

FLORIDA STATE UNIVERSITY OFFICE OF DISTANCE LEARNING

2017 Student Technology Fee Proposal:



for Accessibility File Conversion and Compliance Reporting for Canvas

Prepared for:	Student Technology Fee Advisory Committee
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December 8, 2017

Project Description

Background

On January 18, 2017, revised information and communication technology (ICT) standards and guidelines created by the U.S. Access Board (generally referred to as the "Section 508 Refresh" or "the Refresh") were published in the Federal Register. The new Section 508 standards incorporated into the federal acquisition requirements apply to information and communication technology that is used, developed, procured, or maintained by federal and state agencies that accept federal funding, including public universities. As a result, the Refresh updates the standards and rules that govern what makes digital content accessible under the Americans with Disabilities Act (ADA) and other legislation that regulates access for persons with disabilities.

The new standards also indicate that all types of public-facing content, as well as specific categories of non-public-facing content that are created and/or used would have to be accessible to people with disabilities. Previously, it was not clear if this content was covered under Section 508, especially when it was not posted to a website. The result is that, with these new rules, all of Florida State University's course content posted in Canvas, regardless if the course is in-person or online, is required by law to be accessible by persons with disabilities.

Moreover, in the past when FSU instructors were given notice of accommodation for students with disabilities, instructors had some time to remediate the course content with the assistance of the Student Disability Resource Center (SDRC) and the University Libraries. Recent lawsuits brought against universities by the Department of Justice (DOJ), Office of Civil Rights, and the resulting settlements indicate this window of notice and remediation is collapsing. Settlements indicate that the DOJ now interprets any unnecessary delays in accessing material as discrimination. For instance, an October 2016 settlement with the University of Miami, Ohio, states that the university, working with the course instructor, must meet "no later than two (2) weeks before the beginning of each course" to "Identify all materials, including multimedia, that will be provided to or used by students, as well as which materials will need to be converted each week of the semester, to the extent the information is set forth in the course syllabus or is otherwise available." The settlement also requires the university to establish a website where students can notify the university of course material that is not accessible upon which the university will have "three (3) business days of an individual's submission or upload [to] transmit to the submitting individual a remediated version of the inaccessible file, unless such factors [...] necessitates additional time." The trend is moving toward no delays for accessible versions of course content.

As the 508 Refresh and Miami's settlement, as well as others like it, demonstrate, the DOJ, and other disabilities advocacy organizations acting on their behalf, are becoming more demanding regarding course content accessibility. This creates a large liability for Florida State because the vast majority of course content delivered digitally does not meet the new Refresh formats.

Impact on Instruction

This proposal is for a pilot installation of Blackboard Ally, an LTI add-on for the university's Canvas learning management system (LMS) that will allow the following:

- 1. For Students: On-demand accessible versions of noncompliant course content
- 2. **For Instructors**: Visual indication of course content compliance and instructions on how to permanently remediate content
- 3. For University Administration: Compliance reporting that spans from the course level to the entire university

This one-year pilot of Blackboard Ally is proposed as a step to address Florida State University's potential liability regarding its current ADA and 508 Refresh course content noncompliance. This pilot would offer a cost-effective way to test the ability of the software to remediate noncompliant content on-demand as well as inform and empower our faculty to remediate noncompliant content on their own. The pilot would also provide a way for the university administration to run department-, college-, and university-wide reports to determine the scope of noncompliance and track the university's effort to become more compliant. The pilot, which would last one year, would cover two to three colleges/departments that cumulatively generate under 4,000 FTE. The participating colleges/departments are to be determined.

The pilot of Blackboard Ally would allow the Office of Distance Learning (ODL) and the participating colleges/departments to evaluate the following functions:

- **On-Demand Document Remediation**: The best way to ensure that course content is accessible should an accommodation request occur is for the content to be created in an accessible way. However, this is not always possible. There are millions of legacy documents in FSU courses that do not meet ADA standards. Blackboard Ally offers students the ability to access course content in accessible ways without any delays. This is achieved by on-demand remediation. Blackboard Ally adds an additional downloadable option that lists the possible accessible and alternative formats the documents can be converted into for immediate use. (See Appendix I, Figure 1.) Upon selection of the menu option "Accessible versions," Ally presents the student with the accessible versions available on-demand based on the original file's format and the file's accessibility issues. (See Appendix I, Figure 2.)
- Compliance Feedback for Instructors: Providing on-demand remediation for noncompliant documents is a great stop-gap to address students' immediate needs when accommodation requests arise, but the results of on-demand remediation vary greatly depending on the format and issues present in the original document. This is especially true when documents, such as PDFs, contain scanned material that must go through a process of optical character recognition. This process is fraught with difficulties because the results depend on the clarity of the original scan, the fonts used to present the text, and if the pages contain additional graphics, images, or handwriting that may cause the text to be unclear. The best solution is to have the documents remediated by the instructor or university staff. Blackboard Ally gives visual feedback to the instructor as to the state of the file, its standards compliance, and guidance on remediating document issues. Using the common metaphor of a gauge and color coding of green, orange,

and red, Blackboard Ally adds status icons before the links to all files so that the instructor knows the status of each file. (See Appendix I, Figure 3.) By moving the mouse over the status icons, a dialog box appears, giving the instructor a textual description of the status level of the document. (See Appendix I, Figure 4.) By clicking the status icon, a dialog box appears to the right of the screen showing a graph and percentage of compliance, descriptions of the issues, links on how to fix the problem. It also offers a place to upload the remediated file or the ability to fix the problem for issues such as having alt-text for images displayed on the course page. (See Appendix I, Figure 5.)

