

# Digital Accessibility Policies and Procedures

## Table of Contents

1. [GMU Policy 1308](#) – Information and Communications Technology Accessibility
2. [Accessible Media](#)
3. [Accessible Textbooks and Alternative Formats](#)
4. [Document Remediation](#)
5. [Assistive Technology Assessments](#)
6. [Website and Web App Accessibility Monitoring, Testing, and Reporting](#)
7. [Purchasing and Procurement](#)

-----

## GMU Policy 1308 – Information and Communications Technology Accessibility

The ATI is committed to ensuring all members of the Mason community are provided with equitable access to all information and communications technology (ICT) resources on Mason campuses. We provide direct assistive technology assessments, training, and support services to individuals with disabilities who require immediate technology solutions. We also work closely with strategic partners to develop and implement a broad, comprehensive ICT accessibility plan.

View Policy [1308 – Information and Communications Technology Accessibility](#) for additional information.

-----

## Accessible Media

Responsibilities for the provision of accessible media online and in the classroom are as follows:

*Faculty/Staff will adhere to the following:*

- Video(s) will be used for at least one year.
- Video(s) transcripts are the property of George Mason University and thus will only be used on GMU websites and/or in classrooms.

*ATI staff will provide the following:*

- Caption file, uploaded to the Kaltura video, completed to at least 99% accuracy.

- Copy of video transcript upon request (text file only), completed to at least 99% accuracy.
- Faculty/staff can request permission to edit caption/transcripts themselves.
- Confirmation emails will be sent upon receipt of your submission for processing, at the completion of your request, and as needed throughout the process.

### *Machine Captions vs Professional Captions*

All videos uploaded to Kaltura (i.e., Blackboard MyMedia) are automatically machine captioned. AI-based machine captions offer quick turnaround times (15-60 minutes, depending on length of media), however, accuracy rates are much lower (75-85%) and require manual edits to improve accuracy. ATI staff will not edit machine-captioned media. The requestor is responsible for editing machine captions.

Professional captioning is provided free of charge for courses and public-facing media. ATI staff will utilize vendors for professional captions and transcriptions, which offer no less than 99% accuracy. Professional captions are generated using AI, then corrected and verified by a human transcriber.

### *Procedure for Requesting Captions*

1. Complete the online [Request Services Form](#) for content used in courses and on public-facing websites.
  - a. For Bulk Requests (e.g., 2 or more videos), use the [Accessible Media Bulk Request Form \(Excel\)](#) and upload the spreadsheet to the request services form.
  - b. Most common media types (e.g., .flv, .avi, .mov, .wmv, .mp4, etc.) are accepted.
2. Staff and Faculty will submit media and request forms at least 4 business days prior (10 business days for audio description) to the date media is needed for the course. Requests submitted less than 4 business days from the date that the media is needed may not be completed on time.
  - a. *For Kaltura users:* If your videos are hosted on Kaltura, please tag each video being requested with “captions.”
  - b. *For videos not hosted within Kaltura (e.g., SharePoint, computer, etc.),* video files should be uploaded to Kaltura.
  - c. *For videos hosted on platforms like YouTube or Vimeo,* faculty/staff may provide the URL(s) to the videos.
3. ATI staff will contact faculty to confirm all requests prior to the start of the job. The job(s) will not be started unless an online media or bulk request form has been submitted and ATI has access to the video file(s).

### *Captioning, Transcription, and Audio Description Prioritization:*

ATI staff prioritizes media requests in the following order:

1. Courses with a student with a sensory impairment (i.e., blind, low vision, deaf, and/or hard of hearing) enrolled.
2. Degree programs with students with sensory impairments enrolled.
3. Front-facing websites hosting audio and/or video content.
4. Online courses developed c/o Stearns Center.

**Please Note:** Requests for audio description, when there is no specific accommodation needed, are evaluated on a case-by-case basis.

