

Shifting Left- Strategizing Accessibility in Higher Education

[00:00:00.44] JACLYN LAZZARI: I just want to thank everyone today for joining this webinar titled Shifting Left-- Strategizing Accessibility in Higher Education. My name is Jaclyn, and I'm on the marketing team at 3Play. I'll be moderating today's webinar. And with that taken care of, I will pass it off to Kelly Hermann, who has a wonderful presentation prepared for you today. Thanks, Kelly.

[00:00:25.31] KELLY HERMANN: Great, thanks, Jaclyn. Hey, everyone. I am Kelly Hermann. I am the Vice President of Accessibility, Equity, and Inclusion for the University of Phoenix.

[00:00:33.21] I have been working with students with disabilities and accessibility for almost 25 years through a variety of different institutional contexts. So while right now, I happen to work in mostly online education at a for-profit provider, I've also spent time at the SUNY, one of the SUNY campuses. I was there for 12 years. And also at a small private liberal arts college in upstate New York prior to working here at the University of Phoenix.

[00:01:00.98] So my background is mostly in student accommodations and accessibility, but I also have oversight, at the University of Phoenix, of our support services and educational program related to our diverse student population. So really excited to be here today. And Jaclyn, we can go ahead and go to the next slide.

[00:01:22.65] So this is what we're going to be talking about over the next little bit here. And I bet you many of you are here because you know about this first one, the web accessibility rules and the standards, and what they mean for you. We'll talk a little bit about the Title II rules and what that means for us in higher education, and then we're going to go through and talk about where you start.

[00:01:45.92] There's a lot to unpack when it comes to strategizing how to approach accessibility. How do you build this into your institutional practices? How do you create a culture of accessibility at your institution? And I'll be able to share some tips and insights that I have from doing this in the last eight years at the University of Phoenix, but also in the other institutions where I've worked.

[00:02:09.29] So we're going to talk about stakeholders. We're going to talk about policies and procedures. We're going to talk about assessment and evaluation. And then let's talk a little bit about shifting left. And the shift left is a concept that we talk about in terms of embedding accessibility into all phases of development.

[00:02:27.86] So we're going to talk about content design, upskilling and professional development, and continuous improvement. And as Jaclyn said, please ask your questions throughout the webinar. They're going to compile those for us, and we'll address those at the end.

[00:02:43.48] So there are no questions that are too silly or too ridiculous. If you're thinking it, probably, somebody else is, as well. So hopeful that I can be able to share some information about my experience that can help you answer those questions today. All right, we can go on to the next slide.

[00:03:02.17] And I always like to start with this. For those of you who may not be able to see the screen, I have here a picture from the Smithsonian exhibit on the disability rights movement. And there, you can see a bus in the background, and you see several very visibly disabled individuals sitting around the bus with different protest signs.

[00:03:23.69] But in the foreground of the picture is a gentleman who is sitting in a wheelchair, and on the back of his wheelchair is a sign that says, "I can't even get to the back of the bus." And I use this image to talk about the disability rights movement, the disability community. And there's lots of different ways that people come to experience disability in their lives.

[00:03:45.89] And within the disability community, there isn't consensus about how to talk about someone who has a disability or to refer to disability itself. If you're like me, you got your formal education and training-- I graduated with my master's degree in 2000 and got my bachelor's in 1997.

[00:04:07.70] It was ingrained in me that it was person-first language, that you spoke about "a person with a disability." And I have seen many folks who do the kind of work that I do on social media correcting people who prefer identity-first language, which is to say that this is a disabled person.

[00:04:28.97] But there's no consensus. There's no one right way to do this. Both are valid perspectives, and oftentimes are based on the individual preferences of the person who has the disability themselves.

[00:04:42.65] So throughout our time here this afternoon, you'll hear me switching from saying person with a disability to disabled persons. And I do that because I don't know who's in my audience. I don't know how you feel about this, and I want to make sure that we're being respectful of those different perspectives.

[00:04:59.98] So if you hear that, it might feel a little uncomfortable for you if you've been trained, like I have, in using person-first language. But it is not meant as any disrespect. And I share this to highlight that this is one of the areas where there is a diversity of thought among the community. So Jaclyn, if we can go to the next slide.

[00:05:20.16] And I also want to make sure that we start with the definition of accessibility. So there are lots of different ways that we think about access, and accessibility, and equality, and civil rights, but this is actually legally defined for us.

[00:05:38.89] And so accessibility is when a person with a disability is afforded the opportunity to 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 equally integrated manner with

substantially equivalent ease of use. And the person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.

[00:06:12.66] That's a lot. So what does that mean? What that means is that as technology evolves, and as we do more and more online, especially in higher education, some of the more traditional and historical ways that we've thought about accommodating students may not be truly accessible.

[00:06:33.88] Now, this is absolutely a time, too, where you're not going to throw the baby out with the bathwater. There are still some of those accommodations that have to be part of our strategy because there's individualization that needs to happen for each person who's coming to us in higher education and saying, I'm a student, I'm a faculty member, I'm an employee, and I need access because I have a disability.

[00:06:55.72] But when we start thinking about web accessibility and the content that you're sharing with your audience, whether it's the public or any member of your community, there are certain things that we know we need to do to ensure that that content is accessible.

