LYRASIS 2019 ACCESSIBILITY SURVEY REPORT

Understanding the Landscape of Library Accessibility for Online Materials

Hannah Rosen, Jill Grogg



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Suggested Citation: Rosen, Hannah, and Jill Grogg. "LYRASIS 2019 Accessibility Survey Report." July 2019, 1-42. www.lyrasis.org/technology/Pages/Accessibility-Survey-Report.aspx.

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Introduction

Accommodating users with disabilities and/or learning impairment is not a new endeavor for libraries. However, the evolving landscape of content digitization and the shifting nature of the scholarly communication ecosystem present new challenges for libraries attempting to adhere to institutional policies and meet legal requirements regarding online accessibility for those users.

Digitized content as well as systems that deliver this content – whether internally or externally created – are increasingly being held to codified standards that libraries must consider. For example, when purchasing toll-based resources or making available Open Access (OA) online materials, libraries are requiring content providers to produce a voluntary product accessibility template (VPAT) "that explains how information and communication technology (ICT) products such as software, hardware, electronic content, and support documentation meet (conform to) the Revised 508 Standards for IT accessibility" (<u>https://www.section508.gov/sell/vpat</u>). Moreover, as libraries create more content themselves, perhaps through library publishing programs, and build or support open source systems to deliver this content, institutions find themselves in the often uncharted role of content provider, having to assess how well their own efforts comply with the Revised 508 Standards (<u>https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule</u>). With increased attention on such codified standards, libraries are confronting how best to comply while simultaneously serving their users with disabilities.

While there are articles and other studies that address specific aspects of accessibility for users with disabilities, much research does not address it holistically, particularly in the United States. Articles tend to be more narrowly focused on topics such as fostering relationships with campus offices for student disabilities, successful integration of accessible digital content with learning management systems, or making digital content accessible for mobile devices. Other countries have tackled this topic at the country-level, such as JISC in the United Kingdom (https://www.jisc.ac.uk/guides/getting-started-with-accessibility-and-inclusion).

In May 2018, the Association of Research Libraries (ARL) released a new SPEC Kit for libraries and accessibility, SPEC Kit 358: Accessibility and Universal Design (<u>https://publications.arl.org/Accessibility-Universal-Design-SPEC-Kit-358/9</u>), which is an updated version of data last collected regarding this topic in 2010 (SPEC Kit 321: Services for Users with Disabilities). In the SPEC Kit 358 (May 2018), ARL presented its findings from a survey to its members about accessibility, focusing on staff assistance with services; accommodations for library staff; publicizing and coordinating services; staff and training; funding and budgets; library facilities; specialized software and hardware; web and online presence accessibility; and universal design for learning.

ARL is an organization of the largest research libraries in North America, with 125 member institutions. SPEC Kit 358 (May 2018) presented an environmental scan of how these large, complex organizations are tackling accessibility in physical and online spaces. LYRASIS is a member organization of more than 1,000 galleries, libraries, archives, and museums, ranging from very small to large research organizations and collections-holding institutions. Leveraging its diversity, in 2019, staff members at LYRASIS distributed a survey regarding accessibility that is broader horizontally and more specific vertically. Horizontally,

institutions of differing sizes and missions are represented in the responses, and vertically, the survey specifically focused on the creation, purchase, and delivery of digitized content as well as the status of policies and implementation.

Methodology

Survey Design

As more and more library content migrates to digital form, the definition of accessibility changes as well. Digital accessibility accommodations are fairly new to libraries, so the main objective in producing this survey was to understand how primarily academic libraries within the United States are handling accessibility for their content, and more specifically, where they stand in terms of policy and implementation. The overarching questions were: how many libraries have policies in place to handle online accessibility, what mandates inform those policies, and what tools and training are at their staff's disposal to assist in these endeavors.

The survey was intended to cover all aspects of library decision making surrounding digital content. Therefore, the survey was divided into three sections. The first section, *Content Acquisition*, refers to any digital content available through, but not created by, the library or other cultural heritage institutions – this includes subscription databases or content purchased with perpetual access rights, as well as support for Open Access content made available through the library catalog and discovery service. The second section, *Content Creation*, refers to any born digital or digitized content created, stored, and made accessible through the library. This includes archival and/or special collections materials, theses and dissertations, monographs and journals, or other library publishing. The final section, *Systems*, refers to any computer systems/software purchased, created, or downloaded and utilized by the library to present content online. This includes front-facing catalogs, information management systems, institutional repositories, digital asset management systems, etc. This definition is also inclusive of different types of systems, including proprietary and open source systems that are locally owned, or third-party hosted. By focusing on these three areas, LYRASIS hoped to cover the vast majority of academic library decision making surrounding content accessibility.

During the survey design period, one of the main concerns was whether the systems portion of the survey might duplicate the content creation portion of the survey, since content hosted on the web is dependent upon systems to be accessible, so the decision making might be one and the same. However, it is the argument of these authors that often enough the activity of choosing and running systems within an institution is separate from uploading materials onto those systems, and therefore enforcing accessibility when choosing systems and enforcing accessibility within those systems still constitutes two different core functions, and therefore two potentially different policies.

Each section of the survey began by asking if the respondent was responsible for making decisions in one of the three areas (purchased content, content creation, or systems) of their institution. If the respondent said yes, they would continue on to more granular questions. If not, they would be forwarded to the next part of the section. This method was meant to ensure that only those knowledgeable about their accessibility policies would respond to the questions.

Within each section, the survey asked the following identical questions:

- 1. Does your institution have an accessibility policy for this area of decision making?
- 2. Which mandate(s) inform your accessibility policy?

- 3. Do you have a timeline for implementing your accessibility policy?
- 4. Who is responsible for updating your accessibility policy and how often is it audited/updated?
- 5. What training has been provided to help staff understand and implement your accessibility policy?
- 6. How is your accessibility policy enforced?

For purchased content, the following questions were added:

- 1. What documentation do you request from content providers to enforce your accessibility policy?
- 2. If your institution provides financial support for the creation of Open Access (OA) content, are you held to the same accessibility mandates as licensed content?

For content creation, the following questions were added:

- 1. What type of content are you creating and making available for your community?
- 2. Which tools/resources do you use to ensure your content conforms to the accessibility policy?