### *Quality Control*

To ensure quality and consistency, ATI staff will randomly review completed requests for errors. Please note the following:

- ATI staff will not review the entire video for accuracy.
- ATI staff will review captions for accuracy at random intervals on the video timeline.
- Faculty/staff must notify ATI staff of egregious errors, and the caption file will be edited as needed.
- Alternatively, faculty/staff may request access to the caption platform to correct caption errors as needed.

### *Returning completed caption files*

For videos hosted on Kaltura, the caption file will be automatically added to the video when it is complete. ATI staff will also contact faculty/staff via email when the captions are complete. For videos hosted on YouTube or Vimeo, ATI staff will provide a caption file for the requestor to upload to their YouTube or Vimeo account.

### *Working with Copyrighted Materials*

If an accessible version of the copyrighted media is not available, ATI staff will evaluate the current media format (i.e., DVD, VHS, streaming video, etc.) and determine the most efficient method for providing post-production accessibility.

- ATI staff will make every effort to contact the publisher and/or copyright holder for permission to add captions and/or audio descriptions to copyrighted works. The addition of post-production open or closed captions, and/or audio description, is for noncommercial, educational purposes only. Mason ensures that the original and work copy (i.e., copy being used to add captions to) are in the hands of a limited number of individuals in the institution and no content in the original media will be removed or

modified. Unauthorized reproduction of the media for any other purpose is prohibited. See [U.S. Copyright Law, Title 17 opens a new window](#), [Section 121 \(PDF\)](#) for additional guidance.

Once an accessible copy is available (whether it already exists online, by post-production, purchase, or the library), the ATI will inform the faculty/staff member making the request on where to access their media.

- **Accessible media that is purchased or produced by ATI** – The faculty/staff member will receive an email confirming that their electronic media can be picked up at the ATI Office. For videos within Kaltura, the faculty/staff member will receive an email notifying them that the caption file was uploaded to Kaltura, and the transcript is available upon request.
- **Accessible media that is available through the library** – The faculty/staff member will receive an email confirming that electronic media is available in the library and to contact Library Media Services to arrange for pick up. In some circumstances, the library may digitize the video and upload the video file to Kaltura for accommodation purposes.

-----

## **Accessible Text and Alternate Formats**

The policies and procedures for requesting accessible text and alternate format support services are as follows:

### *General Policies:*

- Accessible text and alternate format support services are provided to students, staff, and faculty with a documented print disability. Students with documented print disabilities are referred by Disability Services. Faculty, staff, and visitors with documented printed disabilities are referred by the ADA Coordinator.
- ATI staff will provide accessible text by PDF, Word, EPUB, Bookshare access, or Learning Ally access depending upon what is available from the repositories and publishers.
- Manual scanning of a hard copy book will be offered as a last-resort solution if an electronic version is not available.

### *Student Responsibilities for Textbook Requests*

- Students will submit textbook requests at least 10 business days prior to the start of the course. Requests submitted less than 10 business days from the course start date may not be completed on time. ATI staff may need to review the course syllabus to provide

students with the portions of the request while working to complete the rest of the request. Timelines for completion will be discussed with the student at that time.

- Students are required to submit proof of purchase for each book they request.
- Once the student receives the completed request, they will download the file to their device and save it where they can access it as needed.
  - **Please Note:** Copies of completed requests are removed from the SharePoint folder at the conclusion of the semester in which the request was completed.
- By accepting delivery and using the accessible text file provided, students acknowledge that the book is under copyright law and is for their individual educational use only. Unauthorized reproduction of the media for any other purpose is prohibited. See [U.S. Copyright Law, Title 17 opens a new window](#), [Section 121 \(PDF\)](#) for additional guidance.

#### *Procedures for Accessible Textbook Requests*

1. After receiving the request, ATI staff will contact the student to confirm proof of purchase.
2. Once proof of purchase has been confirmed, ATI staff will begin the publisher search.
3. If an electronic copy of material(s) is available through the publisher, ATI staff will start the processing of materials.
4. If an electronic copy of material(s) is not available from the publisher, ATI staff can scan the student's copy of the book if the student agrees. This process involves removing the spine of the textbook. The book will be re-bound with a plastic comb binding.
  - a. **Please Note:** If material is rented, scanning '**is not**' an option since this process requires removal of the book spine. ATI would then contact the student to discuss alternatives.
5. When the request has been completed, ATI staff will email a SharePoint link to download the accessible version(s) of the file(s).

