

# OHIO DEPARTMENT OF EDUCATION

## Electronic information technology (EIT) accessibility policy.

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- (A) Policy statement. Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 prohibit discrimination on the basis of disability in programs and activities by state agencies receiving financial assistance from the U.S. department of education. The Ohio Department of Education (the “Department”) is committed to ensuring that communication with Department constituents, i.e., employees, guests and visitors, with hearing, visual and manual impairments, or who otherwise require the use of assistive technology to access information, is as effective as communication with those without disabilities.

The Department will ensure that all computer software and systems for public use will permit all persons with disabilities to acquire the same information, engage in the same interactions, and enjoy the same services with substantially equivalent ease of use as those without disabilities.

- (B) Purpose. All electronic and information technology (“EIT”) must be accessible to Department constituents and must adhere to the EIT accessibility standards referred to below, in accordance with the Implementation Timeline.
- (C) Scope. This policy applies to all electronic and information technology, excluding EIT intended for private use only. EIT includes:
- (1) Department web pages and linked information;
  - (2) Distance education and e-learning tools and materials.
- (D) Definitions.
- (1) “Official Department web page.” An official Department web page is any web page created by the Department, its centers, offices, or other administrative offices for the official business of the Department.
  - (2) “Department-related web page.” A Department-related web page is any web page created by or linked from a web page created by Department staff or vendor that are:
    - (a) Linked from an official Department web page;
    - (b) Stored on one of the Department-controlled web servers;
    - (c) Created in support of Department businesses; or

- (d) On servers contracted by the Department.
- (3) “Content editors.” Authorized Department staff trained by the communications staff (“Communications”) and human resources (“HR”) department on the EIT accessibility standards and on the approved content management system such that they are approved to maintain a center or office web page.
- (4) “EIT accessibility training.” Required training conducted by staff of the Communications and HR departments for all content editors prior to having authorization to publish EIT on the Department website, web pages, or any Department EIT.
- (5) “EIT accessibility coordinator.” Staff member, in collaboration with the Department’s Compliance Officer, authorized to coordinate and implement the EIT accessibility policy.
- (6) “EIT accessibility standards.” The Department’s EIT accessibility standards are drawn from Web Content Accessibility Guidelines (“WCAG”), W3C web accessibility initiative (“WAI”) and section 508 standards.  
Links to these accessibility standards’ websites are below:
- Section 508: <https://www.section508.gov/>
  - WAI: <https://www.w3.org/WAI/>
  - WCAG: <https://www.w3.org/WAI/intro/wcag>
- (7) “Implementation timeline.” Plan for the Department to be fully compliant with the EIT accessibility standards.
- (E) Parameters.
- (1) The Department, including its centers, offices and administrative offices, through an authorized content editor, is responsible for ensuring that EIT content is accessible. For existing content, the conversion shall be done pursuant to the Implementation Timeline. For new content, the material will meet the EIT accessibility standards when posted. In addition, all software and IT systems purchased shall produce accessible products and documents and/or shall be compatible with assistive technology.
- (2) Content editors may develop and maintain official Department web pages and are responsible for their content subject to the following requirements:
- (a) Software used to develop official Department web pages will be limited to packages approved by the information technology office (“ITO”).
- (b) Official Department web pages must run on ITO servers or servers contracted for by ITO.

- (c) All official Department web pages and related Department web pages and all EIT must strictly adhere to the EIT accessibility standards.
- (d) The EIT coordinator shall provide direction and guidance on standards to be followed for accessibility of all EIT. The standards shall be posted on the ADA accessibility compliance web page. The EIT coordinator is responsible for developing and implementing a plan to monitor all Department EIT for adherence to EIT accessibility standards. The EIT coordinator is authorized to disable any EIT found to be in violation of the EIT accessibility standards.
- (e) All official and Department-related web pages and all EIT must adhere to:
  - (i) Applicable [copyright laws](#).
  - (ii) Applicable state of Ohio and federal laws and rules.
  - (iii) Employee Handbook Policy 300.01/Workplace Expectations.
  - (iv) EIT accessibility standards.
- (f) The use of Department symbols (i.e., Department logo) and related information should adhere to the Department's graphic identity standards from the office of marketing and communications.
- (g) The following are examples of content prohibited from display on either official Department web pages or Department-related web pages, including all EIT:
  - (i) Unauthorized solicitation or endorsement for for-profit business ventures.
  - (ii) Activities that involve a conflict of interest under Ohio Ethics laws and Employee Handbook Policy 203.0/Ethics Policy.
  - (iii) Adult content (including banners).
  - (iv) Any content covered under Family Educational Rights & Privacy Act ("FERPA"), Ohio Revised Code ("ORC") 1347/Personal Information Systems, Ohio Administrative Code ("OAC") 3301-2 Personal Information Systems.
  - (v) Software or media (i.e., photographs, audio, video, etc.) not authorized for distribution, regardless of the purchase price or copyright status.

- (F) Procedures for creating and posting accessible EIT.
- (1) Authorized content editors and faculty may develop and maintain official Department websites or pages and EIT.
  - (2) Staff in the centers, offices and administrative offices requesting ability to place EIT on the Department website must contact the center/office website manager at in order to be trained and become an authorized content editor.
  - (3) If any EIT is determined to be in violation of the parameters in this policy, including the EIT accessibility standards, an effort will be made beforehand to discuss the violation(s) with the content editor or staff and to correct any errors. The EIT coordinator has the authority to disable any EIT from the Department servers if in his/her discretion such action is necessary.
- (G) Purchasing accessible software compatible with assistive technology. It is the policy of the Department to ensure that all IT software and systems purchased meet the EIT accessibility standards by producing accessible products and documents and the implementation timeline addresses existing software that needs to meet the accessibility standards. The software or systems shall permit persons with disabilities to acquire the same information, engage in the same interactions, and enjoy the same services with substantially equivalent ease of use as those without disabilities. Computer software accessibility purchasing standards will be placed into the terms and conditions and request for proposal documents provided by the office of procurement services.
- (H) Reporting violations.
- (1) All accessibility concerns with any Department EIT should be directed to the EIT coordinator for prompt resolution. Any person desiring to make an anonymous complaint with regard to a violation of this policy or any federal or state law with regard to EIT accessibility may do so by reporting violations through a confidential mailbox.
  - (2) In addition, any person desiring to file a formal complaint for EIT accessibility issues may contact the Title II/section 504 coordinator for students or the Title II/section 504 coordinator for employees. The Department grievance policy can be found at:  
<http://education.ohio.gov/getattachment/About/Website-Accessibility/Grievance-Policy.pdf.aspx?lang=en-US>. The contact information for individuals serving in those roles on behalf of the Department can be found at the Department's web page dedicated to accessibility compliance.
- (I) Contact
- (1) For accessibility questions or to file a complaint, email the Department's [Compliance Officer](#).