

Advancing Digital Accessibility with the AEM Quality Indicators for Higher Education (Practice Brief)

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Abstract

Technology has often been called the “great equalizer” that will bring more opportunity and access with each advancement. That advancement has continued to grow exponentially for decades. Unfortunately, the promise of greater access has not always been fulfilled because digital accessibility for people with disabilities is not guaranteed without intentional effort. Higher education, like many industries, has a long history of failing to meet digital accessibility requirements by both user standards and legal requirements. COVID-19 accelerated the adoption of digital materials and technologies and further revealed the detrimental impact of not planning for accessibility. As a result, institutions of higher education are continuing to receive greater pressure to ensure digital accessibility, which includes growing interest from federal regulators and enforcement agencies. Despite clear expectations for accessibility, there is no single best practice to ensure those requirements are met. It is not clear where to start or how to build a proactive, systemic approach that does not solely rely on the time-consuming process of remediation. This practice brief proposes the adoption of the AEM Quality Indicators with Critical Components for Higher Education as a framework to help postsecondary institutions realize the vision of digital accessibility. The authors will describe the development and use of the AEM Quality Indicators with Critical Components for Higher Education and share experiences and narratives from three experts that have successfully utilized this framework at their institutions.

Keywords: digital accessibility, accessible materials, accessible technology, accessible procurement, disability compliance

The pace of technological advancement has continued to grow exponentially for decades (Weller, 2020). The COVID-19 pandemic, however, accelerated the pressure to quickly adopt new technology that could significantly supplement and often replace the physical environment, including in higher education institutions (Bong & Chen, 2021; Grant, 2021; Lazar, 2022). This quick adoption has, ultimately, left higher education fundamentally changed (Bong & Chen, 2021). While these changes have created opportunities and have kept many higher education institution doors open, they have not necessarily resulted in universal accessibility for disabled students, faculty, or staff (Lazar, 2022).

Part of the problem with digital accessibility for people with disabilities is that without intentional effort, accessibility is not guaranteed (Botelho, 2021; Weber, 2020). Higher education has a long history of failing to meet digital accessibility requirements by

both the legal and user standards (Lazar, 2022). Notable examples of failures go back to at least 2010 when the Department of Justice (DOJ) and the Department of Education (DOE) released a joint “Dear Colleague” letter regarding inaccessible electronic book readers (Perez & Ali, 2010). Since 2010, there have been several notable cases and in 2022 the DOJ signaled a renewed interest in clarifying compliance requirements with an updated “Guidance on Web Accessibility and the ADA,” including a video series to support compliance (DOJ, 2022a; OCR, 2022). The DOJ (2022b) noted that many entities had failed to meet digital accessibility requirements and announced plans to update compliance guidelines to ensure website accessibility. More directly, the Department of Justice and Department of Education released a joint “Dear Colleague” letter in May 2023 highlighting the obligations for institutions of higher education to ensure digital and on-

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line accessibility, and that enforcement actions will be taken to ensure compliance (Clarke & Lhamon, 2023). Indeed, the DOJ followed up on their statements in April 2024 when the agency issued a final rule updating regulations for Title II of the Americans with Disabilities Act (ADA), which established greater accountability for digital accessibility standards (DOJ, 2024). While these regulatory and enforcement steps are welcomed by many, higher education professionals should be taking proactive steps to ensure digital accessibility without the threat of legal recourse or sanctions (Botelho, 2021; Grant, 2021).

The time to strike is now, but where should anyone begin? Digital access is a complex challenge that requires “training, hardware, software, content, and standards [to] work together harmoniously, and each of these elements must be understood as a dynamic process” (Botelho, 2021, p. S27). No single person or department can easily manage each of these elements in a campus or system-wide manner without overreliance on retroactive remediation, which is a waste of effort and resources (Botelho, 2022; Lazar, 2021). Instead, institutions need to methodically build systemic approaches that overcome the decentralized cultures and processes to have a proactive response (Botelho, 2022; Lazar, 2021). The reality is that digital accessibility should not be left only to experts or disabled individuals to address; instead, everyone needs a basic understanding of their shared responsibility including content creation and the selection of new technology (Bong & Chen, 2021; Botelho, 2021; Sanders, Kessel, & Chen, 2022). New processes and approaches should have structures and incentives in place to impart the socio-cultural values of higher education into the decisions related to purchasing new technology, training community members on the new technology, and how to ensure content is accessible (Botelho, 2022; Lazar, 2021; Weller, 2020).

This work can all be quite overwhelming, especially for those empowered to address disability access without knowledge of digital accessibility practices or a centralized footing to address these issues directly. As Lazar (2021) noted, the legal requirements for higher education are quite clear, but there is no single best practice or mechanism for ensuring compliance. To build institutions that incorporate valuing accessibility, we need to have an approach that includes “the wisdom of firm principles and legal guidelines, combined with a high level of delegation, where public, private, and nonprofit sectors play to their strengths” (Botelho, 2022, p. S33). This practice brief explores the benefits of establishing the AEM Quality Indicators with Critical Components for Higher Education as a framework on college campuses to realize this

vision. Participating institutions have experienced improved collaborative relationships, policies, and procedures, all of which have ultimately led to positive outcomes in digital accessibility.