#### *Job Completion Timelines*

1. ATI staff will send an acknowledgement of textbook and alternate format requests to the student via email within 1 business day.

2. A status update for each book will be provided to the student via email within 2 business days.
3. The minimum turnaround time for the delivery of accessible text requests is 2 weeks. Complexity of content and other variables (i.e., STEM) may result in longer turnaround times. ATI staff will handle these special circumstances on a case-by-case basis.

#### *Request Prioritization*

ATI staff prioritizes media requests in the following order:

1. Requests for *required* instructional resources are processed in the order in which they are received.
2. Requests for resources from non-academic units that are needed for an accommodation (e.g., Center for the Arts).
3. Requests for instructional resources that are *NOT* required (i.e., recommended, suggested, or for personal reading) are processed in the order they are received.
4. Requests for resources from non-academic units that are not needed for accommodation.

#### *Policies for Requesting Alternate Formats for Tests, Quizzes, and Exams*

- Alternate format requests for tests, quizzes, and exams are processed c/o with Disability Services. The original exam document must come directly from the Disability Services Testing Center, the Antonin Scalia Law School, or from the instructor of the course.
- The timeframe to complete requests will depend on the complexity of the subject content (e.g., STEM). ATI staff will discuss the timelines for completion with DS staff or the faculty member at that time.
- Depending upon the quality of the material submitted, ATI staff may request the original document from the instructor to create an accessible version. In these circumstances, the timeline for completion will reset to when ATI staff receive the updated copy.

#### *Alternate Format Requests from Non-Academic Units*

Requests from non-academic units are reviewed and provided on a case-by-case basis. The following guidelines will be followed when addressing these requests:

- Requestor will submit an accessible text request and proof of purchase for each resource.
- ATI will start processing a request when **both** the request and proof of purchase (if necessary) are received.
- The minimum turnaround time for the completion of all requests is two weeks.
- In times of heavy volume, priority is given to books requested by students with documented disabilities who are registered with Disability Services.

-----

## Document Remediation

### *Request Process for Accessible Documents*

Faculty and staff must submit document remediation requests at least 5 business days prior to the date the content is needed. Requests submitted less than 5 business days from that date may not be completed on time.

To submit a document remediation request, faculty/staff must do the following:

1. Go to the [ATI's Request Services website](#), select *Request a Document Accessibility Review*. Select **Request document remediation support**.
2. Fill in all applicable information on the form.
3. Upload the document(s) to the request form (no limit to file size or number of documents uploaded).
4. ATI staff will notify the requestor by email when the request is received and in process.

### *Document Remediation Prioritization:*

ATI staff prioritizes the remediation of documents in the following order:

- Courses that have a student with a sensory impairment (i.e., blind, low vision) enrolled.
- Degree programs with students with sensory impairments enrolled.
- Front-facing websites hosting Word, PowerPoint, or PDF documents.
- Online courses developed c/o Stearns Center.

### *Quality Control*

To ensure quality and consistency, the following elements are assessed and remediated in Word, PowerPoint, and PDF documents:

#### **Word and PowerPoint documents**

- Alternative Text and Images (when added by faculty or staff)
  - **NOTE:** ATI staff will work in concert with the requestor for all meaningful alternative text descriptions. This ensures the correct intent and purpose of the image is relayed to the end user.
- Headings
- Lists
- Tables
- Meaningful Hyperlink Text
- Color Contrast

#### **PDF documents**

- Alternative Text and Images
- Headings
- Lists
- Tables
- Meaningful Hyperlink Text
- Color Contrast
- Page Numbers

After completing the review and remediation process, ATI staff will read through the documents using the JAWS or NVDA screen reader to ensure proper reading order. For long documents, ATI staff will review selected portions.

