Form 1: Presentation Checklist

Digital Accessibility Policy

Name: ___Jamie Rougeux & Kristine Roshau___   **Date**: ___05/07/2024___

Department: ___Disability Services and eLearning___

COCC Contact Information: ___jrougeux2@cocc.edu, kroshau@cocc.edu___

Use the instructions for this document to complete your presentation checklist; then e-mail your completed presentation checklist (*not* the instructions) to the Academic Affairs chair by his or her specified deadline. **Please note:** If an item listed is not relevant to your specific presentation to Academic Affairs, please mark as **N/A**. Use as many pages as necessary.

PROPOSAL OVERVIEW

In April 2024, the Department of Justice's published their final ruling to establish technical standards for accessibility for public entities under Title II of the American's with Disabilities Act. Per the Rule, public entities must comply in order to provide equal access to all services, programs, and activities that are provided via the web and mobile apps.

For educational institutions specifically, "Course content is to be treated like any other content and public educational institutions will generally need to ensure that content complies with Web Content Accessibility Guidelines 2.1 Level AA starting 2 years after the effective date of 06/24/2024." (Full document available via link below.)

We hereby propose the following to codify a baseline policy for the accessibility of digital instructional content delivered at COCC. This policy aligns with the new technical standards from the DOJ and will enable the institution to establish scope and procedures around implementation that will support meeting the two-year deadline for compliance.

https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state

TYPE OF AGENDA ITEM

■ Information Item (requires approval of AA Chair)

■ Action Item

☐ Information and committee feedback

☐ Procedure—revision   (Attach current procedure with proposed changes illustrated with track changes)

☐ Procedure—new
Identify suggested location in *GPM*: _____

☐ Policy—revision (Attach current policy with proposed changes illustrated with track changes)

■ Policy—new
Identify suggested location in *GPM*:___A-6-0_____

☐ New academic program (Complete only items #1 and #2 on this form and attach stage 2 document.)

☐ Other:_____

BUDGET

For the Department of Instruction, this will likely require more irregular wage staff to assist with formatting and/or remediation of previously inaccessible instructional content before, during, and after a given term. For future budget years, the College should plan to fund potential new positions (technical experts) and/or provide funds for training of staff to assist with research, additional policy making, and the vetting, procurement, testing, monitoring of all digitally accessible material. Other non-immediate budget unknowns may include adoption of new remediation tools or software, replacement of academic technology if deemed inaccessible, and possible funding of out-sourced contract work if necessary.

INSTRUCTIONAL REQUIREMENTS

The departments of eLearning and Disability Services are creating a 2-3 year master plan for Instruction to meet and stay in the compliance. For faculty, support staff, and Administration this may include (but is not limited to) the following:

Faculty:
- Re/assessment of chosen platforms or vendors of digital courseware and material (ebooks, 3rd party publisher content, external software, etc.)
- Adherence to quality course standards in course/material development and review, such as those used during Peer Review, Major Overhaul or other development grants, Online Teaching Certification and (proposed) regular course reviews. (See supplemental attachments for examples).
- Commitment to timely communication/continuous working relationship with support departments (email, phone calls, etc.) for content specific questions.
- Attending professional development and training opportunities provided by the College around areas of digital accessibility

Faculty responsibility for maintenance and revision of course content falls under G-34-4 GENERAL RESPONSIBILITIES OF ALL INSTRUCTORS: 3) Professional Improvement: Keep oneself and one's courses current in content and instructional methods and make recommendations for equipment and supplies purchased.