Compliance Reporting: In addition to helping students and instructors access and remediate course content, Blackboard Ally assists the university administration in visualizing and understanding the degree of course content compliance over time. This will also help the university administration know where to direct additional resources to become more compliant and to judge how well remediation assistance is unfolding at the course, department, college, and university levels. Blackboard Ally offers a number of reports that show – on a broad scale – how much of the content in the LMS is compliant. Reports can also drill down into great detail on the course level, listing all course documents and the issues that cause them to be noncompliant. (See Appendix II for sample reports.)

By simultaneously addressing the needs of students, instructors, and administration, Blackboard Ally assists the university move toward full compliance. It is this kind of proactive efforts that the DOJ is looking for in universities should complaints of noncompliance arise.

Relationship to Other FSU Initiatives

The pilot of Blackboard Ally supports and augments numerous initiatives which include:

- 1. Strategic Goals of Diversity, Inclusion, and to position FSU as a University of Choice
- 2. Supports and Augments Student Disability Resource Center (SDRC)
- 3. Supports Provost Office's efforts towards creating a permanent Accessibility Oversight Committee and university wide policies regarding accessibility

Diversity, Inclusion, and Becoming a "University of Choice"

One of FSU's core values is "Dynamic Inclusiveness." Yet, when course content is not readily available and accessible to students with disabilities when it is for students without disabilities, the inaccessible documents result in a two-tiered student body: Those who can immediately engage course content, and those who must wait. Being inclusive stresses the ability for all students to participate equally to the best of their abilities. Blackboard Ally helps the university take steps toward removing all delays and barriers by giving students with disabilities immediate access to course content even if the on-demand version still has errors and issues. It provides faculty and administration with tools to address inaccessible course content over time. It also helps the university track how well it is allocating resources to address issues of content inaccessibility and shows how well the university is meeting state and federal compliance requirements. All of these actions help the university demonstrate its commitment to diversity and inclusion, while augmenting efforts such as the "University of Choice" initiative created by J.R. Harding, an advocate for individuals with disabilities. Harding was appointed by Provost Sally McRorie to spearhead inclusion initiatives around campus.

Support and Augment the Student Disability Resource Center (SDRC)

One of the best resources FSU offers faculty and students is the Student Disability Resource Center (SDRC). Here students find the assistance they need to receive the accommodation necessary for them to be successful. The SDRC also operates as a resource to faculty to assist in the remediation of course materials. The difficulty the SDRC faces each semester is one common to many services – too little staff, resources, and time. Blackboard Ally assists the SDRC by attending to many of the immediate student remediation needs and giving faculty the knowledge and capabilities to address certain accessibility issues within documents. By doing so, the SDRC is able to allocate its limited staff, resources, and time toward the students with the greatest needs and the course material that requires remediation that is beyond the capabilities of both Blackboard Ally and the course instructor.

Support the Provost's Work toward Permanent Accessibility Committee and Policies

In fall 2017, Provost Sally McRorie established a workgroup to draft

- a proposal for a permanent committee to oversee the university's accessibility compliance
- policies directing university faculty and staff as to how the university plans to meet its state and federal accessibility obligations while also fostering an environment of diversity and inclusion

This workgroup is currently spearheaded by Robert Fuselier, Interim Director of ODL. ODL sees Blackboard Ally as a potential tool that the Provost's Accessibility Oversight Committee could use to help establish and monitor its policies. By establishing this Blackboard Ally pilot in parallel to the formation of the committee, course content compliance reporting will be in place for the pilot colleges when the committee begins reviewing existing policies and the current state of the university's compliance. These content compliance administrative reports created by Blackboard Ally, although only covering the pilot colleges, will nevertheless assist the committee in determining what parts of the remediation process have the greatest needs and how best to craft policies and allocate resources to address course content inaccessibility. Not having reports of content compliance, even if they only cover a portion of the university's course content, will slow down the university's ability to create policies and allocate resources and potentially open up the university to liability and litigation. This is not hypothetical. In 2011, two blind students instituted litigation against the university because the clickers, online software, and content used in their courses were not accessible. <u>The 2012 settlement</u> <u>from this lawsuit alone was \$150,000</u>. This pilot would be one step toward removing the liability arising from inaccessible course material.

Project Plan and Team

Software Installation

Upon approval and release of funds, Blackboard Ally could be quickly acquired. Because it is LTI add-on software for the Canvas LMS, the software already works with Canvas; the process of adding it would be based on the issuance of security keys and account authorizations. As a result, it is a straightforward installation within Canvas, which would be handled by ODL's Canvas support staff at no additional cost.

Training & Support

Because Blackboard Ally is a user-friendly, intuitive system, users would need little training. Nevertheless, the Canvas support engineers would be trained by Blackboard to assist FSU faculty and staff (see budget) and ODL instructional development faculty would work with the college/department faculty and staff to address course content remediation questions and to train on the college/department reports.

Cross College/University Reports

As Blackboard Ally can create reports that span colleges, ODL would have a process in place for the university administration to request reports.

Budget, Costs, Support, and Post-Project Operations

Blackboard Ally's pricing is based on FTE tiers. While the entire university's FTE is in the mid-30,000s, this pilot will operate within the 2,001-4,000 FTE tier, which costs \$18,000. The cost of training is \$2,000. Thus, the total one-year pilot cost is \$20,000.