### *Returning completed files*

When the request has been completed, ATI staff will email the requestor the list of completed documents along with a SharePoint link to download the accessible version(s) of the file(s).

### *STEM Content*

Due to the length and complexity of STEM content, requests are evaluated on a case-by-case basis. ATI staff will work in concert with the student, faculty, and Disability Services to ensure timely delivery of the instructional materials.

## Assistive Technology Assessments

Assistive Technology (AT) assessments are informal and typically last about an hour. Assessments are conducted onsite in the ATI's main office (Aquia Building, Room 238, Fairfax campus) or virtually via MS Teams or Zoom. AT assessments at the Loudoun, Mason Square, and Science and Tech campuses are handled on a case-by-case basis.

### *AT Assessment Requests*

- **Students:** A referral from [Disability Services \(DS\)](#) is needed for any student requesting technology accommodations, such as alternative text, testing accommodations, or other AT to use in the classroom.
- **Employees:** Referrals for workplace accommodations (i.e., faculty, staff) are processed by the [ADA Coordinator in the Office for Diversity, Equity, and Inclusion \(DEI\)](#).
- The ATI will offer *informal* AT assessments for anyone who wishes to visit our office to see what AT is available on campus and to learn about our resources. No referral is needed for those **not** seeking classroom or workplace accommodations.

### *AT Assessment Procedures*

1. The AT Specialist receives a referral from staff within DS, Learning Services (LS), or DEI (i.e., ADA Coordinator).
2. Within 2 business days of receipt of the referral, the AT Specialist will reach out to student with information on the process and to schedule an assessment.
3. The student then will schedule the assessment via Microsoft Bookings for either an in-person or virtual (Zoom/Microsoft teams) session.
4. The student and AT Specialist will have a 1-hour informal AT assessment discussing needs and wants, along with a demo of available technologies.
  - a. **Please Note:** Additional meetings to demo technology or discuss more complex AT solutions are handled on a case-by-case basis. The AT Specialist will work with the student, staff, or faculty member to arrange these additional meetings.
5. After the AT assessment is completed, the AT Specialist will send a follow-up email to both the student and the staff member who submitted the referral (i.e., DS, LS, or ADA)

summarizing what was discussed and instructions on how to access any of the agreed upon AT solutions.

#### *Technical support*

- If a student, staff, or faculty member needs additional technical support after the AT assessment has been completed, they may reach out to the AT Specialist or the general ATI office email. The AT Specialist will respond to all requests within 2 business days.

-----

## **Website and Web App Accessibility Monitoring, Testing, and Reporting**

#### *Benchmark for Testing*

All websites and web-based applications are tested for compliance with the standards and guidelines outlined in Title II of the Americans with Disabilities Act (ADA) and the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA.

#### *Automated Testing Procedures*

*Automated testing* is conducted using the [DubBOT](#) web governance solution. This cloud-based system crawls websites to provide an initial assessment and overview of all the accessibility issues it has identified. It also pinpoints the location of the errors on the website. **(Please Note:** At this time, The DubBOT solution can only be used for testing websites)

- **Review Schedule** – Mason-hosted websites are crawled on a weekly basis. Web developers and content managers have access to updated web accessibility assessment data via their DubBOT dashboard. Additionally, a DubBOT-generated summary of accessibility issues is available through a link from the dashboard.
- **Reporting** – Each quarter, the ATI reviews the accessibility scores of all Mason-hosted websites including academic and non-academic units providing benefits, services, programs, and activities provided by or on behalf of the University. Scores are based on compliance with the standards and guidelines outlined in WCAG 2.1 Level AA.
- Websites with scores below the threshold of 80% are flagged for follow-up with the responsible unit. These sites are also submitted for manual testing.

## *Manual Testing Procedures*

*Manual testing* is completed by ATI staff members using AT; this includes, but is not limited to, screen reading software, screen enlarging software, voice recognition, and other alternative keyboard and mouse options. Manual testing provides more specific examples of how accessibility issues affect the usability of the website.

