

# Accessibility Exception Requests

Wichita State University's Accessible Content Policy (8.11) requires that all instructional content be accessible. This document details the procedure for requesting those exceptions.

The goal of an exception is to document the process by which we will ensure that the university provides effective access, with substantially equivalent ease of use, to instruction, information and services for eligible individuals in a timely manner.

## Requirements for Exception requests

Exception requests must contain the following elements in order to be considered.

### Requesting Unit Contacts

Contact information for the below parties:

- The individual making the request
- The requesting unit

### Rationale

The requesting unit must document how this request fits into one or more of the following categories:

- Compliance is not technically possible or feasible given current technology
- The information or service is used by a specific, limited audience which has no known need for accessibility features
- For third party and/or vendor delivered products, no accessible and equally effective alternative for the information or service exists
- Making the information or service accessible would require extraordinary measures that constitute an undue burden to the university

Note that for the purposes of determining if an undue burden exists, WSU is considered to be a single entity, and thus a burden would be analyzed according to the impact to the institution as a whole and not to the unit requesting the exception.

### Equally Effective Access Accommodation Plan (EEAAP)

This plan should address how access barriers in the instruction, information or service will be mitigated, and any benefits or opportunities afforded by the information or service will be provided, in a timely manner for eligible individuals who are unable to effectively use or interact with the information or service.

The primary support team for accommodations is Disability Services, who will make arrangements with other teams if necessary. In some cases there may be expenses due to accommodations related to an accessibility exception that has been granted. These expenses are the responsibility of the requesting department and/or college.

Depending on the nature of the information or service, examples of an accommodation might include:

- Providing an alternative that effectively provides an equivalent result e.g. an alternative software that performs the same or similar function.
- Providing assistance to the eligible individual either in-person or over the phone.
- Providing the information in a format that meets our accessibility standards.

This plan should take into account the criticality and timeliness of the information or service and address a method to ensure that the eligible individual can access the accommodation without any adverse consequences resulting from the need for the accommodation. This means, for example, that any deadlines imposed by the information or service that are not met due to the use of an accommodation must be waved, and the requesting unit must have a plan to ensure this occurs.

Timeliness should be considered in light of the nature of the information or service but should generally not exceed 10 (ten) business days. The accommodation plan should also address the timeline for delivering the accommodation, and the process by which any benefits or opportunities afforded by the information or service will be provided to the eligible individual.

#### Communication Plan

The requesting unit must document a plan to ensure that eligible individuals are made aware of the availability of the EEAAP, and the steps they must take to request access, if applicable. These communications should be readily accessible in the same places that any other general communication regarding access to the information or service are present.

In the case of a course, information about the availability of the EEAAP should be included in the course syllabus. For non-academic services and content, appropriate indications that the user can request an accommodation should be provided.

#### Compliance Plan

Exceptions are designed to be temporary in nature and are intended only to serve as a bridge to provide effective access. Requesting units should document their plan to bring the information into compliance with our accessibility standards. These plans might include:

- Contract language obligating the vendor of third-party information or services to bring their software or content into compliance within a period of time.
- For internally developed information or services, a timeline for making them accessible and compliant with our accessibility standards.

- Detailed collaboration with the vendor to bring their information or service into compliance.

The requesting unit must, if the information or service is not internally developed, have a compliance plan if the third party fails to make their information or service accessible. Examples include:

- Contract termination
- Financial penalties
- Selection of an alternative product
- Development of accessible front end
- Replacement with internally developed alternative

#### Business Purpose

The requesting unit must provide the business purpose for the information or service to include:

- Who – what university or external populations will use the information or service?
- What – what is the function of the information or service?
- How – How will the information or service be made available?

#### Accessible Alternative Justification

The requesting unit must document if their purchasing process evaluated other alternatives that were more accessible. If so, the requesting unit must explain what academic or business reasons necessitate the selection of the less accessible option. If more accessible alternatives were not evaluated, or did not exist, the unit must document their plan to ensure that a search for a more accessible alternative is conducted when the contract or exception expires.

## Submitting Exceptions & Process Expectations

The exception request form will be an online tool with a workflow that includes several steps.

Step 1: Requesting Person completes the form

Step 2: Requesting Department Approves Request

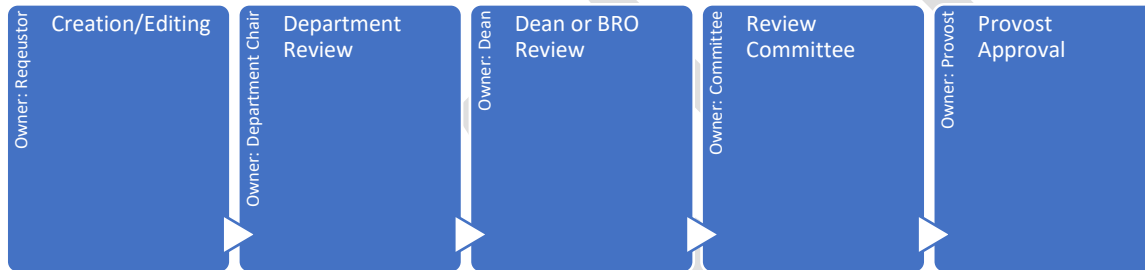
Step 3: Requesting Dean or Budget Officer Approves Request

Step 4: Accessibility Exception Review Committee Reviews Requests

Step 5: Provost Approves Request.

If at any stage the exception is not approved, it will be returned to the Requesting Person for revision.

### Exception Workflow Status Diagram



Step 1: Requesting Person completes the form

The form (found through the Accessibility section of the WSU website) asks for the following information:

- Requesting Person
- Class number/Resource Name
- Department/Office (dropdown – to set approvers and workflow)
- Rationale (why should an exception be granted)
- Equally Effective Accommodation Plan (what will we do if someone needs an accommodation)
- Communication Plan (how will the audience be told about the exception and how to request accommodations)
- Compliance Plan (how do we plan to reach an accessible point in the future)

When the form is submitted, it will be forward to the Department Approver (defined in the workflow).

## Step 2. Department Approval

The department will review the submissions and either approve them or return them to the requesting person for revision.

The department approval is an important stage at which assertions in the rationale should be considered. If, for example, the instructor of a course is claiming that more accessible textbooks lack other qualities that make the chosen textbook a better choice for the class despite accessibility challenges, the department chair and other department colleagues are the best subject matter experts to determine the validity of the rationale.

It is also important for the department to be aware of the number of exceptions being requested by their department or office, and to understand the challenges that those exceptions pose if an accommodation must be arranged.

## Step 3. Dean/Budget Review Officer Approval

The Dean or other Budget Review Officer (for non-academic areas) will review the submissions and approve them or send them back to the Requesting Person for revision.

At this level, the approval is an opportunity for the Dean to be aware of the number and scope of exceptions being requested before they are passed along to the Provost's office.

## Step 4. Accessibility Exceptions Committee Review

The Accessibility Exceptions Committee will review the submissions as they come in and prepare recommendations for the Provost.

## Step 5. Provost approval

The Provost will provide the final approval for the exceptions.

Once the exceptions have been approved, the Requesting Person will be notified. Stakeholders at all levels will be able to review the workflow and status of all of their exceptions through the web site.