



Date: February 28, 2024

To: Andre Avramchuk, Chair Academic Senate

From: Jane Gauthier, Chair Educational Policy Committee

Copies: R. Roquemoire; M. Hawley; C. Pugh; C. Wang; K. Hillstrom; C. Haras; K. Fisher

Subject: **EPC Memo 23-12: Proposed Modifications to Accessible Instructional Materials Policy – Chapter V of the Faculty Handbook**

On January 9, 2024, EPC received a memo from the Academic Information Resources Subcommittee (AIRS) regarding proposed modifications to the Accessible Instructional Materials Policy. AIRS worked with Information Technology Services staff to develop these modifications. The proposed changes range from the modernization of language to inclusion of newly mandated executive orders from the Chancellor's office. These changes in policy are urgently needed to ensure equitable access to materials for all students and compliance with governing documents (e.g., Americans with Disabilities Act of 1990, Rehabilitation Act of 1973, Collective Bargaining Agreement between CFA and the CSU), and to address a 2023 Chancellor's Office Audit. On January 31, 2024, EPC discussed and approved the proposed modifications.

Lines 14-16: Updated the correct campus name (Cal State LA).
Lines 17-18: Added a more recent coded memo (2021).
Line 22: Updated the correct campus name (Cal State LA).
Lines 29-30: Updated to reflect the current LMS (we no longer use Moodle).
Lines 38-43: Added a new definition for Remediation as this is the most common and labor-intensive practice regarding ensuring accessibility (as opposed to creating an accessible document from scratch).

The following additions (Lines 44-86) reflect the results of the second (Fall 2023) Chancellor's Office audit finding that Cal State LA does not have a robust compliance structure in place for accessible materials: ALL course materials must be made accessible to students by the curriculum owner(s) regardless of whether there is a formal accommodation request, including materials (e.g., journal articles) hosted in the campus LMS.

Lines 45-46: Reflecting recent audit and federal mandate. Accessibility is an equity issue.
Lines 47-58: Revised to clarify that accessible materials are the specific responsibility of the curriculum owner, as well as to distinguish types of remediation services.
Lines 60-64: Language updated to include ensuring accessibility in the LMS (Canvas) as well as LMS support tools for faculty.



- Lines 73-76: Specifies student responsibility regarding accessible materials and ITS Accessibility services.
- Lines 78-80: Language updated to reflect recognized terminology (ICT and not “electronic”).
- Lines 81-83: Language updated to reflect the increased use of third-party integrations in online platforms such as textbooks, that are required by law to meet accessibility standards.
- Lines 84-86: Updated to specify campus resources supporting accessibility remediation.

Accessible Instructional Materials

(Senate: 10/14/14; President: 10/22/14)

GOVERNING DOCUMENTS: The Americans with Disabilities Act of 1990 (ADA), sections 504 and 508 of the Rehabilitation Act of 1973, California Government Code 11135, CSU Executive Order 926, CSU Coded Memo AA 2013-03, and the Collective Bargaining Agreement between the California State University and the California Faculty Association.

The Collective Bargaining Agreement between the CSU and CFA recognizes that quality education requires an atmosphere of academic freedom and academic responsibility. As such, they acknowledge and encourage the continuation of academic freedom while recognizing that the concept of academic freedom is accompanied by a corresponding concept of responsibility to the university and its students. Instructors select instructional materials for their courses based on pedagogical considerations such as, but not limited to, instructional objectives, course content, teaching style, and the characteristics of the students enrolled in the course.

The CSU and CSULA CAL STATE LA are committed to provide equal EQUITABLE access to information resources to all individuals. This commitment is both an ethical matter and a legal mandate. CSULA CAL STATE LA and CSU policies must comply with federal and state laws governing access to information and services for students / persons with disabilities. The Chancellor's Office (CSU Executive Order 926 1111 and Coded Memo AA 2013-03 ACCESSIBLE TECHNOLOGY INITIATIVE MEMO, MARCH 2021) requires campus administrations to create plans to support faculty and staff practices that will ensure timely access to all instructional materials. The Center for Effective Teaching and Learning (CETL) provides information to support faculty in providing accessible instructional materials. Faculty members seeking additional information should consult with the CSULA CAL STATE LA INFORMATION TECHNOLOGY SERVICES (ITS) ACCESSIBILITY AND THE Office for Students with Disabilities (OSD). The successful implementation of this policy requires the active cooperation of the faculty, departments, administration, staff, and students.

DEFINITIONS

Instructional materials are defined in this policy to include, but are not limited to the following: course syllabi; the expressive content of digital teaching media; content delivered by audio or video methods whether recorded or live streamed, learning management systems (e.g., Moodle)-(LMS), or other technologies not yet developed EMERGING INSTRUCTIONAL TECHNOLOGIES; web-based publications; and any other materials created for the purposes of teaching or instruction or to support the teaching of a course, regardless of mode of delivery. This policy does not apply to routine course materials that the student requires in the normal course of academic endeavors (e.g., paper, pencils, pens, notebooks, etc.).

