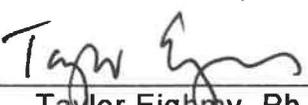


Web Presence and Accessibility Internal Audit Report
Project # 2018-31
April 19, 2018

Reviewed by:



Taylor Eighmy, Ph.D.
President

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Web Presence and Accessibility Internal Audit Report
Project # 2018-31

Objectives:

Determine if the University of Texas at San Antonio (UTSA) web presence is effectively architected and administered to ensure continuous compliance with federal, state and UT System / UTSA accessibility regulations.

Determine if the University of Texas at San Antonio (UTSA) operational controls are in place and functioning to ensure the readability and usability of UTSA's web presence.

Conclusion:

The development, maintenance and management of UTSA's web presence and compliance is the responsibility of various stakeholders across UTSA as illustrated within the Web Presence and Accessibility Roles and Responsibilities Matrix (**Appendix A**). In our opinion, governance and accountability for the UTSA web presence needs improvement to be consistently applied across the university to ensure accessibility compliance and to effectively address ease of use (usability and readability). UTSA's current policies, procedures and practices are not designed to comply with federal, state, and UT System accessibility standards and provisions as illustrated within the recent 2018 Texas Department of Information Resources Accessibility Survey submitted on March 2nd (**Appendix B**).

Non-Priority Recommendations:

- Establish an accessibility policy that includes the standards and specifications illustrated within the applicable federal, state and UT System guidelines. (High)
- Appoint a Web Accessibility Coordinator that is responsible for developing, supporting, and maintaining the university's accessibility policy and trainings. (High)
- Assess the current Web Content Management System to determine its capability to strategically manage the entire UTSA web presence (High)
- Provide periodic web training opportunities and resources to assist web developers who design, redesign, develop, and maintain all university websites. (High)
- Develop and enhance UTSA policies, procedures, processes, and practices to address readability, accessibility and usability for the entire web presence. (High)
- Design and configure a website architecture that provides reasonable oversight, monitoring, accountability and an inventory of all university websites. (Medium)

A Priority Finding is defined as *“an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.”* Non-Priority Findings are ranked as High, Medium, or Low, with the level of significance based on an assessment of applicable Qualitative, Operational Control, and Quantitative risk factors and probability of a negative outcome occurring if the risk is not adequately mitigated. **This audit resulted in five High and one Medium-level findings, but no Priority Findings.**

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Background

Universities need to have a reliable, accessible, effective and attractive web presence. Universities are competing for quality students from the new “igeneration” students who are fully connected and using the internet, social media and smartphones. The online world is an integral part of their life and their primary tool for information gathering, decision-making, success and communication. Numerous research studies and abstracts have been published over recent years regarding the effectiveness of university websites. In summary, these studies identified significant deficiencies in university website usability and the increased reliance on these websites by students in making decisions on which institution to attend. The most common information sought included, majors, course availability, cost, rankings, size, and location. In addition, the younger generation and undergraduates utilized the university web services more than graduate students, alumni and staff.

There are currently about 30,000+ items (sub-sites) under the UTSA home page www.utsa.edu. The University Communications and Marketing Web Services team, which reports to the Vice President for External Relations, manages the design and development of the UTSA home page and about 60 sub-sites. Decentralized web developers in the colleges, departments, institutes, centers, individual professors and student workers manage and/or create the remaining sub-sites. Examples of decentralized managed websites are:

- UTSA Enrollment Services (utsa.edu/enrollment/)
- UTSA One Stop Financial Aid (utsa.edu/financialaid/)
- UTSA On-Campus Housing (utsa.edu/housing/)
- UTSA Financial Affairs (utsa.edu/financialaffairs/)

Furthermore, web accessibility is important due to our changing student demographics as an inaccessible website can create a barrier for many students with disabilities. Several federal, state, or UT System laws, regulations, policies and procedures require UTSA to ensure accessible websites are provided that are clearly organized, and easy to navigate for current/future users. At UTSA, 3.6% of our students self-report a disability to Student Disability Services. Nationally, the self-report rate is about 3% to 5%. In the Office of Veteran and Military Affairs, the (self-reported) disabled veteran’s population is increasing each year by 12%. UTSA has received the following military designations:

- Military Times’ Best for Vets: Colleges 2016 rankings,
- “Top School” for its military culture by Military Advanced Education & Transition,
- One of the most Military-Friendly Schools® in the U.S. by Victoria Media Inc.

