Roane State AIMT Adoption/Procurement Process

TBR’s AIMT adoption and procurement process includes an accessibility requirement that vendor’s products and services conform to the adopted TBR accessibility standards. This requirement has provided specific resources for vendors to use in identifying the vendor’s approach to accessible informational material and technology (AIMT) development and conformance – including a timeline to full conformance. This procedure supports our strategic AIMT review process with two instruments that are required from vendors – the “[Accessibility Statement](http://www.roanestate.edu/webfolders/WESTDK2/Accessibility%20Statement%20%282a%29.docx)” and “[Conformance and Remediation form](http://www.roanestate.edu/webfolders/WESTDK2/Conformance%20and%20Remediation%20Form%20%282b%29.docx)”. Here is an outline of the TBR adoption and procurement requirements:

1. Vendors need to fully conform to TBR identified accessibility standards and demonstrate how they meet accessibility standards in the Accessibility Statement form - if not fully conformant now, (only in the case there is no other material or technology that does the same thing and is accessible) then at some point in the near future in order for us to do business with them.
2. If the vendor is not fully conformant now, they need to identify when they will be conformant in the [Conformance and Remediation form](http://www.roanestate.edu/webfolders/WESTDK2/Conformance%20and%20Remediation%20Form%20%282b%29.docx) and demonstrate substantial progress to meet agreed upon deadlines – we retain the right to cancel a contract or discontinue use of a material or technology if substantial progress to meet full conformance is not achieved.
3. TBR system office procurement will follow the current purchasing workflow through Angela Flynn’s office and vetted for accessibility through the Assistive Technology/Accessibility Specialist, where TBR institutions will have individuals identified by the institutions’ Accessibility Task Force for their accessibility workflow. Both the TBR institutions and TBR central office will populate the website with accessibility results for review access by the TBR system.
4. NOTE - If an IMT is adopted or procured and it is not technically feasible for the product to be accessible, then an [Alternative Access Plan](http://www.roanestate.edu/webfolders/WESTDK2/Alternate%20Access%20Plan.docx) will be developed for any conformance gaps of that product and used until such time the IMT is replaced with an AIMT or the IMT is fully conformant.

## IMT Definitions:

**“Informational Materials”** are items that are created, purchased or identified to serve in instruction and/or communicate information both in the curricular and non-curricular settings. These items may include, but not limited to, documents, textbooks, library media, software content, web/online content and learning objects, E-Books, videos, learning laboratories, recordings, and ITV content.

**"Technology" or “Information and Communication Technology” (ICT)** includes information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information.Examples of ICT includes, but is not limited to, internet and intranet websites, electronic content, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, telecommunications products, computers and ancillary equipment, software, information kiosks and transaction machines, videos, IT services, and multifunction office machines which copy, scan, fax documents and emerging technologies.

## The Adoption/Procurement Process Model in steps:

### **Step 1 - Gather Information for Review (IMT requester),**

In the first step of the process, the IMT Requester obtains all information that is necessary for initial review with the Accessibility Liaison.

The IMT Requester is responsible to:

* Determine if the product/service meets the definition of IMT.
* Begin the [Accessible Informational Material & Technology Adoption/Procurement Checklist](http://www.roanestate.edu/webfolders/WESTDK2/AIMT%20Adoption-Procurement%20Checklist%20%281%29.xlsx);
	+ Identify functional and business requirements for IMT;
	+ Conduct market research to find IMTs that meet requirements;
	+ Select IMT(s) that best meets the functional and business requirements.
* Request documentation on accessibility from the vendor(s) and provide the vendor(s) with the Accessibility Statement and Conformance and Remediation forms for the vendor(s) to return to the IMT Requester completed.
* Do an initial verification of documentation and confirm form completion.
* Submit Accessible Informational Material & Technology Adoption/Procurement Checklist and accessibility documentation to your Accessibility Liaison for review.

### **Step 2 - Review by Accessibility Liaison**

Upon submission of the [Accessible Informational Material & Technology Adoption/Procurement Checklist](http://www.roanestate.edu/webfolders/WESTDK2/AIMT%20Adoption-Procurement%20Checklist%20%281%29.xlsx) with supporting documentation from the IMT Requester, the Accessibility Liaison is responsible to:

