

Arlington Independent School District

Corrective Action Plan

Table of Contents

| | |
|--|----|
| Arlington Independent School District – Corrective Action Plan | 1 |
| Introduction..... | 2 |
| Commitment to Accessibility | 2 |
| Benchmarks for Accessibility | 3 |
| WCAG 2.0 Level AA and WAI-ARIA 1.0 | 3 |
| Implementation Plan | 4 |
| Overview..... | 4 |
| Review | 4 |
| 1.0 - General | 5 |
| 1.1 - Plan for New Content | 5 |
| 1.2 - Accessibility Audit and Corrective Action Plan | 5 |
| 1.3 - Accessibility Training and Resources | 5 |
| 1.4 - Accessibility Grievance Procedures..... | 6 |
| 2.0 - Funding of Personnel and Technical Systems | 7 |
| 2.1 - Principal Architect..... | 7 |
| 2.2 - Formation of Web Services Department | 7 |
| 2.3 - Funding of Technical Systems..... | 7 |
| 2.4 - Digital Media Procurement..... | 7 |
| 3.0 - Websites..... | 8 |
| 3.1 - District, Department, and Campus Sites..... | 8 |
| 4.0 - Documents | 9 |
| 4.1 - Documents Posted to Arlington Independent School District Websites | 9 |
| 5.0 - Audio/Video..... | 10 |
| 5.1 - Captions and Transcripts for Audio/Video Resources | 10 |
| 6.0 - Timeline..... | 11 |
| 7.0 - Communication of Digital Accessibility Initiative | 12 |

Introduction

The U.S. Department of Education, Office for Civil Rights (OCR), initiated an investigation into allegations that the Arlington Independent School District (“District”) violated Section 504 of the Rehabilitation Act of 1973 and its implementing regulation at 34 C.F.R. Part 104, and Title II of the Americans with Disabilities Act of 1990 and its implementing regulation at 28 C.F.R. Part 35. Specifically, the complainant alleged that the district’s website contained barriers to access for people with disabilities, thereby denying them an equal opportunity to participate in the district’s programs, services, and activities and denying them effective communication necessary for full participation in the district’s programs, services, and activities.

This resolution has been entered into voluntarily and does not constitute an admission that the District violated Section 504 and Title II and their implementing regulations.

Commitment to Accessibility

The Arlington Independent School District seeks to treat all individuals with dignity and respect and to value people as its first priority. To this end, the District is committed to providing accessible information to all people wherever possible. The District will work to ensure that persons with disabilities have an opportunity equal to that of their non-disabled peers to access and utilize information technologies, and technology-related services, except where doing so would impose an undue burden on the District or require a fundamental alteration.

Benchmarks for Accessibility

In order to ensure the accessibility of our web pages, the District will comply with a set of nationally-recognized accessible technology standards.

WCAG 2.0 Level AA and WAI-ARIA 1.0

The Web Accessibility Initiative (WAI) is an effort coordinated by the World Wide Web Consortium (W3C), an international standards organization for the World Wide Web. The WAI has published multiple guidelines for accessibility which address a variety of web-related technologies, including the Web Content Accessibility Guidelines (WCAG), and the Accessible Rich Internet Applications Suite (WAI-ARIA). The District will conform to the following benchmarks to evaluate and improve web applications:

[WCAG 2.0 Level AA](#)

[WAI-ARIA 1.0](#)

Adherence to these accessible technology standards is one way the District will ensure people with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any Recipient programs, services, and activities delivered online, as required by Section 504 and Title II and their implementing regulations; and that they receive effective communication of the District's programs, services, and activities delivered online.

Implementation Plan

Overview

The District needs to complete the following actions in order to ensure full remediation and implementation of accessible information technologies. The District intends to make every reasonable effort to complete these tasks within 18 months of the date OCR approves the Corrective Action Plan. Oversight and accountability will be maintained by the Web Services Department.

