Improving Access for All: UDL to the Rescue

QM accessibility levels, government

mandates, and inclusive design practices

Cynthia Kauder
EIR Accessibility Coordinator,
Texas A&M University;
Lead IT Policy Analyst, Texas A&M IT

René E. Quiroz, PhD
Senior Training & Development Consultant,
The Texas A&M University System;
Quality Matters Master Reviewer

Goals

- Understand the relationship between quality assurance, governmental accessibility requirements, and Universal Design for Learning (UDL).

- Learn revised Quality Matters standards and new accessibility requirements

- Discover ways quality assurance, accessibility standards and UDL best practices can improve the student experience.

It can be confusing!
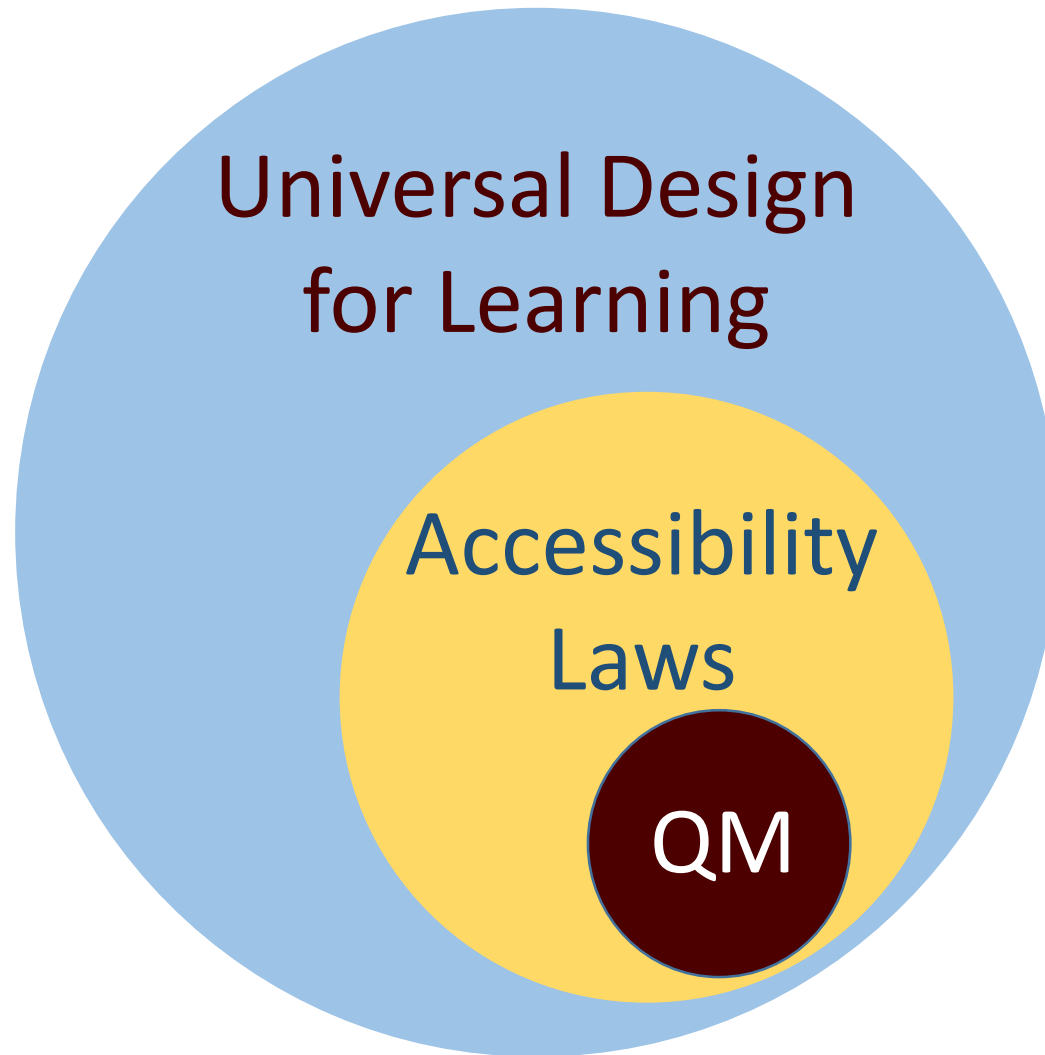
Various quality assurance standards

vs.

