

Northern Kentucky University Accessibility Charter

PURPOSE OF CHARTER

This charter represents a commitment to dedicate the necessary time and resources to accessibility. It formalizes the existence of the accessibility program and illustrates management support for it.

This charter is a means to share the vision with others to achieve consensus between all key players. According to the Project Management Institute (PMI) “A program is groups of related projects managed in a coordinated manner to obtain benefits not available from managing them individually. Some projects within a program can deliver useful incremental benefits to the organization before the program itself has completed.” www.pmi.org/learning/featured-topics/program

The purpose of this Accessibility Program Charter is:

- To define program goals and a high level timeline
- To establish program member’s roles and responsibilities
- To confirm expectations with the sponsors and stakeholders
- To formally authorize the program
- To describe expected outcomes, define a general scope and projects within
- To provide a high- level approach for the Electronic Information Technology (EIT) Program
 - The reason for the EIT program
 - Justification for the EIT Program

BUSINESS CASE

The U.S. Department of Education’s Office of Civil Rights (OCR) has fined universities for violations of the American with Disabilities Act (ADA) and has been requiring campus technology reforms to ensure full access to technology that is crucial to academic and business success.

Some universities violations:

Failure to allocate sufficient resources to coordinate and implement EIT Policy

- University of Cincinnati
- Youngstown State University

Failure to make faculty, staff and students aware of institutional resources for accommodation and accessibility:

- Louisiana Tech University
- University of Cincinnati

Failure to systematically and effectively monitor EIT content and services to ensure accessibility

- University of Cincinnati
- California Community Colleges
- Atlantic Cap Community College

- Youngstown State University

Failure to provide an accessibility policy that demonstrates campus commitment to EIT accessibility

- University of Cincinnati
- Youngstown State University
- University of Montana
- Penn State
- Louisiana Tech
- Florida State University

Failure to implement a procedure to ensure information obtained, provided, or developed by third parties is accessible

- Louisiana Tech
- Penn State
- Miami University
- Colorado University – Boulder
- Arizona State
- Case Western Reserve
- Princeton University

Failure to provide captioning of announcements and commentary made over public address systems during athletic and other public events

- University of Kentucky
- Ohio State University
- University of Maryland

Other items many of the above universities were charged with:

- Failure to implement a procedure which ensures procured EIT is accessible, such as including accessibility requirements in RFPs and contractual language.
- Failure to provide regular, ongoing training, instruction, and support at all levels appropriate to a person's roles and responsibilities, regarding the institutions EIT Accessibility Policy and procedures, tools, resources, and techniques to ensure the policy and procedures are effectively and consistently implemented.
- Failure to implement accessibility solutions for EIT other than web-based, online, or software based technologies, such as classroom controls, copiers, ATMs and digital signage.
- Failure to provide a top-level website dedicated to accessibility, which serves as a central repository and includes, but is not limited to, accessibility information, news, tools, and best practices.
- Failure to provide accessible instructional materials and library resources in a timely manner.
- Failure to create a culture where accessibility is considered a proactive need, but instead is considered a reactive accommodation need.
- Failure to provide accessible websites.
- Failure to provide audio descriptions.

PROGRAM OVERVIEW

Program Purpose

The purpose of the program is to coordinate the implementation of the projects within the program to provide a holistic view of all the key decisions and dependencies and optimize resources to deliver the best results. It is essential to the success of the program to understand the integration points and intersection of the projects within the program and to maintain consistent and on-going communication between all projects.

Program partners

The main program partners for the implementation of the EIT Program are: The IT Accessibility and Compliance Analyst, Office of Student Affairs-Disability Services, Office of Information Technology, Marketing and Communication, Procurement, CITE and General Counsel. The program partners will collaborate on the implementation of the projects within the program. Each partner plays a crucial role in the overall success of the program. The partners will also establish and maintain accessibility compliance requirements based on enterprise risk management, enterprise shared services and user-centered design practices. The partners are committed to working with the university's IT governance structure, which enables collaboration and support for accessibility initiatives.

Program Description and Goals

The successful implementation of the EIT program will ensure that Northern Kentucky University is providing individuals with disabilities equal access to its programs and activities, consistent with the requirements of Section 504 of the Rehabilitation Act of 1973 (section 504) and the Americans with Disabilities Act (ADA) of 1990, as amended. The university is committed to the idea of universal web accessibility that enables all university community members and visitors full access to information provided on its websites. Every effort will be made to make these pages as accessible as possible in accordance with the applicable guidelines listed above.

The EIT program will be completed in phases.

The EIT Program Phase I includes (but is not limited to) the following projects:

1. Web content and eLearning compliance Audit – to include the purchase of an auditing tool for web and LMS content.
2. Classroom materials – will focus on UDL especially when provided via LMS (e.g. word documents such as syllabi and colors used in templates).
3. Procurement – development of policies and procedures to ensure EIT and information obtained through EIT provided or developed by third parties is accessible.
4. Awareness and training – to include communications and professional development for any faculty, staff, or students responsible for creating or distributing information with EIT.
5. Captioning - Develop policy and identify all videos to be captioned.
6. Transcripts – provide transcripts of audio recordings.

