

CLEVELAND PUBLIC LIBRARY

Board Meeting

June 19, 2018

RESOLUTION ADOPTING POLICY ON WEB ACCESSIBILITY

WHEREAS, On January 24, 2018, the Cleveland Public Library was notified that the United States Department of Education Office for Civil Rights had received a complaint alleging that the Library's web pages are not accessible to individuals with certain disabilities; and

WHEREAS, The Department of Education offered the Library the option of negotiating and entering into a resolution agreement under which the Library would take certain steps to make its website and web-based resources accessible and the Department of Education would forego its investigation into the accessibility complaint; and

WHEREAS, The Library and the Department of Education reached an agreement on March 8, 2018 under which the Library agreed, among other things, to implement a policy addressing website accessibility and setting forth a plan for bringing the Library's website into compliance with accessibility standards; and

WHEREAS, The Library has completed drafting a Policy on Web Accessibility which the Department of Education has approved and which is attached as an exhibit to this resolution for consideration by the Board of Library Trustees; now therefore be it

RESOLVED, That the Board of Trustees of the Cleveland Public Library hereby approves the Policy on Web Accessibility, as attached, to be effective June 20, 2018.



CLEVELAND PUBLIC LIBRARY

325 Superior Avenue • Cleveland, Ohio 44114 • 216.623.2800 • www.cpl.org

POLICY ON WEB ACCESSIBILITY

Purpose

The Cleveland Public Library (the “Library”) strives to be the center of learning for a diverse and inclusive community and to offer its patrons access to a variety of services and resources designed to improve patrons’ personal and professional lives and wellbeing. This Policy on Web Accessibility (“Policy”) establishes standards for the accessibility of web-based information, resources, and services (collectively, the “Online Content”) offered to patrons by the Library.

Accessibility Standard

The Library will adopt the World Wide Web Consortium’s (“W3C”) Web Content Accessibility Guidelines (“WCAG”) 2.0 Level AA to evaluate and determine user accessibility of the Online Content for individuals with visual, print, hearing, and physical impairments or who otherwise require the use of assistive technology to access information.

Web Accessibility Coordinator

The Library has designated a Web Accessibility Coordinator whose contact information is as follows:

Web Administrator
Cleveland Public Library
325 Superior Avenue
Cleveland, Ohio 44114
216-623-2936
website@cpl.org

The Web Accessibility Coordinator will have the authority to coordinate and implement this Policy and all other requirements relating to the accessibility of the Library’s Online Content.

Accessibility of Third Party Content

The Library will make reasonable efforts to obtain contractual commitments from its third party content providers to maintain their content in a manner that conforms to WCAG 2.0 Level AA. The Library will also test select third party content providers to determine whether the content conforms to WCAG 2.0 Level AA on a random basis and upon receipt of a complaint that the third party content is not accessible. If the Library determines that the third party provider’s content does not conform to WCAG 2.0 Level AA, then the Library will notify the provider and will request that the content be made accessible. If the provider fails to make its content accessible, then the Library will consider such failure as a factor when determining whether to renew its subscription with the provider and may, as appropriate, consider such failure a breach of contract.

The Library will consider accessibility as a factor in selecting new third party content and in determining whether to renew its subscriptions for third party content already offered by the Library.

Annual Training

The Library will provide annual training for all staff responsible for creating or distributing information with Online Content to patrons, employees, guests, and visitors with disabilities. The annual training will

include training on this Policy as well as the role and responsibility of staff in ensuring the accessibility of web design, documents, and multimedia content. The training will be facilitated or selected by the Web Accessibility Coordinator or other Individual with sufficient knowledge, skill, or experience to understand and employ the standards as set forth in this Policy.

Accessibility Audits

The Library will conduct audits assessing the accessibility of the Library's online content on an annual basis. The audits will be conducted under the direction of the Web Accessibility Coordinator and will measure the accessibility of the Online Content according to the standard adopted by the Library in this policy. The Library will document, evaluate, and, if necessary, remediate all accessibility issues identified by the audit within a reasonable time following the audit.

Accessibility Complaints

Library users, administrators, employees, guests, and visitors may report violations of the standard adopted by the Library in this Policy, file a complaint according to the Library's Section 504 and Title II Grievance procedure, and/or contact the Web Accessibility Coordinator with any accessibility concerns. Complaints regarding the accessibility of Online Content should include:

- Name of complainant;
- Complainant's telephone number and/or email address;
- Description of the problem encountered;
- Date that the problem was encountered;
- Web address or location of the problem page; and
- Description of the solution desired.