliance with Section 508 but also foster a more inclusive learning environment that meets the diverse needs of our EL population. Recognizing that the remediation process may pose a burden for some organizations, seeking remediation services from third-party providers can be a practical option. These services specialize in remediating digital assets for accessibility compliance and can alleviate the workload for adult schools. Collaborating with reputable third-party providers can ensure that our digital materials are thoroughly and efficiently remediated, allowing our staff to focus on their core responsibilities. In conclusion, we must do the right thing for our learners, our adult schools, and our community. Acknowledging the importance of accessibility and committing to remediation, we embrace inclusivity and equal access for all individuals within the California Adult Education System. More training from OTAN, the creation of shared accessible resources, and the utilization of third-party remediation services can help us meet Section 508 compliance and fulfill our commitment to accessibility. Let us come together, collaborate, and work towards creating an inclusive educational environment that empowers and supports all learners. Together, we can make a lasting impact and create a positive change in the lives of our learners and the communities we serve.

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References:

Southwest ADA Center. Southwest ADA Center. (n.d.) Retrieved March 21, 2023, from http://www.southwestada.org/

<u>The Americans with Disabilities Act of 1990, Title II, and Tile III (2022)</u>: The webpage includes the current ADA Title II and Tile III regulations.

<u>Information and Communication Technology (ICT) Final Standards and Guidelines (2022)</u>: This is a link to Section 508 of the Rehabilitation Act of 1973.

<u>Section 508, U.S. GSA: Applicability and Conformance Requirements (2022)</u>. This webpage discusses how the revised Section 508 Standards incorporate by reference the WCAG 2.0 Level AA Success Criteria and apply the WCAG 2.0 Level AA success criteria and conformance requirements to both web and non-web electronic content.

National Center on Disability and Access to Education (NCDAE) (2017). <u>Steps You Can Take Now to Address Accessibility at Your Institution</u>.

<u>California Civil Codes Sections 54 through 55.2</u> Access for persons with disabilities is also addressed under California Civil Code Section 54 through 55.2 which provides that "individuals with disabilities or medical conditions have the same right as the general public to the full and free use of the streets, highways, sidewalks, walkways, public buildings, medical facilities, including hospitals, clinics, and physicians' offices, public facilities, and other public places."

<u>California Education Code, Title 2. Elementary and Secondary Education; Division 4. Instruction and Services; Part 33. Instructional Materials and Testing. Chapter 1. Instructional Materials This section of the California Education Code provides basic requirements for instructional materials including the requirement to adhere to Section 508 of the Rehabilitation Act of 1973.</u>

<u>California Education Code, Title 3. Postsecondary Education, Division 5, Part 40, Chapter 6. Academic Materials</u> This California Education Code establishes the California open Education Resources Council. It includes not only licensing requirements for materials, but also the requirement that all materials meet the standards established under Section 508 of the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 794d), and the Web Content Accessibility Guidelines adopted by the World Wide Web Consortium for accessibility.

<u>Web Content Accessibility Guidelines (WCAG) Overview</u>: Web Content Accessibility Guidelines (WCAG) is developed through the <u>W3C process</u> in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally.

Accessibility Design and Planning Resources

This section below includes different perspectives of how agencies and organizations approach the process of making their materials accessible.

Five Steps to Ensure Accessibility for All

The website <u>edWeb.net</u> supplies a five-step guide presented by Consortium for School Networking (COSN) to ensure agencies are still up to date in their internal accessibility planning.

Accessibility Guidelines: Creating Accessible Continuing Education

The American Speech-Language-Hearing Association has their own set of guidelines that includes Universal Design (UD) principles within a framework for creating accessible courses, lectures, discussion and more.

Teacher's guide: How to make learning materials accessible

The guide is based on the elements of Universal Design with resources for understanding the diverse types of learners (visual, auditory, tactile, or text/reading learners) and supplies several step-by-step guides through their accessibility toolkit. The Global Partnership for Education supports UNICEF's effort to ensure learning materials are accessible.

National Federation of the Blind – Higher Education Accessibility Online Resource Center

The <u>Higher Education Accessibility Online Resource Center</u>, developed by the National Federation of the Blind's Center of Excellence in Nonvisual Access, is a comprehensive guide for colleges and universities aiming to create inclusive campuses for students with disabilities. Emphasizing the importance of leadership, planning, and adherence to international accessibility guidelines, the center offers insights into digital accessibility, legal requirements, and best practices. Covering aspects such as the World Wide Web Consortium's guidelines, legal precedents, and the AIM-HIGH Act, the resource center provides a roadmap for institutions to integrate accessible technology from the beginning and ensure equal access for students with diverse abilities.

The resource center's checklist encompasses various dimensions, including requirements, standards, policies, procurement, grievance procedures, training programs, student orientation, technology audits, and instructional materials. By offering sample policies, highlighting successful institutions, and emphasizing third-party consultants' role, the center serves as a valuable tool for colleges and universities committed to fostering a digitally accessible campus and providing an inclusive education environment for all students.

ⁱ Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794d) Section 508 specifically addresses electronic and information technology accessibility standards and requires federal agencies to ensure that their electronic and information technology is accessible to individuals with disabilities. It sets forth guidelines and technical standards that public organizations, including educational institutions, must follow to make their digital resources accessible to individuals with disabilities.