
Building a Procurement Process around Accessibility

Kara Zirkle, Accessible Technology Specialist



MIAMI UNIVERSITY

Common Issues of Accessibility

- Services or products are a daily use within Higher Education and thus impact various areas:
 - Inaccessible LMS', University Wide Applications and teaching supplemental applications
 - Alternative texts (textbooks)
 - Document accessibility (Word, PPT, PDFs)
 - Captioning for videos
 - Inaccessible library resources (databases, search, print resources)
 - Additional classroom resources (e.g., iClicker, podiums)
 - Inaccessible university websites/web resources
 - ATMs
 - Access to auxiliary offices (financial aid, registrar)

Challenges around Procurement

- Complexity of procurement related workflows (how many different ways can something be purchased?)
- Magnitude of purchase requests and authorized individuals to make purchases.
- Lack of awareness about accessibility and how it plays into procurement.
- Lack of resources for assessing accessibility of services and goods.

Open Source Contracting

Problem: Many institutions use open source software. Unfortunately, the procurement process usually restricts collaboration and participation. By adding these elements to boiler-plate contracts we hope to encourage better practices. Supporting more effective engagement will allow us to build / maintain the code better.

A great resource to walk through theories, ideas and suggestions:

- Compliments of Mike Gillford: <https://github.com/mgifford/open-source-contracting>

The Basics

- Do you have higher authority support?
- Is there Policy in place around accessibility?
- Do you have access to the proper stakeholder groups? (Legal counsel, procurement, IT, etc.)
- Do you have or consider yourself an accessibility specialist?
- Does the accessibility specialist have a business mindset?

Next Steps

- Start defining what an accessible procurement process would entail.
 - Often this can consist of creating contract language around accessibility, requesting Voluntary Product Accessibility Templates (VPATs) from a vendor, and/or an accessibility road-map where the vendor shows a timeline of future improvements to be made for accessibility.
- Other options may be to run an automated and/or manual test for accessibility on a product demo.
- Provide documentation around receiving, reviewing and reporting findings of the accessible procurement process.
 - Be sure to include possible alternative action plans for accommodations when a product may not be fully accessible. Reviewing the possibility for exceptions that may apply such as fundamental alternation, national security, back office, etc. is also important. Please refer to your policy or standard in which your policy applies to in order to accurately reflect these exceptions.

Procurement Policies and Processes

Recommendations for Procurement processes and policies.

- State the organization's commitment to include accessibility in the procurement process.
- Set out basic provisions, such as asking vendors for Voluntary Product Accessibility Template (VPAT) or to highlight accessibility features when reviewing possible products.
- Determine where best to seek advice in relation to accessible procurement.

Procurement Policy

Mason:

SCOPE

- This policy applies to all George Mason University faculty and staff who may authorize the purchase or development of administrative systems/applications on behalf of the university.

POLICY STATEMENT

- This policy provides for the review of all proposed additions of administrative systems/applications in advance of procurement or development so the university may verify compliance with federal, state, and university policies, eliminate duplication, and ensure compatibility with existing systems. All procurement and/or development of administrative systems/applications must be reviewed and approved by the Architecture Standards Committee (ASC) in advance of purchase or development. The forms and instructions can be found at: <http://ascreview.gmu.edu/>.
- Proposed additions of administrative systems/applications that are not deemed appropriate by the ASC will not be approved for purchase, development, or implementation by any university unit.

COMPLIANCE

- Any administrative systems/applications found to be installed and operating without the approval of the ASC, as of July 2013, is in violation of this policy and will be subject to appropriate disciplinary action, including deactivation and potential removal from the university's systems and network.

Miami Accessible Technology Policy:

Purpose:

- Miami University is committed to providing equal opportunity for qualified individuals with disabilities to participate in, and benefit from, Miami's services, programs, and activities. The purpose of this Policy is to acknowledge that Miami's commitment to equal opportunity for qualified individuals with disabilities includes services, programs, and activities that Miami delivers through web-based, digital, and emerging technologies.