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Audit Details

Determine if the University of Texas at San Antonio (UTSA):

- Web presence is effectively architected and administered to ensure continuous compliance with federal, state and UT System / UTSA accessibility regulations, and
- operational controls are in place and functioning to ensure the readability and usability of UTSA's web presence

1. Accessibility Policy

Texas Administrative Code (TAC) 206.70 – Accessibility: “An institution of higher education must establish an accessibility policy” and “Each state website should be designed with consideration for current and emerging Internet connection technologies available to the general public”.

Texas Administrative Code (TAC) 213.41 – Electronic Information Resources (EIR) Accessibility Policy and Coordinator: “Each institution of higher education's accessibility policy shall require a published plan by which EIR will be brought into compliance with the Technical Accessibility Standards and Specifications of this chapter. The plan shall include a process for corrective actions to remediate non-compliant items”.

The University of Texas System System-wide Policy (UTS150) Access by Persons with Disabilities to Electronic and Information Resources Procured or Developed: “all U.T. System institutions must comply with the DIR Accessibility Rules when developing, procuring, maintaining, or using EIRs.”

UTSA Handbook of Operating Procedures (HOP) – 4.22 University Marketing, Branding, and Communications (publication date, December 21, 2017): “In accordance with federal law, UTSA websites must be designed to be accessible, so that people with disabilities have access to online information, data and services comparable to that accorded individuals who do not have disabilities.”

Observation:	UTSA does not have a published Accessibility Policy that meets the requirements of the Texas Administrative Code (TAC). There is a UT System accessibility policy that provides general guidelines to all UT Institutions. However, the accessibility procedures within the UT System policy are not applicable to UTSA's environment. UTSA should develop an accessibility policy and procedures that meets UTSA's needs.
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2. Accessibility Coordinator

The roles and responsibilities defined below by the Texas Department of Information Resources (DIR) assume that the Electronic Information Resources (EIR) Accessibility Coordinator role in a Texas state agency or institution of higher education is a full-time position. If the coordinator has additional job roles and responsibilities, the list below should be carefully prioritized based on the accessibility needs of the agency. Furthermore, the Texas Administrative Code defines this position as the EIR Accessibility Coordinator and UT System Accessibility Policy and Procedures define this position as the Web Accessibility Coordinator. Both of these titles (EIR and Web Accessibility Coordinators) are interchangeable to help ensure compliance with Texas and UT System guidelines. Both guidelines call for an institution "Accessibility Coordinator".

Per the DIR, the (EIR) Accessibility Coordinator's role and responsibilities may consist of (not an all-inclusive list):

- "Provides leadership and guidance, and acts as liaison to all functional areas where EIR is developed or procured
- Develops and maintains policies, procedures, guidelines, and tools that meet the requirements of [1 TAC 206](#) and [1 TAC 213](#); and [TGC 2054.451](#),
- Plans, monitors, and coordinates EIR accessibility activities,
- Develops EIR accessibility strategies and implementation plans,
- Participates in responding to Texas Department of Information Resources' EIR Accessibility Survey as part of the Information Resources Deployment Review, and
- Identifies EIR accessibility training needs and develops training plans to meet those needs".