For systems, the following questions were added:

- 1. Which tools/resources do you use to ensure your systems conform to the accessibility policy?
- 2. If your institution chooses to use Open Source Software (OSS), whether hosted locally or through a third party hosting agent, are those applications held to the same accessibility mandates as proprietary software?

Response options were a mixture of multiple choice and open-ended questions. A complete list of the survey questions can be found in Appendix A.

Survey Distribution

This survey was conducted between January 31st and March 22nd, 2019. The survey was distributed via several listservs run and maintained by LYRASIS staff, in order to adequately cover the three decision-making areas. The listservs are as follows:

<u>lyroffers@lyralists.lyrasis.org</u> – LYRASIS members-only listserv run by the Content and Scholarly Communication Initiatives (CSCI) department which distributes information about new scholarly content vendors and/or offers, discounts, and open access initiatives, as well as other pertinent LYRASIS information pertaining to scholarly communication or library publishing.

<u>archivpres@lyralists.lyrasis.org</u> – Public listserv also run by the LYRASIS CSCI department specifically designed to inform members and non-members about new vendors, discounts, and classes related to archives and preservation.

<u>archivesspace@lyralists.lyrasis.org</u> – Private listserv run by the LYRASIS Digital Technology Services (DTS) department for libraries that use LYRASIS ArchivesSpace OSS hosting services.

<u>archivesspace_users_group@lyralists.lyrasis.org</u> – Public listserv run by the ArchivesSpace organizational home for ArchivesSpace users.

Due to the possibility of users being on multiple listservs, respondents were asked to submit their names and institutions at the beginning of the survey to mitigate multiple responses. Respondents were informed that their contact information would be confidential, but would be used to identify multiple responses from a single institution. More details concerning multiple survey responses from single institutions are available in the following section.

Survey Results

The survey received two hundred and five (205) responses. Respondents who said they were not responsible for any of the three subject areas were eliminated. Responses that left all answers blank were also eliminated.

The survey received two responses from fourteen distinct institutions. For each institution, the survey was designed to determine if the respondents were responsible for the same area (content acquisition, content creation, or systems). If there was no overlap within the three survey sections, both entries were maintained for analysis. If there was overlap, the authors looked to see if their responses were similar. If the responses were identical, one entry was kept for that institution. If their responses differed, both entries were removed from the overall survey data in order to avoid affecting the analysis. All responses from those fourteen (14) institutions were maintained and analyzed separately.

In total, one hundred and fifty-five (155) distinct survey responses were used for central analysis.

Due to the demographic makeup of LYRASIS membership, the authors anticipated that the majority of responses would come from academic libraries of various sizes. Subsequently, respondents were asked to identify themselves by Carnegie Classifications, with the possibility of identifying as a 'special focus' institution (independent archives, museum, or gallery) or other:

Table 1.

Carnegie Classifications	Count	Percentage
Associates College	8	5%
Baccalaureate College – Arts & Sciences (259)	15	10%
Baccalaureate College – Diverse Fields (324)	3	2%
Baccalaureate/Associate's College: Associates Dominant (149)	1	1%
Baccalaureate/Associate's College: Mixed Baccalaureate/Associate's (259)	1	1%
Doctoral University – Higher Research Activity (R1)	22	14%
Doctoral University – Highest Research Activity (R2)	12	8%
Doctoral University – Moderate Research Activity (R3)	17	11%
Master's College and University: Larger programs (M1)	17	11%
Master's College and University: Medium programs (M2)	7	5%
Master's College and University: Smaller programs (M3)	10	6%
Other	34	22%
Independent Archives	4	3%
Museum	4	3%
Total Responses	155	

As Table 1 demonstrates, the survey received a fairly widespread response rate from academic libraries of differing sizes. The 'Other' category also covered several distinct categories of cultural heritage institutions, including three (3) corporate archives, thirteen (13) public libraries or departments within public libraries, six (6) government archives (including federal, state and local), and two (2) primary education schools. This significant response rate from non-academics can assumedly be attributed to the distribution of the survey on three (3) archives-focused listservs.

Analysis and Findings

The survey analysis is organized in accordance with the three sections of the survey: Content acquisition, content creation, and systems. It is the hope of the authors that readers will be able to quickly turn to the areas of the survey that best reflect their interests and/or area(s) of decision making.

Content Acquisition

This portion of the survey is devoted to the acquisition and purchase, either in perpetuity or on a subscription basis, of licensed digital content, such as e-books or e-journals. This portion also includes the payment of funds to Open Access (OA) online initiatives, such as the Open Library of the Humanities.

Table 2.

Carnegie Classifications – Content Acquisition	Count	Percentage
Associates College	8	9%
Baccalaureate College—Arts & Sciences (259)	10	11%
Baccalaureate College—Diverse Fields (324)	1	1%
Baccalaureate/Associate's College: Mixed Baccalaureate/Associate's (259)	1	1%
Doctoral University – Higher Research Activity (R1)	10	7%
Doctoral University – Highest Research Activity (R2)	6	10%
Doctoral University – Moderate Research Activity (R3)	9	11%
Master's College and University: Larger programs (M1)	8	9%
Master's College and University: Medium programs (M2)	5	5%
Master's College and University: Smaller programs (M3)	7	8%
Other (please specify)	13	14%
Special Focus Institution	5	5%
Total Responses	83	

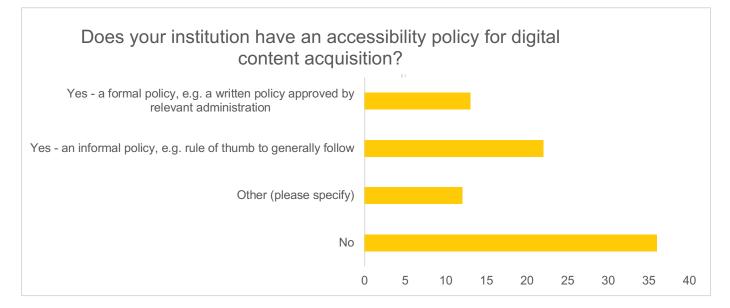
As seen in Table 2, eighty-three (83) respondents said they were responsible for content acquisition in the survey. The demographic breakdown shows an even distribution of academic institutions across Carnegie Classifications. Of those respondents who self-identified as 'Other,' it is worth noting that seven (7) represent public libraries.

Question 1: Does your institution have an accessibility policy for digital content acquisition?

Table 3.

