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Seattle, WA 98174-1009

October 19, 2018

**Re: The University of Nevada, Reno Resolution Agreement  
OCR Reference No. 10172016  
First Progress Report**

Dear Ms. Noel Nightingale,

Pursuant to Section 5 of the Resolution Agreement entered into by the U.S. Department of Education's Office for Civil Rights (OCR) and the University of Nevada, Reno, the University committed to report on progress towards the completion of the Corrective Action Plan according to the approved schedule. This letter serves as our first such report.

The report is organized into 5 sections: Summary, Completed Requirements, In-Progress Requirements, Ongoing Requirements, and the approved Corrective Plan Schedule. An addendum listing current accessibility workshop offerings and current web accessibility liaisons for each of the colleges, divisions, and major units at the University is included as well.

The University assumes that once this progress report has been reviewed and approved by OCR, activities and tasks with requirements listed as complete no longer need to be included in future reports.

Additionally, due to the complexity of making research and scholarly documents accessible, the University would like to request an additional 60 days from the date listed as the planned completion date to develop and publish strategies for producing accessible research and scholarly documents (see Section 4, Table 10 of the Corrective Action Plan Schedule). As mentioned in Section 2.3.2 below, a Research & Scholarly Works standing subcommittee of the ICT Committee was formed in September 2018 to look more closely at the issues related to accessibility of academic, research, and other scholarly works created at the university and made available online. The subcommittee needs additional time to meet, discuss and make recommendations for procedures and policies concerning accessibility of this content to the ICT Committee.

/s/

Steven Smith  
Vice Provost for IT/Chief Information Officer  
Chair of the Information Communications Technology Accessibility Committee

# **University of Nevada, Reno Accessibility Corrective Action Plan Progress Report**



University of Nevada, Reno

October 2018

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## **Summary**

In the past 6 months, the University has completed a number of the activities and tasks listed in the approved Corrective Action Plan Schedule (see Section 4 below). Key activities and tasks that have been completed are:

- **By March 31, 2018, identifying and developing a web property registry of all known university domains and subdomains**
  - A web property registry of all known university domains and subdomains was created in October of 2017. To verify accessibility compliance, websites on the registry, that can be added and tracked by Siteimprove, are added to the University's instance of the Siteimprove Intelligence Platform. The number of websites tracked in Siteimprove grew 100% between February and August of 2018, from 95 domains to 190. As of September 24, 2018, Siteimprove is tracking and analyzing approximately 79.09% of websites that are in the web property registry. The remaining 20.91% of websites are either not compatible with Siteimprove's platform, not reachable from off-campus, or are not publicly available. Efforts to monitor and verify the remaining sites are in-progress.
- **By June 30, 2018, identifying html content to carry forward to the university's new website and prioritizing remediation efforts prior to migration**
  - Issues identified using automated accessibility tools such as the Siteimprove Intelligence Platform, the Level Access AMP application, as well as manual testing has informed which types of content will be brought into the new website. Lessons learned from remediating web accessibility issues identified both in and outside of the audit have, and continue to, influence both the design and development of the new website. The new website makes accessibility a top priority, by incorporating the principals of Universal Design into both the visual and functional pieces of the site. The development site that houses the future website is also actively being tracked within the Siteimprove Platform, and manually checked by the MarCom Web Team, to ensure that the site will be accessible before it goes live in accordance with the University's ICT Accessibility Policy.

The University continues to make progress on the activities and tasks listed in the Corrective Action Plan Schedule as in-progress. Key activities and tasks that are in-progress are:

- **By January 1, 2019, captioning all videos professionally or internally produced, used in courses and shared on campus websites or on video storage sites**
  - Teaching and Learning Technologies (TLT) is working to ensure that all instructional videos are captioned. Between January and early September of 2018, over 662 videos and 211 hours have been captioned. We continue to make progress on existing content, while keeping up with new content.
  - Additionally, the Marketing & Communications team is working to ensure that all videos on video storage sites published using the official University account are captioned. As of September 14, 2018, the MarCom team has identified 143 captioned videos out of a total of 283 videos in the main YouTube account. The MarCom team also identified 300 videos in the main Vimeo account. Of those 300 videos, 152 are captioned. Work is continuing to caption the remaining non-captioned videos on both YouTube and Vimeo.
- **By June 30, 2019, removing documents and CMS-based embedded multimedia that will not be carried forward to the new university website**

- The MarCom team utilized Siteimprove, assistance from the CMS vendor, and manual methods to develop an inventory of documents and media within the CMS. As of August 9, 2018, the team has identified 7,171 used and 13,037 unused documents as well as 788 unused media files in the CMS. Siteimprove also identified 8,126 linked documents: 6,715 PDFs files, 713 Excel files, 535 Word files, 87 PowerPoints files. Of those 6,715 linked PDFs identified, Siteimprove has flagged 5,054 of the linked PDFs as inaccessible as of September 10, 2018. Activities and tasks related to removal and remediation of inaccessible documents are listed below (see Section 2.2.2. In-Progress Requirements related to Table 5: Content Management System).
- Additionally, the Marketing & Communications team utilized Siteimprove to develop an inventory of all CMS-based embedded videos. As of September 7, 2018, Siteimprove has identified 270 videos that are embedded using either the YouTube, Vimeo, Wistia, or Kaltura video players. The Marketing & Communications team is working on creating reports for Web Accessibility Liaisons so that they can determine which videos within the CMS can be removed and which need to be remediated before the January 1, 2019 deadline.

Lastly, the University continues to implement ongoing efforts to improve accessibility awareness and communication across campus. Key activities and tasks that are ongoing are:

- **Hosting an annual campus forum regarding accessibility**
  - The Provost has asked the Chair of the Information and Communication Technology (ICT) Committee and the Office of Marketing & Communication to collaborate and develop a plan to host an annual campus forum regarding accessibility. The first annual campus forum is scheduled for November 28<sup>th</sup>, 2018 4 pm to 5:30 pm and open to the public. The event has also been posted on the [University's event website](#).

# **1. Completed Requirements**

## **1.0 - Level Access Audit Results**

### **1.0.1 to 1.0.4 - Public Site, PeopleSoft, Canvas, PDFs**

#### **Completed Requirement(s):**

- No completed requirements to report on

#### **Response:**

Activities and tasks related to Public Site, PeopleSoft, Canvas, and PDF audit results are in-progress. More information regarding the progress of remediation of issues identified during the audit can be found below in sections 2.0.1 thru 2.0.4.

## **1.1 - General: Policies, Procedures, Communication, and Training**

### **1.1.1 - Table 1: Accessibility Policies & Procedures**

#### **Completed Requirement(s):**

- Develop accessibility policies and procedures
- Publish commitment to accessibility statement on website
- Publish accessibility policies and procedures on website

#### **Response:**

As previously reported in the Corrective Action Plan submitted to OCR and accepted on March 5, 2018, the University completed the requirements above on July 1, 2017. The ICT Accessibility Policy is included in the [University Administrative Manual](#). Both the ICT Accessibility Policy and the ICT Accessibility Procedures are available on the University's Accessibility website (<https://www.unr.edu/accessibility>). The Commitment to Accessibility Statement was published on the University's website on March 1, 2017, and website owners have been notified that all University websites must include a link to the Commitment to Accessibility web page hosted on the University website (<https://www.unr.edu/accessibility/commitment>).

We believe this response constitutes full compliance with all the completed requirement(s) defined in Section 1, Table 1 of the Correction Action Plan Schedule.

### **1.1.2 - Table 2: Accessibility Communications**

#### **Completed Requirement(s):**

- Meet with Office of Information Technology (OIT), Teaching & Learning Technologies (TLT) and Information and Communication Technology (ICT) committee representatives to discuss details for campus-wide communications plan
- Hold President's Council briefing on accessibility
- Send Provost letter to President's Council, Dean's and Academic Leadership Council

#### **Response:**

Representatives from Information Technology (OIT), Teaching & Learning Technologies (TLT), Information & Communication Technology (ICT) and Marketing & Communications (MarCom) met in 2017 to discuss a campus-wide communication plan. The resulting 2017

Communications Plan created and implemented by Marketing & Communications (MarCom) included briefing the President's Council on accessibility and crafting the message that the Provost delivered to the President's Council, Deans, and the Academic Leadership Council.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 1, Table 2 of the Corrective Action Plan Schedule.

**1.1.3 - Table 3: Training Plan**  
**Completed Requirement(s):**

- Develop a training plan and course material for basic web accessibility training for all appropriate personnel

**Response:**

A training plan and course material for basic web accessibility training was developed, and approved by the OCR, prior to March 1, 2017 and offered to appropriate personnel. Reports regarding personnel trained have been sent to OCR in accordance with OCR's timeline for reporting.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 1, Table 3 of the Corrective Action Plan Schedule.