The following are Texas and UT System guidelines that apply to the position of an agency or institution "Accessibility Coordinator":

- Texas Administrative Code (TAC) 206.70 and 213.41,
- Texas Department of Information Resources EIR Accessibility Coordinator Roles and Responsibilities,
- UTS150 Access by Persons with Disabilities to Electronic and Information Resources Procured or Developed by the UT System Administration and The UT System Institutions, and
- UT System Policy and Procedures.

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Observation:	The position of Accessibility Coordinator and the roles and responsibilities as defined by TAC, DIR, and UTS are not appropriately assigned to an applicable institutional office and/or representative. Presently, the position is assigned to the former OIT Interim Infrastructure / Information Security Officer. This employee's former role and responsibilities do not align with the defined roles and responsibility for an Accessibility Coordinator. Additionally, this employee assists in managing the technical features of the university's information technology and is not responsible for the administration of the web presence.
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3. Content Management System (CMS)

CMS is a software system that provides users that may have limited knowledge of web programming or markup languages as a way to manage digital information on a website through creating and maintaining content. Additionally, CMS is a tool that helps maintain, control, change and reassemble the content on a website. It requires a system administrator and/or web developer to set up and add features, since it is a maintenance tool for non-technical users. Furthermore, the effective management of a web presence can have a useful business application for the organization. A robust CMS can provide the foundation for collaboration, and offer users the ability to manage documents and output for multiple websites. These are examples of key features of any CMS tool (not an all-inclusive list):

- The ability to design, create and maintain personalized content for a website.
- The ability for editors to review and approve content prior to publication.
- The ability to have an automated publishing process.

In October 2014, University Communications and Marketing (UCM) within the Vice President for External Relations submitted a Request for Proposal (RFP) for a Content Management System (CMS). The RFP outlined need for the environment and needs to be:

- "the utsa.edu web presence is comprised of over 30,000 web pages spread over sixty (60) plus web sub-domains and multiple web servers"
- "the University is seeking a Content Management System ("CMS") to provide consistent branding, clear navigation, timely and relevant content and greater efficiency for production for utsa.edu web sites"
- "University anticipates up to 100 concurrent users.

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- “For sub-domains, the CMS is to support 1-50 sub-domains”
- “For web servers, The University expects the CMS to push to 10 servers”

The Cascade Content Management System was purchased and installed in 2015.

Observation:	The Cascade Content Management System (CMS) has been solely utilized by University Communications and Marketing (UCM) to manage the UTSA home page and about 60 sub-sites. The Cascade CMS was not strategically made scalable to manage and accommodate the entire UTSA web presence. However, UCM has gradually begun (on a volunteer basis) transferring college, department, office, or individual web sites into CMS, so the decentralized web developers can take advantage of the CMS features and benefits.
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4. Web Developers Guide and Training

Texas Administrative Code (TAC) 213.39 – Accessibility Training and Technical Assistance: “The president or chancellor of each institution of higher education shall ensure appropriate staff receives training necessary to meet accessibility-related rules”.

The University of Texas System System-wide Policy (UTS150) Access by Persons with Disabilities to Electronic and Information Resources Procured or Developed section 4.3: The “U. T. System Institution President. Ensures that all appropriate staff at the U. T. System institution receives training necessary to meet all accessibility-related rules.”

UTSA Handbook of Operating Procedures (HOP) 4.22 – University Marketing, Branding and Communications and HOP 8.13 – The Organization and Appropriate Use of the Internet at UTSA:

Furthermore, to enable web developers to comply with applicable readability, usability and accessibility policies, regulations and guidelines. As an industry best practice, the institution would provide training opportunities for web developers and ensure other web development resources are available to aid developers of web-based content (including but not limited to UTSA websites and web-based online courses). Standardization assists in simplifying the user experience, and greatly helps those who design, redesign, develop and maintain websites. The use of

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common tools and techniques will allow users to reinvest their resources in other vital areas of the Web development such as the overall “user experience”.