Does your institution have an accessibility policy for content acquisition?	Count	Percentage
Yes - a formal policy, e.g. a written policy approved by relevant administration	13	14%
Yes - an informal policy, e.g. rule of thumb to generally follow	22	24%
No	36	39%
Other (please specify)	12	13%
Total Responses	83	

Chart 1.



Among the respondents, thirty-eight percent (38%) have either a formal or informal accessibility policy, while thirty-nine percent (39%) have no policy in place.

Under the category of 'Other,' several answers indicated policies currently under construction. One respondent wrote, "Formal policy is being researched by committee on accessibility for college." Another wrote, "we will be the end of the month." These sentiments were echoed by "policy under development," "working on it," and "I am writing one."

Others indicated that they hoped/expected content providers would conform to recognized accessibility standards in lieu of having a policy:

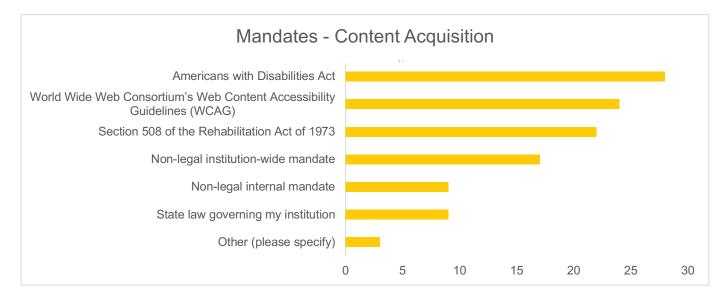
"We generally purchase from well-established vendors who have guidelines in place to make their content accessible"

"We have a policy for content that will be hosted on our servers. Beyond that, we are encouraging our vendors to move toward WCAG 2.0 AA, but don't yet have a policy beyond that."

According to these results, a technical majority of libraries have some form of accessibility policy. However, the fact that only fourteen percent (14%) of represented libraries across the spectrum have a formal, written policy indicates that an emphasis on accessibility in library collections policy is still fairly nascent.

Question 2: Which mandates inform your accessibility policy?

Chart 2.



The most popular mandate is the Americans with Disabilities Act, closely followed by the World Wide Web Consortium's WCAG Guidelines, and Section 508 of the Rehabilitation Act of 1973. Non-legal institution-wide mandates are less popular, but still relevant, while state laws and non-legal library mandates held comparatively less influence.

Question 3: Who is responsible for your accessibility policy, and how often is it audited/updated?

This question was deliberately left open-ended, and received thirty-three (33) responses. The comments are roughly split three ways. Over a third of respondents said the library was responsible for dictating the policy, while another third of respondents seemed unsure. The remaining respondents indicated that, in fact, the accessibility policy came from outside of the library. Departments mentioned include University Councils/task forces/accessibility groups, even a Title IX coordinator.

Within the library, there is no unifying theme. Two respondents mentioned a collections committee, but other responses include the system librarian, electronic resources librarian, administration, and even the library director. Several people wrote the equivalent of "unsure."

In regards to the question of auditing/updating the policy, most respondents indicated that there is no specific plan in place for ongoing evaluation. Some responses include:

"We have not had this discussion yet."

"truthfully, we don't have a system in place for audit or updating."

"unknown, it's a new policy"

The lack of cohesion regarding this question makes sense. Since only 14% of respondents have formal policies at all, the landscape is still fairly in flux. Auditing and/or updating an accessibility policy appears to be a much lower priority than simply having a policy in the first place.

Question 4: Do you have a timeline for implementing your accessibility policy?

Table 4.

Timeline	Count
1 – 2 years	5
5+ years	2
All content must conform with the policy at this time	14
Other (please specify)	16

The majority of respondents said that content must already conform at this time, or chose 'Other.' When looking at the 'Other' comments, a more nuanced picture of implementation appears. Many respondents are trying to determine what their timeline should be, or are more inclined to focus on newer resources because they are easier to navigate. Sample responses included:

"We're supposed to be in compliance, but it is taking time"

"As new licenses are negotiated or existing licenses are renegotiated."

"We do not really have a timeline. We would favor a new resources that has an accessibility option over one that does not."

"no specific timeline but the policy is supposed to guide all new acquisitions"

Question 5: How do you enforce your accessibility policy?

This question was open-ended, and received thirty-two (32) responses. The responses broke down fairly evenly into four main categories.

On the more stringent end of the spectrum, seven (7) of the respondents had strict enforcement policies, such as:

"All digital content, software, and hardware is passed by an IS team reviewing it extensively for accessibility."

"Each Website and resource is checked weekly to make sure we are meeting the policy."

Six (6) of the respondents said that they were enforced based on the licensing agreements signed at the time of purchase, with the understanding that vendors are responsible for maintaining accessibility to content:

"We do not purchase content for which vendors cannot document efforts to make their products accessible for most users."

Another six (6) of the respondents said they had informal enforcement, either through policing or handling issues on a case-by-case basis.

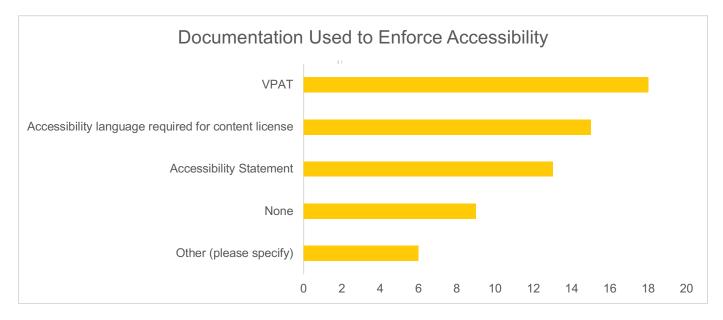
"The policy is not strict, stating that purchases must be compliant, "when possible" so enforcement comes in librarian judgement of content need v. level of accessibility."

Seven (7) more respondents were unsure of their enforcement policies, and six (6) respondents said there was no enforcement of their accessibility policies. These answers indicated a lack of administrative oversight:

"At this point, it isn't. It should be, the Institution is working toward it as is the Library but it is in its infancy stage."

Question 6: What documentation do you request from content providers to enforce your accessibility policy?

Chart 3.



Respondents were allowed to choose multiple items for this question, in case they use more than one method for enforcing their policies.