1. Initiate the [Accessibility Review Form](file:///C%3A%5CUsers%5CBensonRM%5CAppData%5CLocal%5CMicrosoft%5CWindows%5CTemporary%20Internet%20Files%5CContent.Outlook%5CI96SGG5Z%5CAIMTReviewDocumenttemplateFinalv2.0.docx),
	1. The Accessibility Liaison initiates, the Accessibility Review Form to record detailed information about the requested product/service and other details about the accessibility review,
		1. Confirm all required IMT Requester fields in the checklist are completed (if not complete –return to IMT Requester) and transfer pertinent vendor information to the [Accessibility Review Form](http://www.roanestate.edu/webfolders/WESTDK2/Accessibility%20Review%20Form%20%283%29.docx).
	2. Confirm the required accessibility documents and other vendor accessibility documents have been submitted:
		1. [Accessibility Statement](http://www.roanestate.edu/webfolders/WESTDK2/Accessibility%20Statement%20%282a%29.docx) and Required Documents
		2. [Conformance and Remediation Form](http://www.roanestate.edu/webfolders/WESTDK2/Conformance%20and%20Remediation%20Form%20%282b%29.docx)
	3. The Accessibility Liaison works with the IMT Requester to obtain any missing information or incomplete Accessibility Documentation.
2. Review Accessibility Documentation
	1. The Accessibility Liaison reviews the Accessibility Documentation provided by the IMT Requester for completeness and verifies if the requested product/service meets the definition of IMT.
	2. Confirm Impact (Info section of [AIMT A-P Checklist](http://www.roanestate.edu/webfolders/WESTDK2/AIMT%20Adoption-Procurement%20Checklist%20%281%29.xlsx))
		1. Evaluate the potential impact, specifically on persons with disabilities, of the proposed product/service by considering what the product/service does, where in the university the product/service will be used and by whom, and how widely used the product/service will be and annotate observations in the Findings section of the Accessibility Review Form. Factors that may lead to a high impact determination include:
			1. The product/service would be used by a large number of persons;
			2. Access to a program/service may be denied;
			3. A critical program/service may be impacted;
			4. The product/service's use would create significant legal exposure; and/or
			5. There are no known workarounds to the accessibility barriers or the cost to provide accessibility workarounds would be high;
3. Review product for accessibility critieria
	1. There are several review tasks that can be combined to complete the accessibility review. It is important to remember that determination of which review tasks to perform for an accessibility review will depend on many situational factors including impact, accessibility team capacity and capabilities, and any other constraints at the time the review is conducted.
		1. The following is a list of review tasks that can be recommended for the review:
			1. Documentation Review
				1. The Accessibility Liaison reviews the documentation and evaluates the vendor's dedication to accessibility and stated level of support for each applicable TBR Accessibility Standard.
			2. Common deficiencies found during a documentation review include:
				1. Missing metadata
				2. Documentation is out-of-date
				3. Incomplete Documentation
				4. Discrepancies / Contradictions
				5. Lack of Specificity
				6. Lack of Understanding
				7. "Not Applicable" status claims
				8. Display Modes
			3. After completing the documentation review, the Accessibility Liaison annotates any original documentation and sends it to the vendor along with a request for any necessary clarifications or revisions.
		2. Vendor Demo (Accessibility Features)
			1. It is common for IMT Requester(s) to request a live demonstration (either in-person or via web conference) for a product or service that is being considered for Adoption/Procurement. In the context of an Accessibility review, the Accessibility Liaison would be invited to attend the demonstration, and he/she would ask the vendor to complete certain tasks while using the product in way that a user with a disability might (e.g. with a screen-reader, without mouse, without audio.)
		3. Automated Testing (Targeted or Comprehensive) – Accessibility Liaison refers product to accessibility team for further testing:
			1. Automated conformance testing can be performed using automated testing tools. Automated testing tools range from free, browser-based add-ons/tool bars up to Enterprise-grade tools for auditing, testing and monitoring (e.g. Compliance Sheriff.)
			2. It is important to note the proper role of Automated Testing. It is estimated that automated conformance testing can definitively determine compliance for only about twenty percent (20%) of web content. Determining compliance for the remaining eighty percent (80%) requires either manual testing or functional testing for sensory and mobility impairments. Still, automated testing can and should play a vital role in many accessibility reviews. The benefits of using automated testing include:
				1. Free tools: No cost, quick, end-users can perform quick checks for common accessibility problems with only minimal training
				2. Enterprise-grade tools: regularly scanning university websites using standardized checkpoints provides a mechanism to produce baseline compliance reports and document improvement over time.
		4. Manual Testing (Targeted or Comprehensive) – Accessibility Liaison refers product to accessibility team for further testing:
			1. Manual, hands-on accessibility testing is performed by users of assistive technology or testers who attempt to use the product while simulating the experiences of users with various disabilities. Testers use assistive technology such as screen readers, screen magnifiers, test with sound turned off, use only the keyboard for navigation and interaction, and use voice recognition software to interact with the product.
			2. Items identified as needing a visual check during the automated testing process are checked during the manual testing process. For example, the automated tool might identify the presence of an image tag <img> in the source code and indicate there is an associated alt attribute <alt>, but only a manual inspection can conclusively determine if the alt attribute that is present is a meaningful equivalent for the visual data.
			3. Given limited campus resources and the time-intensive nature of manual testing, campuses should take into consideration impact and campus capacity levels when determining the scope for manual testing.
			4. Code review is most often performed during an IT AAP accessibility review due to a vendor’s inability to remediate a technology product. The review involves examining accessibility gaps at the code level (e.g. HTML source code, JavaScript). The tester does research to determine how to potentially address/remediate specific accessibility gap(s) and finds/develops new/revised coding and does reiterative testing to validate the new/revised coding.
	2. Once the review is completed, the Accessibility Liaison will,
		1. Annotate in the Findings and/or Recommendations of the Accessibility Review Form:
			1. Any specific accessibility gaps that require remediation (if applicable).
			2. Needed workarounds to allow access until the gaps identified during the review have been remediated (if applicable).
		2. Request an updated Conformance and Remediation form with
			1. New development timeline for product full conformance (if applicable).
			2. And vendor workarounds to provide end-users access until the vendor has resolved each of the identified accessibility gaps (if applicable).
		3. Attach an Alternative Access Plan (if applicable)
			1. The Accessibility Liaison works with the IMT Requester, Accessibility Team (or multi-disciplinary committee) to prepare a plan that documents how an alternate access will be provided for any users who experience difficulties using the product due to any identified accessibility gap and meets the definition of Substantially Equivalent Ease of Use.
		4. Complete Accessibility Review Form, which includes writing a summary of the review findings and making recommendations for the IMT requestor.
		5. Upload Accessibility Documentation and fill in AIMT Web Form Criteria.
		6. Forward the Accessible Informational Material & Technology Adoption/Procurement Checklist along with all required documents, initials and signatures to the IMT Requester for adoption/procurement.