Support departments, specifically Disability Services/eLearning:
Development of 2-3 year master working plan, including but not limited to:
- Development of rubrics and materials to aid in assessment of course materials, tools, and software
- Development and delivery of training and professional development options for faculty and staff
- Collaboration with college-wide partners to align with broader future policies and implementation

Instructional Administration:
- Affirm and uphold institutional digital accessibility standards
- Define remediation procedures for reported digital accessibility issues, including tracking and monitoring timelines established for resolution
- Ensure the institution adequately assigns resources to enact this policy

OPERATIONAL NEEDS, CURRENT AND FUTURE

Affected parties across the college will need to assess the impact of this Ruling. We recommend convening an accessibility workgroup or taskforce with broad college representation to assist with the following:
- Determine/recommend college-wide accessibility policy
- Determine technical federal guidance interpretation
- Provide impacted departments with up-to-date information, resources and technical assistance as we work toward compliance
- Determine continuous technical expertise/support needs for all departments (such as new positions, funding requests, etc.)

STUDENT IMPACT

The requirements outlined in the new Title II ruling and the likely updates to Title III and Section 504 are expressly and specifically written to lower burdens for any user who interfaces with the College, but will positively impact students most of all.

Our current model is reactive, often resulting in delayed access to course content and necessitating considerable work upfront for students. Establishing a proper Digital Accessibility Policy not only sets the college on the path of compliance with ADA law, it also moves us toward a proactive model.

A proactive approach to digital accessibility ensures students with disabilities will access course content at the same time as their peers. It requires known digital barriers to be addressed in a timely manner, and in such ways as to protect the privacy and independence of the individual needing accommodation. Further, this policy acknowledges that the use of digital content is an integral component of higher education, and that accessible digital content improves the learning experience for every student, and is in direct alignment with our Mission of providing a high-quality, equitable and accessible lifelong education for all.

ANTICIPATED IMPLEMENTATION TIMELINE

Policy- Immediate approval.
Policy Scope and Procedures: 24-25 AY
Instructional Compliance - by or before June 2026.*

*eLearning and Disability Services will collaborate with impacted departments and groups across the college for the development of a 2-year compliance path and potential adoption of a college-wide policy.

New Modifications to the ADA
April 2024

Two primary laws related to disability

- Americans with Disabilities Act (ADA) Prohibits discrimination on the basis of disability

- Section 504 of the Rehabilitation Act Prohibits discrimination on the basis of a disability for any program receiving federal financial assistance

For the purposes of this discussion…

…the ADA has two relevant Titles:

- **Title II** – applies to public entities (state and local governments, libraries, school districts, community colleges)

- **Title III** – applies to private entities (businesses, private institutes of higher ed)

The ADA and Digital Accessibility

- The ADA was signed into law in 1990.

- The DOJ first asserted that the ADA applies to websites of covered entities in 1996.

- However, because there were no specific technical requirements for web content and mobile apps, there has been no specific direction on how to comply with the ADA's general requirements of nondiscrimination and effective communication.

- The DOJ has modified the ADA to address the accessibility of web content and mobile apps by adopting accessibility standards.

New Rule to Update ADA Requirements

- August 4, 2023 – Department of Justice (DOJ) published a Notification of Final Rule Making (NPRM) to establish technical standards for web and mobile app accessibility for **public entities** under **Title II of the ADA**.

- October 3, 2023 – public comment period ended. MANY organizations and individuals submitted comments on the rule.

- April 8, 2024 – Department of Justice published a notice that the Attorney General has signed a final rule. The final rule will be published soon.

What does the rule cover?

- The purpose of the rule is to revise the regulation implementing Title II of the ADA in order to ensure that the services, programs, and activities offered by State and local government entities to the public via web content and mobile apps are accessible to individuals with disabilities (p 34).

- The rule applies to all web content and mobile apps that a public entity provides or makes available either "directly or through contractual, licensing, or other arrangements."

- The rule also outlines a number of exceptions to these general requirements, which are discussed in detail below.

Changes to Regulatory Text

- 35.104 – several definitions were added (p 54)

- Subpart H was added to include:
  - 35.200 requirements for web and mobile accessibility
  - 35.201 exceptions
  - 35.202 conforming alternate versions
  - 35.203 equivalent facilitation
  - 35.204 duties (including fundamental alteration or undue burden limitations)
  - 35.205 effect of noncompliance that has a minimal impact on access

Timelines

- A public entity, other than a special district government, with a total population of 50,000 or more shall begin complying with this rule two years after date of publication in the federal register.