The Voluntary Product Accessibility Template, or VPAT, is the most popular documentation required of content providers, and this affirmation is not surprising – it is not a new resource, and most content providers have become attuned to this request from their customers. The VPAT is followed by some form of accessibility language in the license, or a separate accessibility statement. Those respondents who selected 'Other' indicated similar preferences, just with more detail. Two (2) respondents said they required some form of accessibility language if a VPAT was not available or unclear, while two (2) other respondents indicated that they required assurances from content providers without accessibility statements, either describing their plans for providing on-demand access to requested content or for developing accessibility policies in the future.

Question 7: If your institution provides financial support for the creation of Open Access (OA) content, are you held to the same accessibility mandates as for licensed content?

Table 5.

No	3
Other (please specify)	8
We do not contribute to OA Initiatives	19
Yes	7
Total Responses	37

This was an open-ended question. The authors were curious to learn whether libraries hold OA materials to the same standards as licensed materials, since most OA collections do not require license agreements from supporting members.

Unfortunately, since the majority of the question respondents indicated they do not contribute to OA initiatives, there was not enough data to draw definitive conclusions. The 'Other' responses did not clarify the issue. This question could be pursued further, perhaps amongst a group of libraries more actively engaged in supporting OA initiatives.

Question 8: What training has been provided to help staff understand and implement your accessibility policy?



Chart 4.

This question allowed for multiple responses, since it is possible to participate in more than one of these training opportunities. The two (2) most popular responses were self-training and webinars or online courses. According to these results, librarians focused on content acquisition appear to be held responsible for their own education. Webinars and online courses are more often than not geared towards individuals, making the second most popular response essentially another form of self-training.

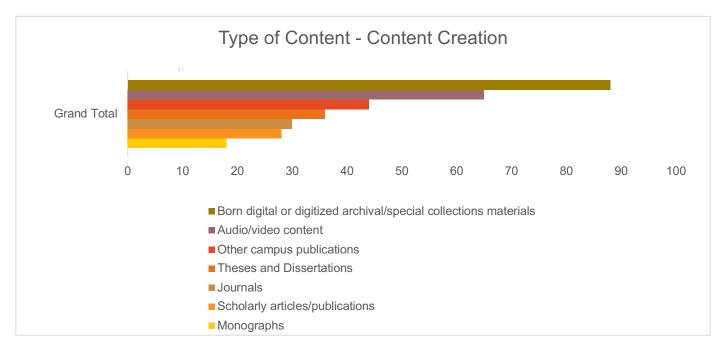
Content Creation

This portion of the survey is devoted to the creation of digital content within the library. Created content refers to any digital material created, stored and made accessible within an institution. This could include library publishing, such as theses, dissertations, scholarly journals or monographs, as well as digitized items from archives and special collections.

Table 6.

Carnegie Classifications – Content Creation	Count	Percentage
Associates College	1	1%
Baccalaureate College—Arts & Sciences (259)	12	11%
Baccalaureate College—Diverse Fields (324)	2	2%
Baccalaureate/Associate's College: Associates Dominant (149)	1	1%
Baccalaureate/Associate's College: Mixed Baccalaureate/Associate's (259)	1	1%
Doctoral University – Higher Research Activity (R2)	9	8%
Doctoral University – Highest Research Activity (R1)	12	11%
Doctoral University – Moderate Research Activity (R3)	10	9%
Master's College and University: Larger programs (M1)	14	13%
Master's College and University: Medium programs (M2)	5	5%
Master's College and University: Smaller programs (M3)	7	7%
Special Focus Institution	7	7%
Other (please specify)	25	24%
Total Responses	106	

One hundred and six (106) respondents said they were responsible for content creation in the survey. The demographic breakdown shows a fairly even distribution of academic libraries, but a higher number of institutions describing themselves as 'Other.' Of those respondents who self-identified as 'Other,' eleven (11) of the institutions are public libraries (with an emphasis on archives/local history centers within those public libraries), while ten (10) of the institutions represent archives or special collections. Because this section of the survey is focused on unique collections, it is not surprising that a large portion of the responses came from non-academic collections-holding institutions.



Question 1: What type of content are you creating and making available for your community?

Chart 5.

Before asking about the accessibility policy, the authors were interested in determining what types of unique content were being created by respondents. Respondents were able to choose more than one option, since many librarians, archivists or other staff handle content from multiple areas of the library. Born digital or digitized archival/special collections materials were ranked highest, which reflects the large number of archives and special collections represented in this section of the survey. It was not anticipated that audio/video being the second most popular form of content, so the survey did not offer a more granular definition of what that means. It could mean archival/special collections content, library created content, class recordings, or some combination of those or other recordings.

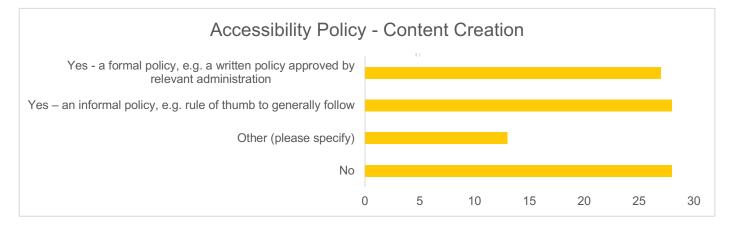
The content more closely associated with scholarly publishing, a.k.a. theses, dissertations, monographs and journals, was the least popular form of content. No conclusions can be drawn from this due to the demographics of the respondents. For example, this data point could indicate less emphasis on library publishing within the overarching community; or, it could simply mean that more archivists and special collections librarians responded to this portion of the survey, and therefore fewer of them work with scholarly publications.

Question 2: Does your institution have an accessibility policy in place that applies to the content you create and make available on the World Wide Web?

Table 7.

Does your institution have an accessibility policy in place that applies to the content you create and make available on the World Wide Web?	Count	Percentage
Yes - a formal policy, e.g. a written policy approved by relevant administration	27	28%
Yes – an informal policy, e.g. rule of thumb to generally follow	28	29%
No	28	29%
Other (please specify)	13	14%
Total Responses	96	

Chart 6.



Ninety-six (96) respondents replied to the questions about an accessibility policy. Fifty-seven (57) percent of respondents have either a formal or informal accessibility policy, while twenty-nine (29) percent have no policy in place.

