

ALCTS EXCHANGE 2017 | Day 4, What's a WCAG?: Discussing Electronic Resource Accessibility with Vendors

>> SPEAKER: Hello, everyone. I guess I will just go ahead and get started. My name is Erin Finnerty, and I'm the electronic resources librarian here at Temple University, and thank you so much for choosing to attend my ALCTS Exchange presentation, what's a WCAG? Discussing electronic resource accessibility with vendors. I've been working with this for about four years now, so I'd like to think that I've seen some ups and downs and changes over the course of that time. So, let's jump right in. I'll quickly go over an outline for this presentation. By the time we finish, I hope you'll have a basic understanding of our accessibility evaluation tools and that you'll feel you can effectively communicate with vendors and internal stakeholders on this issue of resource compliance. You should also be able to get started creating a standardized workflow for gathering all this accessibility-related information by referring to the slides I provided, if that is something you're interested in doing. Since we only have about 25 minutes together, I'm just going to provide a quick review of accessibility compliance as it applies to electronic resources and then try to spend most of our time talking about vendor communications, but I just like to establish a basic vocabulary that'll come in handy when communicating with your organization or with resource vendors on this issue. A term that some of you might already be familiar with is Section 508. Section 508 refers to an amendment of the Rehabilitation Act of 1973. This requirement developed a set of standards and criteria that function on capabilities of the applicable products.

There's now also a guide to these standards, which helps kind of break some of it down a little bit more. Those most directly applied to federal agencies. It provided a framework that can be used in other institutions and organizations that are interested in accessibility compliance of electronic and information technology. It's also the origin of some language we'll use later for purposes of evaluation, like undue burden or commercial unavailability. These are obviously lots of hyperlinks for you to peruse at your leisure, so I'll absolutely make the slides available later. So, this is just a screenshot of the, um, Section 508 website. As you can see, there's lots of information for both buyers and sellers of products and good basic information on current accessibility information and standards. Part of the reason that more and more institutions, especially academically, have started developing organization-level accessibility policies has applied specifically to the procurement of technical products might have to do with a number of visible lawsuits against various institutions for failure to provide adequate accommodations, specifically for access to electronic materials used in research, scholarship and curriculum. Some issues were outside of the library and involved the university level online learning system or institutional websites, or in some cases, it was an organizational switch to using Google apps. I think it's pretty likely that institutions already have some version of a university-level accessibility policy and available disability services, but there's definitely been an increased focus on compliance when it comes to electronic content, either created or hosted by the institution or licensed from a vendor. Temple and many other schools have entire websites dedicated to accessibility as it relates to technology. You can see here that there's policies and guidelines and different resources and even how-to materials. This type of website is really intended to serve the entire community, everybody from faculty to students to staff, so it's kind of a one-stop shop of resources.

Okay, WCAG, as mentioned in the title of my presentation, that stands for web content accessibility guidelines. This definition here is pretty succinct, I won't read the whole thing, but, um, it's essentially, um, a goal of providing a single shared standard for web content accessibility that meets the needs of

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individuals, organizations, and governments. So, it is, um, a nice standard for that, and it's kind of always evolving, like there's different success levels within WCAG2.0, and now WCAG2.1 is actually in development, so it can make accessibility compliance or tracking accessibility compliance a little bit of a moving target. Okay, so, assistive technology basics, I just want to try to zip right through this. I'd like to give some examples of different types of assistive technology, mostly in an academic library setting, but definitely applicable to other organizations. Audio visual content provides the most opportunity for compliance. Closed captioning for videos is a very prominent concern, as is having full audio transcripts to accompany those images. For full text content, you really want to see compatibility with assistive level screen reader. Here's a screen shot from a video product. You can see here that they have both closed captioning and full text transcripts available for this particular video. Um, sometimes, only a selection of content within a database will have captioning or transcripts available, especially if it's an aggregator that's sourcing content from many different publishers or distributors, so that can also make it very difficult to track or communicate about. Interface evaluation tools, another term that might be familiar to some of you is VPAT, voluntary product accessibility templates. It was designed by the government to create a standard evaluation of accessibility for technological products. I don't want to get too into the weeds here, but it provides a very specific breakdown as to how an electronic resource may or may not be designed with accessibility compliance in mind. This is a screenshot of the LUA VPAT repository. This is a wonderful idea and a very valuable resource for librarians or anyone interested. There was an effort being made here to collect those VPATs and that type of information in a central place, but as you might imagine, that is sometimes easier said than done, staying up-to-date as platforms change is difficult, and, um, I do believe they had to require permissions from each vendor to include the information here on a public site.