## **1.2 - Web Accessibility**

**1.2.1 - Table 4: Web Accessibility Overview**  
**Completed Requirement(s):**

- Identify and develop web property (URL) registry of all known University domains and subdomains

**Response:**

Through a combined effort between Information Technology (OIT), Marketing & Communications (MarCom) and Web Accessibility Liaisons from each of the colleges, divisions, and major units an official web registry was created in October 2017. The official web registry is maintained by the Information & Communication Technology (ICT) Audit subcommittee and represents, to the best of our knowledge, all known domains and subdomains. To verify accessibility compliance, websites on the registry, that can be added and tracked by Siteimprove, are added to the University's instance of the Siteimprove Intelligence Platform. The number of websites tracked in Siteimprove grew 100% between February and August of 2018, from 95 domains to 190. This 100% increase represents an effort to understand and remediate the full scope of accessibility issues on all websites created by or on behalf of the University. Due to reporting limitations within Siteimprove, some websites needed to be consolidated into a single website for tracking purposes.

Additionally, as of September 24, 2018, Siteimprove is tracking and analyzing approximately 79.09% of websites that are in the web property registry. The remaining 20.91% of websites are either not compatible with Siteimprove's platform, not reachable from off-campus, or are not publicly available. Efforts to monitor and verify the remaining sites are in-progress.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 2, Table 4 of the Corrective Action Plan Schedule.

### **1.2.2 - Table 5: Content Management System Web Content ([www.unr.edu](http://www.unr.edu))**

#### **Completed Requirement(s):**

- Identify HTML content to carry forward in new site build and prioritize remediation efforts prior to migration
- Create inventory of documents related to each web property in the domain registry
- Identify documents to remediate and carry forward into the new web design
- Create inventory of CMS-based embedded multimedia (e.g. videos)
- Identify CMS-based embedded multimedia to remediate and carry forward into new website build

#### **Response:**

As part of the redesign and rebuild of the University website ([www.unr.edu](http://www.unr.edu)), the Marketing & Communications (MarCom) Team, in partnership with colleges, divisions, and major units using the University's Content Management System (CMS) have identified HTML content to carry forward in the new site build. Issues identified using automated accessibility tools such as the Siteimprove Intelligence Platform, the Level Access AMP application, as well as manual testing has informed which types of content will be brought into the new website. Lessons learned from remediating web accessibility issues identified both in and outside of the audit have, and continue to, influence both the design and development of the new website. The new website makes accessibility a top priority, by incorporating the principals of Universal Design into both the visual and functional pieces of the site. The development site that houses the future website is also actively being tracked within the Siteimprove Platform, and manually checked by the MarCom Web Team, to ensure that the site will be accessible before it goes live in accordance with the University's ICT Accessibility Policy.

Additionally, the MarCom team utilized Siteimprove, assistance from the CMS vendor, and manual methods to develop an inventory of documents and media within the CMS. As of August 9, 2018, the team has identified 7,171 used and 13,037 unused documents as well as 788 unused media files in the CMS. Siteimprove also identified 8,126 linked documents: 6,715 PDFs files, 713 Excel files, 535 Word files, 87 PowerPoints files. Of those 6,715 linked PDFs identified, Siteimprove has flagged 5,054 of the linked PDFs as inaccessible as of September 10, 2018. Activities and tasks related to removal and remediation of inaccessible documents are listed below (see Section 2.2.2. In-Progress Requirements related to Table 5: Content Management System).

The Marketing & Communications team also utilized Siteimprove to develop an inventory of all CMS-based embedded videos. As of September 7, 2018, Siteimprove has identified 270 videos that are embedded using either the YouTube (164), Vimeo (108), Wistia (0), or Kaltura (0) video players. Some pages have multiple embeds. The Marketing & Communications team is working on creating reports for Web Accessibility Liaisons so that they can determine which videos within the CMS can be removed and which need to be remediated before the January 1, 2019 deadline. Activities and tasks related to removal and remediation of inaccessible embedded



multimedia within the CMS are listed below (see Section 2.2.2. In-Progress Requirements related to Table 5: Content Management System).

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 2, Table 5 of the Corrective Action Plan Schedule.

### **1.2.3 - Table 6: Non-Content Management System Web Content (e.g. unce.unr.edu; naes.unr.edu)**

#### **Completed Requirement(s):**

- Create inventory of documents
- Identify documents with accessibility issues
- Identify embedded multimedia (e.g. videos)

#### **Response:**

The MarCom team utilized Siteimprove to develop an inventory of documents and media outside of the CMS. As of August 7, 2018, Siteimprove has identified 40,177 linked documents: 36,086 PDFs files, 360 Excel files, 2,405 Word files, 1,702 PowerPoints files. Of those 36,086 linked PDFs identified, Siteimprove has flagged 18,066 of the linked PDFs as inaccessible as of September 10, 2018. Activities and tasks related to removal and remediation of inaccessible documents outside the CMS are listed below (see Section 2.2.3. In-Progress Requirements related to Table 6: Non-Content Management System Web Content).

The MarCom team also utilized Siteimprove to develop an inventory of all embedded videos outside the CMS. As of September 7, 2018, Siteimprove has identified 1,450 videos that are embedded using either the YouTube (1,338), Vimeo (123), Wistia (1), or Kaltura (7) video players. Some pages have multiple embeds. The Marketing & Communications team is working on creating reports for Web Accessibility Liaisons so that they can determine which videos outside the CMS can be removed and which need to be remediated before the January 1, 2019 deadline. Activities and tasks related to removal and remediation of inaccessible embedded multimedia within the CMS are listed below (see Section 2.2.3. In-Progress Requirements related to Table 6: Non-Content Management System) Web Content.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 3, Table 6 of the Corrective Action Plan Schedule.

## **1.3 - Instructional Materials**

### **1.3.1 - Table 7: Learning Management System Accessibility**

#### **Completed Requirement(s):**

- Establish accessibility requirements for the LMS; these requirements were established when our LMS was adopted in 2015. The requirements reflect WCAG 2.0 standards.
- Adopt and implement policy that requires all new instructional materials to be accessible starting January 1, 2018
- Implement Blackboard's Ally software to ensure more accessible course content is available to students, offer additional feedback to faculty regarding their materials, and provide analytics to administration

- Ensure accessible live chat and discussion board functions in the LMS.
- In 2015 and 2017, the discussion board functionality was found to be accessible according to WCAG 2.0 AA and the company's VPAT. Our 2017 audit confirmed this functionality.
- Develop accommodations for the web conferencing platform built into the LMS

**Response:**

The requirements listed above have all been completed at the time of this report.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 3, Table 7 of the Corrective Action Plan Schedule.

**1.3.2 - Table 8: Instructional Content outside the Learning Management System (LMS)  
Completed Requirement(s):**

- Procedures have been established for faculty to request accessibility review of instructional software applications.

**Response:**

The procedures and associated processes for the review of instructional software have been put into place.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 3, Table 8 of the Corrective Action Plan Schedule.

**1.3.3 - Table 9: Library Website and Services Accessibility  
Completed Requirement(s):**

- Identify HTML content to carry forward in new site build and prioritize remediation efforts prior to migration
- Create inventory of documents

**Response:**

In the past 6 months, University Libraries created an inventory of 1351 documents (PDFs, PowerPoints, Word docs, etc.). Additionally, they have identified approximately 1539 HTML pages. As of this time, University Libraries is planning to migrate approximately 160 of the HTML pages to their new site build. Remaining HTML pages will be archived or remediated based on priority.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 3, Table 9 of the Corrective Action Plan Schedule.

## **1.4 - Documents**

**1.4.1 - Table 10: Document Accessibility  
Completed Requirement(s):**

- Create and publish instructional materials on how to create accessible documents. These materials will be reviewed and revised as standards and file formats evolve.
- Establish and publish best practices on accessible PDF documents used for instruction.

These materials will be reviewed and revised as standards and file formats evolve.

- Develop and implement training sessions on how to create accessible PDF documents.

**Response:**

The requirements listed above have all been completed at the time of this report. A site-license for Adobe Acrobat Pro has also been acquired to assist faculty and staff in making their materials accessible.

The remaining activities and tasks related to Document Accessibility are either in-progress or ongoing. More information regarding the progress of the activities and tasks listed in Section 4, Table 10 of the Corrective Action Plan Schedule can be found in sections 2.4.1 below.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 4, Table 10 of the Corrective Action Plan Schedule.