- A public entity with a total population of less than 50,000 or any public entity that is a special district government shall begin complying with this rule three years after date of publication in the federal register

How does this impact higher ed?

- The expectation is that similar updates will be proposed for both **Title III of the ADA** as well as **Section 504**.

- These changes will impact expectations for all postsecondary institutions.

- It is likely to also have indirect effects as far as the availability of more accessible third-party content and digital remediation tools.

Adoption of new standards

- The new rule establishes standards that will be used to determine whether web and mobile apps are accessible.

- The standards they have adopted (by reference) are the **Web Content Accessibility Guidelines (WCAG)**

- WCAG is an internationally-recognized set of standards established by the World Wide Web Consortium (W3C)

WCAG is based around four principles:

1. **P**erceivable
2. **O**perable
3. **U**nderstandable
4. **R**obust

P.O.U.R

WCAG Success Criteria

- Each version of WCAG is made up of a number of Success Criteria that outline specific metrics used to determine whether a site satisfies the guidelines.
  - For example, **Success Criteria 1.4.4: Resize Text** requires that text can be resized without assistive technology up to 200 percent without loss of content or functionality
- Each Success Criteria is classified as A, AA, or AAA. These correspond to the three possible levels of conformance:
  - **Level A**: Represents the minimal level of conformance. For Level A conformance, a web page must satisfy all Level A Success Criteria.
  - **Level AA**: For Level AA conformance, a web page must satisfy all Level A and Level AA Success Criteria.
  - **Level AAA**: For Level AAA conformance, a web page must satisfy all Level A, Level AA, and Level AAA Success Criteria.

Evolution of WCAG

There have been several versions of WCAG created since they were originally conceived in 1995:

- Version 1.0 (1999)
- Version 2.0 (2008)
- Version 2.1 (2018)
- Version 2.2 (2023)

The successive versions of WCAG published so far are backwards compatible, meaning that, if a website conforms to version 2.1, for example, it ALSO conforms to 2.0 and 1.0.

Standards Adopted in the new Rule

The new rule adopts **WCAG Version 2.1 Level AA** as the standard required to meet the requirement of being "accessible" under the ADA.

For WCAG 2.1, Level A consists of 30 Success Criteria, Level AA consists of 20 Success Criteria, and Level AAA consists of 38 Success Criteria. Therefore, **to fulfil the requirements of this rule, web content and mobile apps must conform to the 30 A and 20 AA Success Criteria**.

Also worth noting:
- WCAG 2.1 and 2.0 AA are common standards adopted by schools as part of their web accessibility policies.

Conventional Electronic Documents

- Conventional electronic documents are defined to mean web content or content in mobile apps that is in a portable document format (PDF), word processor file format, presentation file format, or spreadsheet file format. This list is exhaustive, rather than open-ended (p 71).
- Database files are not included in the definition.
- In contrast to WCAG 2.1, the rule includes conventional electronic documents in the definition of "web content" (p 83).
- DOJ believes that WCAG 2.1 Level AA is also the appropriate standard for other file formats not included in the definition of "conventional electronic documents" because WCAG 2.1 was crafted to address these other file formats as well (p 76).

Social Media

- This rule covers web content or content in a mobile app that a public entity makes available via a social media platform. The posts made to these platforms "must generally conform to WCAG 2.1 Level AA" (p 146).
- Public entities must use available accessibility features on social media platforms to ensure that their social media posts comply with this rule. However, where public entities do not provide social media platforms as part of their services, programs, or activities, they do not need to ensure the accessibility of the platform as a whole (p 149).