Under the category of 'Other,' there is a lot of uncertainty. Five (5) respondents indicated they were unsure, while four (4) respondents indicated that policies exist, but do not apply to the actual creation of digital content:

"We have a general accessibility policy but it does not define or provide guidance for digital content"

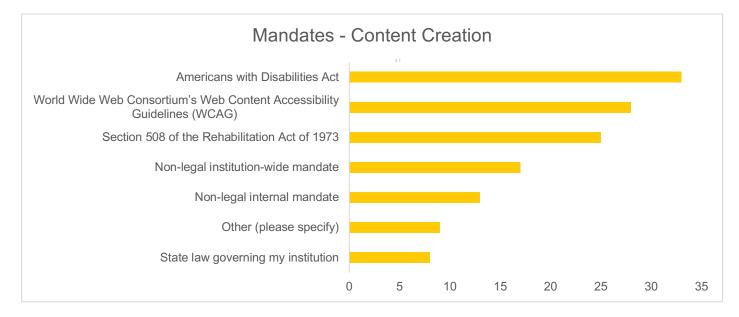
"our college has an accessibility policy that applies to the website, but not necessarily to the institutional repository"

"The University may but the Library does not"

"Content management systems and IR software is built to address accessibility issues"

Question 3: Which mandates inform your accessibility policy?

Chart 7.



As in the content acquisition section, the most popular mandate is the Americans with Disabilities Act, closely followed by the World Wide Web Consortium's WCAG Guidelines, and then Section 508 of the Rehabilitation Act of 1973. Non-legal mandates and state laws hold little importance.

Question 4: Who is responsible for your accessibility policy, and how often is it audited/updated?

This question was deliberately left open-ended, and received forty-six (46) responses. The comments fall under four main groups.

Ten (10) respondents did not know who was responsible for their accessibility policy, or said this was under development.

The largest group, seventeen (17) respondents, indicated that the accessibility policy falls under the purview of outside university administrators or committees, several of which are specifically designed to handle accessibility:

"the ADA team and the Digital Accessibility Committee"; "Student Office of Accessibility"; "Public Services Division"; "Disability Resource Center."

Sixteen (16) respondents indicated that the policy was developed and maintained within their library. Within the library, five (5) respondents said there are task forces dedicated to developing the policy, while four (4) respondents said that IT officers or webmasters are responsible for developing their accessibility policies. Seven (7) respondents said they as individuals are responsible for their accessibility policies.

In regards to the timeline for auditing/updating the policy, most respondents did not address the question. Of the handful of respondents who did address the question, three (3) institutions update their policy annually,

three (3) institutions update their policies as needed, and three (3) institutions' policies are so new that they have not considered auditing/updating their policy:

"I am currently implementing the first generation of an accessibility policy for this institution."

"Central accessibility office (new - no update schedule yet)"

"Student office of accessibility. It was created in the Spring of 2017, and has not been updated yet"

This pattern mirrors the *Content Acquisition* portion of the survey. Auditing and/or updating an accessibility policy seems to be less important than having a policy in the first place. Since the majority of respondents said outside university groups were responsible for their accessibility policies, they may also be uninterested in learning the auditing/update schedule.

Question 5: Do you have a timeline for implementing your accessibility policy?

Table 8.

Timeline	Count
1 – 2 years	10
3 – 4 years	3
5+ years	1
All content must conform with the policy at this time	19
Other (please specify)	18

The majority of respondents said that content must already conform at this time, or chose 'Other.' Under 'Other,' a more nuanced picture of implementation appears: Most respondents who answered the question indicated that new content must conform to their policy, while existing content is handled on a case-by-case basis, or when possible:

"All new content must comply. Old content must comply by June, or we'll start the takedown process. All non-compliant content should be down by the end of December."

"All content must comply* (*to the best of our ability - born digital or ocr typed text) at this time. While we work on ways to efficiently make materials more accessible (particularly handwritten scanned documents and AV materials) we can improve accessibility to these items on request."

"All new content is supposed to be compliant now; I believe that there's a short grace period (a year or two) for pre-existing content."

"all new content that is used for classes must conform at this time. Historical content, or content that is not being used for class instruction must conform if requested by a user" One particular response of note indicated that there is no timeline due to resistance to the policy:

"No. The Library is a leader on campus for web accessibility. There is a lot of resistance on campus, so we're starting small with education, training, and "low-hanging fruit" before establishing concrete timelines"

Question 6: How is your accessibility policy enforced?

This question was open-ended, and received forty-one (41) responses. A few trends emerged, with a handful of respondents noting that either campus administrators or campus IT are responsible for enforcement:

"University IT generates reports of web accessibility for our web pages"

"Public Services Division Web Team monitoring; automated scorecard services in development"

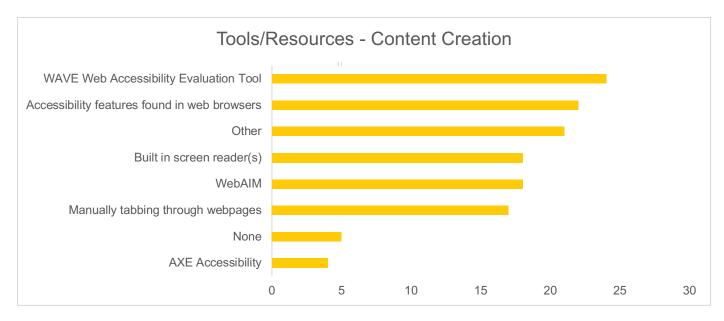
Four (4) respondents said issues were addressed on a case-by-case basis, while one (1) respondent said that items would be spot checked in the future.

Seven (7) respondents said they were self-enforced to varying degrees, including "honor system."

Eight (8) respondents were unsure how their policy would be enforced.

Question 7: Which tools/resources do you use to ensure your content conforms to the accessibility policy?

Chart 8.



The authors were interested in learning which tools are most popular when creating accessible online content. Respondents were encouraged to select more than one option, including specific tools, such as WebAIM, and more general tools/methods, such as manually tabbing through webpages.

The results indicate that librarians use a wide variety of tools to make sure their content conforms to accessibility policies. The WAVE Web Accessibility Evaluation Tool was the most popular choice, followed very closely by embedded accessibility features found in web browsers. Other tools and tricks were fairly evenly distributed, with only AXE Accessibility lagging behind. In the category of 'Other,' a handful of people used SiteImprove, but it was more often a combination of various tools and methodologies cobbled together:

"specific computers in one location, plus captioning, audio description, or transcription upon request for audio or video works"

"I also use non-built-in screen readers such as NVDA & JAWS; I believe our IT departments have done additional testing with other tools."