## **1.5 - Electronic Media Accessibility**

### **1.5.1 - Table 11: Video Accessibility**

**Completed Requirement(s):**

- Implement policy, effective January 1, 2018, requiring all new instructional videos to be captioned.
- Refine in-house captioning standards to align with DCMP standards

**Response:**

The requirements listed above have all been completed at the time of this report.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 5, Table 11 of the Corrective Action Plan Schedule.

## **1.6 - Accessibility Reviews**

### **1.6.1 - Table 12: Accessibility Reviews & Audits**

**Completed Requirement(s):**

- Obtain SiteImprove license for unlimited sites

**Response:**

The University has obtained a license for the Siteimprove Intelligence Platform through a statewide agreement negotiated through the Nevada System of Higher Education.

We believe this response constitutes full compliance with the completed requirement(s) listed above and defined in Section 6, Table 12 of the Corrective Action Plan Schedule.

## **2. In-Progress Activities & Tasks**

### **2.0 - Level Access Audit Results**

#### **2.0.1 - Public Site**

### **In-Progress Requirement(s):**

- Remediate Public Site issues identified during the audit.

### **Response:**

Over the past six months, the University has continued the process of remediating the issues identified in the 7 use cases and across the 40 “modules” (pages) that the auditor reviewed. The Marketing & Communication Web Team prioritized the modules with major issues identified in the report and has implemented fixes for 62% of the modules (8 out of 13) with major issues. Fixes to the modules included, but are not limited to, disabling the auto-play feature on carousels (image sliders), providing equivalent keyboard event handlers for the info boxes on the admissions page, and moving the focus appropriately when a user opens a dialog so that the focus is inside the dialog. The MarCom Web Team anticipates the remaining modules with major issues will be addressed within the next six months and reported on in the next progress report.

## **2.0.2 - PeopleSoft**

### **In-Progress Requirement(s):**

- Remediate PeopleSoft issues identified during the audit.

### **Response:**

The University is planning a major upgrade to PeopleSoft 9.2, which is the current vendor supported version, in June of 2019. During the quality assurance and testing phases, accessibility audits will be conducted to identify if previous issues have been resolved and if any new issues arise.

## **2.0.3 - Canvas**

### **In-Progress Requirement(s):**

- Remediate Canvas issues identified during the audit.

### **Response:**

90% of the items identified have been remediated and/or removed. The remaining issues are related to one specific course which is currently being addressed. These remaining issues will be resolved by the end of the fall 2018 semester.

## **2.0.4 - PDFs**

### **In-Progress Requirement(s):**

- Remediate PDF issues identified during the audit.

### **Response:**

A site-license for Adobe Acrobat Pro has been acquired to assist faculty and staff in making their materials accessible. Additionally, the University will implement a campus-wide forms solution by December 2018 that can provide accessible online forms to replace PDF forms.

## **2.1 - General: Policies, Procedures, Communication, and Training**

### **2.1.1 - Table 1: Accessibility Policies & Procedures**

#### **In-Progress Requirement(s):**

- No in-progress requirements to report on

**Response:**

Activities and tasks related to the Accessibility Policies and Procedures have all been completed. More information regarding the completed activities is listed in Section 1.1.1 above or in Section 1, Table 1 of the Corrective Action Plan Schedule.

**2.1.2 - Table 2: Accessibility Communications**

**In-Progress Requirement(s):**

- Host annual campus forum

**Response:**

The Provost has asked the Chair of the Information and Communication Technology (ICT) Committee and the Office of Marketing & Communication to collaborate and develop a plan to host an annual campus forum regarding accessibility. The first annual campus forum is scheduled for November 28<sup>th</sup>, 2018 4 pm to 5:30 pm and open to the public. The event has also been posted on the [University's event website](#).

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 1, Table 2 of the Corrective Action Plan Schedule.

**2.1.3 - Table 3: Training Plan**

**In-Progress Requirement(s):**

- No in-progress requirements to report on

**Response:**

Activities and tasks related to the Training Plan are either completed or ongoing. More information regarding the ongoing efforts are listed in Section 1.3.1 above or in Section 1, Table 3 of the Corrective Action Plan Schedule.

**2.2 - Web Accessibility**

**2.2.1 - Table 4: Web Accessibility Overview**

**In-Progress Requirement(s):**

- All web content created by or on behalf of the University will be accessible according to WCAG 2.0 level AA

**Response:**

The University has taken the approach to rebuild all content and infrastructure related to the Central Content Management System. The Web Rebuild with regard to HTML structure is 70% complete. Quality assurance processes have been implemented that require all HTML components to be validated for WCAG 2.0 Level A and AA compliance before it will be published in the new Content Management System. The content migration is planned to start in November 2018.

Additionally, the Marketing & Communications team utilized Siteimprove to develop an inventory of all documents and embedded videos. The Marketing & Communications team is

working on creating reports for Web Accessibility Liaisons so that they can determine which documents and videos need to be remediated or can be removed.

For colleges, divisions, and major units outside the central content management system, the Marketing & Communications team continues to offer units the option of migration of their web content into the central content management system giving them an accessible template to work with. The Marketing & Communications team plans to help migrate 12,000 pages that currently reside on inaccessible webpages to accessible templates. Inaccessible websites and web content not migrating into the CMS, is being remediated by the college, division, or major unit to which it belongs.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 2, Table 4 of the Corrective Action Plan Schedule.

### **2.2.2 - Table 5: Content Management System Web Content (www.unr.edu)**

#### **In-Progress Requirement(s):**

- Remove content from the site that will not be carried forward into new design
- Remove documents from the site that will not be carried forward into new design
- Remediate CMS-based documents that have accessibility issues
- Remove inaccessible embedded multimedia that will not be carried into the new web design
- Remediate CMS-based embedded multimedia that have accessibility issues

#### **Response:**

The University has taken the approach to rebuild all content and infrastructure related to the Central Content Management System. The Web Rebuild with regard to HTML structure is 70% complete. Quality assurance processes have been implemented that require all HTML components to be validated for WCAG 2.0 Level A and AA compliance before it will be published in the new Content Management System. The content migration is planned to start in November 2018.

Additionally, the Marketing & Communications team utilized Siteimprove to develop an inventory of all CMS-based documents and embedded videos. The Marketing & Communications team is working on creating reports for Web Accessibility Liaisons so that they can determine which documents and videos within the CMS need to be remediated or can be removed.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 2, Table 5 of the Corrective Action Plan Schedule.

### **2.2.3 - Table 6: Non-Content Management System Web Content (e.g. unce.unr.edu; naes.unr.edu)**

#### **In-Progress Requirement(s):**

- Remediate or remove inaccessible HTML content
- Remediate, replace, or remove documents with accessibility issues

- Remediate, replace, or remove inaccessible embedded media

**Response:**

As of September 10, 2018, the ICT Audit subcommittee has completed 18 out of the 22 planned Siteimprove Accessibility Reports for each of the colleges, divisions, and major units of the University. The Siteimprove Accessibility Reports lists each of the known domains and subdomains belonging to a college, division, or unit, as well as a count of the identified accessibility issues. The goal of the report is to inform each college, division, or unit of the domains and subdomains with issues and provide a summary of the information that is available within Siteimprove. Web Accessibility Liaisons and domain owners are expected to use the information both in the report and in Siteimprove to inform their decisions regarding either remediating or removing inaccessible content by the planned completion dates listed in the Corrective Action Plan Schedule.

Additionally, access to and assistance with the University's instance of the Siteimprove Intelligence Platform is provided to Web Accessibility Liaisons, faculty, and staff by the Marketing & Communications Web Team. Siteimprove users also have access to free online courses regarding basic web accessibility and using the Siteimprove platform through Siteimprove Academy.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 2, Table 6 of the Corrective Action Plan Schedule.

## **2.3 - Instructional Materials**

### **2.3.1 - Table 7: Learning Management System Accessibility**

**In-Progress Requirement(s):**

- Ensure accessible class assignments and materials on the learning management systems.

**Response:**

Policy has been adopted to require that all materials and assignments are accessible by January 1, 2019, (new materials had to be accessible starting January 1, 2018). Additionally, Blackboard Ally has been implemented by the University to help ensure accessible versions of materials located in the LMS are available as well as providing feedback to faculty about the accessibility of their documents located in the LMS. A site-license for Adobe Acrobat Pro has also been acquired to assist faculty in making their materials accessible. In support of these efforts, TLT offers multiple training courses to assist faculty in the creation or remediation of accessible materials.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 2, Table 7 of the Corrective Action Plan Schedule.