Accessible materials are materials that are designed or converted in a way that makes them usable across the widest range of student variability regardless of format (e.g., print, digital, graphic, audio, video).

REMEDIATION IS THE PROCESS OF MAKING DIGITAL CONTENT ACCESSIBLE TO A BROAD RANGE OF LEARNERS, INCLUDING THOSE WITH DIVERSE LEARNING STYLES OR ABILITIES, FOR EQUITABLE ACCESS TO INSTRUCTIONAL MATERIALS. THIS INCLUDES, BUT IS NOT LIMITED TO, THE FOLLOWING STANDARD PRACTICES: TRANSFORMING DOCUMENT

STRUCTURE, ADDING IMAGE ALT-TEXT, FORMATTING TEXT AND HYPERLINKS, ENSURING ADEQUATE COLOR CONTRAST, ADDING CLOSED CAPTIONS AND AUDIO TRANSCRIPTS.

POLICY

It is the shared responsibility of faculty, STAFF, AND the administration to ensure EQUITABLE ACCESS TO that accessible instructional materials are available to FOR ALL students. The university will adopt procedures that ensure that instructional materials are accessible to enrolled students THE UNIVERSITY IS RESPONSIBLE FOR SECURING RESOURCES FOR INSTRUCTIONAL MATERIALS REMEDIATION SERVICES (E.G., FUNDING, PERSONNEL). HOWEVER, IT IS THE RESPONSIBILITY OF EACH FACULTY AS OWNER OF THEIR CURRICULUM TO CREATE AND/OR SELECT /or curate ALREADY ACCESSIBLE INSTRUCTIONAL MATERIALS, USE PROVIDED LMS TOOLS TO IDENTIFY INACCESSIBLE MATERIALS, AND TO INITIATE DIGITAL INSTRUCTIONAL MATERIALS REMEDIATION SERVICES (E.G., REQUESTING HUMAN-GENERATED CAPTIONS, REMEDIATION OF INACCESSIBLE FILES). THE PARTY THAT INITIATES USE OF THE INSTRUCTIONAL MATERIAL IS RESPONSIBLE FOR ENSURING THE ACCESSIBILITY. THUS, IF A PROGRAM MANDATES USE OF PARTICULAR MATERIALS FOR A GIVEN COURSE, THE PROGRAM (RATHER THAN THE INDIVIDUAL FACULTY ASSIGNED TO TEACH THE COURSE), IS REponsible FOR PRODUCING THE MATERIALS IN AN ACCESSIBLE FORMAT (E.G., HIGHLY COORDINATED COURSES). or with disabilities at the same time they are available to any other student, including materials that require conversion to accessible formats by OSD. This includes tlearning TOOLS ARE PROVIDED IN THE CAMPUS LMS THAT IDENTIFY THE ACCESSIBILITY OF COURSE FILES AND PROVIDE ALTERNATIVE FORMATS FOR STUDENTS. FOR THIS REASON, FACULTY ARE RESPONSIBLE FOR POSTING ALL COURSE MATERIALS IN THE CAMPUS LMS TO TAKE ADVANTAGE OF UNIVERSITY-PROVIDED REMEDIATION SUPPORT. management systems strongly encouragedto learning management system The university will bear the cost of converting materials to an accessible format when an accessible version considered acceptable by the course instructor does not already exist. PROVIDES SUPPORT FOR CREATING, ADOPTING, AND REMEDIATING COURSE MATERIALS IN AN ACCESSIBLE FORMAT. Students are responsible for notifying OSD of their disability and their need for accommodation in accordance with OSD procedures.

Early adoption of required textbooks and other course materials facilitates the efforts of OSD to provide appropriately formatted materials in a timely manner. When possible, instructional materials should be available in multiple formats (e.g., print, electronic, audio). Given two or more equivalent instructional materials, the instructor should select an accessible version. STUDENTS ARE RESPONSIBLE FOR NOTIFYING OSD OF THEIR DISABILITY AND THEIR NEED FOR ACCOMODATION IN ACCORDANCE WITH OSD PROCEDURES. If needed, faculty should work with ITS ACCESSIBILITY AND an OSD Disability Specialist to review alternative formats for educational materials in advance of the need for such materials.

Electronic and information technology INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) resources used in instruction must also be accessible and meet the section 508 standards for electronic and information technology ICT. Examples include course websites, materials uploaded to a course website or learning management system, THIRD-PARTY LMS INTEGRATIONS, video and multimedia products, software, telecommunication devices, and computers EMERGING INSTRUCTIONAL TECHNOLOGIES. Faculty can seek guidance and information about the accessibility of electronic and information technology resources from THEIR COLLEGE INFORMATION TECHNOLOGY CONSULTANT (ITC), OSD, the Center for Effective Teaching and Learning, and Information Technology Services ACCESSIBILITY.