Based on the responses, no one tool can handle all aspects of accessibility – librarians combine resources to ensure the results they require.

Question 8: What training has been provided to help staff understand and implement your accessibility policy?



Chart 9.

The two most popular responses were 'Self-training' and 'In-person training from other staff.' This represents a shift from the first section of the survey (*Content Acquisition*). Like content acquirers, content creators appear to independently seek out information based on their own needs. However, content creators differ in terms of in-person training from other staff. While twenty-nine (29) respondents said they used self-

training, twenty-eight (28) respondents reported getting in-person training from other staff. This tells an encouraging story – while content creators may need to pursue information on their own, they have a network of support amongst other staff members to help them learn the tools they need. In fact, two of the replies in the 'Other' section indicated that the respondents themselves are the trainers:

"Other staff" in this instance is our Web Discovery Librarian and myself"

"Personally provide training on accessible PDFs to library staff"

This spells good news for content creators – whatever one staff member learns, they will work to share that information with other members of their organization.

Systems

The last portion of the survey is dedicated to computer systems/software used to store, disseminate or organize information or content on the World Wide Web. This could refer to front-facing catalogs, information management systems, institutional repositories, digital asset management systems, etc. This also includes different ways of acquiring systems, such as purchased internal systems, hosted systems, homegrown systems, or downloaded open source systems. This does not refer to internal administrative systems such as those used for payroll or benefits.

Table 9.

Carnegie Classifications	Count	Percentage
Associates College	5	7%
Baccalaureate College—Arts & Sciences (259)	7	10%
Baccalaureate College—Diverse Fields (324)	2	3%
Doctoral University – Higher Research Activity (R2)	2	3%
Doctoral University – Highest Research Activity (R1)	9	12%
Doctoral University – Moderate Research Activity (R3)	9	12%
Master's College and University: Larger programs (M1)	7	10%
Master's College and University: Medium programs (M2)	2	3%
Master's College and University: Smaller programs (M3)	7	10%
Special Focus Institution	4	5%
Other (please specify)	19	26%
Total Responses	73	

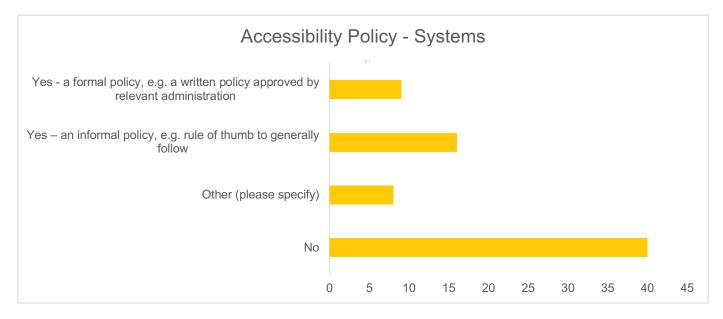
Seventy-three (73) people answered this portion of the survey. As with the two previous sections, this section reflected a fairly even distribution amongst bachelors, masters, and doctoral institutions. As in the *Content Creation* section, the 'Other' section was the largest section, and emphasized archives, special collections, and public libraries (with an emphasis on archives/local history centers within those public libraries). This emphasis on unique collections holders is not surprising. Purchased and/or acquired OA content is often hosted on external platforms, so systems chosen by and/or controlled within an institution are likely to focus on unique content.

Question 1: Does your institution have an accessibility policy for determining which systems will be used to host content on the World Wide Web?

Table 10.

Does your institution have an accessibility policy for determining which system will be used to host content on the Word Wide Web?	Count	Percentage
Yes - a formal policy, e.g. a written policy approved by relevant administration	9	12%
Yes – an informal policy, e.g. rule of thumb to generally follow	16	22%
Other (please specify)	8	11%
Νο	40	55%
Total Responses	73	

Chart 10.



Fifty-five (55) percent of respondents said their institutions have no accessibility policy for their systems, a far higher percentage than either of the previous sections. Only twelve (12) percent of users have a formal policy, and twenty-two (22) percent have an informal policy.

In the 'Other,' section, two (2) respondents said that they have accessibility policies, but systems are not always specified:

"We have an accessibility policy, but I'm not sure it specifies which systems will be used for what content--I believe that's more of a collection development decision."

"not which systems, but the content itself"

Another respondent indicated that there are levels of policy:

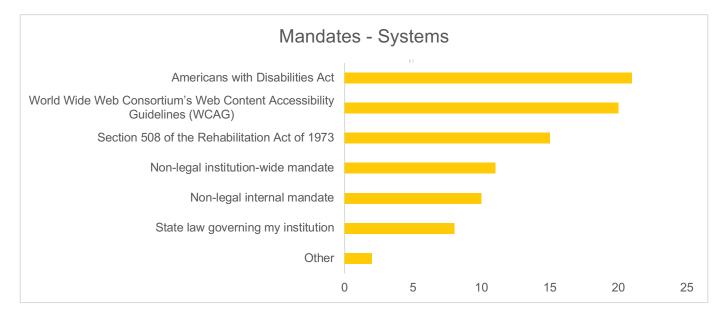
"Yes, a policy with regard to the institution broadly, but it is determined within the IT department. It has not affected my choice of system for hosting archives content."

The response rate for this section was lower than the two previous sections, which could be attributed to the nature of job responsibilities. Librarians and archivists are not typically responsible for implementing institution-wide technology, and therefore may have felt less qualified to respond to this section of the survey.

More importantly, of those who did respond, over half said that there is no accessibility policy for systems. Systems maintain significant influence over the level of accessibility content is even capable of assuming; the fact that they appear to be the least considered parts of the accessibility policy is cause for concern and further investigation.

Question 2: Which mandates inform your accessibility policy?

Chart 11.



As in both previous sections of the survey, the most popular mandate is the Americans with Disabilities Act, closely followed by the World Wide Web Consortium's WCAG Guidelines and then Section 508 of the Rehabilitation Act of 1973. Non-legal mandates and state laws hold much less importance.

Question 3: Who is responsible for updating your accessibility policy, and how often is it audited/updated?

This question was deliberately left open-ended, and received twenty-five (25) responses. Three main groups stood out amongst the responses.