### **2.3.2 - Table 8: Instructional Content outside the Learning Management System (LMS)**

**In-Progress Requirement(s):**

- All instructional materials located outside of the LMS will be accessible in accordance with University policy.

- Instructional software applications used in courses will be accessible in accordance with university policy.

**Response:**

Policy has been adopted to require that all materials and assignments are accessible by 1/1/2019 (new materials had to be accessible starting 1/1/2018). A site-license for Adobe Acrobat Pro has also been acquired to assist faculty in making their materials accessible. In support of these efforts, TLT offers multiple training courses to assist faculty in the creation or remediation of accessible materials.

The procedure has established been for faculty to request accessibility testing of instructional software.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 2, Table 8 of the Corrective Action Plan Schedule.

**2.3.3 - Table 9: Library Website and Services Accessibility**

**In-Progress Requirement(s):**

- The University Libraries' websites, documents and electronic media will be accessible according to WCAG 2.0 Level AA
- Remove content from the site that will not be carried forward into new design
- Identify documents to remediate and carry forward into the new web design
- Remove documents from the site that will not be carried forward into new design
- Remediate documents that have accessibility issues
- Create inventory of embedded multimedia (e.g. videos)
- Identify embedded multimedia to remediate and carry forward into new website build
- Remove non-accessible embedded multimedia that will not be carried into the new web design
- Remediate embedded multimedia that have accessibility issues

**Response:**

University Libraries has developed an internal plan to help ensure all websites, documents, and electronic media will meet accessibility requirements. The inventory of documents and HTML pages allows University Libraries to identify content that can be archived, or which must be remediated. All Library employees who post content on the web have been informed about accessibility requirements, and many are working to help with remediation efforts. Additionally, weekly office hours with the Web Accessibility Liaison for University Libraries are scheduled to start in November 2018 and run ongoing for the foreseeable future. Library employees can ask questions and work on personal pages with help from the Library Web Accessibility Liaison.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 3, Table 9 of the Corrective Action Plan Schedule.

**2.4 - Documents**



### **2.4.1 - Table 10: Document Accessibility**

#### **In-Progress Requirement(s):**

- Develop and publish strategies for producing accessible [research]\* and scholarly documents.

\*formerly said scientific

#### **Response:**

A Research & Scholarly Works standing subcommittee of the ICT Committee was formed in September 2018 to look more closely at the issues related to accessibility of academic, research, and other scholarly works created at the university and made available online. The subcommittee will make recommendations for procedures and policies concerning accessibility of this content to the ICT Committee. Additionally, a site-license for Adobe Acrobat Pro has also been acquired to assist faculty in making their materials accessible.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 4, Table 10 of the Corrective Action Plan Schedule.

## **2.5 - Electronic Media Accessibility**

### **2.5.1 - Table 11: Video Accessibility**

#### **In-Progress Requirement(s):**

- All videos (professionally or internally produced) used in courses and shared on campus websites or video storage sites will be captioned according to recommended Described and Captioned Media Program (DCMP) standards

#### **Response:**

To assist with ensuring that all videos shared on campus websites or video storage sites are captioned, Marketing & Communications has compiled an inventory of all embedded and linked to videos across the sites currently tracked in Siteimprove. As of September 7, 2018, Siteimprove has identified 3,935 total videos. Of the 3,935 videos identified, 1,720 videos are embedded using either the YouTube, Vimeo, Wistia, or Kaltura video players. Marketing & Communications is working on creating reports for Web Accessibility Liaisons so that they can work with their College/Division/Major Unit to determine which videos can be removed and which need to be remediated before the January 1, 2019 deadline.

The Marketing & Communications team is also working to ensure that all videos on video storage sites published using the official University account are captioned. As of September 14, 2018, the MarCom team has identified 143 captioned videos out of a total of 283 videos in the main YouTube account. The MarCom team also identified 300 videos in the main Vimeo account. Of those 300 videos, 152 are captioned. Work is continuing to caption the remaining non-captioned videos on both YouTube and Vimeo.

Additionally, Teaching and Learning Technologies (TLT) is working to ensure that all instructional videos are captioned. Between January and early September of 2018, over 662 videos and 211 hours have been captioned. University Policy has required all new instructional video content to be captioned since January 1, 2018. We continue to make progress on existing content, while keeping up with new content. Existing video content is captioned according to prioritization where, the most used content in the courses with the highest enrollments are done first.

Procedures are in place where students can request any uncaptioned content they encounter to be captioned. TLT provides both in-house and professional captioning services for faculty. TLT also supports faculty in the creation of accessible instructional video content.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 5, Table 11 of the Corrective Action Plan Schedule.

## **2.6 - Accessibility Reviews**

### **2.6.1 - Table 12: Accessibility Reviews & Audits**

#### **In-Progress Requirement(s):**

- No in-progress requirements to report on

#### **Response:**

Activities and tasks related to Accessibility Reviews & Audits are ongoing. More information regarding the ongoing efforts are listed in Section 3.6.1 below or in Section 6, Table 12 of the Corrective Action Plan Schedule.

## **3. Ongoing Activities & Tasks**

### **3.0 - Level Access Audit Results**

#### **3.0.1 to 3.0.4 - Public Site, PeopleSoft, Canvas, PDFs**

#### **Ongoing Requirement(s):**

- No ongoing requirements to report on

#### **Response:**

Activities and tasks related to Public Site, PeopleSoft, Canvas, and PDF audit results are in-progress. More information regarding the progress of remediation of issues identified during the audit can be found above in sections 2.0.1 thru 2.0.4.

### **3.1 - General: Policies, Procedures, Communication, and Training**

#### **3.1.1 - Table 1: Accessibility Policies & Procedures**

#### **Ongoing Requirement(s):**

- No ongoing requirements to report on

#### **Response:**

All activities and tasks for Section 1, Table 1 have been completed and a response has been provided in the section above.

#### **3.1.2 - Table 2: Accessibility Communications**

#### **Ongoing Requirement(s):**

- Meet with UNR Communication Team to develop a communication plan to inform constituents of the intent, scope and progress regarding the Universities accessibility initiatives.
- Visit Faculty Senate to discuss accessibility & captioning

- Send campus-wide accessibility letter
- Deliver annual correspondence to remind campus about ICT accessibility policy
- Send accessibility liaison letter

**Response:**

In 2017, Marketing & Communications (MarCom) held 8 internal meetings regarding accessibility communications for the University’s various audiences: campus, faculty, staff, students, and the community. The resulting 2017 Accessibility Communications Plan was a product of those meetings and continued to be updated through the end of the year. In 2018, 3 additional meetings were held to discuss and create a new communications plan that the Information and Communication Technology (ICT) Committee would oversee and implement. Additionally, members of the ICT Committee discussed accessibility and captioning at the University’s Faculty Senate meetings 6 times during 2017 and 2018. A campus-wide accessibility letter, as well as a reminder of the ICT Accessibility Policy was delivered by Provost 3 times and once by the President between 2017 and 2018. An email regarding the role and responsibilities of web accessibility liaisons was sent out on August 16, 2018. Dates for all the meetings mentioned above are listed in the Corrective Action Plan Schedule below.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 1, Table 2 of the Corrective Action Plan Schedule.

**3.1.3 - Table 3: Training Plan**

**Ongoing Requirement(s):**

- Training sessions are required
- Reporting to OCR regarding training activities

**Response:**

Per University policy, everyone who creates and/or modifies online content is required to take Basic Web Accessibility training annually. As of August 2018, a total of 759 personnel have attended trainings across the 4 accessibility courses the University offers through TLT (Basic Web Accessibility; Accessible Office Documents; Accessible Documents in the LMS; Accessible PDFs). Follow up consultation is available through TLT (for instructional materials) and web accessibility liaisons (for all other web content).

Reports regarding personnel trained were sent to OCR on March 14, 2017 and December 31, 2017 in accordance with OCR’s timeline for reporting.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 1, Table 3 of the Corrective Action Plan Schedule.

**3.2 - Web Accessibility**

**3.2.1 - Table 4: Web Accessibility Overview**

**Ongoing Requirement(s):**

- No ongoing requirements to report on

**Response:**

There are no applicable ongoing requirements for Section 2, Table 4 of the Corrective Action Plan.

### **3.2.2 - Table 5: Content Management System Web Content (www.unr.edu)**

#### **Ongoing Requirement(s):**

- No ongoing requirements to report on

#### **Response:**

There are no applicable ongoing requirements for Section 2, Table 5 of the Corrective Action Plan.