Based on the 2015-2016 Annual FTE Reports from the FSU Office of Institutional Research, 4,000 FTE would facilitate the inclusion of multiple colleges such as the College of Education (2017.3 FTE), College of Social Work (795.8 FTE), and College of Engineering (1163.4 FTE). While this is just an example, it demonstrates that this pilot would allow the inclusion of multiple, diverse colleges, contingent on the interest of the college's administration and staff.

At the end of the pilot, an evaluation of Blackboard Ally would be conducted by all the participants. If the software was determined to be beneficial, expanding the scope of the installation would not be difficult. It would consist of modifying the security codes and accounts. The budget or budgets for the cost of a full university implementation, somewhere in the range of \$105,000-\$120,000, would be determined in consultation with the university administration. Additionally, due to the cost, other processes would be required, including bidding.

The Blackboard Ally quote is attached as Appendix III. In our proposal, we opted not to request the funds for the optional Blackboard Ally: Deployment & Adoption Plan.

INFORMATION TECHNOLOGY SERVICES



STUDENT TECH FEE BUDGET TEMPLATE

2016-2017 Project Funding Proposal

Project Details		
Project Title:	Blackboard Ally Pilot	
Organization or College:	Office of Distance Learning	
Department or Unit:		
Project Period:	Summer 2018-Spring 2019	
Start Date:	Approximately May/June 2018	
End Date:		Apr-19

I. Senior/Key Personnel (list senior and/or key personnel whose compensation will be funded through project non-recurring funds)						
First Name	Middle Name	Last Name	Project Role	Requested Salary	Fringe Benefits	Funds Requested
N/A						

Total Funds Requested for Senior/Key Personnel \$

II. Student & Other Personnel (insert description)							
Туре	FTE	Requested Salary	Fringe Benefits			Funds Requested	
Graduate Students	N/A						
Undergraduate Students	N/A						
Other Personnel	N/A						

Total Funds Requested for Students & Other Personnel \$

Total Salaries, Wages & Benefits ______

III. Equipment (list items a	id dollar amounts for each item or multiple items of the same type, including software, with a total cost of over \$2,000)	
Item	Description	 Funds Requested
Blackboard Ally Software	2001-4000 FTE Tier Installation of Blackboard Ally as LTI add-on for Canvas	\$18,000
Training Blackboard Ally	Blackboard Ally training for ODL and participating colleges' staff	\$ 2,000.00
	Total Funds Requested for Items Over \$2,000	\$ 20,000.00
	Total Funds Requested for Items Under \$2,000	\$ -

Total Funds Requested for Equipment Costs \$ 20,000.00

\$

IV. Other Costs					
Category				Funds Reques	ted
Materials & Supplies	N/A				
Consultant Services	N/A				
Equipment or Facility Rental/Use Fees	N/A				
Additional Project Costs (describe in budget justification)	N/A				
			Total Funds Requested for Other Costs	\$ -	_

Total Project Cost

20,000.00

Appendix I: Illustrations of Blackboard Ally's Functionality

READINGS
1. Jonathan Z. Smith, "Religion, Religious," in <i>Critical Terms for Religious Studies</i> , ed. Mark C. Taylor (Chicago, IL: University of Chicago Press, 1998), 269–84. This text is available in the following formats: <u>Web Page (HTML)</u> <u>MS Word Doc</u> <u>PDF (Screen Readable)</u> <u>PDF (Original)</u> <u>PDF (Original)</u> <u>Composition</u> <u>ACTIV</u>

Figure 1. Blackboard Ally's download menu with the option to download accessible versions of the file.

Downloa	ad Accessible Version	×	Download Accessible Version	×	Download Accessible Version
•	Tagged PDF Structured PDF for improved use with assistive technology		OCRed PDF Automatically extracted text for improved reading and searching		HTML For viewing in the browser and on mobile devices
ی	HTML For viewing in the browser and on mobile devices		HTML For viewing in the browser and on mobile devices		Pub For reading as an e-book on an IPad, Kindle, etc.
•	ePub For reading as an e-book on an iPad, Kindle, etc.		ePub For reading as an e-book on an IPad, Kindle, etc.		Electronic braille BRF version for consumption on electronic braille displays
•	Electronic braille BRF version for consumption on electronic braille displays		Electronic braille BRF version for consumption on electronic braille displays		Audio MP3 version for listening
0	Audio MP3 version for listening		Audio MP3 version for listening		Cancel A* Download
	Cancel A* Downton	ad	Cancel At Down	oad	

Figure 2. Three example dialog boxes presented as possible accessible versions of a document that can be downloaded ondemand. The options available depend on the original file type and the accessibility issues present in the document.

READINGS
1. Jonathan Z. Smith, "Religion, Religions, Religious," in <i>Critical Terms for Religious Studies</i> , ed. Mark C. Taylor (Chicago, IL: University of Chicago Press, 1998), 269–84. This text is available in the following formats: <u>Web Page (HTML)</u>
Figure 3. Screen capture showing the instructor's view in Canvas with Blackboard Ally document status icons displayed next to each link.

READINGS		
 Jonathan Z. Smith, "Religion, Religions, Religious," in <i>Critical Terms for Religious Sti</i> Press, 1998), 269–84. This text is available in the following formats: <u>Web Page (HTML)</u>	Click to improve	Accessibility score: Low Click to improve

Figure 4. Screen capture showing the types of dialog boxes that appear by mousing over the status icon.