Policy Topics:

- [Web Content](#)
- [Textbook and Course Material Accessibility](#)
- [Student Lifecycle Critical Transactions](#)
- [Student Organization Websites](#)
- [Procurement](#)
- All web technology or software that Miami procures for use by its students shall conform to the relevant accessibility standards (a listing of relevant standards can be found at the AccessMU website) as long as the technology is commercially available and its purchase does not result in undue financial and administrative burdens or a fundamental alteration. If a product is available and meets some, but not all, of the relevant accessibility standards, Miami will procure the product that best meets the standard, unless its purchase would result in undue financial and administrative burdens or a fundamental alteration, or unless an exception applies pursuant to Miami's Accessible Technology Procurement Policy. The AccessMU website contains a [listing of exceptions](#). Exceptions can only be granted by the Procurement Review Committee.

Sample Documents

Policy

- [Example Policies in Higher Education](#)
- [George Mason University](#)
- [Miami Accessibility Policy](#)

Procurement Language (Contract/Addendum/RFP)

- [George Mason University](#)
- [Accessibility for IT Solutions Contract Language](#)
- [Missouri Sample Contract Language](#)

Compliance

- Not only do you need to have the standards set within policy you need the level of compliance.
- Expectations for all areas of study, administration, etc.
- Consequences, Repercussions and finally
- Remediation
- Support Letter from President, VPs, Provost, etc.

Procurement Start-Up Plans

- Create an Accessibility Committee (someone to discuss accessibility and how it can be included into procurement)
- Work with the Procurement Department and incorporate accessibility into the policy.
- Create a Purchasing Review Committee (this could be from an Architectural Standard that could include Security, Accessibility, Infrastructure Compatibility, etc.)

Assessing the Accessibility Issues

- Include accessibility from the start.
- Maintain accessibility review throughout the life of the contract (renewals, addendums, etc.)
- Involve users with disabilities to test applications.
- Train all those with the ability to purchase and educate vendors on the process and accessibility requirement.
- Provide or create an individual or group with the responsibility to oversee purchase approvals.
- Have a sound exceptions qualification (security, fundamental alteration, etc.) along with steps of how this is determined.

Exceptions Requiring Review

- For all web technology or software not subject to the automatic exceptions listed above, that Miami procures for use by students, the Procurement Review Committee may grant an exception only for:
 - Web technology or software for which, after consultation with the Accessible Technology Coordinator, the person or entity requesting the exception can show that no equivalent accessible option is available; or
 - Web technology or software that is used as a standard or common practice in a field of study, industry, or profession.

Best Practices

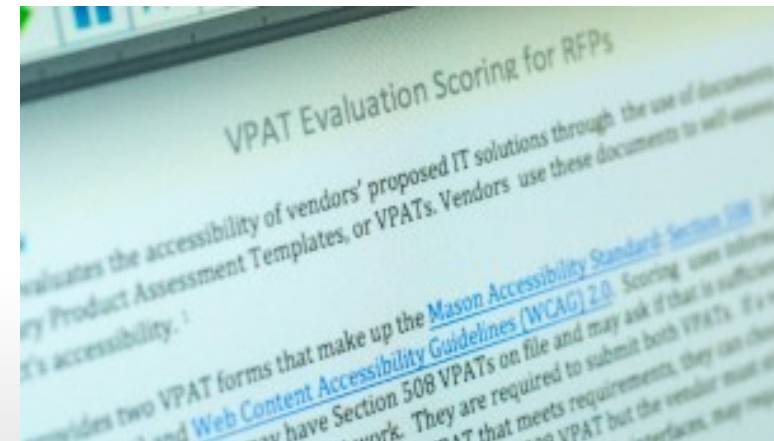
- Establish **Accessibility Policy** that includes **Electronic and Information Technology (EIT)**
- Establish/update **EIT Grievance/Remediation Process**
- Establish/update **Procedures for Procurement**
- Establish **EIT Accessibility Training**
- Establish/update **Accessibility Web Portal/Website**
- Hire **EIT Accessibility Staff**
- Establish **Process for Monitoring EIT Issues**
- Search and Complete vendor for **EIT Accessibility Audit**

Remember You Can't Catch Everything!