[00:07:12.34] And they need to be able to get that information, engage in those activities, interact with it as equal to somebody who doesn't have a disability as possible. Which means that if someone can't see, the solution isn't to hire a reader to sit next to them and read it out loud to them.

[00:07:33.91] The solution is, make sure your images have effective alternative text. Make sure that the navigation is keyboard-accessible. Make sure that things are labeled properly so that someone who's using a screen reader knows what they're trying to do without having someone sit next to them. We want them to be independent.

[00:07:51.87] So keep that in mind as we talk about this, and that that's the goal of everything that we're going to talk about here today. We can go on to the next slide, Jaclyn. Thank you.

[00:08:02.16] So the law around accessibility. So first and foremost-- and I say this with a little bit of pride-- I am not an attorney. I joke, sometimes to the chagrin of the attorneys I do work with, that I am not an attorney, but I happen to play one on TV, only as it relates to the ADA, Section 504, and in limited cases, FERPA. And I say that in jest because my experience and my expertise is in interpreting the laws and being able to devise policies and procedures that are going to make the environment more accessible for our students, faculty, and staff.

[00:08:39.21] But there are three laws that we commonly talk about. The first is Section 504 of the Rehabilitation Act of 1973. And Section 504 is regulated by the Office of Civil Rights in the Department of Education. And so that's one set of laws that we look to. And if you're covered under Section 504, it's because you receive any dollars in federal money. That's what invokes the coverage and the protections of 504.

[00:09:10.04] The Americans with Disabilities Act of 1990, there's a lot of information out there right now. There are three primary titles that we talk about in the ADA, but there are actually five. But we're only going to really talk about, today, Title II and the difference between Title III.

[00:09:25.68] Title I is employment. So that's something that's important, but most likely not why you're here joining us today. Title II applies to state and local governments, and Title III applies to places of public accommodation.

[00:09:38.52] One thing that I do want to note about Section 504 and the relationship with the ADA is that typically, when one is updated, the other is updated so that they are consistent with each other. You do not see wild differences in the requirements under ADA and Section 504, because a lot of institutions are covered under both.

[00:09:58.00] And then there is Section 508 of the Rehabilitation Act. And Section 508 gets talked about a lot because there are web accessibility standards within Section 508. Those only apply to procurement activities of the federal government, though I will point out that some states have adopted 508 standards as state law.

[00:10:19.97] So you may be subject to Section 508 even if you are not part of the federal government and procuring anything for the federal government. It may be that you have to adhere to 508 because of your state law.

[00:10:35.00] So all of that to say 508 gives us some guidance, but usually is not something that is going to be enforced upon an institution of higher education. And so what's important about this? You want to talk to your legal counsel, and you want to make sure that you understand the context within which your institution is working.

[00:10:54.91] So I suspect that many of you are here today to talk about the web accessibility rules for Title II that were released last April. And Title II, as I mentioned earlier, only applies to state and local governments. So what does that mean?

[00:11:10.01] That means that institutions that are publicly funded-- so community colleges, state public-funded institutions-- are considered part of the state and local government. And you have to follow these web accessibility rules. We're going to talk a little bit more about the differences and what you'll see on the Title II regs, but I'm going to be honest. I'm not going to talk a lot about the Title II regs today.

[00:11:36.80] There are a lot of resources Casey just dropped in the chat. I have it hyperlinked here in the PowerPoint, as well, that there is a fact sheet from the Department of Justice on these Title II rules. It goes through all of the exceptions. It goes through the guidelines and the requirements. So certainly, if you have not taken a look at that, I advise you to go ahead and take a look at that and review that with your legal counsel, because your legal counsel is the one who is best situated to give you advice on what this means for your campus.

[00:12:06.22] But the thing that I love about the Title II regs is that it does firmly solidify the Web Content Accessibility Guidelines, or WCAG. You will hear-- I know a lot of us who do this work talk about the WCAG guidelines. That's what that means.

[00:12:21.20] And these guidelines come from the W3C, which is the World Wide Web Consortium. That is an international standard. It's an international group of folks with expertise in development and accessibility who put forth the standards for us to follow to ensure that our environments, our digital environments, can be as accessible as they can be right out of the box, from the point of launch. And so they're really, really important.

[00:12:50.65] I'm also not going to talk a lot about what the standards are under WCAG today. We're going to talk more about how you approach compliance and how you strategize this on your campus. There are a ton of resources that are out there, as well, if this is something where you want to learn more. And Casey also put in the chat the link to the W3C page, which is actually really good and has a lot of resources. All right, Jaclyn, we can go on to the next one.

[00:13:21.60] As promised, let me talk a little bit about Title II of the ADA, these web accessibility regulations. So a couple of things I want you to take away from this if you don't already know. The public institutions that are covered under Title II have either until April of 2026 or April of 2027 to comply with these regulations. And it's important to know how to determine which state applies to you.

[00:13:52.15] So if you are sitting right now at a state-funded public institution or a community college, you need to look at the area population that you serve, not your institution. So I have seen some incorrect guidance out there advising folks that it's your FTE and your student population. It is not. It is the area of the state or the local entity that you pull from for your population.

[00:14:22.69] So if you're a community college, your primary population likely is a county. And if you look at your county population, and if that's your primary catchment area and that's the only place where you're drawing your students, and that's under 50,000 people, you would have until April of 2027.