Review

Once OCR approves the District's Corrective Action Plan, the District will provide a report to OCR, once every six months, summarizing the status of the Corrective Action Plan and how it is being implemented.

In addition to the reports required by the OCR Resolution Agreement, the District's Web Services Department will produce an annual report summarizing the status of its digital accessibility initiatives.

1.0 - General

1.1 - Plan for New Content

A committee, consisting of internal stakeholders and technical staff, was created in October 2016 to draft and approve a Plan for New Content. Their charge was to:

- Establish a consistent web experience across all sites for stakeholders.
- Refresh the design of the current websites.
- Create expectations and standard operating procedures for maintenance of the websites to ensure that content posted is accessible to all stakeholders.
- Develop a training plan and timeline for rolling out the new guidelines and websites.

The Plan for New Content was approved by the committee on January 26, 2017. Once approved by OCR, the District will distribute the Plan for New Content to all appropriate personnel and it will be made available on the District's website.

1.2 - Accessibility Audit and Corrective Action Plan

The District, in accordance with the OCR Resolution Agreement, completed an Audit of content and functionality on its website, including, but not limited to, the home page, all subordinate pages, and intranet pages and sites, to identify any online content or functionality that is inaccessible to persons with disabilities, including online content and functionality developed by, maintained by, or offered through a third-party vendor or an open source.

The District, in accordance with the OCR Resolution Agreement, has also developed a Corrective Action Plan to address all inaccessible content and functionality identified during the Audit. This plan sets forth a detailed schedule for addressing the identified problems, setting up systems of accountability and verification of claims of accessibility by vendors or open sources, and creating a system of testing and accountability to maintain the accessibility of all online content and functionality on an ongoing basis.

1.3 - Accessibility Training and Resources

The District will provide accessibility training to all appropriate personnel, including, but not limited to: content developers, administrators, staff, and all others responsible for developing, loading, maintaining, or auditing online content and functionality. This training will follow the schedule as identified below:

| Audience | Training | Date of Completion |
|----------------------------------|-----------------------------------|--|
| Department and Campus Webmasters | 6 hours of accessibility training | Within 18 Months of Approval of Corrective Action Plan |

| Audience | Training | Date of Completion |
|-------------------------------------|-----------------------------------|--|
| Department and Campus Communicators | 6 hours of accessibility training | Within 18 Months of Approval of Corrective Action Plan |

As set forth in the Plan for New Content, no personnel responsible for developing, loading, maintaining, or auditing online content and functionality will gain access to those systems without first completing software and accessibility training as specified by the Web Services Department.

The District will create a website about its Digital Accessibility Initiative. This website will serve as a resource to all stakeholders of the district.

1.4 - Accessibility Grievance Procedures

On November 7, 2016, the District established a set of procedures whereby any individual may submit a grievance to the Web Services Department regarding inaccessible content. A formal grievance is filed in accordance with District policies, DGBA, FNG, or GL.

2.0 - Funding of Personnel and Technical Systems

2.1 - Principal Architect

The Superintendent of the District, through the Assistant Superintendent of Technology, with the support of the Director of Technical Services and Systems Integration, on July 1, 2016, appointed the District Webmaster to be the Principal Architect for full remediation and implementation of the Resolution Agreement.

2.2 - Formation of Web Services Department

The District Webmaster, with the administrative and financial support of the Superintendent and Assistant Superintendent of Technology, created the Web Services Department. A new, full-time Website Specialist position was established in October 2016 to be the primary support for campus websites and assist the District Webmaster to develop and implement accessibility and operation standards across the district.

2.3 - Funding of Technical Systems

The District will continue its annual subscription to Siteimprove Content Suite, Web Governance Software, for the Web Services Department to maintain, monitor, and optimize the district's websites for accessibility. The most current renewal purchase order was issued on August 2, 2016 and the software subscription is valid through August 31, 2017.

