Procurement Protocol for
Accessible Digital Technologies

March 27, 2018

Tufts University is committed to ensuring accessibility for all individuals with disabilities in compliance with Section 504 of the Rehabilitation Act of 1973, as amended. This Act prohibits disability discrimination in any program or activity that receives Federal funds or is conducted by an executive agency.

Tufts has developed a three-pronged approach to ensure equal access to all digital technologies and digital content. This Accessibile Digital Technologies Procurement Protocol is designed to make sure that any digital technology, or Information Communication Technology (as defined by the federal government) is evaluate for accessibility before the university enters into a purchase agreement. Tufts will also implement a Web Accessibility Protocol and a Captioning Protocol later in 2018.

The Accessible Digital Technologies Procurement Protocol is intended to facilitate ongoing efforts to improve accessibility, involving the purchases the University makes in the area of Accessible Digital Technologies (ADT). ADT includes all university-sponsored websites, any information technology and equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. More specifically, ADT can include, but is not limited to telecommunications products (such as telephones), information kiosks, Automated Teller Machines (ATMs) and transaction machines, internet and intranet websites, electronic books and electronic book reading systems, search engines and databases, course management systems, classroom podiums and technology and multimedia, personal response systems ("clickers"), and office equipment such as, copiers and fax machines.

This protocol requires the University to consider the accessibility of a product during the RFP phase of product purchasing using the Federally recognized accessibility standards (Section 508 of Electronic Information and WCAG 2.1 AA for web accessibility).

While the University is committed to taking measures to promote access to ADT for all students, faculty, staff and the public with disabilities, there may be situations that call for exceptions to the protocol. If a necessary product cannot be made or acquired that fully meets these standards, the person or department desiring to purchase the product must submit a plan for equally effective alternative access of the features within the product that are inaccessible (APPENDIX 5). The purchasing person or department should consult with Student Accessibility Services on an appropriate work-around.

It should be noted that exceptions to accessible products are **unlikely** to be given for Learning Management Systems (LMSs) or web technology or software that is used for critical or important transactions (registering for classes, accessing university information on a mobile device). Any inaccessible standalone instructional support applications (apps, Kindle devices or technologies used in the classroom) may be used only if, to the extent necessary, adequate alterantive accessible application, technology or user support is made available.

Steps for Completing an Accessibility Check during the RFP process:
The process for vetting ADT products for accessibility will be conducted by a team within TTS (Tufts Technology Services) that is responsible for evaluating any purchase across the university. The team has been trained by a representative from Student Accessibility Service on how to evaluate a website or EIT using the method outlined in this protocol. The team will receive up-dated training annually or as frequently as the law changes. TTS will follow the steps below to determine whether or not the vendor has sufficiently demonstrated that the product is accessible according to the Federal standards and provide next step solutions if the product is inaccessible in whole or part. TTS will then submit a report detailing their findings and recommendations to the Purchasing office for consideration prior to issuing a contract.

TTS will use the process below to confirm or deny the accessibility of a product after the vendor has issued a report:

1. All RFPs issued to vendors for bids will include accessibility language (Appendix 1).
2. All requests to purchase ADT products (of any amount or for any usage) that are made through the Purchasing office will be checked for accessibility by TTS.
3. The Purchasing office will assign each proposed purchase to a member in TTS to be checked. TTS will ask the Vendor to fill out Tufts Assessment of Product form (Appendix 2 and 3) and return it within two weeks for review. Note that there are different forms for the vendor to fill out depending on whether the product is web-based or non-web-based.
4. The Vendor will provide Tufts with a platform to test the product internally. TTS will run in-house accessibility tests with screen reading software, paying particular attention to how a member of the Tufts community will interact with the product.
5. TTS will summarize the findings in a report with regard to the WCAG and Section 508 of the Rehabilitation Act standards. TTS will submit the report with findings and recommendations to the Purchasing office (See Appendix 4).
6. The Purchasing office will then decide whether or not to purchase the product and if so, whether it requires an exemption (see Appendix 5). The Purchasing office may seek guidance from the Office of University Counsel and Student Accessibility Service.
7. The purchaser will be notified of the university's decision and provide a copy of the findings. If the university grants an exception with conditions, the vendor must produce a roadmap outlining proposed efforts towards compliance and timeline (Appendix 6).

If the purchaser asks to purchase the product even though it is inaccessible, then the purchaser must request an exception and submit it to the Chief Information Officer (CIO). The request for exception should include:
1. Demonstrate that the technology for which an exception is sought is the only option available or is used as standard common practice in the field of study, as no other options exist.

2. Include a timeline and plan for how to ensure alternate access if the request is granted and if deemed not to present an undue burden or fundamental alteration to the program that it is being purchased for.

The CIO will work with the Office of University Counsel and Student Accessibility Service to determine whether an exception is appropriate and the parameters of any such exception. The terms of the exception will be communicated to the vendor in writing prior to the university signing a purchasing agreement (see Appendix7).