Captions for Live-Audio and Prerecorded Content

- WCAG 2.1 Level AA Success Criteria 1.2.4 requires captions for live-audio content in synchronized media (p 150).
- DOJ believes that the compliance dates set forth in this rule will give public entities sufficient time to locate captioning resources and implement or enhance processes to ensure they can get captioning services when needed (p 153).
- DOJ does not believe it is prudent to prescribe captioning requirements beyond the WCAG 2.1 Level AA requirements, whether by specifying a numerical accuracy standard, a method of captioning that public entities must use to satisfy this success criterion, or other measures.
Rather than specify a particular accuracy level or method of satisfying Success Criterion 1.2.4 at this time, the final rule provides public entities with the flexibility to determine the best way to comply with this success criterion based on current technology (p 155).

Accessibility of class or course content

- Under the final rule, password-protected course content for public elementary, secondary, and postsecondary institutions will be treated like any other content and public educational institutions will generally need to ensure that content complies with WCAG 2.1 Level AA starting two or three years after the publication of this rule in final form (p 210).
- Posts by third parties on course websites may be covered by the exception for content posted by a third party. However, that exception only applies where the third party is not posting due to contractual, licensing, or other arrangements with the public entity (p 234).
  It is unclear whether students count as third parties in this case
- See pages 210-235 for more discussion

Considering digital books, textbooks, libraries

- The DOJ declines to make changes to the rule in response to commenters or otherwise opine about public entities' obligations with respect to intellectual property law. However, there may be some instances in which a public entity is permitted to make a conforming alternate version of web content where it is not possible to make the content directly accessible due to legal limitations (p 235).
- The DOJ declines to adopt additional technical standards or guidance specifically related to EPUBs though this does not preclude public entities for setting their own standards for EPUBs under the "equivalent facilitation" clause (p 236).
- Digital textbooks, including EPUBs, will be treated the same as all other educational course materials (p 237).
- Under this rule, public libraries are treated the same as other public entities (p 240). Some material maintained in and by libraries may fall under the archived web content exception (p 241).

Conforming Alternate Versions

- Under WCAG, a "conforming alternate version" is a separate web page that, among other things, is accessible, up to date, contains the same information and functionality as the inaccessible web page, and can be reached via a conforming page or an accessibility-supported mechanism. (p 257).
- Under this rule, the DOJ specifies that the use of conforming alternate versions is permitted only in limited, defined circumstances, which represents a slight departure from WCAG 2.1. A public entity may use conforming alternate versions of web content ONLY where it is not possible to make web content directly accessible due to technical or legal limitations (p 257).
- See p 257-265 for additional discussion

Equivalent Facilitation

- This provision is intended to clarify that public entities can use methods or techniques that provide equal or greater accessibility than this rule would require (p 266).
- The DOJ no longer believes that telephone lines can realistically provide equal access to people with disabilities (and therefore do not constitute equivalent facilitation) (p 267-268).

Fundamental Alteration and Undue Burden

- Section 35.204 provides that in meeting the accessibility requirements set out in this subpart, a public entity is not required to take any action that would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens (p 269).
- In determining whether an action would result in undue financial and administrative burdens, all of a public entity's resources available for use in the funding and operation of the service, program, or activity should be considered. The burden of proving that compliance with the requirements of 35.200 would fundamentally alter the nature of a service, program, or activity, or would result in undue financial and administrative burdens, rests with the public entity (p 269).
- See p 268-278 for additional discussion

Title I Requirements and other Duties

- Complying with the web and mobile app accessibility requirements set forth in subpart H means that a public entity is not required by Title II of the ADA to make any further modifications to the web content or content in mobile apps that is makes available to the **public**. However, it is important to note that compliance with this ADA Title II rule will not relieve Title II entities of their distinct employment-related obligations under Title I of the ADA (p 271).

- An entity may still be required to make other modifications to how it provides a program, service, or activity, where necessary, to provide access for a specific individual (p 271).

- Similarly, just because an entity is in compliance with this rule's web content or mobile app accessibility standard does not mean it has met all of its obligations under the ADA or other applicable laws (p 272).