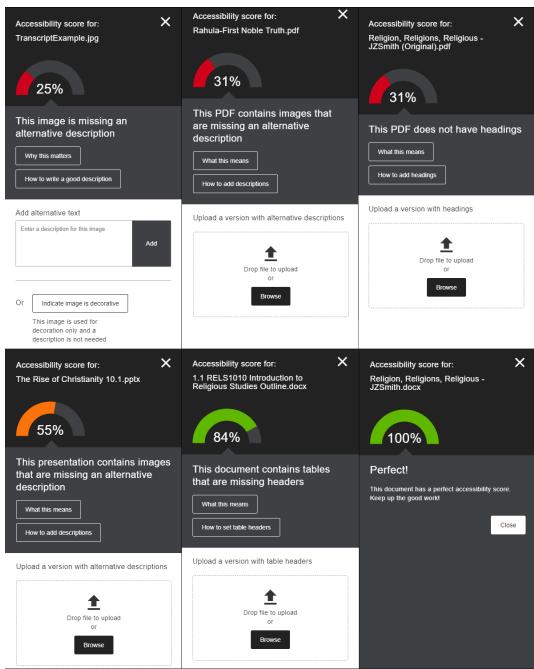


Figure 5. Six examples of the types of feedback and remediation options and instructions given to instructors and university staff on how to remediate the problems with course documents. The first example shows the ability to add image alt-text directly and the last example is an example of a fully compliant document.

Appendix II: Blackboard Ally Sample Reports

Blackboard Ally supports a variety of reports that give extensive details about particular courses and document sets to offering large summaries spanning a department, college, or the entire university. The following sample reports are included in this appendix:

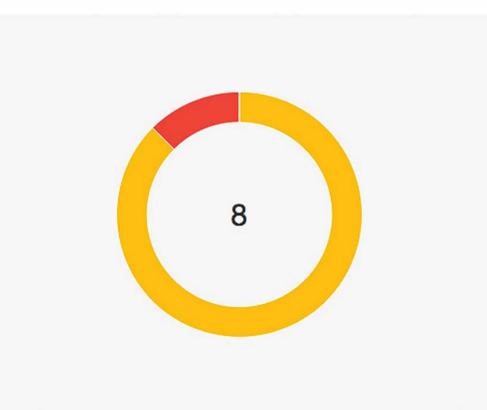
- Course Report
- Course Report Listing Items with Issues
- Department/College Courses
- Department/College Courses with Issues
- University Overview By Month
- University Overview By Academic Year

SOC225_42213

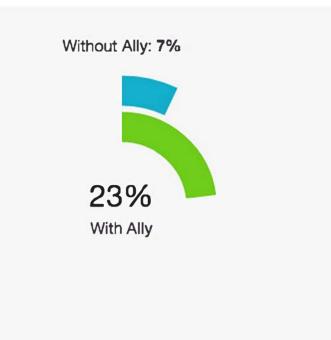
SOC225 Social Aspects of Addiction - ONS 42213

🚢 23 📝 Go to course

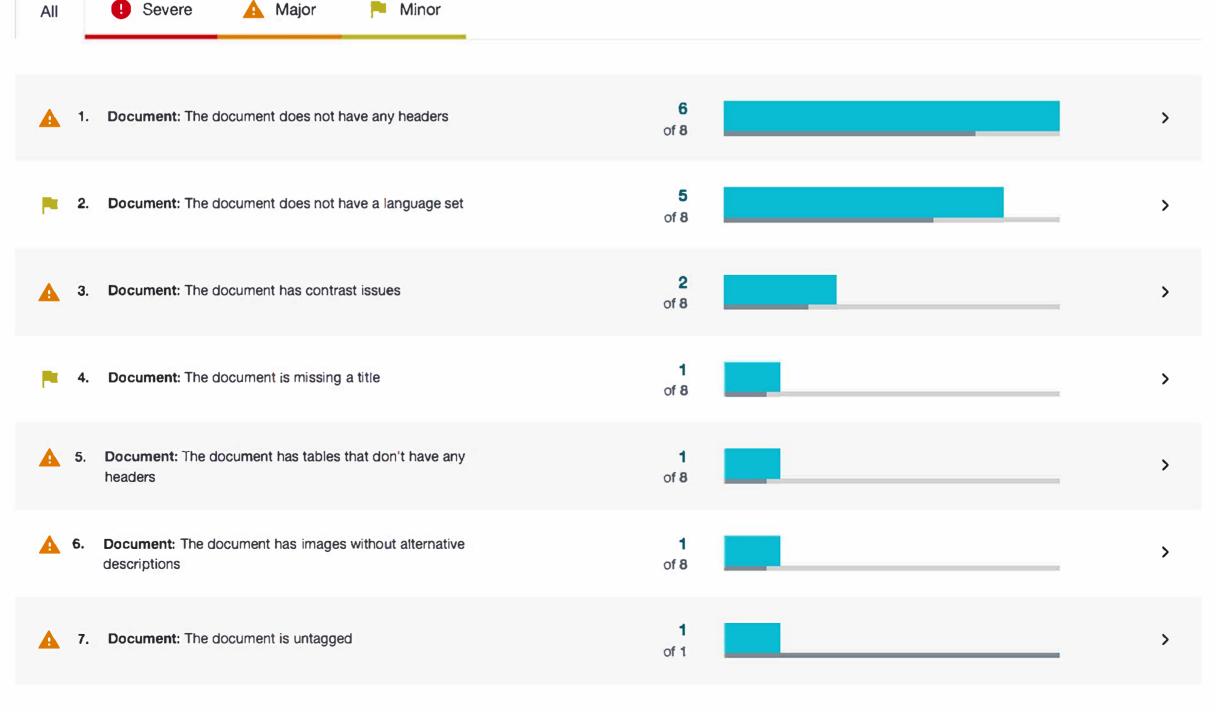




Overall accessibility score



Accessibility issues



0

MTH065_22288

MTH065 Elementary Algebra - ONS 22288

👫 53 📝 Go to course

Document: The document is scanned These documents are either entirely scanned or contain pages that are scanned. Screen readers are unable to convert an image into words, even if the image only consists of text, so people with screen readers or other assistive devices will not be able to read those pages. Scanned documents, especially those of poor quality or those containing handwriting, can be difficult to read for everyone. They also have other usability issues such as not being able to search inside the document.