In the first group, eight (8) respondents indicated that their policies are dictated at the University level. Groups mentioned include "campus administration," "Associate Vice President for Administration and Title IX Coordinator," and "ADA team and digital accessibility committee."

Six (6) respondents said that either the library director or a library committee, such as the "Dean's Library Council" is responsible for their accessibility policy:

"The Library's Administration and Full Time Librarians work collaboratively to create and update the policy."

What differentiates the systems section of the survey is that five (5) respondents said either a university level or library level IT department is responsible for updating the policy:

"IT at the University level, Systems Librarian within our library"

In regards to auditing/updating the policy, as with the two previous sections, few responded to this portion of the question. Two (2) respondents said the policies are updated annually, one respondent said their policy is updated every five (5) years, and two more respondents said their policies are updated as needed.

Question 4: Do you have a timeline for implementing your accessibility policy?

Table 11.

Timeline	Count
1 – 2 years	6
3 – 4 years	3
5+ years	1
All systems must conform with the policy at this time	10
Other (please specify)	8

As with the previous two sections of the survey, the majority of respondents said all systems must conform to the current policy, but more detail was revealed in the 'Other' section. The majority of respondents said that the emphasis was on making sure new systems conform, with the assumption that older systems will be brought up to date over time:

"New systems must conform at this time. Old systems in-house have until June. Old systems...have no specific deadline, but we're pushing towards accessibility"

"all new systems must conform before purchase, unless given provisional ok to purchase."

"Newly launched products and services are supposed to conform to web accessibility requirements."

Question 5: How is your accessibility timeline enforced?

This question was left open-ended, and received twenty-four (24) responses. Several people mentioned procedures in place for enforcing accessibility, usually upon acquiring software:

"We have to go through an approvals process before we can add software, open source or not, and checking accessibility issues is part of that process"

"All systems must go through internal review before public launch"

Three respondents mentioned systems testing:

"3rd party auditor, using SortSite - Accessibility Checker and Validator.

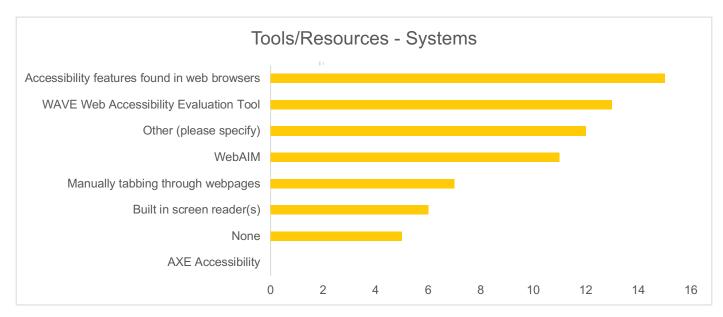
"ongoing testing"

"Testing and re-deployment"

Remaining responses fell into the camps of self-enforcement or "unknown." However, the clear distinction with systems lies in the ability to test for accessibility issues. This technical control appears to allow for more procedural, potentially automatic enforcement of accessibility policies.

Question 6: Which tools/resources do you use to ensure your content conforms to the accessibility policy?





The authors were interested in learning which tools are most popular when assessing systems for accessibility. Respondents were encouraged to select more than one option, including specific tools, such as WebAIM, and more general tools/methods, such as manually tabbing through webpages.

The results indicate that librarians use a wide variety of tools to make sure their content conforms to accessibility policies. The existing accessibility features found in web browsers are the most popular tools, followed by the WAVE Web Accessibility Evaluation Tool and WebAIM. In the 'Other' section, five (5) respondents mentioned SiteImprove.

Question 7: If your institution chooses to use Open Source Software (OSS), whether hosted locally or through a third party hosting agent, are those applications held to the same accessibility mandates as proprietary software?

Table 12.

Yes	No	Other (please specify)	We do not utilize OSS
19	2	2	5

Because OSS is technically free (not including staff time and resources necessary to implement and run OSS), the authors wanted to know if it is held to the same standards as proprietary software. Refreshingly, the vast majority of respondents said that they do hold OSS to the same mandates as proprietary software.

Question 8: What training has been provided to help staff understand and implement your accessibility policy?

Chart 13.



The majority of respondents said they rely up on self-training to gain the skills needed to understand and implement their accessibility policies. Webinars/on-line courses and in-person training from other staff are tied as the second most popular form of training, but sit much farther behind. All other forms of training are clustered fairly closely together.

Institutions with Multiple Survey Responses

This study was unique in that multiple institutions were represented by two survey responses from two different staff members. The chosen strategy of including or excluding responses in the overall survey findings was detailed in the methodology portion of this report. In this portion of the findings, the authors wanted to examine whether different members of the same institution saw their policies the same way.

Fourteen (14) institutions were represented by more than one respondent. The majority of these institutions were doctoral universities:

Table 13.

Carnegie Classifications	Count	Percentage
Baccalaureate College—Arts & Sciences (259)	1	7%
Doctoral University – Higher Research Activity (R2)	2	14%
Doctoral University – Highest Research Activity (R1)	5	36%
Doctoral University – Moderate Research Activity (R3)	3	21%
Master's College and University: Larger programs (M1)	1	7%
Special Focus Institution	2	14%
Total Responses	14	

Of these fourteen (14) institutions, only four (4), or roughly thirty percent (30%) represented complete agreement between the two respondents. The rest broke down into two camps:

In five (5) institutions, one respondent said they have an informal policy, while the other respondent said they have no policy, or chose 'Other' to explain their policy in more detail. These responses are technically contradictory, but represent a gray area. An informal policy could be informal enough to be translated as no policy, depending on the work area of staff, while throughout this survey, the response 'Other' has often represented some form of informality, extensively explained.

The more interesting breakdown comes when there is a conflict between formal and informal policies. In three (3) institutions, one respondent said they have a formal policy, while the other respondent said they have an informal policy, or 'Other'. In two institutions, one respondent said there is a formal policy in one section of the survey, while the other respondent replied to a different section of the survey stating that they use an informal policy.