Noncompliance with minimal impact on access

- Section 35.205 describes a particular, limited circumstance in which a public entity "will be deemed to have met" the requirements of 35.200 even though the public entity's web content or mobile app does not perfectly conform to the technical standard. The entity must demonstrate that the nonconformance has a minimal impact on access for individuals with disabilities, as defined in the regulatory text (p 279).

- Section 35.205 does not alter a public entity's general obligations under this rule nor is it intended as a blanket justification for a public entity to avoid conforming with WCAG 2.1 Level AA from the outset (p 279)

- See p 278-285 for additional discussion

Measuring Compliance

- The DOJ believes that a tailored approach is needed for measuring compliance with a technical standard in a digital space (p 288).
- The DOJ believes that it is likely to be more difficult for State and local government entities to maintain perfect conformance to the technical standard set forth in this rule than it is to comply with the ADA Standards (p 290).
- The DOJ believes that measuring compliance as strictly 100 percent conformance to WCAG 2.1 Level AA would not be the most prudent approach, and that an entity's compliance obligations can be limited under some narrow circumstances without undermining the rule's objective of ensuring equal access to web content and mobile apps (p 291).
- The goal of this rule is to provide access to people with disabilities that is functionally equivalent to the access experienced by people without disabilities (p 293).
- See p 288-315 for additional discussion

Best Practices

- Public entities can help facilitate effective communication by providing notice to the public on how an individual who cannot access preexisting conventional electronic documents (or web content or mobile apps) because of a disability can request other means of effective communication or reasonable modification in order to access the public entity's services, programs, or activities.

- Public entities can also facilitate effective communication by providing an accessibility statement that tells the public how to bring web content or mobile app accessibility problems to the public entities' attention and developing and implementing a procedure for reviewing and addressing any such issues raised.

Exceptions

Some types of content do not have to comply with the technical standard in certain situations (p 157). These are:

- Archived web content
- Preexisting conventional electronic documents, unless they are currently used to apply for, gain access to, or participate in the public entity's services, programs, or activities
- Content posted by a third party
- Individualized, password-protected or otherwise secured conventional electronic documents
- Preexisting social media posts

Exceptions to the Exceptions

- **There may be situations in which the content otherwise covered by an exception must still be made accessible to meet the needs of an individual with a disability under existing title II requirements.** (this is mentioned multiple times in the final rule)

- The final rule does not include exceptions for password-protected course content in elementary, secondary, and postsecondary schools (something that was proposed in the NPRM).
- The final rule also does not include exceptions for linked third-party content because that proposed exception would have been redundant and could have caused confusion.

Archived Web Content

Archived web content is defined as content that:

1. Was created before the date the public entity is required to comply with this rule, reproduces paper documents created before the date the public entity is required to comply with this rule, or reproduces the contents of other physical media created before the date the public entity is required to comply with this rule;
2. Is retained exclusively for reference, research, or recordkeeping;
3. Is not altered or updated after the date of archiving; and
4. Is organized and stored in a dedicated area or areas clearly identified as being archived.

- Archived web content must meet all four parts of the archived web content definition in order to qualify for the exception (p 167).
- Under this exception, public entities may not circumvent their accessibility obligations by merely labeling their web content as "archived" or by refusing to make accessible any content that is old.
- See p 173-175 for info on the relationship to preexisting conventional docs exception

Preexisting conventional electronic documents

- Conventional electronic documents that are available as part of a public entity's web content or mobile apps before the date the public entity is required to comply with this rule do not have to comply with WCAG 2.1 Level AA unless such documents are currently used to apply for, gain access to, or participate in a public entity's services, programs, or activities (p 174).
- DOJ believes that public entities should generally focus their resources on developing new conventional electronic documents that are accessible and remediating existing conventional electronic documents that are currently used to access the public entity's services, programs, or activities (p 175).
- If a public entity changes or revises a preexisting document following the date it is required to comply with the rule, the document is no longer considered "preexisting" for the purposes of the exception (p 177).