### **3.2.3 - Table 6: Non-Content Management System Web Content (e.g. unce.unr.edu; naes.unr.edu)**

#### **Ongoing Requirement(s):**

- Accessibility Liaisons submit new sites to be scanned by Siteimprove
- Identify inaccessible HTML content

#### **Response:**

Web Accessibility Liaisons continue to submit new sites to be added to the official web registry and scanned by Siteimprove. The registry grew 100% between February and August of 2018, from 95 domains to 190 domains.

Once new sites are analyzed by Siteimprove, Web Accessibility Liaisons are expected to use the information provided within Siteimprove to inform their decisions regarding either remediating or removing inaccessible content by the planned completion dates listed in the Corrective Action Plan Schedule.

The ICT Audit subcommittee also uses the information in Siteimprove to create Siteimprove Accessibility Reports for each of the colleges, divisions, and major units of the University. The Siteimprove Accessibility Reports lists each of the known domains and subdomains belonging to a college, division, or unit, as well as a count of the identified accessibility issues. These reports are provided on a quarterly basis.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 2, Table 6 of the Corrective Action Plan Schedule.

## **3.3 - Instructional Materials**

### **3.3.1 - Table 7: Learning Management System Accessibility**

#### **Ongoing Requirement(s):**

- Offer training sessions on how to create accessible course materials (*See Addendum: General Accessibility Trainings*)
- Additional accessibility training sessions were offered by Teaching & Learning Technologies (TLT) (*See Addendum: General Accessibility Trainings*)
- Accessibility training sessions were expanded, redesigned, and offered with increased frequency. (*See Addendum: General Accessibility Trainings*)

- Require faculty to attend Basic Web Accessibility training annually
- Develop and conduct training on how to create and use accessible material in the LMS

**Response:**

All the training sessions laid out above have been developed and each training session is offered several times a month. The General Accessibility Trainings Addendum lays out which trainings are offered and a description of each. Work is almost completed on an online version of the Basic Web Accessibility training, which will allow more users to take the training. Reports of attendance at the required basic web accessibility training sessions have been sent to OCR in accordance with OCR's timeline for reporting.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 3, Table 7 of the Corrective Action Plan Schedule.

**3.3.2 - Table 8: Instructional Content outside the Learning Management System (LMS)**

**Ongoing Requirement(s):**

- No ongoing requirements to report on

**Response:**

There are no applicable ongoing requirements for Section 3, Table 8 of the Corrective Action Plan Schedule.

**3.3.3 - Table 9: Library Website and Services Accessibility**

**Ongoing Requirement(s):**

- Accessibility Liaison submit new sites to be scanned by SiteImprove
- Work with Libraries staff to ensure that scholarly databases are accessible

**Response:**

University Libraries have submitted 3 additional sites to be scanned by SiteImprove, for a total of 26 sites. For the past 3 years, Libraries staff have requested databases have a VPAT for purchase or subscription renewal. University Libraries subscribe to 280 databases (e-resources) to support university research. 61% of them now have a VPAT.

We believe this response represents progress towards fulfilling the requirement(s) listed above and defined in Section 3, Table 9 of the Corrective Action Plan Schedule.

**3.4 - Documents**

**3.4.1 - Table 10: Document Accessibility**

**Ongoing Requirement(s):**

- Develop and implement strategies for producing accessible scientific and mathematical documents. Teaching & Learning Technologies (TLT) will continue to work with the DRC to establish best practices for these documents.

**Response:**

A Research & Scholarly Works subcommittee was formed to look more closely at the issues related to academic, research, and other scholarly works including engineering, mathematical and scientific documents created and made available online by the university. Additionally, a

site-license for Adobe Acrobat Pro has also been acquired to assist faculty and staff in making their materials accessible.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 4, Table 10 of the Corrective Action Plan Schedule.

### **3.5 - Electronic Media Accessibility**

#### **3.5.1 - Table 11: Video Accessibility**

##### **Ongoing Requirement(s):**

- Caption instructional videos in accordance with University Policy
- Establish and implement procedures for in-house captioning of instructional materials and adjust as-needed
- Develop funding for a sustainable captioning model
- Students may request that recordings of course sessions and presentations created for and during a course, and in use only during that course, be captioned
- Establish procedures for students to request that course recordings be captioned
- NOTE: Videos for courses that have been identified by the Disability Resource Center (DRC) are automatically captioned. Teaching & Learning Technologies (TLT) also can process more immediate requests that might come through the DRC as well. This process was established in 2015 and has been refined in 2017.
- Share this information each semester with students with disabilities through the Disability Resource Center (DRC)

##### **Response:**

All procedures for in-house captioning for instructional video content have been developed and implemented by TLT. Procedures for students to request captioning through the Disability Resource Center (DRC) remain in place and this information is communicated to all students registered through the DRC.

All instructional videos are captioned upon the request of the instructor or the DRC. Due the mercurial nature of instructional content, new video content is added daily, and instructors are responsible for ensuring their video materials are accessible.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 5, Table 11 of the Corrective Action Plan Schedule.

### **3.6 - Accessibility Reviews**

#### **3.6.1 - Table 12: Accessibility Reviews & Audits**

##### **Ongoing Requirement(s):**

- Conduct reviews and internal audits on quarterly basis
- Contact site owners with review details
- Review Ally reports to monitor progress on instructional materials in the LMS

- Review remediated results on a quarterly basis and notify site owners
- Report inaccessible content to provost for enforcement quarterly

**Response:**

As of September 10, 2018, the ICT Audit subcommittee has completed 18 out of the 22 planned reviews and internal audits using the Siteimprove Intelligence Platform. The resulting Siteimprove Accessibility Reports list each of the known domains and subdomains belonging to a college, division, or major unit, as well as a count of the identified accessibility issues and were shared with the designated Web Accessibility Liaisons. Web Accessibility Liaisons and domain owners are expected to use the information both in the report and in Siteimprove to inform their decisions regarding either remediating or removing inaccessible content by the planned completion dates listed in the Corrective Action Plan Schedule. An “Accessibility Issues by Site” report was presented to the Provost on June 12, 2018, which summarized the state of accessibility compliance of each site at that time. Additional reports will be provided to the Provost on a quarterly basis.

Additionally, Teaching & Learning Technologies has developed an Instructional Materials Accessibility Report that summarizes accessibility issues identified using the Blackboard Ally Canvas Plug-in. These reports will be delivered to all academic units.

We believe this response constitutes full compliance with the ongoing requirement(s) listed above and defined in Section 6, Table 12 of the Corrective Action Plan Schedule.

## 4. Corrective Action Plan Schedule

### Section 1 - General: Policies, Procedures, Communication, and Training

**Table 1: Accessibility Policies and Procedures**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Develop accessibility policies and procedures	7/1/2015	7/1/2017	ICT Committee	Completed
Publish commitment to accessibility statement on website	3/1/2017	3/1/2017	ICT Committee	Completed
Publish accessibility policies and procedures on website	7/1/2017	7/1/2017	ICT Committee	Completed

**Table 2: Accessibility Communication**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Meet with UNR Communication Team to develop a communication plan to inform constituents of the intent, scope and progress regarding the Universities accessibility initiatives.	5/10/2017	Ongoing	MarCom OIT	Ongoing  Met on: 5/12/17, 6/7/17, 7/27/17, 10/19/17, 10/20/17, 10/23/17, 10/31/17, 12/20/17, 6/8/18, 6/12/18, 7/24/18 (all internal meetings)
Meet with OIT, TLT and ICT representatives to discuss details for campus-wide communications plan	5/12/2017	5/12/2017	MarCom	Completed



<b>Activities and Tasks</b>	<b>Start Date</b>	<b>Planned Completion Date</b>	<b>Responsible Parties</b>	<b>Status as of 10/19/18</b>
Hold President's council briefing on accessibility	5/30/2017	5/30/2017	President's Council OIT MarCom	<b>Completed</b>
Visit Faculty Senate to discuss accessibility & captioning	8/31/2017	Ongoing	TLT OIT	<b>Ongoing</b>  Visited: <b>3/16/17</b> <b>8/31/17</b> <b>9/21/17</b> <b>10/19/17</b> <b>9/20/18</b> <b>10/18/18</b>
Send Provost letter to President's Council, Dean's and Academic Leadership Council	11/1/2017	11/13/2017 1/6/2017	MarCom	<b>Completed</b>  Sent on: <b>11/13/17</b> <b>1/6/18</b>
Send campus-wide accessibility letter	12/17/2017	Ongoing	OIT MarCom	<b>Ongoing</b>  Sent on: <b>6/26/17 (President)</b> <b>11/13/17 (Provost)</b> <b>1/16/18 (Provost)</b> <b>8/21/18 (Provost)</b>
Deliver annual correspondence to remind campus about ICT accessibility policy	6/1/2017	Ongoing	Provost	<b>Ongoing</b>  Sent on: <b>6/1/17</b> <b>8/21/18</b>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Send accessibility liaison letter	2/16/2018	Ongoing	ICT Audit subcommittee	<b>Ongoing</b>  Sent on: <b>8/16/18</b>
Host annual campus forum	4/30/2018	Ongoing	ICT Committee MarCom Provost	<b>In progress</b>

