

Web Accessibility Policy and Resolution Procedure

[Revised Policy with Corrected URL*]

Effective: August 14, 2018

Introduction

This Web Accessibility Policy and Resolution Procedure (“Policy”) implements section 1 of the Ohio Virtual Academy (“OHVA”) Resolution Agreement with the Office of Civil Rights (“OCR”) of the U.S. Department of Education, OCR Docket Number 15-16-1299, October 18, 2016. Section 1 requires the adoption of a policy to ensure that information available through our Website (www.ohva.k12.com) is accessible to our students, prospective students, employees, guests and visitors with disabilities, particularly to those with visual, hearing or manual impairments or who otherwise use assistive technology to access information.

Accessibility Standard

While no technical standard has yet been determined that is universally recognized to meet the legal requirements and needs of all persons with disabilities under Section 504 of the Rehabilitation Act of 1973 or Title II of the Americans with Disabilities Act, this Policy adopts the Web Content Accessibility Guidelines 2.0 Level AA (“Guidelines”) as the technical standard that OHVA strives to achieve.

Point of Contact

OHVA hereby designates as its Accessibility Coordinator its school management company, K12 Virtual Schools L.L.C. (“K12”), and the K12 Accessibility Manager is the role within the K12 organization responsible for the oversight of web accessibility compliance and implementation. The Accessibility Coordinator may be assisted by other personnel and contractors as appropriate under the circumstances. The Accessibility Coordinator can be contacted at: Accessibility Manager, K12 Virtual Schools L.L.C., 2300 Corporate Park Drive, Herndon, VA 20171, Phone: 866-512-2273, <https://www.k12.com/accessibility.html>.

Implementation

OHVA personnel responsible for publishing content on the Website or for acquiring Third Party Content that is made available through the Website (“Third Party Content”) shall use good faith efforts, subject to the requirements and exceptions of applicable laws, to bring the Website and the Third Party Content into conformance with the Guidelines. Through contracts entered into with Third Party Content providers, new and revised Third Party Content website pages and other Third Party Content will be required to meet the requirements of the accessibility standards and Guidelines.

In the event that the Guidelines are insufficient to address a particular disability or impose an undue burden due to the nature of the content, OHVA will provide content in a suitable alternative format (e.g., electronic text file or audio description) or manner where necessary. Such alternative format may not produce the identical result or level of achievement for persons with and without disabilities but must afford persons with disabilities equal opportunity to obtain the same result, to gain the same

benefit, or to each the same level of achievement, in the most integrated setting appropriate to the person's needs.

Training

Personnel responsible for publishing content on the Website will be trained in designing and creating accessible web pages no less than annually. Training will be provided by qualified persons, through online training programs vetted by the Accessibility Coordinator or by a combination thereof. Training will include information on:

- Creating new and revising existing Website pages in conformance with the Guidelines;
- How to ensure accessibility in web design, documents and multimedia content;
- Testing those pages prior to publication for conformance with the Guidelines;
- Accessing the pages after publication through a web browser and testing the pages for conformance with the Guidelines; and
- This Policy.

Testing will include:

- Viewing, using and listening to the page through all of these browsers:
 - Internet Explorer
 - Chrome
 - Safari
 - Firefox
- Viewing, using and listening to the page on the following platforms:
 - Windows
 - McIntosh
- Testing the page using the following accessibility checking tools:
 - aXe
 - W3C Checklist of checkpoints for Web Accessibility Guidelines.
*<https://www.w3.org/WAI/standards-guidelines/wcag/>. Keep a completed copy of this checklist for each page/site reviewed until a new change is made and the new documentation supersedes this.
 - WebAIM tools
- Reviewing the page for issues that the automated checking tools cannot identify (e.g., color contrast or text alternatives to items conveyed with color.)

Audits

Under the direction of the Accessibility Coordinator and at regular intervals, but in no event less than annually, information available through the Website will be audited to determine whether it is in conformance with the Guidelines. The pages and Third Party Content audited and any problems identified will be documented. Problems identified through the audit will be evaluated and, if necessary, remediated within a reasonable period of time. Completion of the remediation will be documented.

Resolution Procedure

In order to inform, students, prospective students, employees, guests and visitors that they may report violations of accessibility, OHVA will follow the K12 Resolution Procedure which shall be published on the Website. The K12 Resolution Procedure will provide as follows:

Should a user encounter difficulty in accessing the OHVA Website, the user should follow the Resolution Procedure which includes a step-by-step approach to address specific grievances, which inevitability will vary by the type of disability and the technology available to address user accessibility issues. While members of the public in general may experience web accessibility problems, priority is given to issues encountered by students, their parents/guardians and their learning coaches and by persons interested in enrolling in the school.

When experiencing accessibility issues, a user has two (2) options available. First, the user can make direct contact by completing the form at the Accessibility link on the primary entry page of the website. In the alternative, the user can contact 866-512-2273 to make a formal complaint regarding accessibility through the school's Section 504 and Title II grievance procedures.

Using the first option, information in the form will be submitted to K12's Accessibility Coordinator who will acknowledge receipt of the information within approximately two (2) business days after receipt of the information. The Accessibility Coordinator has sufficient resources and authority to coordinate and implement this Policy and Procedure and related commitments.

The Accessibility Coordinator will investigate the complaint to determine the nature of the problem. Once that assessment is completed, the Accessibility Coordinator, in consultation with other appropriate persons (and, if necessary, one or more third parties), will develop a written remediation plan. While most web accessibility issues have a solution, there are some web accessibility problems for which there may not yet be a feasible technological solutions or assistive alternatives. For example, a student with blindness or deaf/blindness may need a tactile graphic of a map or a coordinate grid rather than a digital version. If that is the case with an issue that is reported, the Accessibility Coordinator will research beyond OHVA's own knowledge and resources in an effort to resolve the accessibility issue provided it does not result in a fundamental alteration in the nature of a service, program or activity or in undue financial and administrative burdens under Section 504 and Title II. The Accessibility Coordinator will provide the user with a written explanation of the efforts made and the results.

Within ten (10) business days after the issue is reported, the Accessibility Coordinator will respond with a proposed solution. Simpler solutions may be addressed more quickly. The Accessibility Coordinator will monitor the progress of the remediation to ensure resolution by the projected completion date. If there is likely to be slippage of more than seven (7) business days in projected completion, efforts will be made to put the project back on its original path to completion.

Accessibility Coordinator:

Accessibility Manager
K12 Virtual Schools L.L.C.
2300 Corporate Park Drive, Herndon, VA 20171
Phone: 866-512-2273

<https://www.k12.com/accessibility.htm>

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