Third-Party Content

- Web content and mobile apps that are created or posted on behalf of a public entity fall within the scope of this rule (p 188). Where a public entity links to third-party content but the third-party content is truly unaffiliated with the public entity and not provided on behalf of the public entity due to contractual, licensing, or other arrangements, the linked content falls outside the scope of this rule.
- This exception does not apply to the tools or platforms the public uses to post third-party content on a public entity's web content or content in mobile apps, such as message boards (p 190).
- This exception applies to, among other third-party content, documents filed by independent third parties in administrative, judicial, and other legal proceedings that are available on a public entity's web content or mobile apps (p 191).

Third-Party Content (continued)

- Sometimes a public entity itself chooses to post content created by a third party on its website. The exception does not apply to content posted by the public entity itself, or posted on behalf of the public entity due to contractual, licensing, or other arrangements, even if the content was originally created by a third party. For example, many public entities post third-party content on their websites, such as calendars, scheduling tools, maps, reservation systems, and payment systems that were developed by an outside technology company. Sometimes a third party might even build a public entity's website template on the public entity's behalf. To the extent a public entity chooses to rely on third-party content on its website in these ways, it must select third-party content that meets the requirements of this rule. This is because **a public entity may not delegate away its obligations under the ADA** (p 192).

- Authoring tools, embedded content, and other similar functions provided by the public entity that facilitate third-party posting are not covered by this exception and must be made accessible in accordance with the rule (p 194).

- Under this rule, public entities are not responsible for making linked third-party content accessible where they do not provide or make available that content, directly or through contractual, licensing, or other arrangements (p 200).

External Mobile Apps

- Under the rule, external mobile apps are subject to the rule in the same way as mobile apps that are developed, owned, and operated by a public entity (an example given is "ParkMobile" for parking) (p 207).

- This approach of applying ADA requirements to services, programs, or activities that a public entity provides through a contractual, licensing, or other arrangement with a third party is consistent with the existing framework in Title II of the ADA. Under this framework, public entities have obligations in other Title II contexts where they choose to contract, license, or otherwise arrange with third parties to provide services, programs, or activities (p 210).

Password-Protected or Otherwise Secured Docs

- There is an exemption for conventional electronic documents that are (1) about a specific individual, their property, or their account; and (2) password-protected or otherwise secured (p 241).
- Some examples are bills, healthcare documents, financial statements, receipts
- The rule preserves flexibility for public entities to make all individualized, password-protected or otherwise secured conventional electronic documents accessible by using, for example, an accessible template to generate such documents (p 242).
- Public entities are still bound under Title II to make these documents accessible for persons with disabilities.
- This exception does not apply to individualized information made available in formats other than a conventional electronic document (p 243).
- The exception also does not apply to the platform on which the public entity makes these documents available (p 243).

Password-Protected or Otherwise Secured Docs (continued)

- Content that is broadly applicable or otherwise for the general public is not subject to this exception. For example, a PDF notice that explains an upcoming rate increase for all utility customers and does not address a specific customer's particular circumstances would not be subject to this exception (p 244).
- If web content is covered by the exception for individualized, password-protected or otherwise secured conventional electronic documents, it does not need to conform to WCAG 2.1 Level AA to comply with this rule, even if the content fails to qualify for another exception, such as the preexisting conventional electronic document exception (pp 244-245).
- See p 241-252 for further discussion

Preexisting Social Media Posts

- The final rule includes an exception for preexisting social media posts that were posted before the date the public entity is required to comply with the rule (p 253).
- Due to the continually evolving nature of social media platforms, the department encourages public entities to err on the side of ensuring accessibility where there are doubts about coverage, to maximize access for people with disabilities (p 256).
- Social media posts posted after the compliance date are treated consistent with all other web content and content in mobile apps, and the relevant exceptions may apply depending on the content at issue (p 256).