[00:14:40.83] If you have a population that you pull from-- so if you are a community college that serves multiple counties in your state, or maybe you have a statewide focus, or you're a state public-funded institution that has a statewide pull for your population, you're likely over 50,000 people and you have to comply with the regulations by April of 2026. And there's some great resources that the Department of Justice has put out to help you figure that out.

[00:15:10.77] The basic bottom line of the Title II web accessibility rules-- so this is Kelly Hermann's interpretation of this-- it is solidifying what we've been talking about for years as best practice in the regulations. And it's not often that the regulations are consistent with what we talk about for years as best practice. Usually, there are some nuances where we're like, oh, gosh, why did they do that?

[00:15:37.08] That's really not the case here. They have said, pretty much, that by April of 2026, your web and mobile content needs to be accessible regardless of request by an individual with a disability. There are exceptions for archived material and information that you may need to maintain on your website.

[00:15:58.74] And again, I'm not going to go through all of the nitty-gritty details of the exceptions, because that's going to be very institutionally based. And you need to work through that with your general counsel and folks on your campus in terms of those nuances. But the bottom line is that by April of 2026, everything that you have out on the website, on your mobile application, needs to conform with WCAG 2.1 AA, which is what we talk about as best practice in the field.

[00:16:32.63] So those of you at private institutions, you're not quite off the hook. And the reason that I'm going to say that you're not quite off the hook, number one, the Department of Justice has signaled its intent to similarly develop rules for Title III of the ADA. Now, when this was first published, back in April of 2024, as we all know if you are in the US, we've had a change in administration.

[00:16:57.51] And with a change in administration comes different leaders, different priorities, and different approaches to this. So whether or not we see Title III rules, I think it's too soon to hedge any bets on that. And so I don't want you to be thinking, oh, gosh, they must be imminent.

[00:17:18.18] I would say they're probably not imminent, because Title III applies to places of public accommodation, not just institutions. So there is a wider reach for Title III. So I think that it's going to be a little while before we'll see that.

[00:17:32.93] But the Department of Education has indicated the same process that they want to follow for Section 504. So again, there's a lot of activity in our country today about the Department of Education. Whether that means that we're going to have web accessibility rules for Section 504 or not, I think it's anyone's guess at this point. Probably more so leaning, at this moment in time, to say, I would probably suspect we won't have them under this current administration.

[00:18:06.77] But regardless of any regulations, if you are at a private institution, the requirement under Section 504 is that all of your programs, activities, and services should be and must be accessible, because to not be accessible would be discriminating on the basis of disability, and that's still not permissible under the law, regardless of regulations.

[00:18:31.76] So the advice that I have been giving from the time that the first Kindle lawsuits were filed back in 2009, if you remember that, where we first started having more attention paid to educational technology and its accessibility, has been, this is a program, service, or activity of your institution, and it should be accessible. And I'm not changing that advice.

[00:18:57.22] That's the advice that I'm giving to my institution. That's the way that we approach this as an institution that's covered under Title III. And we know that this is important to our students.

[00:19:09.59] And so we'll talk a little bit more, as we go through the rest of the slides, about what that means. And I'm going to give you some of the benefit of how I've been approaching this at an institution that is not covered by Title II, but that has a really strong commitment to ensuring that our digital content is accessible. OK, Jaelyn, we can go on to the next one.

[00:19:30.52] OK, so where are we going to start? We're going to break it down by who, what, and how. And so we can go on to the next one. I want to start with this slide. And this slide is probably the most important in my opinion, because it is the non-negotiables. And again, this is in the world according to Kelly Herman. Accessibility non-negotiables for your institution.

[00:19:56.81] So for my institution, the first one is accessibility requirements must improve our content, but also must be achievable and sustainable. It does not do you any good to put out a benchmark standard if you cannot meet it. It's the meeting it that's important. So as we talk through the rest of this webinar, we're going to be thinking through what your institutional context is and what you can actually do.

[00:20:28.39] The second one-- accessibility is considered and integrated into all phases of design and development. It is not just a step in the QA process. I have more to say on this one later, so I'll save that for then.

[00:20:47.23] Number 3. Decisions regarding the use of tools and/or content are driven by learning objectives or business-related needs. One thing I'll say about this one-- I will frequently get emails, or Teams messages, or phone calls from my colleagues, where they'll say to me, hey, Kelly, we've got three or four different tools that we're considering embedding into this course. I'm going to send them all over to your team. Will you take a look at them and tell us which one is the most accessible? And that's the one we'll go with.

[00:21:22.93] And I love that message from the support that it's communicating in terms of saying, we know accessibility is a critical factor here, but that's actually the wrong way to approach it. And it's the wrong way to approach it because we should be choosing our tools, especially tools that we're embedding into our curriculum, based on how it's going to help students meet the learning objectives. And that's the first thing that I usually say back, is, like, well, hang on, time out.

[00:21:50.31] How do you need the students to experience this content? How do you need them to demonstrate that they have actually learned the course concepts? Because that's what needs to drive the tool adoption. And once you have that, that gives me more leverage in any conversation that I'll have with a vendor about any accessibility defects that we might find.

[00:22:10.18] So I'm going to talk a little bit more about that, but I wanted to preface, at least as an introduction, that we have to situate, as the top priority, the learning goals and the objectives for why that tool is going to be used before we situate the priority around accessibility.