- **Review Schedule** – Manual tests are conducted on an as-needed basis (i.e., by request, third-party app as part of an academic or workplace accommodation, or flagged because of an accessibility score falling below 80% on the DubBOT platform).
- To submit a document remediation request, faculty/staff must do the following:
  - Go to the [ATI's Request Services website](#), select *Request Support for Testing Websites and/or Apps for Accessibility*. Select **Request website/software application accessibility review**.
  - Fill in all applicable information on the form.
  - With 2 business days, ATI staff will notify the requestor by email when the request is received and is processing.
- **Reporting** – Manual accessibility testing results are compiled using a template, which is then emailed to the requestor. Manual tests will include the following information:
  - Specific tasks completed and technology used during testing.
  - Issues that are likely to present functional accessibility.
  - Recommendations to address the issues.
  - A follow-up meeting is offered to the requestor to discuss the results.
- **Timeline** – Due to the variation and complexity of websites and software applications reviewed, ATI staff cannot guarantee specific turnaround times. Nonetheless, every effort is made to complete accessibility reviews within 10 business days of the request.

## *Request Prioritization*

ATI staff prioritizes website and software accessibility review requests in the following order:

- Courses with students with sensory impairments (i.e., blind, low vision, deaf, and/or hard of hearing) enrolled.
- Degree programs with students with sensory impairments enrolled.
- Resources with a reported accessibility barrier.
- Front-facing websites and applications providing essential services.

-----

## Purchasing and Procurement

In cooperation with University Counsel, the Purchasing Office, University Libraries, and Information Technology Services, the ATI Office has established purchasing guidelines that ensure all ICT purchases are reviewed for accessibility. As such, all ICT purchases are expected to conform to the standards and guidelines outlined in the [Information Technology Access Act § 2.2-3500 through § 2.2-3504 of the Code of Virginia](#) and [WCAG 2.1 Level AA](#), as well as all other obligations promulgated under [Title II of the Americans with Disabilities Act](#).

### *Role of Accessibility in Review of ICT Purchases and Procurement Contracts*

The ATI is represented on ITS' [Architectural Standards Review Board \(ASRB\)](#). All application requests submitted to the ASRB are examined to determine if an accessibility review, among other areas (e.g., security, enterprise integration, etc.) is required prior to purchase. All applications are evaluated based their compliance with WCAG 2.1 AA standards and the review process varies depending on access to the technology and information available at the time of the review.

*Accessibility reviews are completed as part of the ASRB if:*

- The application has a user-interface.
- The application will be used in a coursework.

The information collected for the review, whenever possible, includes the following:

- **Specific use case**
  - Number of users
  - Type of user
  - Type of resource (i.e. instructional software used in courses, Mason core resource, administrative resource).
- **Vendor Documentation** – Voluntary Product Accessibility Template (VPAT) or Accessibility Conformance Report (ACR).
- **Testing Environment** – Access to the application or “sandbox” for manual testing.

### *Assessing Risk*

All reviews include a *risk assessment*. A [Risk Assessment Matrix](#) is used to determine the probability that an AT user would be impacted. The following issues are considered:

- The likelihood an AT user would need to engage with the application. This includes a description of potential users and purpose of the application is documented.
- The severity of the accessibility issues discovered as a result of the review. This includes examples of accessibility issues are documented.

#### *How the Risk Matrix Impacts Approval*

- Software determined to present a **Low Risk** are approved in regard to accessibility.
- Software determined to present a **Moderate Risk** are approved in regard to accessibility, with additional requirements including the development of an equally effective alternative access plan.
- Software determined to be **High Risk** may be rejected. In cases where these applications do move forward, requirements to mitigate risk must be followed. Additionally, *High Risk/High Impact Accessibility Language* may be required in the contract to ensure vendors follow through with accessibility remediation timelines.

#### *Reporting Results from Accessibility Reviews*

Results of the review include both an *assessment of risk (High, Moderate, or Low)* using the [Risk Assessment Matrix](#) and recommendations for mitigating risk.