**Table 3: Training Plan**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Develop a training plan and course material for basic web accessibility training for all appropriate personnel	2/9/2017	3/1/2017	TLT	<b>Completed</b>
Training sessions are required	3/20/2017	Ongoing	TLT	<b>Ongoing</b>  <b>759 total training attendees across 4 accessibility courses</b> (Basic Web Accessibility; Accessible Office Documents; Accessible Document in the LMS; Accessible PDFs)

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Reporting to OCR regarding training activities	3/14/17	Ongoing	TLT	<b>Ongoing</b>  Sent on: <b>3/14/17</b> <b>12/31/17</b>

## Section 2 - Web Accessibility

Using automated accessibility tools such as the SiteImprove Intelligence Platform, the Level Access AMP application, as well as manual testing, the University identified many of the commonly made accessibility issues. Based on the nature of the barriers, the outdated web governance, and the Benchmarks for Accessibility requirements, the University has determined a complete redesign and rebuild of the website, www.unr.edu, would be more cost effective and result in the most accessible website.

**Table 4: Web Accessibility Overview**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
All web content created by or on behalf of the University will be accessible according to WCAG 2.0 level AA	7/1/2017	3/20/2020	Domain Owners Accessibility Liaisons MarCom	<b>In progress</b>
Identify and develop web property (URL) registry of all known University domains and subdomains	11/1/2017	3/31/2018	MarCom Accessibility Liaisons OIT	<b>Completed</b>  <b>2/8/18 – 95 domains</b> identified and tracked in Siteimprove  <b>8/13/18 – 190 domains</b> identified and tracked in Siteimprove

**Table 5: Content Management System Web Content (www.unr.edu)**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Identify HTML content to carry forward in new site build and prioritize remediation efforts prior to migration	11/1/2017	6/30/2018	MarCom Accessibility Liaisons	<p><b>Completed</b></p> <p><b>2/8/18</b> – Identified <b>23 Level A</b> and <b>1 Level AA</b> total issues across <b>16,186 pages</b></p> <p><b>4/1/18</b> - Identified <b>19 Level A</b> and <b>2 Level AA</b> total issues across <b>15,969 pages</b></p> <p><b>6/29/18</b> – Identified <b>18 Level A</b> and <b>3 Level AA</b> total issues across <b>15,976 pages</b></p> <p><b>8/13/18</b> – Identified <b>23 Level A</b> and <b>2 Level AA</b> total issues across <b>16,111 pages</b></p>
Remove content from the site that will not be carried forward into new design	6/30/2018	6/30/2019	MarCom	<b>In progress</b>
Create inventory of documents related to each web property in the domain registry	2/1/2018	6/30/2018	Accessibility Liaisons MarCom	<p><b>Completed</b></p> <p><b>8/9/18</b> – Identified <b>7,171 used documents</b> and</p>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
				<b>13,037 unused documents</b> in the CMS,  <b>9/7/18</b> – Identified <b>8,126 linked documents:</b> <b>6,715 PDFs</b> files, <b>713 Excel</b> files, <b>535 Word</b> files, <b>87 PowerPoints</b> files
Identify documents to remediate and carry forward into the new web design	2/1/2018	6/30/2018	Accessibility Liaisons	<b>Completed</b>  <b>8/7/18</b> – Identified 4,952 <b>linked inaccessible PDFs</b> in the CMS  <b>9/10/18</b> – Identified <b>5,054 linked inaccessible PDFs</b> in the CMS
Remove documents from the site that will not be carried forward into new design	7/1/2018	6/30/2019	MarCom	<b>In progress</b>
Remediate CMS-based documents that have accessibility issues	7/1/2018	6/30/2019	Accessibility Liaisons	<b>In progress</b>
Create inventory of CMS-based embedded multimedia (e.g. videos)	3/1/2018	5/31/2018	MarCom	<b>Completed</b>  <b>8/9/18</b> – Identified <b>23,906 unused images</b> and <b>788 unused media</b>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
				files in the CMS, <b>14,568 used images</b>  <b>9/7/18</b> – Identified <b>270 CMS-based embedded videos: 164 YouTube</b> embeds, and <b>108 Vimeo</b> embeds (some pages had multiple embeds)
Identify CMS-based embedded multimedia to remediate and carry forward into new website build	6/1/2018	6/30/2018	MarCom	<b>Completed</b>
Remove inaccessible embedded multimedia that will not be carried into the new web design	7/1/2018	6/30/2019	MarCom	<b>In progress</b>
Remediate CMS-based embedded multimedia that have accessibility issues	7/1/2018	6/30/2019	MarCom	<b>In progress</b>

**Table 6: Non-Content Management System Web Content (e.g. unce.unr.edu; naes.unr.edu)**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Accessibility Liaisons submit new sites to be scanned by SiteImprove	11/1/2017	Ongoing	Domain Owners Accessibility Liaisons	<b>Ongoing</b>  <b>2/8/18</b> – <b>94 domains</b> identified and tracked in Siteimprove (excluding the CMS)

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
				<b>8/13/18 – 189 domains</b> identified and tracked in Siteimprove (excluding the CMS)
Identify inaccessible HTML content	11/1/2017	6/30/2018	Domain Owners Accessibility Liaisons	<b>Ongoing</b>  <b>2/8/18 – Identified 1,439 Level A and 142 Level AA issues</b> outside the CMS across <b>126,755 pages</b> and <b>94 domains</b>  <b>4/1/18 – Identified 1,925 Level A and 192 Level AA issues</b> outside the CMS across <b>127,106 pages</b>  <b>6/29/18 – Identified 3,537 Level A and 395 Level AA issues</b> outside the CMS across <b>217,907 pages</b>  <b>8/13/18 – Identified 3,976 Level A and 462 Level AA issues</b> outside the CMS across <b>218,336 pages</b> and <b>189 domains</b>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Remediate or remove inaccessible HTML content	7/1/2016	3/20/2020	Domain Owners Accessibility Liaisons	<b>In progress</b>
Create inventory of documents	2/1/2018	6/30/2018	Domain Owners Accessibility Liaisons	<b>Completed</b>  9/7/18 – Identified <b>40,477 linked documents: 36,086 PDFs</b> files, <b>360 Excel</b> files, <b>2,405 Word</b> files, <b>1,702 PowerPoints</b> files
Identify documents with accessibility issues	2/1/2018	6/30/2018	Domain Owners Accessibility Liaisons	<b>Completed</b>  2/8/18 – Identified <b>14,454 linked inaccessible PDFs</b> outside the CMS  7/31/18 – Siteimprove informed us that their PDF Checker tool was configured incorrectly (limited to only scan 25,000 pdfs). The issue was resolved on 8/10/18. Previous counts may have been affected by the misconfiguration.



Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
				<p><b>8/13/18</b> – Identified <b>13,957 linked inaccessible PDFs</b> outside the CMS</p> <p><b>9/10/18</b> – Identified <b>18,066 linked inaccessible PDFs</b> outside the CMS</p>
Remediate, replace, or remove documents with accessibility issues	7/1/2018	3/20/2020	Domain Owners Accessibility Liaisons	<b>In progress</b>
Identify embedded multimedia (e.g. videos)	3/1/2018	6/30/2018	Domain Owners Accessibility Liaisons	<p><b>Completed</b></p> <p><b>9/7/18</b> – Identified <b>1,450 embedded videos</b> outside the CMS: <b>1,338 YouTube</b> embeds, <b>123 Vimeo</b> embeds, <b>7 Kaltura</b> embeds, and <b>1 Wistia</b> embed (some pages had multiple embeds)</p>
Remediate, replace, or remove inaccessible embedded media	6/1/2018	3/20/2020	Domain Owners Accessibility Liaisons	<b>In progress</b>