New accessibility requirements

vs.

Universal Design for Learning best practices

How should we keep it all straight?

In a nutshell...

Universal Design for Learning

Accessibility Laws

QM

Blurred Lines

- Difficult to know where quality assurance standards, accessibility laws and UDL begin and end

- Unique structure of System institutions and agencies, prompting the question of 'who is responsible?'

- OCR inquiries, lawsuits and settlements refer to different standards

Quality Matters

- Inter-institutional peer review process for assessing the quality of online courses
  - Credit bearing
  - Professional development
- Rubric provides standards focused on accessibility
- Texas A&M University system holds a subscription opportunity for members
  - Not all institutions utilize the subscription

QM & accessibility

- Online/blended courses
  - Course design
  - Tools used within the course
  - Learning management system
  - Services available for students
- Enormous shift to usability from the 4th to 5th edition

General Standard 8, 4th edition

- The course demonstrates a commitment to accessibility for all students

- What does this mean?
  - The accessibility standard incorporates the principles of Universal Design for Learning (UDL) and is consistent with Web Content Accessibility Guidelines (WCAG)
    - Most people using the standard did not know what that meant!

Quality Matters Rubric 4th Edition (2011-2013)

Essential standards of the 4ᵗʰ Edition

- ## Specific Review Standard 8.1
  - The course employs accessible technologies and provides guidance on how to obtain accommodation
    - A statement by the LMS provider certifying accessibility should be readily available as a link or attached to the Instructor Worksheet
    - The instructor provides documentation stating the degree of accessibility of any content, tools and software used in the course. If any component of the course is inaccessible, instructions are provided on how to obtain accommodation

General Standard 8, 5ᵗʰ edition

- The course demonstrates a commitment to accessibility and *usability* for all learners

- What does this mean?
  - The course design reflects a commitment to accessibility, so that all learners can *access* all course content and activities, and to *usability*, so that all learners can easily *navigate* and *interact* with course components.

Quality Matters Rubric 5ᵗʰ Edition (2014)

Accessibility further defined

QM Rubric 4th Edition

- Specific Review Standard 8.1*
    - The course employs accessible technologies and provides guidance on how to obtain accommodation
        - A statement by the LMS provider
        - The instructor provides documentation regarding accessibility and accommodations

QM Rubric 5th Edition

- 8.1* Course navigation facilitates ease of use
    - Layout, meaningful names & links, easy to get back to home, documents & tables
- 8.2* Information is provided about the technologies required in the course
    - Microsoft Office
    - Video development/use
    - Google apps

Essential Standards required for QM recognition

Remaining specific review standards

- 8.3 Alternative means to access course materials
  - Closed captioning, alternative text, PDFs selectable and searchable, color, headings in documents and tables

- 8.4 Course design facilitates readability
  - Grouping of similar content, font style and size, use of the screen, formatting of titles and color to facilitate understanding

- 8.5 Course multimedia facilitate ease of use
  - Course elements are easy to use, intelligible, and inter-operational across devices
  - Graphics and animations enhance, images appropriately sized, clear audio, video control, chunking of video, presentation control

Quality Matters Rubric 5th Edition (2014)

Be aware

- Providing link to campus disability services is great BUT!
  - True distance students do not have clear access
  - Disability services on your campus may not be purposed for online courses
  - Onus is on the professor and system member in conjunction
  - Faculty need awareness and skill training

Accessibility

- Allows **_equitable access_** of Electronic and Information Resources for everyone, including those with disabilities
  - Hearing, vision, motor skills, cognitive
- Challenge: some do not register with the disability services office
- Usability should also be considered
- Mandated by law

1TAC 206/213

- State requirements for websites and other Electronic and Information Resources (EIR); for agencies, university systems and institutions of higher education

- Outline roles and responsibilities for some processes

- Indicate standards by reference

- Set forth requirements for procurement of EIR and exceptions

Title II of the ADA

Makes it illegal to discriminate against people with disabilities in *all programs, activities, and services offered by state and local government agencies*.

- TGC 2054 - includes university systems and institutions of higher education

Section 504 of Rehabilitation Act

"No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity *receiving Federal financial assistance* . . . ."

Section 508 of Rehabilitation Act

Requires federal agencies to ensure that electronic and information technology used by the government can be accessed and used by people with disabilities.