- Purchasing and Procurement
 - Prioritize!
 - E.g., monitor all purchases of X value or over \$xxxx
 - E.g., Include accessibility contract language as backstop for all EIT purchases
 - E.g., Establish risk levels (purchases above a certain risk level get reviewed)
 - Testing process
 - Reporting
 - Vendor Response (Timelines and Road Maps)
 - Risk Statements

What Can You Do or Where Do You Start?

- Do you have an automated testing application?
- Do you have students you could ask to test?
- Do you have a testing process?
- Do you test Websites or do you also look at 3rd party applications purchased?
- Minimum – ask for a VPAT (Voluntary Product Accessibility Template)



How to read a VPAT

SECTION 1194.22 WEB-BASED INTERNET INFORMATION AND APPLICATIONS

Criteria

(a) A text equivalent for every non-text element shall be provided (e.g., via alt, longdesc, or in element content).

Supporting Features

Supports

Remarks and Explanations

The product is designed to provide text equivalence for all images, using the alt attribute.

Sect. 508 standard

Criteria

(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation

Supporting Features

Supports with exceptions

Remarks and Explanations

The product does not provide embedded multimedia presentations. Users provide their own content, which may include multimedia presentations.

Vendor opportunity to explain level of support

Alt-text for images (i.e., non-text elements)

Taken from http://udloncampus.cast.org/page/policy_template

E.g., VPAT Matrix

Hardware	Software (Standalone/Web)	Websites	Telecom	Developed Components
Section 508 Standards: 1194.25, 1194.26, 1194.31, 1194.41	Section 508 Standards: 1194.21, 1194.22, 1194.31, 1194.41 Do you have video? If so, include 1194.24 Otherwise complete the full WCAG 2.0 VPAT	Section 508 Standards: 1194.21, 1194.22, 1194.31, 1194.41 Do you have video? If so, include 1194.24 Otherwise complete the full WCAG 2.0 VPAT	Section 508 Standard: 1194.23 Do you use VOIP? Refer to "Software"	WCAG 2.0 Standards as checklist during development Use additional language (ATS must test the developed product for accessibility prior to going live.)

Making the Purchase

Once you have a well rounded process defined for accessibility, begin meeting with the stakeholder groups to gain understanding of the various areas or ways of procurement and the processes around them. Determining ways to track purchases is key to developing a good process around accessibility. Detailed information to track will usually require a database or project management tool. A few examples of possible ways to purchase include:

- Purchase Order (PO)
- License agreement
- Contract or contract addendum and renewal
- Request for Proposal (RFP) or any other documents within the family of RFP such as RFQ, RFI, etc.
- Credit card purchase

Contract Language

- [Vendor] acknowledges that it submitted the voluntary product accessibility template, which indicated the degree to which the [software] complies with Web Content Accessibility Guidelines (WCAG) 2.0, level AA (the “Accessibility Requirements”).
- If you performed testing, apply the report to the contract as Exhibit X
- If vendor provided a response to report or VPAT, attach that road map and timeline as Exhibit Y
- Vendor agrees to correct issues within the timeframe.
- School reserves the right to perform additional testing during agreement. If errors are found vendor will resolve at their expense in an agreed timeline.
- Vendor acknowledges and agrees if accessibility fails to meet requirements, school can terminate the agreement without further liability or obligation to vendor.
- Vendor agrees that it will indemnify and hold harmless the school due to accessibility.
- Hold final payment or certain percentage until final change is made in roadmap.

Documenting and Managing

- We have a form that can be completed to begin a review. This allows the requester to follow along, and us to track our testing.

[Service Catalog](#) / [Accessibility](#) / Accessibility: Client/Vendor Engagement, Procurement Request, or Current Application Review

Accessibility: Client/Vendor Engagement, Procurement Request, or Current Application Review

👉 Get Started

Introduction

What is accessibility? Accessibility is ensuring electronic and information technology, such as our websites, applications and user interface hardware are usable by everyone, including individuals with disabilities.

