

St. Louis Public Schools
Website Accessibility Policy

St. Louis Public Schools (“the District”) recognizes the importance of ensuring accessibility of its website for students, prospective students, employees and the District’s guests with disabilities.

A. Website Accessibility Compliance Standards

With regard to the District’s website and information provided through the District’s website (“Online Content”) which is developed by, maintained by, or offered through a third-party vendor, the District is committed to compliance with the provisions of Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104, and Title II of the Americans with Disabilities Act of 1990 (Title II), so that students, prospective students, employees and the District’s guests with disabilities are able to acquire the same information, engage in the same interactions and enjoy the same benefits and services within the same timeframe as their nondisabled peers with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any of the District’s programs, services and activities delivered online as required by Section 504 and Title II.

The District will adopt the World Wide Web Consortium’s (W3C’s) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 for web content. In the event that the standards, laws and/or regulations change, the District will conform its policies and procedures to meet the change in the standards, laws and/or regulations.

B. Website Accessibility Coordinator and Training

The Website Accessibility Coordinators for the District are:

Eugene Binder
113 E Saginaw Street
St. Louis, MI 48880
989-681-5131
ebinder@stlouisschools.net

Andrea Biehl
113 E Saginaw Street
St. Louis, MI 48880
989-681-2500
abiehl@stlouisschools.net

The Website Accessibility Coordinators will be responsible for the coordination and implementation of the Website Accessibility Policy, and all other requirements relating to accessibility of the District's website. The Website Accessibility Coordinators and any other staff responsible for creating or distributing information with Online Content will undergo annual training on the Website Accessibility Policy and their roles and responsibilities to ensure that Online Content is accessible. The training will be facilitated, in whole or in part, by an individual with sufficient knowledge, skill, and experience to understand and employ the technical standard(s) adopted by the District.

With regard to staff who have already been fully trained at least once on the Web Accessibility Policy, the annual training requirement can be satisfied by disseminating notice that includes the Web Accessibility Policy (*e.g.*, via email with a link to the Website Accessibility Policy), highlights any Website Accessibility Policy updates, and provides the Web Accessibility Coordinators' name, phone number, and email address, with a notation that they serve as a resource for staff with questions about the accessibility of Online Content.

C. Accessibility Complaints

Students, prospective students, employees and the District's guests with disabilities may report violations of the technical standard(s) used by the District, file a formal complaint through the District's Section 504 and Title II grievance procedure (through the District's Section 504 Coordinator), and/or contact a Web Accessibility Coordinator with any accessibility concerns. Website accessibility complaints regarding the inaccessibility of Online Content should include:

- Name of complainant
- Contact information of complainant (telephone number and email address)
- Date of complaint
- Description of the problem encountered
- Web address or location of the problem page
- Solution desired

Complaints shall be submitted in writing, via email, or by online form (linked on website). Complaints shall be automatically routed to the Website Accessibility Coordinators. A Website Accessibility Coordinator shall contact the Complainant within ten (10) business days. If the information cannot be made accessible, the information shall be provided by equally effective alternate access. Records of each complaint, correspondence and resolution shall be maintained by the Website Accessibility Coordinators for a period of one year.

Complaints filed through the District's Section 504 and Title II grievance procedure shall be filed with the District's Section 504 Coordinator:

Steve Taylor
113 E Saginaw Street
St. Louis, MI 48880
989-681-5155

staylor@stlouisschols.net

If a Complaint is filed through the District's Section 504 Coordinator, a copy of the Complaint shall also be provided to a Website Accessibility Coordinator.

D. Accessibility Audit

An accessibility audit (Audit) will be completed initially after implementation of the Website Accessibility Policy and thereafter annually under the direction of the Web Accessibility Coordinators, during which information provided by the District through its Online Content is measured against the technical standard(s) adopted in the Web Accessibility Policy. All problems identified through the Audit will be documented, evaluated, and, if necessary, remediated within a reasonable period of time.

The District makes no assurances regarding the accessibility of any content or open source software that is posted, hosted or offered on the District's website by an individual or entity outside of the control of the District. The District will take all steps reasonably calculated to prevent an individual or entity outside of the control of the District from posting inaccessible content on the District's website, and agrees to promptly remove any inaccessible content once the District becomes aware of such content.

E. Accessibility of Third-Party Sites

Some of the pages on the District website contain links to third-party sites. The District is not responsible for the Online Content or accessibility of third-party sites, which do not relate to the District's programs, services and activities. The District makes no assurances regarding the accessibility of any Online Content that is posted, hosted or offered on the District's website by an individual or entity outside of the control of the District.

The District will take all steps reasonably calculated to prevent an individual or entity outside the control of the District from posting on the District's website, and agrees to promptly remove any inaccessible content once the District becomes aware of such content.

Online Content developed by, maintained by or offered through a third-party vendor or by using open sources, which is related to the District's programs, services and activities will be made accessible in regards to the District's Section 504 and Title II legal obligations, except where doing so would impose a fundamental alteration or undue financial and administrative burden.

The District, through the Website Accessibility Coordinators, will take the following steps to ensure accessibility of Online Content provided by third-parties which relate to District programs, services and activities prior to posting the third-party Online Content to the District's website:

- Use an approved accessibility validation tool to review the accessibility of the third-party website;
- Inform third-party developers of the District's policy regarding web accessibility and provide a copy of the policy;
- Prior to procuring materials or software from third-party developers, the Website Accessibility Coordinators shall ensure the materials or software meet accessibility standards identified in Section A;
- Provide links to third-party developers with information and resources on implementing website accessibility;
- Provide an alternate method to obtain the information provided on third-party websites as it pertains to District programs, services and activities; and
- Conduct monthly audits, through a third party web hosting partner, designed to identify any Online Content posted on the District's website that is not accessible. Information provided by an alternate method will be provided as soon as possible, but no later than 10 business days after notice of the inaccessible third party content and will ensure that persons with disabilities will have an equal opportunity to acquire the same information, engage in the same interactions and enjoy the same services with substantially equivalent ease of use as persons without disabilities and any alternate methods will ensure that students with disabilities receive the same benefits and services as their peers who do not have disabilities.

F. Fundamental Alteration or Undue Financial and Administrative Burden

The District, in providing equally effective alternate access, shall take actions that do not result in a fundamental alteration or undue financial and administrative burdens, but nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits and services as their nondisabled peers. In those circumstances where the District's Web Accessibility Coordinator believes that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, the District has the burden of proving that compliance would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the Superintendent, or his or her designee, after considering all resources available for use in the funding and operation of the service, program or activity and must be accompanied by a written statement of the reasons reaching that conclusion.

If an action would result in such an alteration or such burdens, the District shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the benefits and services provided by the District.

Adopted May 21, 2018.