[00:22:31.93] The fourth one-- all public and student-facing content must meet the WCAG guidelines. That's a non-negotiable at my institution. And we talk about it a lot. We talk about

what it means. Our embedding accessibility principles as early as possible into our development process so that we can ensure that we can meet this non-negotiable.

[00:22:56.88] Number 5-- professional development and training should be practical, relevant, and timely regardless of whether it is required or not. I always want the folks who come away from the professional development that my team offers to say, wow, that was really worth our time.

[00:23:18.16] And many of us have experience, I'm sure, where we have required trainings where we're like, good gosh, that was a waste of time. We don't want that. We want them to actually get the skill development, and to be able to add these skills to their repertoire and be engaged in that learning opportunity, because it's important.

[00:23:38.06] And the last one-- we are a team working toward the same goals and objectives. We have some hashtags that we use across the University of Phoenix, and this one's my favorite. It's "work together, win together." And it's really-- because it's really important.

[00:23:51.93] It highlights the need for us to collaborate across divisions and silos. We try to make sure that we are not getting our work in silos as often as we can. I mean, it still happens. We're all human beings, after all. But we really do try to have the emphasis on collaboration and working together. OK, Jaclyn, I'm ready for the next one.

[00:24:16.70] OK, first step-- you need your stakeholders. Who is your team? And so these are the questions that I think about when I joined the University of Phoenix eight years ago, working in a new institutional context where I didn't know anyone. And so I was like, OK, I have to figure out who we need to have assembled here.

[00:24:35.79] So I needed to know who is designing the content, because I need to know which teams are doing the actual work that I need to work with them on. And so understanding where content is designed in your organization is really important because it gives you that roadmap of, how are things going through?

[00:24:56.30] Do you have a process by which design is being approved? OK, well, how do we integrate accessibility into that? And then looking at all of those stages. But I need to know who's doing that work.

[00:25:08.81] We also need to know what is being shared with students, faculty, and staff. So I have different lists of what's shared in our learning management system versus what's being shared on the public-facing website. And the audience for the public-facing website is different than the audience of the learning management system. So it does require, sometimes, some different thought processes that go into that.

[00:25:35.36] Also, where do folks look for support and resources? For us, it's our technical assistance center. They're an incredibly important partner with us, and our faculty help desk. So we know that that's where our students and our faculty are turning when they have questions, so we want them to have that information about accessibility on hand so that they can answer those

questions. And once it hits the level where they don't know the answer anymore, they can get that over to my team.

[00:26:04.07] How do you pay for things and execute contracts? Oh, my goodness, there are so many phrases we could say about money talking and the rest of it walking. Well, this is really true of accessibility requirements, as well. We have important language that we embed into our contracts related to accessibility, and any red lines on those contracts have to come to me for approval before we can actually execute on the contract. And so that's a really important step.

[00:26:30.28] Also, who's responsible for resource allocation? It's important to talk about how the resources at your institution are going to be divided and where the resources are going to be, because everyone is always fighting for those resources, whether it's staff time, whether it's money.

[00:26:49.63] Those are all of the things that we look at in terms of how we approach the way that we're going to do that work and where we need to have that justification. And it becomes a really important part of embedding the work into each team's processes, as well.

[00:27:08.44] I'm going to spend a lot of time talking with you later about evaluating efficacy and effectiveness. I am a huge proponent in sharing our wins, and sharing the challenges, and wrapping that all with data. It's important so that folks can contextualize and look at the population that we might serve in light of the other populations at your institution.

[00:27:29.72] And lastly, what does campus governance look like? I think, sometimes, those of us who have worked in traditional higher ed are like, oh, gosh, I've got to go to the faculty senate on this. But the faculty senate can actually be a really important partner, and is an important place where faculty turn when they're experiencing things that maybe they're not quite sure is OK. And it can be a really important vehicle and group for you to get buy-in across your institution. All right, Jaclyn, we can go to the next slide. I'm going to take a sip here.

[00:28:07.25] One of the things that I hope you take from the time we're spending here together today is this question. This is the question that you need to have in your mind as you approach your stakeholders. What's in it for me?

[00:28:19.60] And it took me a while before I realized this, that I needed to answer this every time I went to a group to say, hey, I want you to make some modifications to what it is that you're doing. And so I always knew this first bullet, which says, accessibility needs to be integrated into existing practices and procedures to be most effective.

[00:28:41.30] But when I went-- because that was what was in it for me. And I approached those conversations with my colleagues to say, hey, this is going to work better for me if you do it this way. I was missing what was in it for them because I wasn't understanding their processes. And I needed to understand what they were doing and what their workflows looked like so that I could make more effective recommendations and suggestions about how they could build accessibility into their practices.

[00:29:09.25] And it's really important that we look at the overall goals for the project or the work of that department. So my marketing team that works on our website is really focused on prospect student recruitment and making sure that prospects understand who the University of Phoenix is and what we can offer those students.

[00:29:28.99] But that's a different goal than when I go to my center for teaching and learning, who is responsible for instructional design, where they're working with our students once they're already committed and made the decision that they want to be students here. And they are trying to meet the course learning objectives.