Depiction of the Problem

Inaccessible instructional materials are not a new problem. Colleges and universities have been remediating textbooks and documents for as long as disabled students have attended college. The National Center on Accessible Educational Materials for Learning (National AEM Center) at CAST was previously funded by the U.S. Department of Education, Office of Special Education Programs (OSEP) to improve educational and employment opportunities for individuals with disabilities through technical assistance activities that increase both the availability and the use of accessible materials and technologies. The AEM Center recognized that the issue of inaccessible materials and technology is systemic and took initiative to create proactive solutions. As a result, AEM developed the Quality Indicators with Critical Components for Providing AEM and Accessible Technologies, which are the “evidence-based practices for creating and sustaining coordinated systems for providing and using accessible materials and technologies” (National Center on Accessible Educational Materials, 2020b). The original Quality Indicators were developed in the late 2000s for K-12 systems and initially focused on best practices for providing accessible formats of print materials. In 2016-2017, the Quality Indicators were expanded to include digital materials. In 2018, the first version of the Critical Components was published for use by institutions of higher education.

In 2020, the AEM Center conducted a comprehensive revision of the Critical Components for Higher Education. This undertaking included input from important stakeholders and research-based practice from the literature to develop the robust practices tailored for higher education.

Development of the AEM Quality Indicators with Critical Components for Higher Education

The AEM Center used several methods of information gathering to revise the Quality Indicators with Critical Components for Higher Education. AEM Center staff completed a thorough literature review, conducted interviews with higher education experts, and convened a virtual focus group of higher education accessibility experts to review the first draft of the framework (National Center on Accessible Educational Materials, 2020a). The final product was the

AEM Quality Indicators with Critical Components for Higher Education (Quality Indicators), which was written as a guide for higher education institutions to proactively address digital accessibility for materials and technology.

The framework features the following seven Quality Indicators:

- Quality Indicator 1: A Coordinated System
- Quality Indicator 2: Provision in a Timely Manner
- Quality Indicator 3: Written Guidelines
- Quality Indicator 4: Learning Opportunities and Technical Assistance
- Quality Indicator 5: Data Collection
- Quality Indicator 6: Data Use
- Quality Indicator 7: Resource Allocation

Description of Practice

The Quality Indicators provide postsecondary institutions with a framework for implementing systemic change and progress for the provision of accessible materials and technologies. This framework is not prescriptive and is instead adaptive to the unique needs of each institution. The adaptability of the framework is a key feature because it provides a road map while navigating the unique institutional factors ranging from staffing and expertise to the more complex elements of culture and governance.

Experts serving in different positions from three distinct institutions were recruited to answer questions through Zoom interviews related to the current progress of digital accessibility on their campus and its relationship to the use of the AEM Center's Quality Indicators. Joanne Benica, Director of the Disability Service Center at the University of Southern Maine and Mark Nichols, Senior Director of Universal Design at Virginia Tech University both provided feedback on the Quality Indicators in 2020. Benica has worked with disabled students for over 20 years and serves on the Digital Accessibility Committee for the University of Maine System. Nichols is an IAAP Certified Professional in Accessibility Core Competencies and has expertise in leadership in Universal Design for Learning and Accessible Technology. Philip Vorhees, IT Manager in the IT Accessibility Group at Penn State University and has over 25 years of experience developing and implementing accessibility policy and plans for digital and instructional access in higher education.

Questions centered around benefits, obstacles, processes, policy, partnerships, procurement, and data collection. Each expert shared their respective institution's unique experiences using the Quality Indicators. Common threads included improvements in

process and policies through intentional self-study (or assessment), increased collaborations and partnerships, the adoption of common language, and the benefits of data collection to inform and drive change. Impact of the Quality Indicators on procurement processes varied but each expert expressed the potential for further advancements and positive developments in procurement processes remained a priority.

Observed Outcomes

Impact of the AEM Quality Indicators on Postsecondary Process

Each of the participants represent different levels of responsibility and scope for digital access at their institutions ranging from focus on a single department, to institutional and university system-wide adoption. Still, each participant described positive improvements in digital accessibility through both accessible materials and digital technology after undertaking a self-study with the Quality Indicators. Each respondent pointed to benefits in the following specific areas.

Self-Study or Assessment Tool

Benica acknowledged the benefits and application of the Quality Indicators varies depending on institution. Benica stated that the Quality Indicators are a "framework for looking at where you're at. Are you an institution that has done very little on accessible materials and technology? Then great. These QIs are going to take you through and really help you identify where you need to start." She also shared that the QIs are also useful as an assessment tool for those who already have an existing system in place, which is how she uses the tool. "That's how I've used them. The benefit is to evaluate what we've done. They provide that framework."