PROGRAM SCOPE

The Program scope will be dictated by the results of the Web Content and eLearning Compliance audit. The audit results will inform the program's phases and projects.

Program Includes:

- All NKU colleges and campuses, including Grant County
- Web and eLearning content and systems
- A Program Manager will provide oversight and management of the projects which make up the Program
- Establishing university framework, standards and policy based on WCAG (Web Content Advisory Guidelines), and develop a process for updates.

Program Excludes:

- Non-compliance in regards to facilities
- Links to external websites outside of nku.edu
- Other internal NKU applications outside of websites, student-facing web based applications and LMS content

PROGRAM ASSUMPTIONS AND CONSTRAINTS

Assumptions made in defining this program:

- Resources will be available as per the project plans
- All positions considered critical to the success of the program will be hired

Key constraints defining limitations and boundaries for the program:

- Academic calendar may impact faculty availability for training
- Potential systems resource constraints must be determined

PROGRAM RISKS

The high level risks identified for this program are listed below. As additional risks are identified throughout the program life cycle they will be added to the program risk register and monitored.

- Timely completion of the hiring of the full-time position which is critical to the success of the program
- Overall compliance risk to the university
- The decentralized nature of the university's web environment creates a challenge to long-term sustainability
- The lack of EIT policies, standards and guidelines university wide
- Complexity of eLearning content and high number of content contributors
- Potential limited additional Program funding

- Readiness of NKU’s intranet technologies to support the EIT Program content strategy

PROGRAM DELIVERABLES

The following are the program’s deliverables:

Program Deliverables	Estimated Completion Date
Committee meeting	September 2017
Initiate Project and Program status meetings	September 2017
Hire IT Accessibility and Compliance Analyst position	October 2017
Complete Program charter	November 2017
First Executive Program Status Meeting	November 2017
Initiate audit of web content	Fall 2017
Begin development of University framework/standards based on WCAG guidelines	December 2017
EIT contract / procurement policies standards	Winter 2018
Captioning policy	Winter 2018
Awareness campaign and training, kick-off	Winter 2018

PROGRAM ROLES AND RESPONSIBILITIES

Executive Program Sponsors

The Executive Program Sponsors are the key stakeholders of the overall program. The role of the Executive Program Sponsors includes the following:

- Create an environment that fosters sustainable momentum for the program
- Define the program’s connection to the university’s overall business plan and direction
- Review program progress and interim result to ensure alignment with the overall strategic vision

Program Sponsor

The Role of the Program Sponsor includes the following:

- Oversee the implementation of the program’s underlying business and IT strategies
- Allocate and Approve program and project resources
- Serve as an escalation path for issues beyond control of the program

Accessibility Steering Committee

The Accessibility Steering Committee (ASC) has a demonstrable interest in the outcome of the Program and projects. The ASC is empowered to make decisions regarding program scope, budget and schedules,

and to resolve escalated issues and risks. The ASC also addresses issues which are cross-departmental and/or program wide. Additional Accessibility Steering Committee responsibilities include:

- Champion the program and projects at the university level to secure buy-in
- Approve the program charter
- Legitimize the program goals
- Serve as an escalation path for issues beyond control of the project managers
- Attend quarterly Steering Committee meetings to provide feedback on the program and projects' deliverables.

Program Manager

Program management is the process of managing several related projects, with the intention of improving an organization's performance. The Program Manager will align the outcome of the projects with the university's overall business goals as well as the overall strategic objectives of the university. While the role of the Project Analyst is separate from the Program Manager, collaboration and coordination between the two is essential to the success of the program. The Program Manager provides support and guidance on the individual projects as well as to convey the important relationship of each project to the bigger picture, including the larger program and organizational objectives. In addition, the Program Manager duties will include:

- Accountable to the Program Sponsor and Steering Committee for schedule, budget, and quality of all program elements.
- Oversight of the purpose and status of all projects in the program.
- Review/approve project plans for conformance to program strategy, program plan and schedule
- Acts as the communications conduit to Program Sponsor and Steering Committee and conducts periodic status updates.
- Escalates decisions and any budget change control to Program Sponsor and Steering Committee as necessary
- Serves as a program spokesperson responsible for communicating program strategy, benefits, direction, status, and recommendations to the university stakeholders
- Responsible for the operational oversight of the program and all projects
- Responsible for creating and communicating program and project status reports to all identified stakeholders
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Project Analyst

Every project within the program will be assigned a project lead who is given overall authority to plan, execute, monitor and control their individual project. This person will work directly with the project manager assigned to the project to oversee and direct the activities of the personnel assigned to the project. The project analyst responsibilities include:

- Provides leadership for the project
- Ensure overall project process and deliverable quality
- Responsible for the delivery of the solution
- Ensure the solution implemented addresses the project's and program's objectives

- Serves as the central point of communication and coordination of the project
- Ensure timely communication with the stakeholders
- Provide status reports on project deliverables consistent with the communication strategy
- Attend program status meetings to provide updates and report project progress
- Monitor the planning, execution, and control of all activities necessary to support the implementation of the project

Communication Strategy

The Program manager will communicate with all sponsors and committee members as defined in the Communication Plan. Status meetings will be scheduled and status reports (including risks/issues and plan to mitigate) will be distributed as required by audience.

A public website will be created to promote the EIT Program.