[00:29:44.92] So understanding that does change the way that I approach those conversations because I'm thinking about, what do those teams need to know? And how can their work benefit by integrating accessibility into it? What are those other ways that, by integrating digital accessibility into their work, they're going to be able to better achieve their goals?

[00:30:05.71] So one thing we talk about a lot is search engine optimization, especially with our marketing teams. When you tag things properly and follow the WCAG guidelines, there are benefits that they have with search engine optimization that then will help them meet their goals in a better way. Same thing with videos having transcripts and captions, with images having alternative text. All of that becomes metadata that then can help with that search engine optimization.

[00:30:35.07] And probably the one piece that everyone needs to understand is that you can save time, money, and effort by not having to rework things. And so that's the biggest "what's in it for me" that I bring to my colleagues, is that if you build this into your development process, then my team isn't going to look at it and say, oh, you did this wrong, so now you have to go back and fix all 15 pages where you have this heading structure.

[00:31:00.10] Do it from the get-go. Let's talk about it during development so that we can say, why, aesthetically, are you choosing to start with heading 2 instead of heading 1? Well, how can you change your heading 1 so that it matches the aesthetic that you want, and then also offers the navigation that we need to have from an accessibility perspective? So that's how we approach those. OK, Jaelyn, we can go to the next one.

[00:31:25.80] OK, policies and procedures. I think a lot of times, we in higher education think, I have a policy. I'm good. Oh, hate to burst your bubble, but I'm going to burst your bubble.

[00:31:37.14] Policy is definitely the institution's commitment, and it provides guidance and direction. But it's really only as effective as its implementation. If you write a policy and then never refer to it, don't socialize it across your institution, and don't have widespread buy-in, it's not going to do anything to help you.

[00:31:56.67] So you have to look at what the policy does. It's a vehicle for broad-based support. It clarifies your position and your direction. But you have to make it a living, breathing document. It has to be part of the way that you work.

[00:32:12.78] And so that comes with your procedures, because your procedures bring that policy to life, because it tells the institution, this is what we need to do to be able to meet this commitment. And I like to talk about it in terms of a commitment, that this is what we as an institution have committed to, because then I get everyone from the president of the university all the way down to our student-facing staff that help them on enrollment. Everyone understands that we have a culture of accessibility at the institution and that there are certain things that we need to be able to do.

[00:32:47.22] And you're going to hear me say this a bunch during this hour-- are they sustainable and achievable? They don't give you any benefit if no one follows them. They can't be overly complicated. They cannot be overly burdensome.

[00:33:01.77] They cannot put so much pressure on a team that they're like, oh, I'm going to try to do this around her back and hope that they don't catch me, kind of thing. Because that does open your institution up for risk. So make sure that they are achievable and they are sustainable. And you do that by making sure you have feedback mechanisms in place to review and revise.

[00:33:23.80] We do things-- I think I have this on a later slide, but I'll talk about it a little bit here. We have postmortems, for lack of better terms, because that's really not-- it's a morbid use of the term. But we do have post-event, post-launch, postmortems, however you want to refer to it, about the accessibility of something once it has been launched, or once it's been deployed to students, so that we can understand what worked, what didn't work, where were there still questions that we need to make sure that we answered, and what are the suggestions we have for improvement so that we can make it better next time?

[00:33:59.40] That's a critical part of the process, because we need that stakeholder feedback so that we can be the best partners that we can be. OK, Jaclyn, ready for the next one. OK. I say this to my team all the time. Data is our friend. My team has railed against this. When I first got to the University of Phoenix, I had a team that was like, we shouldn't have to justify anything that we do with numbers. We're doing the right thing.

[00:34:26.52] And I love that from an altruistic standpoint. But folks, we need to recognize the context within which we work, and what that is is you have resources. And you have to justify that you're using those resources to the best of your ability and helping the institution meet its goals. So data is your friend. We always want to be talking about our data and this population that we are serving. And it is how you know that your efforts are working.

[00:34:55.50] So at the University of Phoenix, this is the list of things that we measure and what we report on-- the size of our disabled student population per course start. So let me explain this just for a quick second. The University of Phoenix is a non-traditional delivery model. Our students take one course at a time every five weeks. We don't have traditional semesters. So I talk about course starts because I don't have a fall semester and a spring semester. So that's how we talk about it. So just so you have that context.

[00:35:26.41] We talk about our retention. We talk about academic outcomes, including course pass rates for accommodated students. We talk about alternative format usage. And what's really

great about this, and one of the tools that we use as Anthology Ally, is that many students who don't have a disability and don't have accommodations are using alt format, which is fantastic.

[00:35:48.11] And I love showcasing that data, especially because I can say to you, the folks who always like to say to me, Kelly, why are we spending so much time on this small population, and isn't it at the expense of the larger population? And I'm like, no. And I can actually point to the data that we have from Anthology Ally that shows the number of students who are using alternative formats that I know are not accommodated. So that is pretty awesome, that we're able to do that.

[00:36:16.82] But also, through Anthology Ally, we can talk about course accessibility scores, we can talk about file accessibility scores, and our web accessibility scores. And because I do have a digital accessibility team that is embedded with our product teams at the University, I can also talk about the volume of work tasks related to accessibility and accommodations that then speak something to the leadership at my institution, as well as my peers and my colleagues, about the volume of work that we're doing and how we are making the environment at the University of Phoenix more inclusive for all of our students, which is really important. All right, we can go to the next slide.