Um, over the last several years, I've seen VPATs vary greatly in quality and availability. Sometimes, they'll be filled out by the sales rep, sometimes, the developer, it's not uncommon for no VPAT to be available at all, especially when dealing with some smaller vendors. Here are two examples of how the quality of VPATs might vary greatly. On the left is a sample VPAT provided on the state.gov site, and on the right is a VPAT I actually received from a vendor after asking for one. Obviously, in an instance like this, you might elect to refuse or disregard the document. You can see here under the section for information and support, it says support staff sits and chats all day as an answer, so that's not exactly the type of information that we were looking for, but I appreciate the effort. Occasionally, VPATs will be made available publically on the vendor's website. Generally, it's larger agencies that have resources or staff that have their bases covered in that regard. Um, okay, interface evaluation tools. In addition to the VPAT, which is generated on the vendor side, there are a number of interface evaluation tools that you can test, that you can use to test an interface for accessibility compliance. Some are proprietary, but there are plenty of free resources available as well. I've mentioned just a few of them here so as not to overwhelm you, but there is a great aggregator of accessibility tools on that site I've listed at the bottom there. Scanning tools generally run a series of Section 508 tests among others against an interface and generate a report of non-compliant content or possible problems. Here at temple, we use Compliance Sheriff, which is a licensed product. A good free tool is Wave. You can either install a browser plug-in or cut and paste the website URL into the Wave website.

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One thing to keep in mind with these interface scanners though is that they'll all include potential errors that need visual or manual identification. We'll talk a little bit more about this later, but I feel it's important to outline how much time you're willing to spend on this kind of follow-through, how much time you're willing or able to spend on this kind of follow-through. Anecdotally, I've found that simply pushing these kind of summary reports to the vendors also just results in a bunch of questions back, which, of course, means dedicating even more time to, um, working on it. So here's a screenshot of the Wave tool analyzing an article result page on Science Direct. You can see it outlined the potential errors and offers explanations for each. Um, this is an example of a full results report from Compliance Sheriff. It looks a little different now, this is an older version. It does offer a transaction feature scan, which we like, transaction scan feature, which we like. It allows you to open the interface, execute a search, click on a result, and it'll kind of scan all the pages that are touched during that transaction. This kind of reflects a more accurate picture of how a patron might actually use the resource. Okay, um, awareness of organization level initiatives. This is actually one of the questions I'd asked in a pre-session poll on the ALCTS Exchange site. Before you start evaluating your own resources or think about what you might want to be doing within the library, I think it's really important to investigate what's already going on, or not, maybe, within your organization. At universities, it's most common that the Office of Disability Services or maybe even the IT department might already have similar procurement procedures or policies in place that you can look at or crib from or work with. Um, beyond the actual accessibility auditing, it's also important to find out about other changes, how other changes or remediations that are already happening.

This information can also be helpful to have on-hand when developing your own procedures and guidelines. Evaluation of current resources, our first course of action was to do an audit of sorts for all of our existing resources. The idea was to get a snapshot of the accessibility of all of our databases in use or platforms in use. We did not communicate these results to the vendors until later, and even then, it was kind of on a case by case basis. In this situation, you really might want to consider whether or not it's worth your time to invest in this type of process. I kind of say no, it's not, but, of course, the size of your collection might help make that decision for you. It might be more valuable, and if your institutional procedure allows for it, to only evaluate compliance for future acquisitions or, like, renewals. This is just an Excel header from our audit. We were interested in tracking as many aspects of the evaluation procedure as we could, but it proved to be too cumbersome beyond the initial scans or evaluation, much less trying to track communicating all the back and forth with the vendors about what they were up to. Um, if you do decide to move forward with that type of project, the procedure might look something like that. Okay, vendor communication licensing language. Um, as you begin to solicit accessibility-related information from vendors, you'll find that there's a great variance in their level of familiarity and available documentation. As mentioned earlier, some of the larger vendors have entire websites dedicated to public-facing accessibility policies, and on rare occasions will even provide the VPAT right upfront, but for everybody else, and in my experience, this will be the majority of the vendors you're dealing with, you'll need to send an accessibility information request. Essentially, I created a standardized e-mail that communicates the specific items I'd like them to send me. Part of the e-mail request that they, as part of that e-mail, I request that they include accessibility-related language in our license agreement.