Items with this accessibility issue

20140818115927783.pdf	\$ 0%
20150317155717510.pdf	6 0%
20131015092910961.pdf	6 0%
201511241806.pdf	6 0%
20150612131214527.pdf	6 0%
20150430110104949.pdf	6 0%
201601211612.pdf	6 0%
201603171244.pdf	\$ 0%
201602220849.pdf	\$ 0%
20140813121259699.pdf	\$ 0%



Courses

Blackboard Ally: Department/College Courses

Search for a course			Spring 2017 -
MTH075_42187 MTH0 75 Applied Geometry - ONS 42187	14	16	\$ 0%
RD115_42234 RD115 Critical Reading Strategies - ONS 42234	5	10	() 1%
MTH095_42509 MTH095 Intermediate Algebra - ONS 42509	16	16	() 1%
HD107_42228 HD107 Practicing Success - ONS 42228	6	12	\$ 3%
ABSDGED_42786 ABSDGED Math Foundations - ONS 42786	** 13	4	(4%
ABSDGED_42787 ABSDGED Math Foundations - ONS 42787	8	4	\$ 4%
ABSDGED_42792 ABSDGED Reading Language Arts 2 - ONS 42792	** 0	1	\$ 5%
ABSDGED_42790 ABSDGED Reading Language Arts - ONS 42790	3	2	\$ 5%
ABSDGED_42791 ABSDGED Reading Language Arts - ONS 42791	41 16	2	\$ 5%
MTH060_42181 MTH060 Intro to Algebra - WEB 42181	4 14	1	S 5%



Blackboard Ally: Department/College Courses with Issues

2016-17 -

Document: 0

The document is scanned

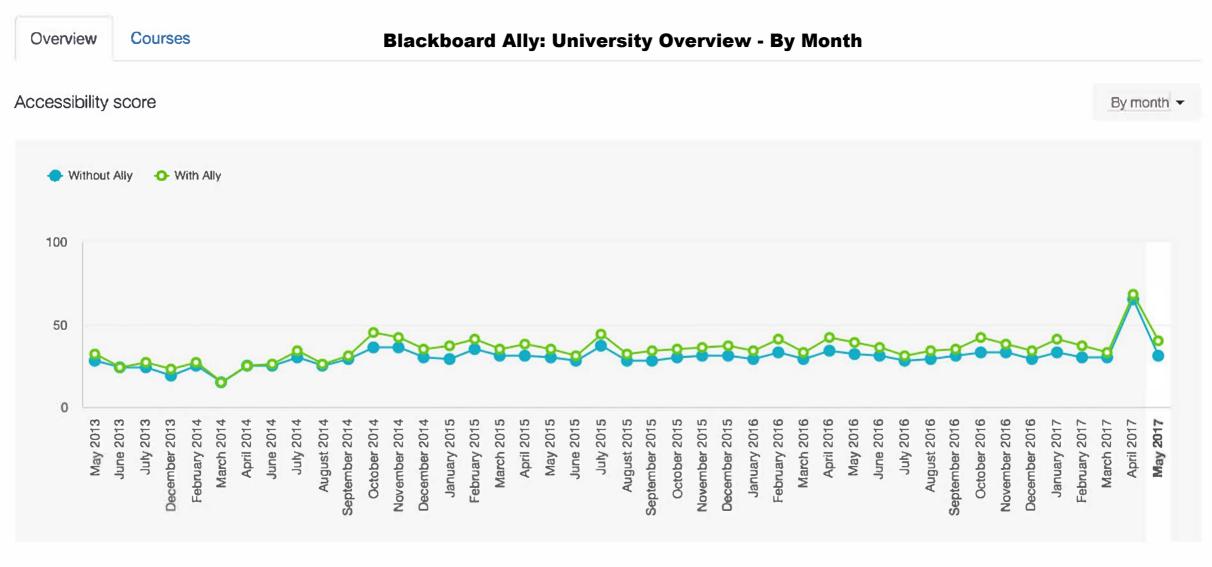
These documents are either entirely scanned or contain pages that are scanned. Screen readers are unable to convert an image into words, even if the image only consists of text, so people with screen readers or other assistive devices will not be able to read those pages. Scanned documents, especially those of poor quality or those containing handwriting, can be difficult to read for everyone. They also have other usability issues such as not being able to search inside the document.