[00:36:55.99] I think I'm talking about some of these slides too much, so I'm going to try to make sure we save enough time for questions here without taxing our interpreter, because I am from New York, so I can talk fast. So let's talk about shifting left and building accessibility in rather than bolting it on. So on the next slide, we're going to talk a little bit about content design.

[00:37:17.29] This is probably one of the areas where I've had to do the most convincing with some of our teams that design content, because they're so used to, we're going to do our thing, and then we're going to pass it off to different teams on different stages of the development. So Kelly, your team will be part of our QA process. And it's hard to break that mindset.

[00:37:41.57] But when they consider accessibility from the very, very, very early stages of design concept and ideation, there are so many benefits. And sometimes when I talk about this, I'll put up some pictures of buildings from where I used to live in New York, where you had-- and I'm sure you have all seen it, too. You have a house, and all of a sudden, you see a temporary ramp go up on the outside of it. And it sticks out like a sore thumb. It's not part of the aesthetic. It is something that is definitely an afterthought and bolted on.

[00:38:16.99] But if you had designed the house with accessibility in mind, it could be part of the aesthetic of the environment. And so if you haven't ever seen it, there's a wonderful ramp at the Ed Roberts Center at the University of Berkeley. And Ed Roberts was one of the pioneers in the disability rights movement.

[00:38:36.19] And so the ramp, instead of being stairs to get up to the second level, it's just this beautiful, rounded ramp that allows anyone to use it. And it makes the environment more inclusive for everyone, because folks who can walk can use it. Folks who need wheelchairs, folks who might have other mobility devices can absolutely use it. And it's part of the design aesthetic, and it looks beautiful. It's actually integrated into the experience.

[00:39:04.42] And it also offers a better user experience, because if somebody needs to have a ramp to get up to the second floor-- but they can still walk together, because anyone can use this ramp. It doesn't necessarily mean that you have to have a divided experience where one person goes to the stairs and the other person goes to the ramp.

[00:39:22.86] I already mentioned it's integrated, and absolutely, building it in through your design and your development is more efficient and more cost-effective, because you don't have to use staff time to go back and rework something. And we kind of liken it to our product teams now with, we all have had the experience of submitting an assignment to an instructor and getting it back either with red ink all over it because, oh, gosh, there's a lot of feedback on this.

[00:39:48.97] I have a lot that I have to work on, or the modern-day equivalent of that-- I don't think my daughter probably doesn't get much back with handwriting on it from her TAs and her professors anymore. But it's comments all over your Microsoft Office-- your Word document or your PDF. And you have this sinking feeling in the pit of your stomach. Like, I have so much that I have to do to fix this.

[00:40:12.03] But when we build it in, and we're providing that feedback as you go, you're not going to have that experience. It's going to be ready to go once you pass that phase because we integrated accessibility into it. OK, thank you, Jaclyn.

[00:40:28.32] All right. Here are the basics. This is what we require of our faculty particularly, is that when they are sharing content with students, they must provide accessible PDFs. Their videos must have captions and transcripts. Any audio files or podcasts that they might be sharing with their students have to have transcripts.

[00:40:52.34] We ask them and require them to post descriptive hyperlinks, and we make them promise never, ever, ever to use the words "click here" as the link. We want them to have images with alternative text descriptions, and those must be accurate and must actually relate to the context within which why they're sharing that image, which is one of the things that you need to be mindful of. AI is making our world better, but there's still need for human involvement, and alt text is definitely one of those examples. And also that we have appropriate color contrast.

[00:41:28.85] So we provide training for our faculty and staff on all of those things, but we don't overwhelm them with the various success criteria that are included within the WCAG guidelines. That's too much. That's too technical. This is what our faculty need to know. OK, we can go on to the next one.

[00:41:47.90] All right, so evaluating our tools and content. There's a lot of different things that we look at as we evaluate tools and content. I happen to be very, very fortunate that I work for an institution that has a digital accessibility team that does this for us. But if you don't have an accessibility team, these are still things that you can ask for and that you can work with your vendor partners on ensuring that you're assessing accessibility.

[00:42:14.01] So the first one is the Accessibility Compliance Report, or you may have heard this referred to as a VPAT-- a Voluntary Product Accessibility Template. The Accessibility

Conformance Report is what we call the VPAT once it's been completed. And so vendors, especially if they're working with the federal government, will have completed VPATs for you to review. And they're important to take a look at, because it does give you some insight into how they have developed and have worked with accessibility in the development of their product.

[00:42:48.04] I'm also going to put a plug in here for 1Ed Tech, is an organization related to educational technology in education from K through 12 all the way through higher ed, and their members are also members of the supplier community. I chaired their accessibility task force as we developed this accessibility rubric. It is a self-assessment by the vendor about that particular product, and it gives you some additional information that you can use in conjunction with a VPAT to understand more about their approach to accessibility.

[00:43:21.36] So if you want more information about that, my contact information will be at the end of the slide deck. And I'm certainly happy to talk more about that. But I think the rubric is a great place to start, and many of you might actually-- your institutions might be members of 1Ed Tech and you don't even know it. So going to the 1Ed Tech website and checking it out would be time well-spent.