RECOMMENDED BEST PRACTICES IN ONLINE CLASSES

Notes for Peer Team use:

- It is recommended that at least one peer team member have online teaching experience.
- Visit with the instructor before entering the Canvas course site to learn about any academic technology that students will be using that observers may not have access to. (Examples – Pearson, Cengage, RedShelf inclusive textbooks.)
- The faculty member being reviewed should request that their peer team members have "peer reviewer" access to their Canvas courses.
- Know what you are looking for. Review the "Shared Values of Teaching and Learning at COCC", and the evaluation guidelines and responsibilities of a peer team member in advance so that you are prepared to make helpful and constructive observations.
- Know the prerequisites of the class and the general abilities and level of students in the class. For example, if the class is part of a larger sequence of online classes within an online program students may be expected to have more skill in navigating the Canvas environment and using its tools than a 1st year mostly on-campus student in their first online class.

Useful definitions and terminology

- *Academic Technology:* technology specifically used to facilitate and augment instruction in an active learning environment. At COCC, this includes Canvas, third-party tools integrated into Canvas, and external tools supported by the college that improve the design, development, and delivery of instructional content.
- *Digital Content: c*ontent delivered through technology including Canvas Pages, electronic documents, audio and video, and websites.
    - e.g.: the Microsoft Word *program* is academic technology; a Word *document* is digital content.
- *Getting Started Area*: colloquially, a dedicated space within the course where instructors make clear to students how to get started and where to find various course components. This area also commonly includes essential course documents, instructor contact information, and other relevant course policies and information.
- *Course Outcomes vs. Unit Objectives: o*utcomes are the broad statement of expected learning at the course level, and which are standardized by COCC. Objectives are specific, observable, and measurable demonstrations of student learning at the unit level and are written by faculty.
- *Accessible*: refers to the concept that people with disabilities can access and use a product or system, product or system, including with the help of assistive technologies.
- *Regular and Substantive Interactions:* interactions which are instructor-initiated, occur at regular intervals, and are academic in nature.

What to look for in the Canvas learning environment

Below are six areas summarizing recognized best practices in online course design. Under each is a general summary of what is broadly being addressed, and questions to ask when looking for representation of that area within a Canvas course.

A bobcat track (🐾) indicates the recommendation is linked directly to COCC general policies, accreditation standards, or federal requirements for meaningful interaction, regular assessment and proactive engagement in student success.

1. Course Overview and Information 🐾

The course contains appropriate and adequate information for a student to successfully access course material, navigate content, and participate. The expectations for students are transparent and readily available.

- Is a current syllabus present, in a format students can view easily online and download/print?
- Are the course objectives clearly stated? Do they match the objectives listed in the college catalog?
- Is a course schedule of due dates and major events (holiday closures, course events such as exams) provided?
- Is it clear for students where they should click to begin the course?
- Does the class have a 'Getting Started' area?
- Does the instructor provide an introduction and contact information outside of the syllabus? (Recommended in the Getting Started area.)
- Is it stated what technology tools and skills students will need to be successful in the course?

2. Course Structure and Organization

The course is designed and organized in such a way that navigation is intuitive and consistent. The learning materials are up to date and any tools included are functional.

- Is the course easy to navigate?
- Does the course have a consistent structure (page color, font, graphics, page layouts)?
- Are modules and elements of the course named so their purpose is clear to students?
- Do all course links work? Are the hyperlinks descriptive? (For example, instead of: "to learn more about photosynthesis click here for a video" -> "here is a video explaining photosynthesis if you'd like to learn more."
- Are students given information about and links to COCC student resources early in the course materials? (Recommended for the Getting Started area.)

3. Communications and Interactions 🐾

The course encourages interaction between the student and instructor, between students, and with the content itself. Regular and substantive interaction is evident.

- Does the instructor make regular announcements about course content, activities, or assessments?
- Are the expectations for netiquette, means of address, and formality and grammatical standards for writing communicated to students?
- If discussion boards are used, are expectations for contributions clearly stated?
- Does the instructor provide guidance on when students can expect responses to email, voicemail, or Canvas Inbox messages?
- Are there multiple opportunities for students to engage with their peers throughout the term? (Recommended to provide using a variety of tools – collaborative assessments, discussions, group activities, etc.)
- Does the instructor communicate how they will participate (examples could be: moderator, facilitator, observer, etc.)
- If the instructor participates in discussions do their comments encourage one or more of the following: deeper learning, exploration of the topic, further student engagement with the material or each other?