It is striking that in these five (5) institutions, or thirty-five percent (35%) of the institutions who had more than one response, a formal policy exists, but either some staff do not know about it, or their responsibilities are separated, and therefore policies do not overlap. Because this is a very small subset of the survey extensive conclusions cannot be drawn from this breakdown, except that it hints at a lack of communication within libraries surrounding accessibility, or perhaps with policy in general. It encourages further exploration

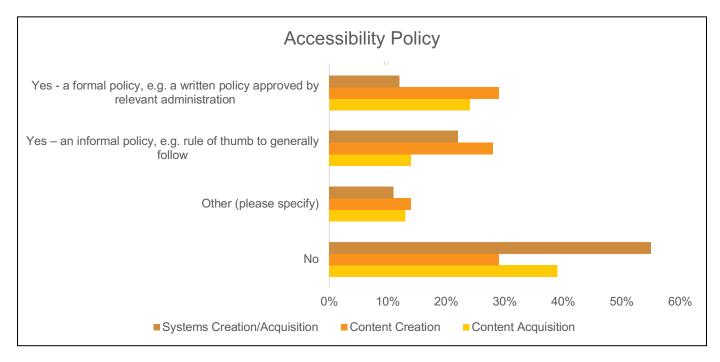
to determine if disparate understandings of accessibility, or policy in general at an institution, is a trend, or an anomaly.

Side by Side Comparisons

The last portion of the survey findings and analysis is devoted to some side by side comparisons to identify overarching trends surrounding accessibility policies, mandates, and training.

Does your institution have an accessibility policy?

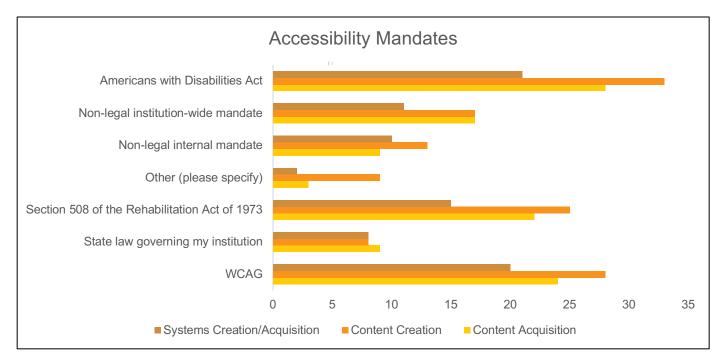
Chart 14.



While the three sections differ on formal versus informal policy, it is clear from the data that only a little over ten percent (10%) of respondents had formal policies spanning the library; on the opposite end of the spectrum, as much as thirty percent (30%) of the library community has no accessibility policy of any kind. As a community, academic libraries and cultural heritage institutions in general, are still working very much in an unregulated space in regards to accessibility – there is a long way to go to reach full awareness of accessibility through formal policies and documentation.

Which Mandates inform your accessibility policy?

Chart 15.



Across all three (3) sections of the survey, the American with Disabilities Act was the number one mandate referenced in accessibility policies, followed by WCAG and Section 508 of the Rehabilitation Act of 1973. Outside of those clear cut mandates, institutional mandates and state laws play a much less influential role for the community.

What training has been provided to help staff understand and implement your accessibility policy?

Chart 16.



Self-training was the most popular response to this question. For *Content Creation*, in-person training from other staff was second, but for the other two sections, webinars/on-line courses were the second most popular form of training. Libraries, either due to lack of resources or lack of emphasis, are not providing their staff with standardized or sanctioned accessibility training – individuals are expected to learn what is necessary on their own, either through independent research, individual online training, or with the help of other individual staff members.

Conclusion

Among the three survey categories – *Content Acquisition, Content Creation*, and *Systems* – several trends cross boundaries. Policies, whether formal or informal, are clearly in place, but uncertainty remains, particularly regarding responsibilities for auditing and enforcing such policies. Most respondents indicated that content or systems must conform immediately to any policies, yet mechanisms and personnel charged with compliance are distributed internally and externally and are not standardized. Siloes -- internal to a library or archive and external within the larger organization – endure and can inhibit consensus for goals and objectives. The most common mandates guiding policies are clearly the Americans with Disabilities Act, WCAG, and Section 508, and self-training is the most frequent way in which personnel educate themselves about accessibility requirements, tools, and guidelines, resulting in individual, rather than organizational, commitment to ongoing education.

Viewing the results holistically, a pattern materializes wherein libraries are the most progressive in terms of accessibility when they maintain the most control over their content. Content creation has the highest rate of formal and informal policies as well as the highest rate of internally sanctioned and supported training. Content acquisition has a rich history of negotiation, and increasing numbers of libraries and organizations are requiring expanded and clearly articulated accessibility statements in their contracts. However, due to the lack of ownership of content and platforms for purchased toll-based or supported OA content, libraries and organizations also have less input and control, which can negatively affect how accessibility for their users is realized. Systems represent the most scattered approach to accessibility, and there are many potential reasons. Perhaps systems are not controlled by the library; perhaps because personnel may not have the skills to properly assess or implement accessibility tenets; or perhaps because they do not have the resources to explore other, more productive options. This section is ripe for further investigation.

Policies and training remain the core elements for an institution's successful approach to accessibility for digital content and systems. In short, more institutions need more definitive policies, even if these institutions are beholden to a parent organization's accessibility plan. Library and archival content acquisition, content creation, and delivery via various systems have unique variables that are rarely addressed in larger institutional policies. Having library-specific policies can inform day-to-day decision making for practitioners, thereby reducing uncertainty and resulting in more seamless access to resources for users with disabilities. Likewise, support for training needs organizational commitment. The burden for continuing education and training should not be on the individual alone. Placing such a burden primarily on the individual creates fractured levels of expertise and perpetuates misunderstandings about who is responsible for which aspects of accessibility for digital content and systems.

Fundamentally, what emerges is a panorama that has a clear center with blurry edges. Accessibility as a concept is very straightforward; the successful implementation of accessibility mandates is much less so. Libraries are moving forward without a map, in part due to legal imperatives or parent organization pressures to do so, which tells us there is an urgent need for greater collaboration amongst the community. For example, a community-led development of a one-stop shop clearinghouse which includes sample institutional policies, VPATs, training materials, and more would assist those institutions still struggling to best meet existing mandates, as well as collectively develop and maintain community standards or best

practices around accessibility. Putting a microscope to the blurry edges illuminates the gaps the library community must bridge in order to maintain the highest level of accessibility standards.

Acknowledgements

The authors would like to thank all of the LYRASIS members and non-members who contributed to this survey. Without their willingness to complete the survey with honest, open answers, this report would not be possible.