[00:43:41.99] We also look at keyboard navigation, where the focus indicator is, because we want to know, what is that experience going to be like for somebody who cannot use a mouse? Resizing of the text, which is really important with mobile, depending on how the environment has been designed, is going to affect the mobile experience as well as the experience for somebody with a disability. We also look at color contrast. We look at compatibility with screen readers.

[00:44:10.37] And we always, always, always ask the vendor, what testing are you doing for accessibility? I want to know how they're approaching this. Do they have an in-house accessibility team? What expertise do they have on that team?

[00:44:23.60] Do they have individuals who work for them that are native users of the assistive technology? Are they hiring third-party consultants, or are they winging it and hoping that they have everything pulled together the way it should be? We work with all of them. And it gives me a lot of information about the starting point when I know that information.

[00:44:44.78] And also, we like to rely on our students, faculty, and staff who are native users of the screen readers and assistive technology, because every person's disability affects them in a different way. And so I can tell you that in my experience-- I accommodate almost 16,000 students every year at the University of Phoenix. Those are just the ones we know about. And every single one of them, even if they had the same diagnosis, it will affect them in different ways. They will use the assistive technology differently.

[00:45:15.89] And so I can have the most beautifully designed, accessible out of the box, conforming to the WCAG standards environment for these students to experience, and I guarantee you I will have at least one or two students who are still going to struggle. And so there's lots of different reasons for that, but the individual differences are so critically important

to the end user experience. And we want to make sure that we understand that. OK, you can go on to the next slide.

[00:45:45.66] Stock your colleagues' toolboxes. Stock your toolbox. I'm going to talk about my last bullet on this slide first. The tool does not equal your strategy. I hear from folks a lot, especially because I will serve as a reference for Anthology, because we've been using Ally for a number of years, who will say to me, oh, I'm good. I don't have to worry about this anymore. We've got Ally.

[00:46:11.07] No, you're not good, because Ally is just one part of your toolbox. It cannot do everything for you. But these are tools that I have personally used in my practice at the three institutions where I work. There are many others. I just don't have familiarity with them, and I'm not going to give commercials for all of them right now. We don't have the time for that, nor is it appropriate.

[00:46:33.31] But these are some really important resources that you can look at to stock your toolboxes to make sure that your accessibility strategy is as comprehensive as it needs to be for your institutional context. You might have faculty who love new tools.

[00:46:49.78] So doing a workshop or a webinar with them about the WAVE browser extension and how that might help them, or the Microsoft Office accessibility checkers, that might get you a little bit further down the road than, maybe, a colleague who has faculty who are like, technology, what do you mean?

[00:47:09.09] I have to have a course shelf for my course? I don't want that. Why can't I keep using the same photocopy of the article I read in 1972 when I was a student? Why doesn't that work anymore?

[00:47:20.50] So you have all of those populations among your faculty and staff and your colleagues. So you want to make sure that you're looking at all of these different types of tools that you can provide to your faculty and staff, and that they know how to use them. Bottom line-- can they use them, do they know how to use them, and will they use them? We can go on to the next slide.

[00:47:46.68] Talking about upskilling and professional development, please don't assume that faculty and staff know how to create accessible content. They don't. They're scared to death of it. I have had that experience over my 25 years more than anything else, where I'll have a faculty member call me and say, Kelly, I was hoping I was going to avoid this, but I've got one of yours in my class now. What do I do?

[00:48:11.11] And I love those calls, because number one, it communicates that they trust me enough to ask me that question. But number two, it means I can help them. And we can get them set up with the right tools and resources so that they can actually ensure that their teaching is more accessible to their students.

[00:48:27.87] And I also don't ever assume that they understand why accessible content is a big deal. Many folks have never experienced what it's like to navigate the built environment or the digital environment using assistive technology. They have no idea what a screen reader is.

[00:48:46.53] They know I talk about it. They're like, oh, gosh, here comes the redhead again. For those of you who can't see me, I'm a six foot-tall redhead. That's a joke I use a lot. Like, oh, gosh, here comes the redhead, because I don't blend into a crowd.

[00:48:58.91] But they haven't experienced that. And so they don't understand what it's like when you can't see, or when you can't hear, and you have to get through the built environment or the digital environment.

[00:49:13.83] So we want to raise that awareness. We want them to understand that, because once they understand that, they might have a little bit more empathy, and they might be willing to step outside the box a little bit of what they're used to doing to change some of their behaviors. And one of the most effective ways to do that, honestly, in my opinion, not only sharing the how-tos, but your student stories.

[00:49:36.53] There is nothing more powerful than hearing from those that it directly affects. And I love it when I have students who are so willing to share their experiences with our faculty so that they can start to understand that their lived experience, meaning the faculty, is not everyone's lived experience, and that we can do better.

[00:49:55.44] I hear from faculty, well, it worked for me when I was in school. Well, that doesn't necessarily mean that we want to still do it that way. I don't know about some of you, but I mentioned to you that I graduated with my master's degree in 2000. That was 25 years ago.

[00:50:09.12] I would hope we've evolved since then, and that we've learned from those experiences that we've had to make it better, because if we can, why not? So it's really important to share that.

[00:50:21.92] And also, this one is big. Folks are often anxious about what they don't understand. And this is an area that's legally laden, so they're afraid and reluctant to express what they don't know because they are so fearful, at times, of appearing insensitive, or that they're going to be accused of being discriminatory. And they don't want to be that person.