4. Learning Materials and Instructional Content

The course offers resources to support the stated objectives, to facilitate student learning and collaboration, and to promote higher-order analysis, problem solving, and critical thinking skills.

- Are unit (week, module, etc.) level objectives present, easy for students to understand, and measurable? (Can they be used by students to check their own knowledge and skills?)
- Are connections between unit level objectives and course outcomes made clear to students?
- Do the learning materials included align with listed learning objectives?
- Does the instructor provide context for learning materials – what is it, why it is included, how students should use it?
- Are course learning materials presented in multiple formats? (Examples, textbook readings, multimedia, web content, etc.)
- Do course learning materials include content with differing representation of ideas, perspectives, or imagery?
- Is the original authorship of course materials clearly displayed? Does the instructor model attribution of materials?
- Does it feel like the amount of content/time to complete the course is roughly similar to that of an in-person course?

5. Assessment and Evaluation

The course provides multiple means for students to demonstrate achievement of the course learning outcomes and unit objectives. The course assessment policy and expectations are clearly stated in advance. Regular and substantive feedback is provided for submitted work.

- Do course assessments align with unit level learning objectives and course outcomes?

- Are students given clear explanations of how to complete assignments and how to submit them?
- Are grading rubrics or information about points possible included in the assignment instructions?
- Does the course include a variety of formative and summative assessments?
- Has the instructor communicated to students when feedback will be given and where to find it?
- Does the instructor provide detailed and timely feedback on assignments?

6. Digital Accessibility 🐾
The digital content and tools used in the course are accessible.

- Does the course include accessibility information for external tools or technologies required to successfully complete the course? (This could be included in the syllabus or Getting Started area and could be a link to a 3rd party accessibility statement or to the COCC Academic Technology catalog. If no external tools are used this does not apply.)
- Are specific directions included to help students contact COCC's Office of Services for Students with Disabilities?
- Is the course content easy to read? (Consider font size and color contrast between text and background.)
- Are documents in the course legible? Does the course avoid scanned pdfs or images of text?
- Do videos in the course contain accurate captions?
- Do images in the course include descriptive alternative text?

Policy Statement

Central Oregon Community College will provide all students with equitable access to learning materials within digital learning spaces by working to ensure that all instructional content and academic technologies conform to the [Web Content Accessibility Guidelines](#) 2.1 Level AA standards.

Purpose

This policy acknowledges that the use of digital content is an integral component of higher education, and that accessible digital content improves the learning experience for all students, including those students with disabilities. This policy extends to the creation, procurement, management, and timely dissemination of all educational resources and technologies, as well as expectations regarding the design, development, acquisition and use of digital academic resources.

Compliance

This policy ensures compliance with applicable local, state, and federal regulations and laws including:

- [Americans with Disabilities Act](#)
- [Section 504 of The Rehabilitation Act](#)
- [Section 508 of the Rehabilitation Act](#)

Definitions:

Academic Technology: technology specifically used to facilitate and augment instruction in an active learning environment.

Accessible: refers to the concept that people with disabilities can access and use a product or system, including with the help of assistive technologies.

Digital Content: content delivered through technology, including the learning management system, electronic documents, audio, video, digital courseware/textbooks, websites, and other supplemental material that requires student interaction to achieve the course learning outcomes.

Equitable Access: means that information presented in an alternative format communicates the same information and allows users to have a comparable experience in as timely a fashion as does the source.

Timely: as it relates to equitable access to instructional content, timely means that the individual with a disability receives access to content in a reasonable time frame that meets the needs of the individual.

As it relates to coordination with other college entities and support departments, timely refers to meeting minimum standards for communication, delivery of content, or completion of other necessary duties as defined by the support departments who are responsible for upholding compliance.