### Section 3 - Instructional Materials

Table 7: Learning Management System Accessibility				
Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Establish accessibility requirements for the LMS; These requirements were established when our LMS was adopted in 2015. The requirements reflect WCAG 2.0 standards.	4/2/2015	7/1/2017	TLT	<b>Completed</b>
Ensure accessible class assignments and materials on the learning management systems.	3/7/2016	1/1/2019	Academic Faculty TLT	<b>In progress</b>
Adopt and implement policy that requires all new instructional materials to be accessible starting January 1, 2018	7/1/2017	1/1/2018	Provost Academic Faculty ICT Committee	<b>Completed</b>
Offer training sessions on how to create accessible course materials. <i>(See Addendum: General Accessibility Trainings)</i>	8/13/2015	Ongoing	TLT	<b>Ongoing</b>  114 faculty attendees
Additional accessibility training sessions were offered by Teaching & Learning Technologies (TLT) <i>(See Addendum: General Accessibility Trainings)</i>	2/2/2017	Ongoing	TLT	<b>Ongoing</b>  Two new training sessions were added: <ul style="list-style-type: none"> <li>• Accessible PDFs</li> <li>• Accessible Documents in the LMS</li> </ul>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Accessibility training sessions were expanded, redesigned, and offered with increased frequency. <i>(See Addendum: General Accessibility Trainings)</i>	3/20/2017	Ongoing	TLT	Ongoing
Require faculty to attend Basic Web Accessibility training, annually	3/20/2017	Ongoing	Provost Academic Faculty TLT	Ongoing
Implement Blackboard's Ally software to ensure more accessible course content is available to students, offer additional feedback to faculty regarding their materials, and provide analytics to administration	11/1/2017	11/1/2017	TLT OIT	Completed
Ensure accessible live chat and discussion board functions in the LMS <ul style="list-style-type: none"> <li data-bbox="247 889 743 1052">In 2015 and 2017, the discussion board functionality was found to be accessible according to WCAG 2.0 AA and the company's VPAT. Our 2017 audit confirmed this functionality.</li> </ul>	4/2/2015	10/3/2017	TLT	Completed
Develop accommodations for the web conferencing platform built into the LMS	9/7/2016	1/5/2017	TLT DRC	Completed
Develop and conduct training on how to create and use accessible material in the LMS	3/7/2016	Ongoing	TLT	Ongoing

**Table 8: Instructional Content Outside of the Learning Management System (LMS)**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
All instructional materials located outside of the LMS will be accessible in accordance with University policy.	1/1/2018	12/31/2018	Academic Faculty	In progress
Instructional software applications used in courses will be accessible in accordance with university policy.	1/1/2018	12/31/2018	Academic Faculty	In progress
Procedures have been established for faculty to request accessibility review of instructional software applications.	4/1/2015	4/1/2015	ICT Software Accessibility Review subcommittee OIT	<b>Completed</b>  4/1/2017 - Procedures Updated

Using automated accessibility tools such as SiteImprove Intelligence Platform, the University Libraries identified many of the commonly made accessibility issues. The University Libraries has determined a complete redesign and rebuild of the Libraries' web presence (e.g. library.unr.edu; guides.library.unr.edu) would be the most efficient way to achieve a more usable and accessible web presence.

**Table 9: Library Website and Services Accessibility**

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Accessibility Liaison submit new sites to be scanned by SiteImprove	2/14/2018	Ongoing	University Libraries	Ongoing
The University Libraries' websites, documents and electronic media will be accessible according to WCAG 2.0 Level AA	2/14/2018	3/20/2020	University Libraries	In progress

<b>Activities and Tasks</b>	<b>Start Date</b>	<b>Planned Completion Date</b>	<b>Responsible Parties</b>	<b>Status as of 10/19/18</b>
Identify HTML content to carry forward in new site build and prioritize remediation efforts prior to migration	2/14/2018	3/20/2020	University Libraries	<b>Completed</b>
Remove content from the site that will not be carried forward into new design	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Create inventory of documents	2/14/2018	3/20/2020	University Libraries	<b>Completed</b>
Identify documents to remediate and carry forward into the new web design	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Remove documents from the site that will not be carried forward into new design	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Remediate documents that have accessibility issues	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Create inventory of embedded multimedia (e.g. videos)	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Identify embedded multimedia to remediate and carry forward into new website build	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Remove non-accessible embedded multimedia that will not be carried into the new web design	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>
Remediate embedded multimedia that have accessibility issues	2/14/2018	3/20/2020	University Libraries	<b>In progress</b>

<b>Activities and Tasks</b>	<b>Start Date</b>	<b>Planned Completion Date</b>	<b>Responsible Parties</b>	<b>Status as of 10/19/18</b>
Work with Libraries staff to ensure that scholarly databases are accessible	8/1/2015	Ongoing	University Libraries	<b>Ongoing</b>

## Section 4 - Documents

**Table 10: Document Accessibility**

<b>Activities and Tasks</b>	<b>Start Date</b>	<b>Planned Completion Date</b>	<b>Responsible Parties</b>	<b>Status as of 10/19/18</b>
Create and publish instructional materials on how to create accessible documents. These materials will be reviewed and revised as standards and file formats evolve.	10/16/2017	Ongoing	TLT	<b>Completed</b>
Establish and publish best practices on accessible PDF documents used for instruction. These materials will be reviewed and revised as standards and file formats evolve.	10/16/2017	Ongoing	TLT	<b>Completed</b>
Develop and implement training sessions on how to create accessible PDF documents.	10/16/2017	Ongoing	TLT	<b>Completed</b>
Develop and implement strategies for producing accessible scientific and mathematical documents. Teaching & Learning Technologies (TLT) will continue to work with the DRC to establish best practices for these documents.	10/1/2017	Ongoing	TLT DRC	<b>Ongoing</b>

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Develop and publish strategies for producing accessible [research]* and scholarly documents.  *formerly said scientific	4/1/2018	12/31/2018*  *formerly 10/31/2018	Research and Scholarly Works subcommittee	In progress

## Section 5 - Electronic Media Accessibility

Table 11: Video Accessibility				
Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
All videos (professionally or internally produced) used in courses and shared on campus websites or video storage sites will be captioned according to recommended Described and Captioned Media Program (DCMP) standards	12/8/2015	1/1/2019	TLT MarCom Faculty Members	In progress
Implement policy, effective January 1, 2018, requiring all new instructional videos to be captioned.	6/1/2017	6/1/2017	Provost OIT Academic Faculty ICT Committee	Completed
Caption instructional videos in accordance with University policy.	6/1/2017	Ongoing	Faculty Members TLT	Ongoing
Establish and implement procedures for in-house captioning of instructional materials and adjust as-needed	10/24/2016	Ongoing	TLT	Ongoing

<b>Activities and Tasks</b>	<b>Start Date</b>	<b>Planned Completion Date</b>	<b>Responsible Parties</b>	<b>Status as of 10/19/18</b>
Refine in-house captioning standards to align with DCMP standards	2/8/2018	2/8/2018	TLT	<b>Completed</b>
Develop funding for a sustainable captioning model	12/8/2015	Ongoing	TLT DRC Provost OIT	<b>Ongoing</b>
Students may request that recordings of course sessions and presentations created for and during a course, and in use only during that course, be captioned	Prior to 2012	Ongoing	TLT DRC	<b>Ongoing</b>
Establish procedures for students to request that course recording videos be captioned  NOTE: Videos for courses that have been identified by the DRC are automatically captioned. Teaching & Learning Technologies (TLT) also can process more immediate requests that might come through the DRC as well. This process was established in 2015 and has been refined in 2017.	12/8/2015	Ongoing	TLT DRC	<b>Ongoing</b>
Share this information each semester with students with disabilities through Disability Resource Center (DRC)	Prior to 2012	Ongoing	DRC	<b>Ongoing</b>



## Section 6 - Accessibility Reviews

Table 12: Accessibility Review and Audits				
Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
Obtain SiteImprove license for unlimited sites and pages.	4/1/2017	11/1/2017	MarCom OIT	<b>Completed</b>
Conduct reviews and internal audits on quarterly basis.	3/1/2018	Ongoing	ICT Audit subcommittee	<b>Ongoing</b>  <b>6/11/18</b> – 12 of out 22 reviews of web content & pdfs completed, reports sent to heads of units.  <b>9/10/18</b> – 18 of out 22 reviews of web content & pdfs completed, reports sent to heads of units.
Contact site owners with review details.	3/1/2018	Ongoing	ICT Audit subcommittee	<b>Ongoing</b>  <b>7/16/18</b> – Reports shared with 14 of out 27 web accessibility liaisons (some reports go to multiple web accessibility liaisons)  <b>9/10/18</b> – Reports shared with 21 of out 27 web accessibility liaisons

Activities and Tasks	Start Date	Planned Completion Date	Responsible Parties	Status as of 10/19/18
				(some reports go to multiple web accessibility liaisons)
Review Ally reports to monitor progress on instructional materials in the LMS.	3/1/2018	Ongoing	ICT Audit subcommittee TLT	<b>Ongoing</b>
Review remediated results on a quarterly basis and notify site owners.	3/1/2018	Ongoing	ICT Audit subcommittee	<b>Ongoing</b>
Report inaccessible content to provost for enforcement quarterly.	6/1/2018	Ongoing	ICT Audit subcommittee	<b>Ongoing</b>  6/12/18 – Shared “Accessibility Issues by Site” report with the Provost & Vice Provost for Information Technology

## **Accessibility Training Plan**

The University has developed a training plan to ensure the ICT Accessibility Policy is put into practice during the digital media creation process. The University provides regularly scheduled face-to-face training opportunities and is in the process of developing an online version of the training. The training plan includes the following:

- All employees who create, edit or publish content to the web are required to attend Basic Web Accessibility Training on an annual basis.
- The training provides best practices on how to make content accessible in accordance with our standards (WCAG 2.0 AA).
- All training attendance is documented.
- Training reports are provided to the Department of Education, Office for Civil Rights (OCR) on an annual basis, until such time as the OCR closes its monitoring of our resolution agreement.