[00:50:46.67] And so sometimes, they get a little bit tight lipped, and they don't want to talk about it. And so I often like to start off sessions that I'm doing with our faculty about remembering back to when Vegas was doing those commercials that "what happens in Vegas stays in Vegas--" obviously before smartphones and social media, because there's nothing that's secret in this world anymore.

[00:51:06.56] But that's what coming to my team is. We will keep your confidence, and we are a safe place to ask those questions, because if you have the question, I would rather you ask me it very inelegantly so that I can be able to answer the question and assuage any concerns that you have, and also make sure that you have the answers. And training and professional development-

- I'm going to highlight it again-- has to be timely, relevant, and practical. So important. All right, Jaclyn.

[00:51:37.60] OK, I think we're getting close here. And we're getting really close on time, so I apologize that I'm talking so much. But hopefully, this is answering some of your questions as we go.

[00:51:47.98] This cartoon that you see on the slide here today, you have a tree in the background. You've got a row of animals in front of the tree, including a bird, a monkey, penguin, elephant, goldfish in a bowl, a seal, and a dog. And there is, assuming, an instructor sitting behind the desk. And he says, for fair selection, everybody has to take the same exam. Please climb that tree.

[00:52:15.46] I love using this cartoon because there are some course contexts where climbing the tree would actually be an essential element of the course, and the students would have to do it to demonstrate that they have met the learning objectives of the course.

[00:52:32.95] Remember what I said earlier-- your determination of whether or not something is going to be accessible has to start with your learning objectives, or the objectives for why it is that activity exists. And if this was a course on tree climbing, and the learning objective is, the student will demonstrate that they can climb a tree, then we would have a conversation of, well, if the student can document what steps would need to be taken in order to climb the tree, is that sufficient demonstration of the learning objectives? Because I can design an alternative assignment for that.

[00:53:08.39] So this is really important because it's how you determine whether or not a requested modification is a fundamental alteration. What alternatives are out there, and do they allow the student to access the content independently? Those are the criteria that we're looking at when something does not meet the WCAG principles.

[00:53:29.54] And the most important part of this-- develop the plan before you have a student in the course. That's probably one of the most important things that we've done at the University of Phoenix, is that when we are designing our courses and we're working with our instructional designers, we are looking at those pieces of course content that are not going to meet the WCAG principles, and we have alternatives ready to go. And we do that with our faculty, and we do that with our subject matter experts who help us design those courses, so that we are ready when the student has the request. OK, Jaclyn, we can go to the next one.

[00:54:08.76] OK, continuous improvement. We talked a little bit about the postmortem before, so I'm not going to talk about that again. But really, what's important is the feedback that you can get from your students and your faculty. What workarounds did they have to put in place to participate in the course that the staff did not know or didn't consider ahead of time?

[00:54:27.43] And if you are not with disability services right now and you're in this webinar, working with your disability services office is going to be important here, because students will

often come to those counselors and tell them what's happening, and give them feedback that would be helpful for you to have as you're working with other parts of the organization.

[00:54:46.00] We also look at regular audits of our tools and content to make sure that our accessibility standards are being maintained. And our vendors are one of our most important partners. I give our vendors feedback all the time. We have regular meetings with some of our bigger vendors. We work directly with their accessibility teams. They will talk with us once something has been released.

[00:55:08.65] We'll test it. We'll see if it works the way we expect it to, and we give them feedback. Or when our students encounter difficulties, we give them feedback. And it is a really important symbiotic relationship where we look at it as, yes, we're giving you money for the tool, but we also have important experience that's going to help you improve that tool. OK, next slide.

[00:55:33.37] I thought this was the last one. Final reminder-- accessibility is a journey, not a destination. And that means that-- not to make you feel despair or give you less hope, but to give you more hope, that every day, we have the opportunity to make the environment better for our students, faculty, and staff. But also, with every new release comes that opportunity to understand how it's working, what have we improved, what, maybe, did degrade a little bit, and we need to be aware of that, too?

[00:56:07.90] But accessibility is definitely a journey. It's not something where we're ever done, because there's new technology and there's new developments all the time. So with that, Jaclyn, I know we have a whole whopping two minutes, but I'm not sure how many questions we have and if any of them we haven't already answered.

[00:56:27.32] JACLYN LAZZARI: Hi, Kelly. Yeah, thanks so much for your presentation. You covered a lot today. We did get some questions. We are coming up on time. I would say you answered a lot of them, but if people have any outstanding questions, are they welcome to email you with those?

[00:56:45.29] KELLY HERMANN: Of course.

[00:56:46.19] JACLYN LAZZARI: Great. So to our audience, if you had any questions that you wanted to ask Kelly today, her email is here on the screen. It is Kelly, K-E-L-L-Y, dot, Hermann, H-E-R-M-A-N-N, @phoenix.edu. So definitely email her your questions and reach out to her when you would like. Thank you so much, Kelly.

[00:57:16.64] And I think with that, that's all the closing remarks. Thank you so much again, Kelly. We really appreciate your time. And thank you to our audience--

[00:57:23.96] KELLY HERMANN: My pleasure.

[00:57:24.11] JACLYN LAZZARI: --for joining us today.