Observation:	A web development guide, associated tutorials and support resources are not available to the UTSA web development community. Currently, web developers or persons assigned the website design, redesign or maintenance roles at each college, department, program, office, division, or other entity of UTSA has limited access to training opportunities and resources necessary to assist in the accomplishment of their duties. The limited trainings / resources that are available relate to the Cascade Content Management System (CMS). However, the decentralized web developers use applications other than Cascade CMS to develop and design their websites.
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5. Accessibility, Readability and Usability

University website development policies, procedures and processes should address readability, accessibility and usability as well as brand compliance. The following are some examples applied at other universities and may be applicable to UTSA based upon centralized and decentralized web design / maintenance roles throughout the university:

- University Communications and Marketing (UCM) or other relevant web management department should provide administrative oversight via guidance, review and approval of websites prior to them being published to ensure readability, accessibility and usability based upon university standards.
- Colleges, offices, divisions, or other entities of the university should have web developers to support their specific college or departmental web presence in accordance with readability, accessibility and usability guidelines.
- The university should have established procedures and accountability to perform periodic reviews of external and internal websites for readability, accessibility and usability.
- The establishment of web developer working groups that meet periodic to discuss university’s best practices, changes to applicable federal or state regulation or guidelines.
- Provide development documentation and continuous training sessions to aid developers in creating UTSA websites that comply with the university’s readability, accessibility and usability standards.

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- Prospective students, current students and staff should be recruited to perform usability testing on individual web sites prior to being published. Usability testing would ensure websites are capable of being used, convenient and practicable for the entire campus community (students, faculty, staff, and external parties). Additionally, this type of testing with users may assist in determining other potential deficiencies that relate to readability and accessibility that automated testing tools cannot provide. Reliance on automated testing is not a replacement for manual or use case testing.

UTSA HOP 4.22 – University Marketing, Branding, and Communications (publication date, December 21, 2017) :

- “Communications and Marketing has oversight responsibility for the creation of new UTSA websites...”
- “All UTSA colleges, departments, programs, offices, divisions, individuals and other UTSA entities are responsible for ensuring their website(s) remain brand compliant and reflect the core values of university”.
- “In accordance with federal law, UTSA websites must be designed to be accessible, so that people with disabilities have access to online information, data and services comparable to that accorded individuals who do not have disabilities. UTSA follows the standards established under Section 508 of the Rehabilitation Act of 1973, amended in 1998 by the Work Force Investment Act (Section 1194.22 and its subsequent amendments) as its minimum requirements for web accessibility. The Web Content Accessibility Guidelines established by the World Wide Web Consortium’s Web Accessibility Initiative (W3C-WAI) includes guidelines that are not addressed in Section 508. These Guidelines are preferred as a UTSA best practice”.

Observation:	<ul style="list-style-type: none">• In Fall 2016 and Spring 2018, readability and accessibility tools were used to examine a sample of 8 internal and 19 external / public facing websites that are commonly viewed by prospective students, current students, staff and faculty employees for their level of readability and accessibility. For example,<ul style="list-style-type: none">○ Future Roadrunners (future.utsa.edu/)○ One Stop Financial Aid (utsa.edu/financialaid/)○ One Stop Scholarships (utsa.edu/scholarships)○ On-Campus Housing (utsa.edu/housing/)
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	<ul style="list-style-type: none"> ○ International Gateway (international.utsa.edu/) and ○ The Graduate School (graduateschool.utsa.edu/) <ul style="list-style-type: none"> • 27 websites were determined to have not been written to an acceptable reading level for UTSA common users, as the levels were considerably higher than the national average 7th grade level. • 27 websites were identified to contain multiple web content accessibility errors. 12 of these sampled websites are administered by University Communications and Marketing (UCM) and 15 are not administered by UCM as they are administered by their respective colleges, departments, and offices. In addition, a limited quantity of the university's web presence is housed within the Content Management System managed by UCM. <p>Usability was not examined during the audit review. However, through limited interviews that were performed with university stakeholders, it was determined (verbally) that usability is not consistently being addressed by the university's colleges, departments, and offices. Due to this determination, it is being documented here for management's consideration with the overall readability, accessibility and usability audit observation.</p>
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Risk Level Observations 1-5:	The combination of these five observations is considered HIGH due to the probability of loss of funding, legal action, and/or adverse impact on the university's reputation related to accessibility, limited oversight, and management's alignment of people, process and technology to efficiently accomplish organizational objectives. In addition, control or process improvement opportunities may provide measurable economic results related to accessibility, readability and usability.
Management's Response for 1-5:	The Deputy Officer for Business Affairs is coordinating with other stakeholders to define a proposal on how UTSA should address accessibility concerns across the university that were identified during this audit review and the 2018 Institution of Higher Education Accessibility Survey recently sent to the Texas Department of Information Resources. The proposal will address the need to re-assign or hire an individual knowledgeable with the accessibility guidelines related to Section 508 of the Rehabilitation Act and Texas Administrative Code 206 and 213. Upon the fulfillment of this position (an Information Architect), aligned appropriately within the university's organizational environment, this position will have the responsibility for the development of the university's accessibility policy (that will