The District has funded the implementation of a new Content Management System (CMS) for complete over-hall of the District's web pages and is currently in the development phase. The purchase order was issued on September 16, 2016 for the CMS hosting environment and the CMS is projected to be fully implemented within 18 months of approval of the Corrective Action Plan. Training of personnel will begin a minimum of 3 months before (estimated) full implementation of the CMS and training is expected to be completed within 12 weeks.

2.4 - Digital Media Procurement

The Web Services Department will partner with the Communications Department to effectively manage the procurement of accessible digital media to support the district, departments, and campuses. The training of personnel will occur simultaneously with the implementation of the new CMS.

3.0 - Websites

3.1 - District, Department, and Campus Sites

All required District websites will be WCAG 2.0 Level AA conformant within 18 months after the date of approval of the Corrective Action Plan as determined by our Resolution Agreement. The District will ensure this by:

- Replacing all existing content on the District's web pages with fully compliant content through a complete website over-hall. The replacement is scheduled to occur no later than June 9, 2017. Any existing or archived content that is required or necessary for the new site will be made compliant before publication.
- Granting access to the new CMS only to personnel who have completed software and accessibility training as specified by the District's Web Services Department.

| Website | Responsible Party | Appointed By |
|------------|--|--|
| District | District Webmaster/ Web Services Department | Superintendent / Assistant Superintendent of Technology |
| Intranet | District Webmaster/ Web Services Department | Superintendent / Assistant Superintendent of Technology |
| Department | Department Webmaster/ Web Services Department | Department Supervisor |
| Campus | Campus Webmaster/ Web Services Department | Campus Principal |

4.0 - Documents

4.1 - Documents Posted to Arlington Independent School District Websites

All required documents posted on a District website will be WCAG 2.0 Level AA conformant within 18 months after the date of approval of the Corrective Action Plan as determined by our Resolution Agreement. Conformance will be based on Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT) - W3C Working Group Note 5 September 2013. The Web Services Department will provide accessible templates for faculty and staff along with training on how to use the templates. Training of personnel will begin a minimum of 3 months before (estimated) full implementation of the CMS and training will continue until all responsible personnel are trained. As part of the Plan for New Content, no personnel responsible for developing, loading, maintaining, or auditing online content and functionality will gain access to those systems without first completing software and accessibility training as specified by the District's Web Services Department.

5.0 - Audio/Video

5.1 - Captions and Transcripts for Audio/Video Resources

The Web Services Department will partner with the Communications Department and campuses to ensure that all required audio and video published by the District or its campuses contain captions and/or are accompanied by a written transcript within 18 months after the date of approval of the Corrective Action Plan as determined by our Resolution Agreement. For video, auto captioning will be utilized and reviewed. Contact information will be included in the captions in the case that additional assistance is needed. Links to documents referenced in the video will be included in the captions and video description, as applicable.

6.0 - Timeline

| Initiative | Start Date | Completion Date |
|--|------------|-----------------|
| Plan for New Content | 7/1/16 | 12/15/18 |
| Audit | 1/1/17 | 1/30/17 |
| Corrective Action Plan | 1/1/17 | 12/15/18 |
| Training Plan | 7/1/16 | 12/15/18 |
| Personnel Funding | 7/1/16 | Ongoing |
| CMS Implementation | 1/1/17 | 6/5/17 |
| WCAG 2.0 Level AA Website Conformance | 1/1/17 | 12/15/18 |
| Document Conformance | 1/1/17 | 12/15/18 |
| Captions and Transcripts | 1/1/17 | 12/15/18 |

7.0 - Communication of Digital Accessibility Initiative

The District will communicate to the community its commitment to accessibility and any future developments in order to build awareness and garner support for the Digital Accessibility Initiative. Communication will occur through a variety of media such as email communication, social blast, and the District's website on a regular basis.

If you have questions about the information provided in this document, or about the accessibility of the information technology at the Arlington Independent School District, please contact the Web Services Department at webservices@aisd.net.