Georgia State University’s
Web Accessibility Policy (proposed)

The objective of this Internet Accessibility Policy is to place emphasis on content, effective communication, and interaction through Universal Design. Universal Design means to design a website so that anyone using common web browsing technology (within two versions of the most current) can get a full and complete understanding of the information contained there, as well as the full and complete ability to interact with the site-flexible enough to accommodate the needs of the broadest range of users, computers, and telecommunication equipment.

This proposed policy would assist the university in establishing a plan for bringing all of its Internet based materials into compliance with current laws (see Appendix C) through Universal Design. These web materials should include but not be limited to: all web material associated with administration and services, courses of instruction, departmental programs, and institution sponsored activities.

This committee respectfully requests that the following recommendations are considered for inclusion in a web accessibility policy.

1. We suggest that the University adopt a reasonable overall plan, not to exceed three years, for bringing all Internet sites and on-line courses into Level One compliance with the World Wide Web Consortium (W3C) guidelines (http://www.w3.org/WAI). This university plan should also allocate resources and service providers to assist instructors, departments and colleges in implementing the plan. The University should create a standing committee or sub-committee to develop this plan and to support faculty/staff efforts to meet compliance. See appendix A for detailed guidelines and instructions on accessible formats for level one compliance.

2. New sites and courses being launched for Spring 2002 and thereafter should be required to be constructed in an accessible format complying with at least the level one guidelines established by the World Wide Web Consortium (See appendix A).

3. Designers for non-accessible sites, courses and supplemental materials should begin immediately working on level one compliance (see Appendix A). They should also develop a written plan for completing the compliance for their sites or courses. Where possible, said plan should be linked from the home, first or opening page of any web site or course.

4. All web and course design contractors hired outside the university should also be required to meet all Federal laws and university Internet policies. See contract example for outside agencies at: http://www.htctu.fhda.edu/waispecs.htm And/or Appendix B.
5. Links to Internet sites and materials published and controlled by non-Georgia State University entities should be carefully considered for accessibility before inclusion. When non-accessible information is presented, an accessible alternative should also be offered. “Think before you link.”

6. All university provided or sponsored training involving Internet technologies should include instruction covering Level One compliance.

The benefits of universal web design extend beyond the community of people with disabilities; it also enables people with low technology greater access. More and more people are accessing the web via cell phone and other non-graphic means. As educators we should be reaching out to all current and future audiences who seek learning.
Purpose

The intent of these guidelines is to foster the creation of web materials which provide equal access to information when using typical industry standard assisted technologies in wide use today by individuals with disabilities.

Where possible these guidelines give the solution for HTML and the HTML editors such as Netscape Composer, Dreamweaver, Frontpage and Homesite.

Access Specifications

**Guideline 1.**

Every graphic image must have a text descriptor. Purely decorative or formatting graphics also fall under this guideline (see solution below).

**Justification:**

If the person viewing the page is using text to speech software, a non-graphic browser such as Lynx, or has the graphics turned off in their browser the graphic will be inaccessible.

**Solution:**

**HTML:** Use ALT attributes in the image reference anchors and include descriptive text within the anchor. Decorative and spacing graphics such as bullets should have an ALT attribute such as a pair of empty quotation marks “” or an asterick “*” or even a short description such as “decorative abstract image”.

**HTML Editors:** the ALT tag or text may usually be found in the properties box for the image or graphic.

**Guideline 2.**

If "Image Maps" are used an alternative method of selecting the imbedded links must be provided. Only use client side image maps.

**Justification:**
If the person viewing the page is using text to speech software, a non-graphic browser such as Lynx, or has the graphics turned off in their browser the links will be inaccessible, and no way of selecting the imbedded links will be available. An alternative means of navigating the site becomes essential.

Solution:

HTML and editors: Either include a text only link before the image map. Or list the imbedded links elsewhere on the page. Note, you should also provide ALT attributes for the image map.

Guideline 3.

Include a detailed text description for all complex images, such as photographs.

Justification:

Often high quality images are included in web pages, and these images often include useful information for the viewer. For the user unable to view the image an alternative method of providing the information must be provided.

Solution:

HTML: Include information in the comments section of the coding for the image. You can also provide a link with the image to a text description. Do not use pop-up windows for this purpose, but rather a separate html document or an anchor/bookmark link to the description.

Editors: use the caption option for graphics to describe the image. Or use the link solution above.

Guideline 4.

Avoid the use of non-standard text formatting and layout.

Justification:

Using tables to align text, frequent changes in font size, color or emphasis make reading the content very difficult if not impossible for
the user using a non-graphic browser. Screen readers process text from left to right across the screen, and can not effectively present tabular or columnar text.

Solution:

HTML: Ideally non-standard formatting should be avoided. Or if it must be used provide a text only version of the page or content in the table. Use proportional font markups (H1, H2, etc.) for text size and formatting.

Editors: Cascading style sheets and layers (for those who are familiar with them) can alleviate all these issues and make the re-design or any site much more flexible.

Guideline 5.

Avoid the use of moving or changing text.

Justification:

Moving and changing text is often annoying to any web user, it along with blinking can create a sense of anxiety in the user. Screen readers cannot process moving or changing text period. Marquees are often read one letter at a time making comprehension of the material very difficult. Moving or changing text often causes the screen reader software to lock-up the computer.

Solution:

HTML & Editors: Use another method to draw attention to the information other than moving or changing text. Text size, color, or capitalization can be very effective in this regard. Be creative.