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	identify a web accessibility coordinator) and recommend resources required to support a content management system, readability, usability of university websites, determine requirements and delivery of training, etc. He/she will develop a continuous plan to monitor and ensure compliance with federal, state or other best practice accessibility guidelines. Coordination and collaboration with other stakeholders such as the ADA Committee, ADA Coordinator, IRM / EIR Coordinator and Web Accessibility Coordinator will be ensured.
Responsible Person:	Barbara J. Baran-Centeno, Deputy Officer for Business Affairs
Responsible Vice Presidents:	Vice President For Business Affairs Vice President for External Relations Vice President for Student Affairs Provost and Vice President for Academic Affairs
Implementation Date:	Proposal to Senior Leadership Team (SLT): June 30, 2018 Other key milestone dates TBD after proposal to SLT and their agreement to proceed or accept risk.

6. Website Architectural Design

Website technical architecture for Institutions of Higher Education is imperative for reasonable oversight and monitoring, the web developers, end-users and an increase in search engine optimization. In addition, the structure of the main homepage and the related linked websites (that include the university domain, various subdomains, and multiple subdirectories) plays a significant role in the design of a reasonable, efficient, rational and logical website architectural strategy.

The University should consider the utilization the hierarchal features of domains, sub-domains, and directories to provide an appropriate level of accountability, protection and an inventory of active university websites to include the web servers that process the requests to distribute information on the internet. Furthermore, consideration should be taken as to which UTSA websites are available to the public through the internet and which UTSA websites are available to private users through the intranet.

Observation:	The current website architecture has evolved through the years and was not designed to facilitate the efficient and effective management, oversight, accountability and monitoring of the estimated 30,000+ websites/documents that are accessed through UTSA.edu main web presence.
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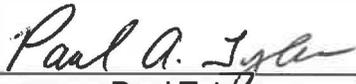
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Risk Level:	The technical architecture is considered MEDIUM due to key organizational technical processes and components not being utilized effectively to meet web presence management objectives are exposed to moderate risks, yet to be addressed, potentially impacting achievement of university initiatives.
Management's Response:	<p>Upon designation of the appropriate governance body, (Information Architect or other designated approving authority), the University Communications and Marketing Web Services team (Web Services) and the Office of Information Technology will meet with the appropriate individual(s) to determine a plan of action. A technical architectural configuration, strategy and plan will be developed to provide efficient and effective management, oversight, accountability and monitoring of the estimated 30,000+ websites/documents that are accessed through UTSA.edu main web presence.</p> <p>In the interim, Web Services will work with OIT to audit the existing utsa.edu web framework.</p> <ul style="list-style-type: none"> • Web Services and OIT will evaluate the existing primary web servers (co-managed by Web Services and OIT), to identify areas of improvement for availability and content management. • Web Services and OIT will implement improvements to the primary web server infrastructure to increase availability under high traffic situations. • Web Services and OIT will implement improvements to the web server infrastructure to provide improved manageability of access for external content managers.
Responsible Persons:	Shashi Pinheiro, Associate Director of Web Services and Mark McCoy, OIT Manager, Platform Application Services
Responsible Vice Presidents:	Vice President for External Relations Provost and Vice President for Academic Affairs
Implementation Date:	Date for completion of interim activities is 02/28/19. The final implementation date is dependent upon the action plan(s) for items 1-5 above.

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CONCLUSION

The development, maintenance and management of UTSA's web presence and compliance is the responsibility of various stakeholders across UTSA as illustrated within the Web Presence and Accessibility Roles and Responsibilities Matrix (**Appendix A**). In our opinion, governance and accountability for the UTSA web presence needs improvement to be consistently applied across the university to ensure accessibility compliance and to effectively address ease of use (usability and readability). UTSA's current policies, procedures and practices are not designed to comply with federal, state, and UT System accessibility standards and provisions as illustrated within the recent 2018 Texas Department of Information Resources Accessibility Survey submitted on March 2nd (**Appendix B**).



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This engagement was conducted in accordance with The Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing.

Appendix A: Web Presence and Accessibility Roles and Responsibilities Matrix

VP for Business Affairs	VP for External Relations	VP for Academic Affairs (VPAA)	VP for Student Affairs	OIT <i>(Reports to VPAA)</i>	ADA Accessibility Committee / Co-chairs
<p>Procurement of Electronic and Information Resources (EIR) includes internet websites (a) home page, and (b) any key public entry points. Additional EIR related items can be found under UTS150.</p>	<p>University Communication & Marketing – Web Services, per Handbook of Operating Procedures, has oversight responsibility of UTSA websites under the home page UTSA.edu.</p>	<p>Faculty are to provide accessibility accommodations to current students with impairments or any disabilities. There is not presently a resource for Faculty to turn to get accessibility assistance.</p>	<p>Student Disability Services (SDS) presently assists Faculty and (self-reporting) Students with providing available accessibility accommodations.</p>	<p>Web Accessibility Coordinator (vacant) role was previously under OIT. Per TAC 213, UTSA shall inform Department of Information Resources (DIR) within 30 days of whenever the accessibility coordinator (AC) position is vacant, or a new or replacement is elected. The IRM or head of the organization informs DIR by completing the online form (Designated EIR-AC).</p>	<p>The ADA Accessibility Advisory Committee is not funded. Annually a report is submitted to the President’s Office. They are considering updating their committee charter based on the audit review.</p>
<p>ADA Coordinator for employees is located under Human Resources (HR). The coordinator assist in providing accommodations to employees, and guests. Students are referred to Student Disability Services (SDS).</p>		<p>Colleges/Depts/Offices web developers (<i>this applies to all VP areas</i>) are responsible for ensuring website compliance for their individual websites. Training is limited to ensure their compliance.</p>		<p>The Office of Information Technology (OIT) provides technical infrastructure. OIT is not responsible for web content. They manage the containers of the content.</p>	<p>The ADA Accessibility Committee consist of 16 representatives from various colleges, depts., and offices that meet on a quarterly basis or as needed.</p>
				<p>Interim CIO is also known as the UTSA Information Resources Manager (IRM) Coordinator whom recently completed the DIR accessibility survey with the assistance of other related parties.</p>	<p>The current ADA Accessibility Committee Co-chairs are Dianne Hengst and Carolyn Ellis. Former ADA Accessibility Committee Chair was Annette Rabago (ADA Coordinator).</p>

Appendix B: DIR Higher Education Accessibility Survey Response 2018

2018 Accessibility Survey

Response ID:62 Data

1. 2018 IHE Accessibility Survey

1. Please select your organization.

743 University of Texas at San Antonio

Other Organization:

2. Are you the institution's designated Information Resources Manager?

Yes

3. Are you the institution's designated EIR Accessibility Coordinator?

Yes

4. Please enter your institutional email address.

Bryan.Wilson@utsa.edu

2. 2018 IHE Accessibility Survey

5. Has your institution participated in the state's free website accessibility scanning program?

No, but we plan to

If not, which of the following best describes why?

6. Does your institution test new and changed agency webpages and website designs for accessibility compliance?

Yes - some pages

7. How does your institution test new and changed agency webpages and website designs for accessibility compliance? Choose all that apply.

Manual testing is performed during development of new pages

Manual testing is performed before deploying changed pages

8. What percentage of your institution's externally-facing webpages are in full compliance with state accessibility requirements, 1TAC 206 and 213?

Less than 50%

9. Does your institution test new and changed web-based applications for accessibility compliance?

Yes - some pages

10. How does your institution test new and changed web-based applications for accessibility compliance? Choose all that apply.

Manual testing is performed during application development

Manual testing is performed before deploying changes

11. What percentage of your institution's web-based applications, are in full compliance with state accessibility requirements, 1 TAC 206 and 213?

Data not available

12. Does your institution document results of accessibility compliance testing?

No

13. Which of the following challenges has your institution faced when attempting to achieve compliance with state accessibility requirements? Choose all that apply.

- Lack of staff with required knowledge/skill sets
- Lack of available training to raise accessibility compliance
- Insufficient budget for staff, training, or technology
- Limitations in technology used in development environments
- Limitations in Commercial Off The Shelf software (COTS)

14. Optional: Please enter any additional comments about EIR accessibility.

3. 2018 IHE Accessibility Survey

15. Each agency must comply with all state website accessibility standards and provisions as defined in 1 TAC 206.70.

Not in compliance

16. Each agency must comply with all listed accessibility standards for products and services as defined in 1 TAC 213.30-213.36.

Not in compliance

17. Each agency must comply with all accessibility compliance exceptions and exemptions provisions as defined in 1 TAC 213.37(1)-(4).

Not in compliance

18. Each agency must comply with all accessibility procurement provisions as defined in 1 TAC 213.38(b)-(g).

In compliance

19. Each agency must comply with the accessibility training and technical assistance provision as defined in 1 TAC 213.39(b).

Not in compliance

20. Each agency must comply with the accessibility survey and reporting requirements provision as defined in 1 TAC 213.40(b).

In compliance

21. Each agency must comply with all accessibility policy and coordinators provisions 1 TAC Sections 213.41(b)-(f).

Not in compliance

22. Optional: Please enter any additional comments you have about EIR accessibility compliance.

Because this is either yes or no with no ability to respond some degree of compliance difficult to say we are in compliance.
Too many people can create website and software to say for sure we are in compliance with all.

4. 2018 IHE Accessibility Survey

23. Which of the following accessibility metrics does your institution measure, or plan to measure, to ensure electronic information resources are accessible? Choose all that apply.

	Currently measuring	Plan to measure	Not measuring
General Accessibility Awareness and Overview training		X	
MS Office Accessibility training		X	
PDF Accessibility training		X	
Developer training (WCAG 2.0)		X	
Project Manager training		X	
Procurement Staff training		X	
Percentage of compliant web pages		X	
Percentage of compliant web documents		X	
Percentage of web videos captioned		X	
Percentage of accessible EIR offerings procured		X	
Percentage of accessible applications developed		X	
Total number of accessibility exceptions or exemptions		X	

24. Enter any additional comments regarding accessibility metrics.

Again we plan to measure to the best we are able. Ann ADA committee been established to review issues.

5. 2018 IHE Accessibility Survey

25. Optional: Please enter any additional comments or suggestions regarding electronic information resources accessibility initiatives or programs.