When you are reviewing potential vendors to decide what to purchase, ready to purchase, renew a contract, or make significant changes to any end-user facing technology assessing the accessibility of that technology is required. This form puts you in contact with the accessible technology team. **The earlier you bring them in to review your plans, the smoother the process may be when procuring.**

When does accessibility apply? Accessibility applies when you can see that there is a user interface (hardware, software or web-based). Accessibility can be at a new purchase, contract renewal or when any significant change is made in an existing product/service. When you purchase, renew a contract, or make significant changes to any end-user facing technology assessing the accessibility of that technology is required.

For questions contact [Kara Zirkle, Accessible Technology Specialist](#) or AccessMU@miamioh.edu

Tracking and Data

- Requester and Vendor Contacts
- Business Case
- Who is the Audience
- Size of Audience
- Deadline for purchase renewal

[Service Catalog](#) / [Accessibility](#) / [Accessibility: Client/Vendor Engagement, Procurement Request, or Current Application Review](#)

Accessibility: Client/Vendor Engagement, Procurement Request, or Current Application Review

[+ Show Help](#) [- Hide Help](#)

When you are reviewing potential vendors to decide what to purchase, ready to purchase, renew a contract, or make significant changes to any end-user facing technology assessing the accessibility of that technology is required. This form puts you in contact with the accessible technology team. The earlier you bring them in to review your plans, the smoother the process may be when procuring.

Requestor *  

This is an individual that is listed as the person asking for assistance.

Kara Zirkle

x

Q

What kind of request are you making? *

What's a good phone number where we can reach you if we have questions? *

Sponsor 

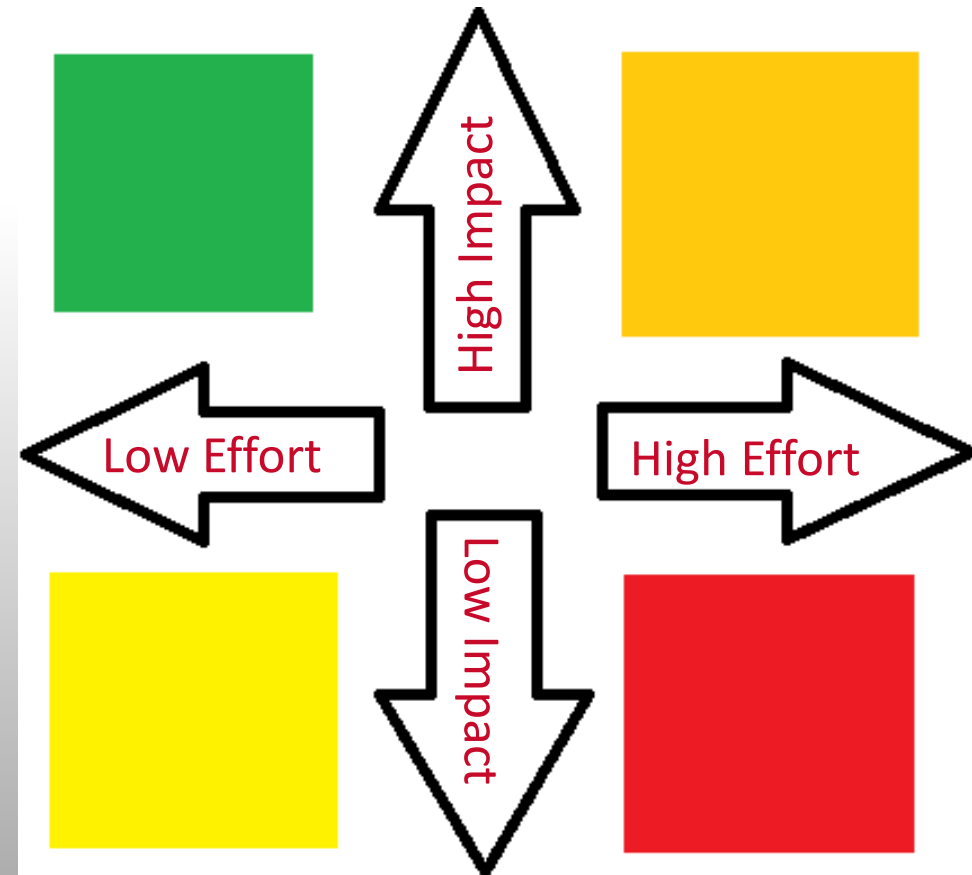
Office at Miami University that is overseeing this request

How to Prioritize?