Guideline 6.

Provide a text transcription or description for all imbedded audio.

Justification:

To the hearing impaired user, or the user without audio capability on the computer, the imbedded audio is of no use.

Solution:
HTML & Editors: Provide associated text for the audio hyperlink, and also provide a transcription or detailed description of the audio material. Always include the type of audio file it is and its size.

Guideline 7.

Make your text links descriptive but not overly wordy.

Justification:

“Click here” is meaningless to those using screen readers and often anyone else. The hyperlinked text should be able to stand alone or be meaningful when out of context. Some screen readers put or list all hyperlinks in one place and not within the original paragraph.

Your text descriptors need to convey information about the nature of the link. Conversely too much text makes the page inefficient.

Solution:

HTML: The information between the <a href> and the </a> should be a brief, complete text descriptor that gives the nature of the link.
Example: <a href="http://www.gsu.edu">Georgia State University home page</a> or even “Georgia State University” would suffice.

Guideline 8.

Only use non HTML formats as alternatives to HTML files not as replacements.

Justification:

A wide variety of alternative formats are strictly graphic in nature, and therefore completely inaccessible to users in text mode or who do not have the proprietary software needed to view the files.

Solution:

Provide a text file equivalent for the specialized format file (e.g. PDF) either in HTML or text format. Also file types like MSWord or Powerpoint should be linked in the original and in the converted to HTML version. Generally, the more ways you give access to any content improves the overall accessibility of your site or material.

Guideline 8.
Provide an alternative to online forms.

Justification:

Forms are not supported by all browsers, and can be very difficult to navigate from field to field or option to option.

Solution:

Provide the user with the ability to access alternative methods of performing the same tasks, such as a printable form or an e-text version of the form. If you decide to use a form insure that it can be navigated using the TAB key.

Guideline 9.

Test your pages in a variety of browsers, and on different operating systems.

Justification:

Each type of browser handles HTML in different ways. To insure that your page is fully accessible across browsers and across platforms they need to be tested for functionality.

Solution:

The Center for Applied Special Technology (CAST) has developed a Web Page accessibility tester called Bobby. This site will allow you to test your pages in a variety of browsers and on a variety of platforms.

CAUTION: if you are using frames on your page Bobby will only evaluate the first frame.

You can find this tester at:

http://www.cast.org/bobby

Guideline 10.

Avoid the use of proprietary HTML markup language.

Justification:
A wide variety of browser specific HTML tags are available. All of these present unique problems when designing fully accessible Web pages. Many of these tags cannot be read by accessibility software.

Solution:

Do not use proprietary tags or provide the user with an alternative presentation of the web document, such as a text only link.

Guideline 11.

Avoid the use of Java or Active X in all Web Pages.

Justification:

Java and its derivatives and Active X components present unique access problems for individuals with disabilities. Typically when encountered by a screen reader the computer locks up, or the voice output ceases to function.

Solution:

Do not use these scripting languages in your web pages, or provide them in an alternative page. Research is currently underway to deal with these issues, but until these problems are addressed the only solution is to not use them.

Level Two and Level Three compliance guidelines will be broken out in a similar format to the Level One guidelines above; however, this will be done at a later date and after the Level One guidelines have been carefully reviewed for clarity.

For more information on Accessible Web Page Design, we highly recommend the following Sites

World Wide Web Consortium Web Authoring Guidelines
This document is the final authority in the development and design of Accessible web pages.

Web Page Guidelines from the General Service Administration
This document provides the guidelines that federal agencies are supposed to use in the design of departmental web pages.
The Web Development Guidelines from the Canadian Government
I find this document very useful, in not only providing guidelines but also
well thought out rationale for the guidelines.
Website accessibility isn’t actually an option, it’s the law.

United States Department of Justice Policy Ruling, 9/9/96: ADA Accessibility Requirements Apply to Internet Web Pages 10 NDLR 240. The policy ruling states that ADA Titles II and III require State and local governments and the business sector to provide effective communication whenever they communicate through the Internet. The effective communication rule applies to covered entities using the Internet for communications regarding their programs, goods or services since they must be prepared to offer those communications via an accessible medium.

In a complaint by a student that a university had failed to provide access to the Internet, the Office of Civil Rights, United States Department of Education (OCR) discussed what was meant to provide effective communication. In a nutshell,

[T]he issue is not whether the student with the disability is merely provided access, but the issue is rather the extent to which the communication is actually as effective as that provided to others. Title II [of the Americans with Disabilities Act of 1990] also strongly affirms the important role that computer technology is expected to play as an auxiliary aid by which communication is made effective for persons with disabilities. (Pages 1-2, 1996 Letter; 28 C.F.R. 35.160(a))

In further clarifying what is meant by "effective communication," OCR has held that the three basic components of effective communication are: "timeliness of delivery, accuracy of the translation, and provision in a manner and medium appropriate to the significance of the message and the abilities of the individual with the disability." (Page 1, 1997 Letter)

OCR also points out that the courts have held that a public entity violates its obligations under the ADA when it only responds on an ad-hoc basis to individual requests for accommodation. There is an affirmative duty to develop a comprehensive policy in advance of any request for auxiliary aids or services. Moreover, the community of persons with disabilities is required to be consulted in the development of this policy. See Tyler v. City of Manhattan, 857 F. Supp. 800 (D.Kan. 1994).