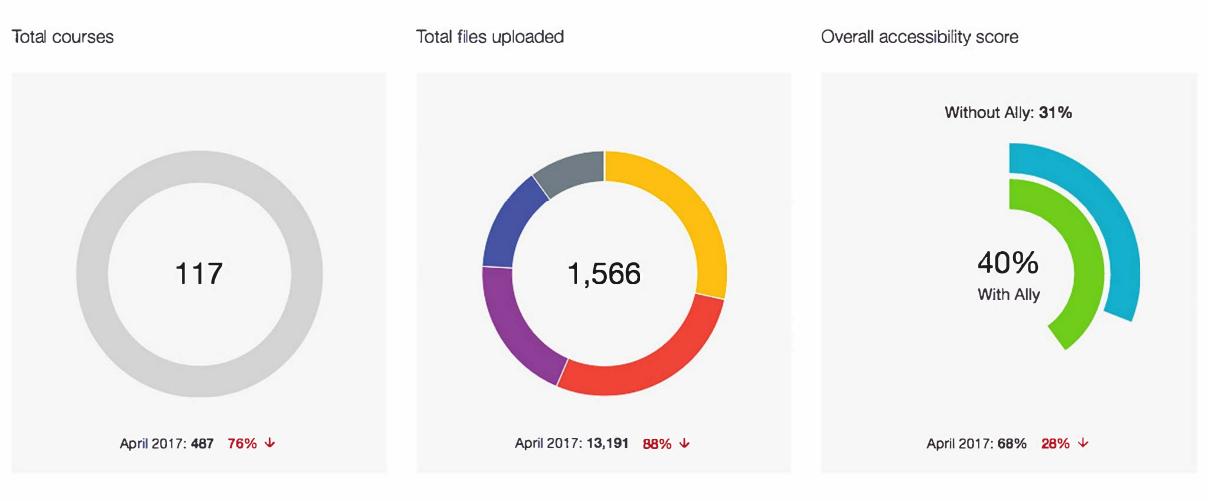
Courses with this accessibility issue

MTH065_22288 MTH065 Elementary Algebra - ONS 22288	5 3	· 108	() 10%
MTH065_32208 MTH065 Elementary Algebra - ONS 32208	4 16	. 61	() 12%
ENGR213_42154 ENGR213 Strength of Materials - ONS 42154	** 7		() 20%
ENGR213_40385 ENGR213 Strength of Materials - ONS 40385	** 13		() 21%
MTH251_32228 MTH251 Calculus I - ONS 32228	12	. 56	\$ 25%
MTH095_42191 MTH095 Intermediate Algebra - ONS 42191	4 17	.51	
MTH095_32213 MTH095 Intermediate Algebra - ONS 32213	43	.49	
ENGR212_32154 ENGR212 Dynamics - ONS 32154	4	<u>.</u> 47	() 10%
ENGR298_33122 ENGR298 Ind Study-Dynamics - ONS 33122	** 1	<u>.</u> 47	
ENGR211_22183 ENGR211 Statics - ONS 22183	8<l< td=""><td>() 21%</td></l<>	() 21%