The higher the impact the higher the priority.

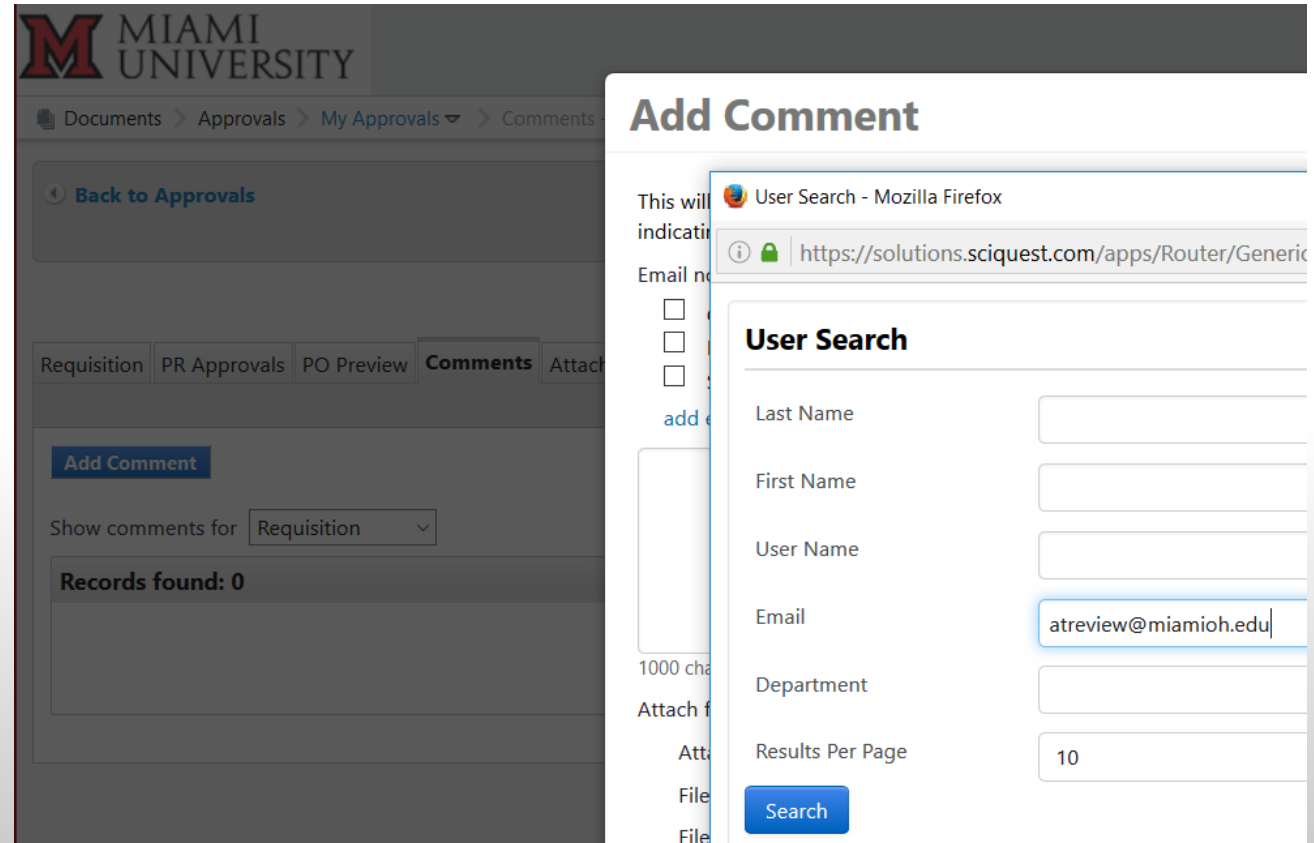
High Impact/High Priority:

Learn what priorities you have as an institution.
For example, number of users vs audience vs use, etc.