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Of course, whether or not to expect anything for this portion of the request depends greatly on the vendor and the product. Here, I've included an example of a really eloquent response we received from a non-profit organization explaining why they would not be able to amend the license for us. Other times, it's a simple no, or sometimes, they ask additional questions, or sometimes, we're just completely ignored. It can also become difficult in the instance of cooperative licensing resources, for example, through a consortium or something like that. Okay, um, so, here's a screenshot of the accessibility policy on their website. As you might imagine, it is very helpful to have something like this on-hand. One of the most frequent reasons vendors give me for not being able to provide any accessibility information or even to be able to fill out a VPAT is a lack of resources or staff or knowledge on the subject. This is an example of the e-mail I'll usually send to vendors. I'll change it if I already have the VPAT on-hand, or I'll include any links, if they have an online accessibility policy page. This customization sometimes makes it difficult to consider pushing this responsibility out to other staff. Oftentimes, I find you need a deeper knowledge of the individual vendors, as well as how you're purchasing the resource to obtain a quality response. This type of message could also be edited to include your expectations or requirements or provide more detail about the type or example of information you're looking for, especially for something like the roadmap. For example, a resource licensed to be a consortium might require additional communications or create additional problems, but that means spending more time on each request. Another element that comes into play is deciding when and why you're going to be asking vendors for this accessibility information. If you're already, um, being kind of included and a procedure's already in place else where in the organization, that might go ahead and determine when you'll need to complete the compliance evaluation. Otherwise, it would really make sense to work it into your current acquisition's workflow as smoothly as possible.

Some options for triggers for an evaluation include point of trial, point of purchase, or invoicing, or when you receive a new updated license. There are, of course, considerations for each, and please also evaluate whether or not you would need to add additional staff or can add additional staff to handle the accessibility evaluations. I cannot emphasize this enough. Depending on the size of your collection and the types of responses you get or don't or have to chase down from your vendors, tracking accessibility compliance can be huge, can be a huge time-suck, though an incredibly worthy one. We're still working on that here at Temple, but in general, it's added several weeks to our current workflow at a minimum. Our current trigger for initiating an evaluation, accessibility evaluation, is receiving a license or renewal form that needs to be signed by the university council. Exception requests and reasonable accommodations, for purposes of internal documentation, here, we use accessibility exception requests, it allows for it to be standardized in a more apples to apples way. Some of the most crucial components are the intended audience, whether or not the resources are required for coursework or job function versus being optional, and what the reasonable accommodations might be, in other words, what accommodations are you or your organization willing to make to remedy this. So, here's the original Temple AER, which, thank goodness, has since been moved online. This form is actually shared by all of the departments at the university, and we were told that the library generated the most of them, which is completely understandable, because we have hundreds of databases and electronic resources. Major emphasis internally was placed on the reasonable accommodations.

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We did end up developing a kind of boiler plate language that could be edited as necessary, depending on the content of the database or the type of the database. We also flirted with the idea of doing executive summaries for each one, but we decided that would only be necessary for, like, job mandatory, large staff-facing systems, like a new discovery layer or a new ILS or something like that. Here's a breakdown of our current procedure for collecting and tracking accessibility information. You can likely incorporate handy-dandy reminders into your notes field or alerts or line it up with your renewal calendar or something like that, because it's very difficult to kind of keep track of how often things are changing and when it was evaluated and the result of that evaluation. This is what I'm currently struggling with personally. It's a current focus of mine in regard to the way we currently, um, evaluate resources. Along with our accessibility exception request comes a question, how often will you evaluate each resource? As with much of what we've discussed for some of this, the question can maybe be answered by organization-level policies or guidelines. For example, here at Temple, each AER is good, or is valid for two years before having to be filled out again. We've been in this program for more than two years, so I'm starting to get some pushback, if I submit another AER for the same resource and there has been zero improvement or zero change, of course, our accessibility office is asking, well, what are we going to do about that? So, I'm not sure how far this might go in impacting our collection development. Another issue is the frequency with which interfaces change or update. How often are you going to evaluate, what course of action will you take if the product remains non-compliant. Here are some additional considerations. Shockingly, there are still issues that I either glossed over today or I feel need further exploration. For example, for establishing an accessibility evaluation procedure, I think it's important to have in mind how the results may or may not actually impact your collection development decisions. Are you in a position to cancel or not purchase a resource if it's non-compliant? Are you going to convey as much to the vendor, and at what point? Will you use the information to find, will you try to find and favor alternative more compliant resources? Do you have the staff and the time and the resources to do that kind of research? Um, we also do not currently test accessibility for mobile devices.

Compatibility is explicitly mentioned on the WC3 site, the WCAG people, but we've only been testing the desktop versions of resources. There's not yet been a mention of expanding our efforts to mobile, although it does apply. For example, we have browsing, which originally only existed on the iPad, and we didn't really have a good way to evaluate it at the time. We've also encountered some resources that in some ways might never be fully accessible, some of our mapping or data visualization tools do not have a text-based alternative or are unable to create an equivalent compliant experience. I mentioned staff-facing resources when I was talking about the executive summaries, but I think it's really important to be prepared for overlap with an IT department or perhaps your administration, if and when that type of resource is acquired. For example, if you're going to be transitioning to an ILS or something like that, accessibility compliance might absolutely come into play. Um, these are some links to additional resources for you. There are many, many, many available now, these are just some that I personally found helpful when we were first getting off the ground. There are lots of good programs and lots of good places. That's it for me. So, I'd be more than happy to open it up for questions.