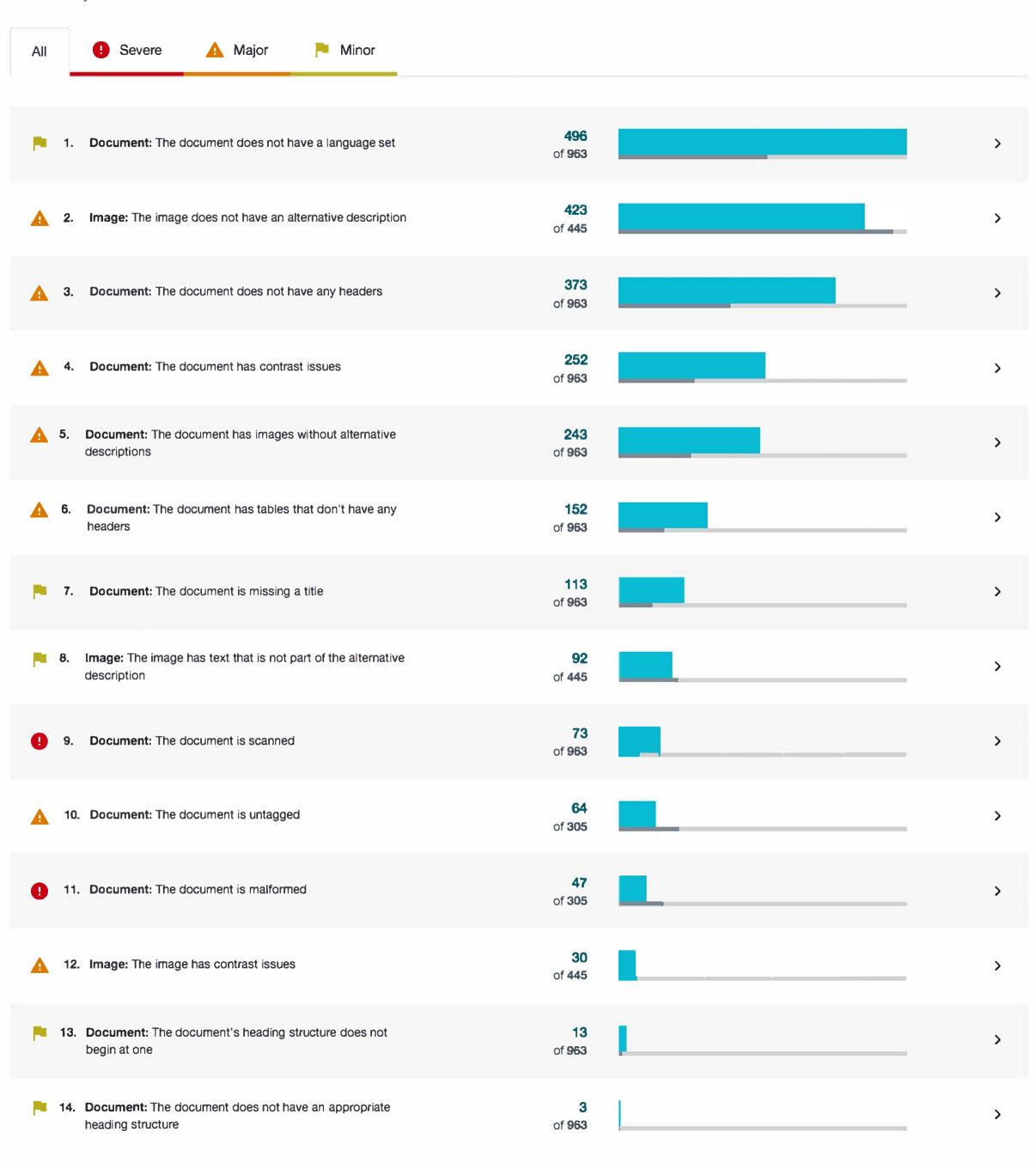
1 2 2 ... 33 Next Previous

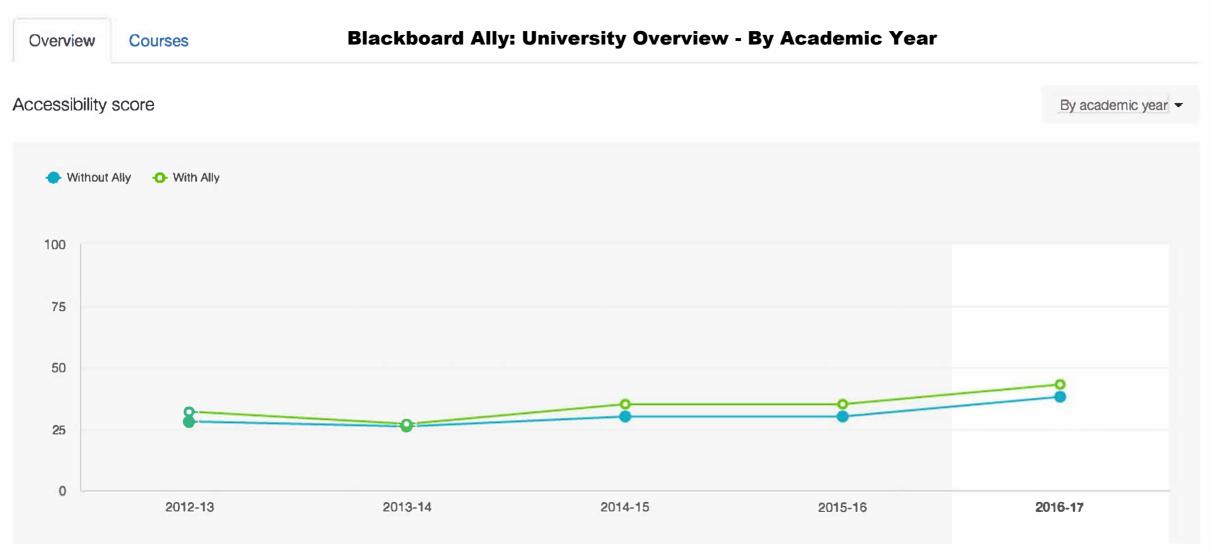


May 2017 👻



Accessibility issues

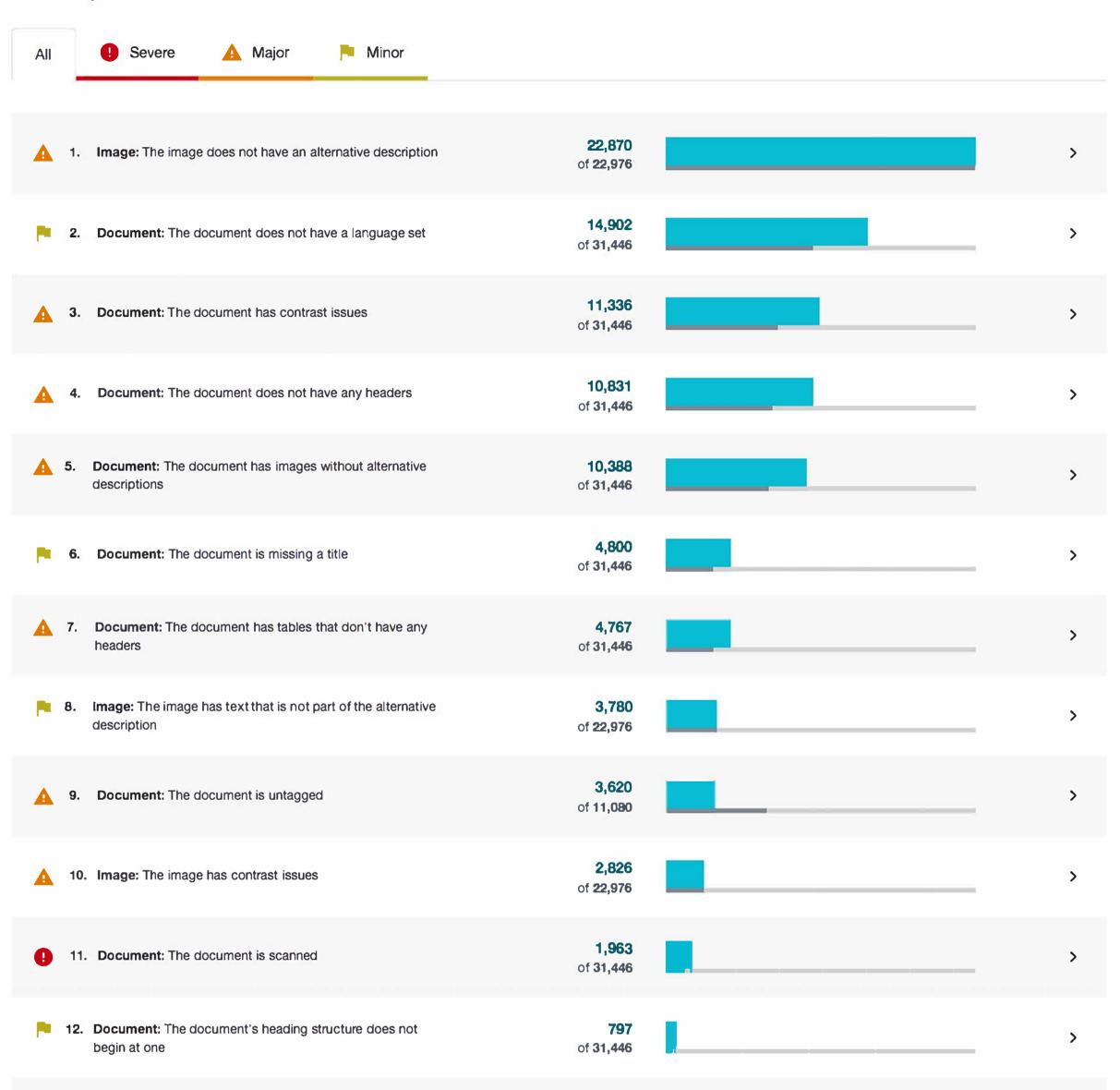


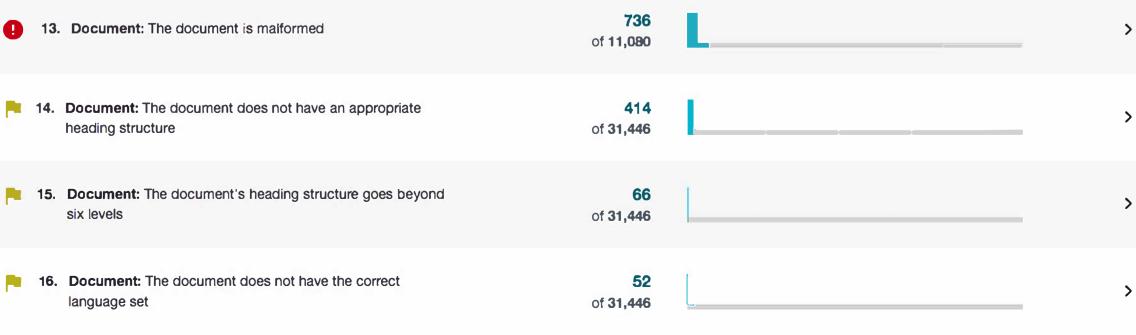


2016-17 🔻



Accessibility issues





Appendix III: Blackboard Ally Quotation

Blackboard

Making course content accessible

Proposal for

Florida State University

Blackboard Ally is a revolutionary product that focuses on making digital course content more accessible. Using inclusivity, sustainability and automation as its key pillars, Blackboard Ally helps you understand and tackle accessibility in a way that benefits all students.

Highlights of Blackboard Ally



Alternative Accessible Formats

Using advanced machine learning algorithms, Ally provides all students access to more accessible alternatives such as Semantic HTML, ePub, Audio and Electronic Braille.



Feedback and Guidance

Deliver in-context feedback and guidance to help instructors improve the accessibility of their content and build towards a sustainable change in behavior.



Institutional Reporting

Gain deep understanding of your institution's performance through the institutionwide course content accessibility report.



What's Included in the Solution?

LMS Integration

Raise awareness and visibility of accessibility by integrating directly into existing workflows. Ally will integrate with all courses in the Learning Management System and provides unlimited storage.

Technical Implementation

Basic technical configuration support to set up and configure the integration.

Report Orientation

Orientation for admins and accessibility staff to help understand and interpret the Ally reports.

SLA & Support

Service Level Agreement and Support are included.

Use of 3rd party services