Miami current Workflow

1. All requests to purchase originate in Miami Buyway as a requisition for purchase order.
2. A requisition is routed through work flow and approved first by funding source
3. Any IT related software is designated by account code and auto forwarded to IT Department staff for review prior to ordering.
4. Accessibility review is conducted by IT staff



Miami Workflow Continued ...

5. Considerations; classroom, business functions for students, student organization/campus life....
6. In instances where a request for proposal is published the following specification is included and the vendor response will be evaluated accordingly;

Procurement Tickets (232)

Wed 11/15/17 9:12 PM

ID	Title	Product	Requestor Name	Requestor Email	Status	Prim Resp	Modified	Priority	Created	Resolved Date	VendorContactName
2825094	SPINPlus Current Application Review	SPINPlus	Heather Johnston	johnsthb@miamioh.edu	Test Implementation	Unassigned	Fri 9/29/17 10:33 AM	5	Tue 3/21/17 9:51 AM		Bill DeCocco
2845461	Banner XE Current Application Review	Banner XE	Sean Poley	poleysa@miamioh.edu	Test Implementation	Unassigned	Wed 8/23/17 2:58 PM	5	Fri 3/24/17 10:15 AM		Unknown
2845532	Accuplacer Current Application Review	Accuplacer	Deborah Newman	newmandm@miamioh.edu	Test Implementation	Unassigned	Mon 10/16/17 2:21 PM	5	Fri 3/24/17 10:22 AM		Unknown
2845583	CampusBird Current Application Review	CampusBird	Elizabeth Miller	liz.miller@miamioh.edu	Test Implementation	Unassigned	Fri 9/29/17 11:26 AM	5	Fri 3/24/17 10:27 AM		Unknown

Internal Testing and Project Management

The screenshot shows the AccessMU interface. On the left is a navigation sidebar with the following items:

- AccessMU (with notification counts 10 and 11)
- Inbox
- Starred (3)
- Today (8)
- Week (8)
- Client Engagement/Document... (5)
- EEAAP and/or Exceptions pro... (31)
- Cilent Engagement Tasks (8)
- Testing Project Folder (<)
- Duc's Current Workload (6)
- Ryan's Current Workload (6)

The main content area displays a task list:

- + Add a to-do...
- Cerkl - also in TD
- Galaxy Digital Retest TC
- SHOW COMPLETED TO-DOS

The screenshot shows the details for a task titled "Library Chat Module Retest - TD #4189054". The task is assigned to Ryan Potts. The interface includes several options for managing the task:

- Set due date
- Remind me
- Add a subtask
- Add a note... (with share icon)
- Add a file (with microphone and folder icons)

The task history shows two messages:

- Duc Ta** 16 days ago: <https://www.lib.miamioh.edu/askus>
- Duc Ta** 3 days ago: Hi Ryan, please review this:
<https://drive.google.com/open?id=1kOm6PKUJYR-njw--gz3MyXLMXMkHr6vO>
- Ryan Potts** a day ago: Here is the review. It took an hour.

Tracking of Time Spent

- Miami uses Ticket tracking for all projects. We also keep track of our hours spent on each project.

Time Type Hours

Client/Vendor Engagement
Support
Testing

ake comments privat

Details

Last Modified

Fri 9/29/17 12:27 PM by Mark Boyce

Estimated Hours

0.00

Actual Hours

124.02

Take Aways

- It takes a village you can't do it alone, nor should you.
- You will never catch everything, but you have to start somewhere.
- Accessibility is a very fluid environment, not everything will have a black and white answer. Being flexible and knowing the process may constantly change is a given.
- Technology is only as good as those that can use it.



Resources

- [Tech Check](#)
- [SSB Bart Digital Accessibility Maturity Model](#)
- [NCDAE Goals Benchmarking and Planning Tool](#)
- [CSU Professional Development for Accessible Technology](#)
- [Policy Driven Adoption for Accessibility \(PDAA\)](#)

Contact Information – Kara Zirkle

Kara Zirkle, Accessible Technology Specialist

Email: Zirklek@miamioh.edu

Phone: 513-529-9006

Work Twitter: [@AccessMU](https://twitter.com/AccessMU)

- If all else fails, easiest: Find me on [LinkedIn](#) or [Twitter](#)