



Web Site Accessibility: a Q&A

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Neiss - Universal access just makes good sense. The disabled identified the need but everyone benefits from curb-cuts and automatic doors. Now curb-cuts and automatic doors are built into the design. Universal accessibility will be eventually in the design of information technologies, not just for the disabled but for new technologies such as Internet Phones, PDA's, WebTV, speech recognition, voice synthesis and digitized voice.

Awareness and training are key to providing universal access. [Technology Policy 99-3](#) puts New York State on the leading edge of this issue. Other states have followed suit, the federal government is also leading the effort. Canada adopted these standards two years ago.

Providing real HTML with proper use of alt tags is not that difficult. The technology industry will deal with PDF's and other files and document delivery methods that are now difficult to build in accessibility. The sad commentary is that more information was universally accessible five years ago than it is today. Technology has moved at a very rapid pace without considering accessibility issues.

By supporting universal access we will increase our ability to educate (and graduate) students with disabilities, increase our ability to hire, retain and promote staff with disabilities, remove potential legal actions and position SUNY as a leader in disability rights and services.

Perry - This is to summarize some issues relevant to SUNY library web sites. Many of the [fourteen "Priority 1" accessibility checkpoints](#) do not represent problems and are a matter of courtesy, good design, and common sense. Some of the guidelines represent real challenges and introduce what seem to be impediments to new services and innovation. The Binghamton campus is not alone in needing some advice about these matters. I appreciate your willingness to consult centrally to help us clarify the legal and ethical issues that have arisen as a



result of the New York State Office for Technology regulations.

Is it an acceptable practice to use our libraries' "traditional" print reserves services as the alternative to a "non-accessible" document format like pdf if every document in e-reserves is also provided in print via the manual reserve service? In general, if a web-based service is not considered accessible, can a manual service be the alternative?

Neiss - The goal of universal access is to provide access, if it is via a screen reader or via manual service, it is acceptable. However, the person accessing the web page needs to be able to get that information in an accessible form.

Perry - Is it an acceptable outcome to deny an important new service or product to all library patrons because the service or product cannot be made ADA accessible?

Neiss - No, provide an alternative as well.

Perry - Do the regulations only apply to web content produced only within SUNY?

Neiss - At this time, yes.

Perry - Or, as it has been suggested locally, are we required to ensure that every vendor of a licensed electronic resource product linked to our library website is also compliant?

Neiss - In the future there will be wording in the NYS standard contracts that require that vendors must provide accessible products or services.

Perry - Are course instructors not permitted to assign readings or research involving a licensed product that may not be "accessible"?

Neiss - No, as long as there is an alternative provided.

Perry - Is there new language to be inserted into all New York State contracts to ensure vendor compliance? Since we have products currently under state contract that are not accessible, will these have to become compliant with the next renewal?

Neiss - Once the wording is in the contracts, they (products or services) will have to be accessible. It is wise to advise vendors of this issue now.

Perry - How will Nylink and SLiCAT handle this issue with regard to its group purchasing?

Neiss - They should be advising vendors now. Nylink is aware of the accessibility issue.

Perry - Is it required that notices be placed when linking to off-campus sites that may not be accessible?

Neiss - Not required, but it is advisable.

Perry - It has been suggested that such a notice might be "You are now

leaving an accessible site" (similar to secure site warnings). This disclaimer does not appear to be required by the W3C site but this practice has been suggested locally.

Neiss - Correct.

Perry - During a local workshop on this topic, it was revealed that there is no single identifiable test or tests for accessibility compliance. Testing with Lynx and "Bobby" may be a "good faith" effort but may still be less than adequate. How can a web developer be sure that the regulations are being met?

Neiss - Bobby and Lynx are very good indicators of compliance with Priority A Level 1, but nothing is perfect. Since all assistive technologies may be different and users will have various versions of software and hardware, as well as older hardware and software, there is no guaranteed validator. Bobby and Lynx are some of the best validation tools out there now.

Perry - What is to prevent the need for continued expensive remediation with each new web reader that doesn't support some feature?

Neiss - It is hoped that legislation such as section 508 of the Workers Rehabilitation Act requiring that all vendors meet accessibility standards (in development by the Access Board) if they want to do business with the federal government will force accessibility standards into the design of new technologies.

Perry - Would it be possible to suggest that the Office for Technology develop a method for determining compliance?

Neiss - The Accessibility Steering Committee is looking into this issue.

Perry - Would it be possible to delay the implementation date for the regulations until a test for compliance has been developed?

Neiss - There may be relaxation of the deadline, but it will not be for this reason. [It was recently announced that the deadline has been extended to December 31, 2000.]

Perry - Do private institutions receiving state funds also have to comply with the regulations?

Neiss - Those organizations must have their legal departments look at that. It is not stated in the state policy.

Perry - It is my understanding that the Aleph 500 system will be tested for ADA compliance under the terms of the contract. If remediation is found to be necessary, may I assume that this process will be coordinated with the pilot sites so that there are no delays in implementing the system? If there are still ADA issues outstanding as a pilot site is ready to go into production, may that site be exempted from compliance until the vendor has resolved the issues?

Neiss - Right now [software] applications are not mentioned in [99-3](#).

However future policies will require that applications are accessible. There may be some implications under [96-13](#) where accommodations for library staff have to be made if they use the product.

Perry - "Provide a text equivalent for every non-text element" and: "If, after best efforts, you cannot create an accessible page, provide a link to an alternative page..."

To the extent this deals with graphics on web pages in general, it is not a problem. The issue for libraries is that scanning of printed materials for a variety of purposes becomes problematic under this regulation. Rendering a scanned image to an exact text equivalent is labor-intensive and impractical. E-reserves systems are based almost entirely on scanning printed material to an image format that is then linked to indexing for course and instructor. The format of choice is pdf since free, easy-to-install, viewers are available for all computing platforms and because pdf files can be made secure. This is apparently non-compliant. Although some sites have recommended merely putting in links to [Adobe's text conversion software](#), this will not be acceptable for scanned documents that will always end up with OCR errors. Similar difficulties exist with images of hand-written documents that cannot be rendered into text without manual editing.

Neiss - There will always be some documents that may not be readable by assistive technologies, regardless of the reason. In this case, as in any other case where suitable accommodation cannot be made, an alternative reader (a real person) would be necessary.

Perry - "Until user agents can automatically read aloud the text equivalent of a visual track, provide an auditory description of important information of the visual track..."

How will we know when a suitable "user agent" exists? Will the Office for Technology designate an agency to certify an acceptable user agent application? Once the "user agent" is known to exist, are we free to ignore this requirement and develop pages as we see fit? If W3C revises the Checkpoints, is it acceptable to adopt the newer version?

Neiss - As technology evolves, so will (it is assumed) the checkpoints, however it cannot be assumed that those using assistive technologies will have those new user agents, so an auditory description should be provided. As new versions of the WCAG are released, the latest version will be the acceptable one to use.

Perry - Although the [Binghamton Libraries](#) do not use multi-media extensively, the requirements for streaming audio and video make these technologies much harder to implement and will have the effect of discouraging their use (an observation, not a question). I realize these are probably not the only issues you need to consider regarding this issue. Please feel free to consult with any other colleagues. I'd be glad to discuss any of these issues further if it would help clarify the questions.



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