### **Step 3 - Adoption or Procurement**

1. **Complete Adoption/Procurement**
	1. Adoption - follow requisite procedure identified by the institution.
	2. Procurement - follow requisite procedure identified by the institution.
	3. Requisite party includes all AIMT Adoption/Procurement process documentation:
		1. Adoption – upon completion of adoption process forward all completed materials (including AIMT Adoption/Procurement process documentation) to Accessibility Liaison for records.
		2. Procurement - forward all AIMT Adoption/Procurement process documentation along with requisite purchasing documentation to purchasing Buyer,
			1. Buyer complete AIMT Procurement Checklist
				1. If any items in the checklist have not been completed, the Buyer will work with either the Accessibility Liaison and/or the IMT Requester to ensure that any missing or incomplete process steps are completed.
		3. Buyer ensures Accessibility documents are filed with PO/Contract along with any other Purchasing Documents. Forward copies to Accessibility Liaison and notify IMT Requester the process has been completed.

## Specific TBR Procurement Language:

### **Direct Purchase – PO (no contract)**

Unless otherwise disclosed to Institution in writing, the Seller warrants and represents that the Products/Services, including any updates, provided to the Institution will meet the accessibility standards set forth in WCAG 2.0 AA (also known as ISO standard, ISO/IEC 40500:2012), EPub 3 and Section 508 of the Vocational Rehabilitation Act.

### **Direct Purchase – Contract Required**

Service and Software Accessibility Standards.  The Contractor warrants and represents that the service and software, including any updates, provided to the Institution will meet the accessibility standards set forth in WCAG 2.0 AA (also known as ISO standard, ISO/IEC 40500:2012), EPub 3 and Section 508 of the Vocational Rehabilitation Act. To the extent that the Products fail to meet the WCAG 2.0 AA, EPub 3 and Section 508 standards, the Contractor will provide Institution with a fully completed Accessibility Statement and Conformance and Remediation forms.  The Contractor shall indemnify and hold the Institution harmless in the event of claims arising from inaccessibility related to the Contractor’s products/services.

### **RFQ/RFP Language**

### All Informational Material and Technology (IMT) developed, purchased, upgraded or renewed by or for the use of the Institution will comply with all applicable TBR policies, Federal and State law and regulations including but not limited to the accessibility guidelines set forth in [Web Content Accessibility Guidelines 2.0 A & AA](http://www.w3.org/TR/2008/REC-WCAG20-20081211/), [EPub3 Accessibility guidelines](http://idpf.org/a11y), [Section 508](http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh) and all other regulations promulgated under Section 504 of the Rehabilitation Act and Title II of The Americans with Disabilities Act as amended. Further:

1. Compliance means that a person with a disability can acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability, in an equally effective and integrated manner, with substantially equivalent ease of use.
2. The Successful Bidder/Proposer warrants that any IMT purchased by, developed, upgraded or renewed for TBR will comply with the aforementioned accessibility guidelines and the contractor/vendor will provide accessibility testing results, written documentation verifying accessibility, as referenced in the attached “Vendor Product Accessibility Statement and Documentation form”, for the product/service identified in this document.
3. The Successful Bidder/Proposer will promptly respond to and resolve accessibility issues/complaints, and to indemnify and hold the Institution harmless in the event of claims arising from inaccessibility of the Bidder/Proposer’s product(s) or service(s).

To demonstrate the Proposer’s product complies with the aforementioned accessibility guidelines, the Bidder/Proposer shall verify accessibility by completing the “Vendor Product Accessibility Statement and Documentation form”. If Bidder/Proposer is not compliant at this time with these standards, Bidder/Proposer shall describe by using the “Accessibility Conformance and Remediation Form”.

Reference Links

[Web Content Accessibility Guidelines 2.0 A & AA](http://www.w3.org/TR/2008/REC-WCAG20-20081211/), [EPub3 Accessibility guidelines](http://idpf.org/a11y), [Section 508](http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh)