

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM  
Policy # 7.008

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Title: Accessibility of Content Delivered Electronically

Authority: Board Action

Original Adoption: Initial  
Effective Date: January 1, 2018  
Last Revision: January 1, 2018

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**Access to Content Delivered Electronically**

To facilitate compliance with the Federal Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, the LCTCS and all member institutions will establish policies and procedures for the management and administration of any websites (internet and intranet) under their jurisdiction, to include online content and functionality developed by, maintained, or offered through third-party vendors that, at a minimum, meet the following:

**Responsibility of LCTCS Colleges and Board Office:**

1. Any existing content, functionality and accessibility prior to the effective date of this policy shall comply with “benchmarks for accessibility” timeframes as required by any agreement(s) entered into by the LCTCS with the U.S. Department of Education, Office of Civil Rights (OCR).
2. Any new or modified content, functionality and accessibility provided after the effective date of this policy and afterwards shall comply with “benchmarks for accessibility” as required by any the U.S. Department of Education, Office of Civil Rights.
3. Internal written procedures will be developed that specify the following:
  - a) The offices or positions responsible for content, functionality and accessibility and their respective roles/duties as related to the management of websites under their administration.
  - b) The written procedures shall specify a documentable process by which content, functionality and accessibility issues are reviewed and tested for compliance with “benchmarks for accessibility” prior to their implementation in a live environment.
  - c) A process by which all content delivered electronically under their administration are reviewed and tested, at a minimum once quarterly, via software specifically for the purpose of identifying non-compliance with “benchmarks for accessibility”.
  - d) Notice shall be made available to persons with disabilities regarding how to request the webmaster or other appropriate personnel

regarding online information or functionality that is currently inaccessible with an office or position designated to perform this function.

**Oversight Responsibility of LCTCS Board Office:**

1. The LCTCS Board Office shall institute a process for scanning materials delivered electronically for all LCTCS entities, via software designed for such purpose that meets requirements of the Federal Office of Civil Rights, at regularly scheduled intervals not to exceed once quarterly during the calendar year.
2. The LCTCS Internal Audit Department shall specify a process by which the results of these scans are provided to them and will audit these results to ensure compliance with OCR guidelines. Any non-compliance issues identified shall be reported to the board at least once a year. The Internal Audit Division, or other auditor with the qualifications required with sufficient knowledge or expertise in website accessibility for people with disabilities, shall provide for a “Corrective Action Plan” to address any deficiencies identified. Such “Corrective Action Plan” shall comply with the requirements stipulate by the OCR.
3. A process by which accessibility training is provided, at least annually, to all appropriate personnel, including but not limited to: webmasters, procurement officials, and all others responsible for developing, maintaining, or auditing web content and functionality. Documentation will be maintained to provide the list of invitees and attendees, including their titles; a description of the delivered training content; and the presenter’s credentials for giving such training.