#### *Provisional Approvals:*

- A provisional accessibility approval **MAY** be provided for software applications that meet the following criteria:
  - Software is essential for coursework or research in specialized fields (game design, engineering, chemistry, etc.),
  - Has limited use within a specialized program of study, and
  - Review would require assistance from content experts to understand the operation and use of the application (authoring/production tools, custom project management systems, industry standard applications, etc.).
- If a provisional approval is provided, the unit requesting the software application must agree to:
  - Provide access to the software as needed for a manual review.

- Provide a sample assignment or activity that utilizes the software.
  - Assist reviewers on the use of the software application if needed.
  - Pending the result of the comprehensive review, the department will assist in the development of an equally effective alternative access plan to be used if an accessibility issue arises.
- If serious accessibility issues are discovered that cannot be resolved by the vendor within a year or impact the requesting unit's ability to implement an equally effective alternative access plan, the department may not be able to renew the software license or use the software for required activities in any coursework.

#### *Suggested Accessibility Language to be included in Procurement Contracts*

To mitigate accessibility issues prior to the purchase and implantation of ICT products, the ATI Office has suggested all departments include the following language in their purchasing and procurement agreements:

- All information and communications technology developed, purchased, upgraded, or renewed by or for the use of George Mason University shall comply with all applicable University policies, Federal and State laws, and regulations, including but not limited to the Information Technology Access Act, §§2.2-3500 through 2.2-3504 of the Code of Virginia, as amended, the Web Content Accessibility Guidelines (WCAG) 2.1. Level AA, and all other regulations promulgated under Title II of The Americans with Disabilities Act, which are applicable to all benefits, services, programs, and activities provided by or on behalf of the University.

#### *Non-Standard Contract Language Options*

- *Suggested High Risk Contract Language:*

If the risk associated with an application is determined to be high, the recommendation may be to include **High Risk Contract Language**:

- All information and communications technology developed, purchased, upgraded, or renewed by or for the use of George Mason University shall comply with all applicable University policies, Federal and State laws, and regulations, including but not limited to the Information Technology Access Act, §§2.2-3500 through 2.2-3504 of the Code of Virginia, as amended, the Web Content Accessibility Guidelines (WCAG) 2.1. Level AA, and all other regulations promulgated under Title II of The Americans with Disabilities Act, which are applicable to all benefits, services, programs, and activities provided by or on behalf of the University.

As part of this agreement, the vendor will provide a projected timeline by \_\_\_\_\_ for making the application fully compliant with ADA/WCAG 2.1 AA.

Components discovered to be out of compliance and inaccessible based on user complaint or user-testing of \_\_\_\_\_ must be identified as high impact technical issues, requiring a product patch or update to be implemented.

If solutions cannot be implemented within a mutually agreeable timeline, the contractor may be found in default of the contract requirements and subject to immediate contract cancellation by the University. In the event of *contract cancellation for default or cause*, the contractor shall reimburse the University any remaining contracting costs. Any resulting contract termination for cause or default shall be in accordance with the “*Termination for Cause*” Term of the subject contract documents.

- *Accessibility Contract Language Suggested for Library Databases*

Copyright issues can sometimes pose challenges with respect to Mason’s ability to *proactively* make instructional content accessible to individuals with documented print disabilities. As such, the following contract language is suggested:

- Contractor shall make reasonable efforts to comply with the Americans with Disabilities Act (ADA), by supporting assistive software or devices such as large print interfaces, text-to-speech output, voice-activated input, refreshable braille displays, and alternate keyboard or pointer interfaces, in a manner consistent with the Web Accessibility Initiative Web Content Accessibility Guidelines (WCAG) 2.1 level AA. If materials are not compliant with WCAG 2.1 Level AA, the customer may require the contractor to make commercially reasonable modifications to make the licensed materials accessible. In addition, the customer shall always have the right to modify or copy the licensed materials when necessary or expedient to make them useable for its authorized users with disabilities as allowed under applicable laws and regulations.

----

## **Contact Us**

For questions regarding the digital accessibility policies and procedures listed above, please contact the ATI Office at 703-993-4329 or [ati@gmu.edu](mailto:ati@gmu.edu).