- Sect. 508 Refresh/Final Rule–
  - Technology neutral
  - Aligns with global accessibility standards: WCAG 2.0 Level AA
  - Good news

§508 §255 REFRESH

Section 508 Final Rule

- Compliance required by January 18, 2018
- Safe harbor provision –
  - applies to Legacy ICT which is compliant with the existing 508 standards and has not been altered after the compliance date
  - Any subsequent alterations would have to meet new requirements
- See a [Section 508 and Final Rule comparison](#)

Sect. 508 additions

- Logical reading order for Assistive Technology (AT)

- Instructions provided by more than sound, shape, size, or visual cues alone

- Establishes audio controls

- Color contrast requirements

- Resizing text –functional when doubled

Sect. 508 additions, cont.

- Keyboard only access - traps, focus and context
- Error ID, form labels and instructions; roles and states available to AT
- Link purpose in context
- Multiple ways to locate content
- Headings and labels are descriptive

Additions, cont.

- Language of page and parts of pages are available to assistive technology

- Consistent navigation

- Error suggestions; also must allow financial input to be modified by user

- HTML/XHTML validation

Sect. 508 – substantially equivalent

Criteria which remain mostly unchanged:

- ALT text requirements
- Closed captioning and transcripts
- Audio descriptions
- Semantic markup for AT
- Images of text
- Keyboard access

Sect. 508 – equivalent, cont.

Criteria which remain mostly unchanged:

- Flexible time limits

- Flashing content

- Skip navigation

- Meaningful page titles

- Logical keyboard focus order

Examining one requirement

Captioning…what is really required?
Strictest sense – captioning all videos is required, but **what does this mean?**

Prioritize by risk; have a documented plan:

- Priority: Student accommodations, online and blended courses, including reference material

- Videos in face-to-face sessions

- Videos as reference material for all courses

- Most importantly, create workflows and processes

Accessibility implementation

- Plan strategically
- Use resources like checklists, and incorporate usability testing or feedback mechanisms when possible
- Automate for productivity and quality
- Validate thoroughly, early and often
- Grow awareness and provide education/training
- Measure and track progress

Risks of noncompliance

- Resource reallocation
  - Remediation
  - Escalated timelines mean money and staffing

- Grants, programs, funding jeopardized

- Damaged reputation

- Student outcomes impacted – more than a checklist

Universal Design for Learning (UDL)

What is UDL?

- Educational framework based on research in the learning sciences

- Guides the development of flexible learning environments

- Can accommodate individual learning differences through multiple modes of access

Three principles of UDL

It's all about options, choice and autonomy for comprehension, action and engagement:

- Provide multiple means of representation; e.g., alternatives to auditory or visual content

- Provide multiple means of action and expression; e.g., multiple tools for construction/composition or choices for assignment output

- Provide multiple means of engagement; e.g., minimize distractions

Top 10 Ways to Impact Curricula

1. Take responsibility.
2. Utilize transcripts, captions, and audio descriptions.
3. Consider color choice.
4. Create and utilize accessible documents.
5. Assign "Alt Text" to images.
6. Use relevant link text.
7. Utilize proper heading structure.
8. Create and utilize accessible tables.
9. Make math/technical content accessible.
10. Research available technologies.

Successes and Challenges

- What are your biggest challenges?

- What has worked for you?

- What do you consistently struggle with?

- What are your greatest successes?

- Are there any failures you have learned from?

How to Improve Student Experiences

Student Experiences Based on Common Access Methods

Method to Allow Access	Characteristic	Student Experience
Accommodations for a student with a disability	Necessary but reactive	Adequate but delays may occur
QM or general quality assurance criteria	Proactive	Enhanced
Accessibility best practices	Proactive and compliant	Equitable
Universal Design for Learning concepts	Proactive and engaging	Optimum

Moving toward "optimum"

Questions to ask:

- How do we fund this?

- How will we communicate it?

- How do we support this?

- How do we train for continued success?

- What dependencies do we have? Expertise, vendor commitment?

- What are our ongoing plans?

How to get help

- Contact your institutional or agency EIR Accessibility Coordinator (EIRAC)
- Check member accessibility websites and tutorials (ITaccessibility.tamu.edu, for example)
- System EIRAC website coming soon

Wrap-up

Questions