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>> SPEAKER: Thank you, Erin. That was wonderful. We actually already have two questions that came in during your talk. The first one is from Keri, and she's asking have you chosen to not purchase resources based on the lack of accessibility? And do you make any compromises on items that are sole source?

>> SPEAKER: Um, yes. Well, no and yes. We have not yet gotten to a crossroads where when we submit our accessibility exceptions request, we get so much pushback that they're saying you simply cannot buy this. If and when that does happen, I'm sure the arguments we would make would be along the lines of, um, not being able to find something comparable, or there's specific language in the AER, forgive me for flipping so quickly, what's it called? Um, it's one of the accommodation things, so exception categories, commercial unavailability is most often the one that we choose, and oftentimes, our reasoning behind that is something along the lines of what's written here, which is this database provides access to a unique combination of e-book and journal titles that aren't available from any other resource, and as you might imagine, that applies to a lot of library resources, not just publisher-level resources, so we often will lean on something as kind of similar to a sole source argument in that way.

>> SPEAKER: Thank you. We also have another question asking is there a centralized area where we can find boiler plate language about how one could ask vendors for information on their accessibility standards or exception requests? Just so that we're not figuring all this out ourselves.

>> SPEAKER: Yes. My goodness. I feel like every time I do get a chance to talk about this with other librarians, that is always one of the biggest take-aways, and it's totally understandable. You know, we all deal, how many library materials vendors are there left in this world? Fewer and fewer, but we're all, so we all work with a similar set of vendors, and we're all going to be asking them for this same information. It would be amazing if we could kind of consolidate that effort, and I do think that that LUA VPAT repository is a really good first step in that direction, but it does seem to be a very difficult thing to stay on top of, and because accessibility is almost kind of on a platform level and not necessarily just on a vendor level, that's a further complication for it. So, I wish I had a good answer for you. I don't know that I do. You're more than welcome to take some of the language I've provided here in this presentation to try to craft your own procedures. Some of the stuff, we took from, um, I forget, one of the licensing recommendation websites, we took some of the accessibility language from there, and then a lot of the reasonable accommodation stuff was kind of crafted out of our own internal procedures. Oh, I see someone just wrote next gen ILS should have an accessibility module. Absolutely. We are currently implementing a new ILS/next gen ILS, and I'm trying to figure out the best way to kind of track and incorporate all of this accessibility auditing and tracking that we do. There isn't kind of an out of the box way to handle it yet, so I don't know if we're going to be tying it into licensing or the renewals procedure or what, but I totally agree. Thank you.

>> SPEAKER: I also had a question about workflow. Did I understand you correctly that you kind of evaluate compliance at the time of licensing and the time of renewal? Or did I misunderstand?

>> SPEAKER: Well, it is really, frankly, it's just when we get a license in hand that requires university signature. So, to go through our university council review process, um, it's at that point we have to have either an accessibility exceptions request in place or already know that the product is a hundred

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percent compliant. So, we might renew a resource for two years, and there might not be a new license for two years, in which case, no big deal, or less of a big deal, maybe, but, um, yeah, so it's essentially anytime we get a document regarding that interface that needs to be signed. Sometimes, that's every year at renewal, and sometimes, it's a longer contract or whatever, so it really varies.

>> SPEAKER: Yeah, that makes sense. I was just thinking for us, you know, at my library, just creating that workflow so it just becomes a regular part of the licensing process or evaluation process, because as you mentioned, it is pretty time-consuming.

>> SPEAKER: Yes. My goodness.

>> SPEAKER: So, we have about one more minute, if anyone in the audience has a question, please feel welcome to enter it into the chat box, and we can get to that.

>> SPEAKER: I see Karla's comment here about the Big 10 Academic Alliance. Thank you so much for mentioning that. I neglected to bring that up. I heard someone talking about that at a recent presentation, and it does sound as though that's definitely a solid effort being made to kind of, um, cooperate these kinds of efforts across academic institutions, so that'll be a wonderful thing to keep an eye out for. Thank you, Karla.

>> SPEAKER: Wonderful. Well, thank you so much, Erin. This has been really educational. If anyone has any additional questions, of course, you can enter them in the online forum, which will be accessible from Erin's session page on the ALCTS's website, and we thank you so much.

>> SPEAKER: Thank you. Take care, everybody.

>> SPEAKER: Bye.

>> SPEAKER: Hi, everybody. This is Matt. I am a member of the ALCTS Working Group, the ALCTS Exchange Working Group. Thank you again to all of our speakers. Laurie Allen will present at 4:00 p.m. eastern, and finally, at 4:30 p.m. eastern, we'll have Karla and Keri presenting. So, we'll return at 4:00 p.m. eastern time. Thanks.