## **ICT Accessibility Implementation Plan**

To reduce the confusion of having multiple accessibility plans (Corrective Action Plan and Implementation Plan), the University has included items outside of the 2017 audit into this Corrective Action Plan and has no further plans to develop a separate ICT Accessibility Implementation Plan as was stated in the original September 2017 proposed corrective action plan submitted and not accepted by the OCR. We believe the Corrective Action Plan achieves the goals the university wanted the Implementation Plan to achieve.

The Accessibility Implementation Plan was to also include sufficient quality assurance procedures including setting up a system of testing and accountability to maintain the accessibility of all online content and functionality on an ongoing basis. This also applied to online content and functionality developed by, maintained by, or offered through a third-party vendor or through the use of open sources, and includes setting up systems of accountability and verifying claims of accessibility by vendors or open sources. Those assurances are described below in the Monitor for Accessibility Compliance section.

## **Monitor for Accessibility Compliance**

Using the Siteimprove Intelligence Platform, the University is actively monitoring and reporting on the accessibility compliance of known domains and subdomains listed in the official web registry. All domains and subdomains are grouped by their respective college, division, or major unit. Each of the colleges, divisions, or major units that have received their Siteimprove Accessibility Report, which summarizes the accessibility compliance of each of their sites, is listed below (see Addendum – 2.0 Web Accessibility Liaisons)

Each college or division has designated a primary Web Accessibility Liaison who, per the [ICT Accessibility Procedures](#), is responsible for:

- Being up to date on university policy and procedures related to accessibility
- Being knowledgeable on how to direct users on how to get the technical assistance they require
- Maintaining a registry of all websites within the college/division that are used for official academic or business activities
- Monitoring accessibility compliance of registry websites

- Reporting the registry to the ICT Accessibility Committee

The University has also purchased a license to the Ally Canvas plugin which allows for the identification and reporting on accessibility compliance of instructional materials located in the LMS.

The ICT Committee currently has an ad-hoc procedure for manually testing websites and web content.

## **Software Procurement**

The University has developed and implemented a robust [Accessibility Procurement](#) process. All software being initially procured or renewed is being reviewed and validated for accessibility.

In the case of new software purchases, the process requires all software vendors to provide a Voluntary Product Accessibility Template (VPAT), a commitment to remediate any barriers, and a timeline for expected completion of remediation. In the cases of student-facing or public-facing software, the University also manually tests the software to verify the claims of accessibility (VPAT). Testing is performed by people with disabilities using assistive technology and by a qualified software tester using manual and automated tools. Vendors are contacted and are required to remediate any identified barriers prior to procurement.

In the cases of software renewals, letters are sent from the Vice Provost for IT & Chief Information Officer to the Supplier and the UNR Purchaser indicating that future renewal requests will not be approved unless and until the vendor or purchaser demonstrates the product meets accessibility requirements.

A system of addressing exceptions to this procurement process is in place and a software subcommittee has been formed to regularly evaluate and update these processes.

## Addendum

### 1.0 - Accessibility Workshop Offerings

#### General Accessibility Trainings

Course	Description	Dates Offered
<b>Creating Accessible Documents</b>	Is your course content on WebCampus accessible? In this workshop, you will learn how to create or convert existing documents (images, Microsoft Word and PowerPoint) on your WebCampus course into accessible formats.	11/18/2014 - 02/13/2017
<b>Basic Web Accessibility Training</b>	Learn why and how to create accessible web-based materials. This workshop will overview the need for accessible content, current regulations related to accessibility, and tips for providing an equitable experience for all users.	3/1/2017 - Ongoing
<b>Creating Accessible Office Documents</b>	This is hands-on follow up to Basic Web Accessibility for people who create content via Office, PowerPoint, Excel, and Publisher. Is your course content in WebCampus accessible? In this workshop, you will learn how to create or convert Microsoft Office documents (Word, PowerPoint, Excel, and Publisher) into accessible formats. <b>NOTE:</b> Participants should have an understanding of basic web accessibility or should attend a workshop prior to attending this training.	9/18/2017- Ongoing
<b>PDF Remediation for Accessibility</b>	Learn how to use Adobe Acrobat Pro to check PDFs and remediate for accessibility. This 2-hour course will cover the basics of setting up accessibility tools and views, performing accessibility checks, and remediating potential problems by tagging documents to ensure proper reflow and reading order, structuring tables & lists, adding alternative text for images and formulas, identifying hyperlinks, creating bookmarks, and more.	10/16/2017- Ongoing
<b>Hands-on with Ally – Canvas Accessibility</b>	Curious about how Ally works and how to make your course more accessible? Come to the hands-on ally training to learn about features for faculty and students. After an overview, time is allotted for guidance as you work on examples from your specific course materials.	11/28/2017- Ongoing

## 2.0 - Web Accessibility Liaisons and College/Division/Unit Heads

### Accessibility Liaisons (as of 10/19/2018)

Division	Web Representative	College/Division/Unit Head	Status as of 10/19/18
ASUN - Associated Students of the University of Nevada	Raul Rodriguez	Sandy Rodriguez	Siteimprove Report shared: <b>8/29/18</b>
CABNR - College of Agriculture, Biotechnology and Natural Resources	Robert Moore	Bill Payne	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
Cooperative Extension	Ashley Andrews	Ivory Lyles	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
CHS - School of Community Health Sciences	Vacant	Trudy Larson	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
CLA - College of Liberal Arts	Lisa McDonald	Debra Modellmog	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
School of the Arts	Yun Ku	Tamara Scronce	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
COB - College of Business	Jennifer Shelton/Christina Hilfer	Greg Mosier	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
COED - College of Education	Will McDonald	Ken Coll	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
COEN - College of Engineering	Kirstin Swagman	Manos Maragakis	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
COS - College of Science	Jennifer Sande	Jeff Thompson	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
DAF - Division of Administration and Finance	Jodi Fraser	Vic Redding	Siteimprove Report shared: <b>8/27/18</b>
DAR - Division of Development and Alumni Relations	Jonathan Studebaker	John Carothers	Siteimprove Report shared: <b>8/29/18</b>
DES - Division of Extended Studies	Mark Albin	Fred Holman	Siteimprove Report shared: <b>9/17/18</b>
DIA - Division of Intercollegiate Athletics	Chad Hartley	Doug Knuth	

<b>Division</b>	<b>Web Representative</b>	<b>College/Division/Unit Head</b>	<b>Status as of 10/19/18</b>
DRI - Division of Research and Innovation	Alex Vanderhoff	Mridul Gautam	Siteimprove Report shared: <b>9/10/18</b>
DSS - Division of Student Services	Molly Beaupre, Megan Pittman & Mary Heid	Shannon Ellis	Siteimprove Report shared: <b>8/29/18</b>
GRAD - The Graduate School	Jennifer Shelton	David Zeh	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
JOUR - School of Journalism	Jessica Fagundes	Al Stavitsky	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
LIB - University Libraries	Tanner Kowalczyk	Kathy Ray	Siteimprove Report shared: <b>9/4/18</b>
MED - School of Medicine	Mike Wilhelm	Thomas Schwenk	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
NURS - Orvis School of Nursing	Pamela Smith	Debera Thomas	
OIT - Office of Information Technology	Tina Hill & Jordan Wines	Steve Smith	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
OMC - Office of Marketing and Communications	Michael Brown	Thomas White	
PRES - Office of the President	Michael Brown	Marc Johnson	
PROV - Office of the Provost	John Kearney	Kevin Carman	Siteimprove Report shared: <b>6/11/18, 7/16/18</b>
Pearson	Michael Brown	Kevin Carman	
SOC - School of Social Work	Vacant	Shadi Martin	