Benica explained that the Quality Indicators remain a useful tool in both beginning and reflective stages. Benica stated the following:

In Quality Indicator 1, the first critical component is about "Do you have this collaborative system in place?" Do you have key people at the table? Did we lose somebody? At my institution, because we've had this group for eight plus years, I'm now asking myself, do we have the right people at the table? Is it time to review membership? Are the right campus partners represented? The QIs are helping me answer those questions in reverse. We already have the coordinated system, we already have written guidelines, we already have a definition of timely manner (for providing accessible materials and technologies for students

with disabilities). So, what are we doing now? How can we go back and go, “Have we met these key components?”

Collaboration and Partnership

Nichols has found the Quality Indicators to be a source of collaboration across campus. Nichols points out that Quality Indicator 4, Learning Opportunities and Technical Assistance, led to a targeted approach and centralized solutions. “We established a partnership with IAAP (the International Association of Accessibility Professionals). So, we have both CPACC and WAS grant programs that we facilitate here on campus, specifically for faculty and staff to build capacity in those areas.” Following the training, the participating faculty and staff then participate in a community of practice that contributes to the “accessibility network.” Nichols explained that the accessibility network “provides insight and guidance to help us and to help our centralized campus accessibility working group identify focus areas and target areas to help improve the pain points that they're experiencing.”

Procurement

Voorhees explained that the process of implementing the Quality Indicators at Penn State has led to “a robust accessibility policy” and a “holistic plan process.” Voorhees says Penn State approaches procurement “from the accessibility perspective” and described their procurement policy as “very specific.” He described how the current approach relies on the IT Accessibility unit, but hopes to use assessment and the QI framework to evolve the process. He shared the following:

We are hoping to spread that [procurement accessibility review] out across the university. We do have web accessibility liaisons to deal with these. We want to expand the procurement process so we can flip it and put it at the beginning of the process in the first hour, instead of the 11th hour.

Ultimately, for Voorhees, the goal is to build a system with the right people, and support for the right people, that will make the procurement “less painful, and then determine what is the best thing that will meet their business case as far as adopting and procuring whatever ICT (information communication technology) it might be.”

Data Collection

Each expert interviewed expressed the importance and priority of data collection. They specifically shared how data related to Quality Indicators 5 and 6 might inform their respective institutions and drive continued progress.

Voorhees suggests that the procurement piece naturally produces promising quantities of data collection, noting the following:

We had all sorts of data collection as far as the procurement piece. We can't help but do that because we already have a ton of it. We'll ask questions: Why are we using this? We could be using this? et cetera. Hopefully that data will inform some of that decision-making.

Voorhees also explained the effort to collect and track data related to people that have been trained through the university in order better understand those individuals and their individual roles supporting accessibility.

Benica envisions expanded training opportunities as an ongoing result of the continued use of the Quality Indicators, which will eventually lead to more quality data. She shared the following:

I think one of the ways you broaden it is to talk to faculty about UDL. The faculty piece, to me, it's an opportunity. It's an opportunity to keep talking about “How are you creating your materials? What tools do you need to make sure that your materials that you're putting out to students are accessible? Or what are you doing to make sure that technology that you want all your students to use, how are you ensuring that it's accessible?” So, that's where I think we have room to start thinking about training beyond the standard. It's an overview of what does accessible technology and materials mean. It talks about who uses said technology, so there's an element about disability awareness. And then it reviews our policy, that written guideline that says we have a shared responsibility. As you train, presumably you're going to have better data on the availability of materials and technology.

Nichols has found that data collection is a source of continued improvement and communication. He focused not only on guiding decisions to improve, but also sharing the stories of those improvements. Nichols stated it best:

The (Quality Indicators) have really given us guidance as to what we need to look at, how we should

be collecting data, and just being that foundation for us that we always lean back on. We'll pull back out, and we'll look at, okay, hey, how are we doing on indicator X? Do we have room for improvement? The data collection ones are always, to be honest with you, the ones where we have a lot of areas of improvement. We can always do better with data collection and how we're leveraging that data to...establish smart strategic goals. But also to share the success stories of accessibility.

Implications

As disability resource professionals continue to strive for accessibility and equity on college campuses, the AEM Quality Indicators with Critical Components provide not only a framework to follow, but also proven best practices to share with campus administrators. The Quality Indicators have been found by practitioners to be a useful guide to continue to develop and expand on digital accessibility efforts. The Quality Indicators can serve many roles and can be implemented uniquely at each campus, whether digital accessibility is a new focus of concern or an existing priority. The adaptability makes this an ideal framework for taking action to improve compliance in an otherwise overwhelming task. For that reason, the AEM Quality Indicators with Critical Components for Higher Education are particularly useful for those who have been unsure of where to start because they highlight core areas to evaluate and focus energy. They can be used to marshal resources, find collaborators, and continuously reevaluate progress toward digital accessibility. And, as our expert participants noted in their own experiences, they provide an adaptable structure that can guide strategic improvement one step at a time.

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