Ally benefits from valued 3rd party services that are included in the solution (e.g., text-to-speech, OCR).

Deployment and Adoption Plan

Blackboard will develop a plan to deploy Ally to the relevant stakeholders in an organization based on Ally institutional reports, organizational resources, course creation method, remediation approach and accessibility goals and objectives. The plan includes:

- Statement of Purpose
- Course Accessibility Goals
- Recommended Policies, Processes & Procedures
- Performance Metrics

Blackboard will also provide a set of recommendations designed to mitigate accessibility barriers identified during discovery.

Remote Faculty / Staff Workshop

This training workshop provides an in-depth exploration of accessibility barriers in instructional materials: how to recognize them, how to correct them, and how to avoid them in your design of new materials. This training focuses on using Ally as a powerful assistant in the creation of excellent educational resources with the goal of providing equal access to all students. It consists of a two-hour synchronous session followed up by one hour of guided asynchronous hands-on practice.

Blackboard



Pricing

Florida State University is interested in running a pilot for Ally for a subset of the institution, such as the College of Education or the College of Business. Instead of using the university's full FTE, we are proposing a one-year contract with a lower FTE for this pilot that covers just this group. Here are the associated prices:

- Ally Software:
 - o Under 2,000 FTE \$12,000
 - 2,001 4,000 FTE \$18,000
 - 4,001 8,000 FTE \$30,000
- Remote Faculty / Staff Workshop \$2,000
- Deployment and Adoption Plan \$18,000

Following the pilot, the university would enter into a new agreement for the full FTE of the institution.

This cost proposal is valid until December 31, 2017.