

## COMMENTS RECEIVED TO PROPOSED NEW OR REVISED POLICIES

<b>AP 2.01.02: ADA &amp; Equal Opportunity, Electronic Information Technology Accessibility Guidelines — INTERIM — EFFECTIVE APRIL 24, 2026</b>		
<b>Date Comment Received</b>	<b>Comment(s)</b>	<b>Response(s)</b>
2-12-2026	Overall this is solid and well-matches the DOJ Title II accessibility rule. I'm concerned that faculty responsibility is very broad via this statement: " <i>Employees shall ensure that any EIT they upload, post, purchase, or maintain meets the required WCAG Standard</i> " as it includes so many people of different classifications; further, what constitutes EIT will cause confusion especially about personal liability and uneven compliance w/o support (per Liz's comments). As of reading, there's no guidance on the F&S page mentioned. Further, the AP includes third-party content in scope, but it doesn't explicitly state things like procurement or enforcement, so without an attached SOP or further qualification I'm concerned that faculty may, eg, assume that if it's in the LMS it's ok, or lead to areas adopting non-compliant tools. Getting the various teams involved with this to Faculty Senate (ADR, LMS/IT, TLC) is needed for additional clarity.	<b>See unified response below comments.</b>

2-12-2026

I have a general concern with us meeting the standards for **WCAG 2.1 (Level AA)** by April 24, 2026 as set by this AP. I understand this is a federal mandate, so I am not suggesting we do not apply it, but there is a lot of content creation by instructors who use D2L to build individual courses, modify courses they are teaching, or communicate with students using class tools who are not familiar with the standards and would not know how to be in compliance.

How will the College address the upskilling needed by instructors to learn how to be in compliance?

Many standards in WCAG 2.1- AA are taught in TE150 (as part of building accessible content in the D2L shell), though this is not a course required for instructors. For reference, TE125 -one level under TE150- is the course that is requested for teaching online. Non-online instructors may still use D2L extensively, but are not required to train on ensuring accessibility.

Here are some ways an instructor may inadvertently not meet WCAG 2.1 (Level AA) standards:

Addressed in Web Writing Guide on PCC page

- An instructor posts an announcement and uses bold, text size, and color instead of headers to organize text. (violates 1.3.1)

- An instructor posts an announcement and uses red lettering to call attention to key items in the post. (violates 1.4.1)
- An instructor adds an illustrative image to the course or announcement but does not add alt text.(violates 1.1.1)

Not addressed in College website information referenced in new AP and may cause an instructor to violate standards.

- An instructor posts a sample assignment in PDF marked up to provide guidance for students. (violates 1.4.1 and 1.3.2)
- An instructor posts a video and does not review auto- captions. This is even more challenging for language instructors who may use two languages and would need to ensure captions in two languages - often meaning that at least half of the video needs to be manually captioned. (violates 1.2.2)
- An instructor posts a colorful infographic, PDF or Google slides that are not tagged for the order in which it should be read by a screen reader.(violates 1.3.2)
- A language instructor adds content or an announcement using two languages and lang tags are not set.(violates 3.1.2)
- An instructor shares a podcast and does not include a text alternative. (violates 1.1.1)

## Unified Response:

Thank you for your detailed reviews and comments. Two minor adjustments are being made to the AP: correcting the review cycle and identifying the location where resources are posted on MyPima, rather than on the public website. Other comments are addressed in the SOP, the resource pages, and support tools.

Web Systems requested that the resource page be on MyPima. The *Digital Accessibility Resources for Employees* page is available under the Employees menu. The new SOP is also available on this page. A single 'parent' SOP will have additional linked 'child' SOPs with additional information for specific areas or use cases. We expect regular updates to the SOPs and resources over our first two or three years of experience, and as we develop better tools.

Many existing resources were developed for the prior standard and are also being updated. Our orientation program also points to several excellent resource pages from large universities, which we can leverage.

The Ally tool supports our learning platforms, while Acquia reviews our public and MyPima web pages and links to help identify content that needs updating. Microsoft applications include fairly robust accessibility checkers. The Grackle extension supports creating accessible versions in Google applications. Both will create accessible PDFs. New AI-supported tools can add closed captioning and create transcripts.

The new ADA regulation will require employees who create content that may be made digitally available to broader audiences, including students, employees, and the public, to adopt practices that make that content more accessible. As an example, a job aid describes how to set up and use Microsoft Word and Google Docs headings instead of bolding and indenting. Both are effective at communicating a message to sighted people, but the HTML code included with headings makes the document equally accessible to people with vision impairments.