

Resolution Agreement
Northborough-Southborough Public School District
OCR Compliance Review No. 01-14-1010

The Northborough-Southborough Public Schools (District) agrees to fully implement this resolution agreement {Agreement) to resolve Office for Civil Rights (OCR) Complaint No. 01-14-1010 regarding the accessibility of its web-site to person with disabilities, especially those requiring the use of assistive technology. By entering into this Agreement, District makes no admissions of any violations of Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act. The District has voluntarily agreed to adhere to the terms of this Agreement.

The purpose of this agreement is to ensure that all content on the District web-site is accessible to students with visual, audio and print-related disabilities, particularly those students requiring the use of assistive technology. Students with disabilities must have the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as other students. The District must ensure that students with disabilities can access the information on the web-sites with substantially equivalent ease of use as students without disabilities. Furthermore, District must assist OCR in ensuring that its web-site also allows students with disabilities to access the information on the individual school websites with substantially equivalent ease of use as students without disabilities. Should the District choose to provide the information in some other manner, the accommodations or modifications must permit students with disabilities to receive all the educational benefits provided by the technology in an equally effective and equally integrated manner.

Definition of Accessible:

"Accessible" means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, it still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology.

Actions and Reporting

1. By July 15, 2014, a notice will be drafted for OCR's review and approval.
 - a. The notice will be sent annually, prior to the start of the school year, to the school principals and appropriate District staff. This notice will include information about each schools' responsibility to ensure that web-sites are accessible, information about accessibility standards, information on how to assess website accessibility in reviews, the expectation that the school will conduct annual web-

site reviews to ensure compliance, and direct the school to identify the person that will be responsible for conducting the review, as well as overseeing any needed modifications .

- b. The notice will require each school and the District's Administrative Office to submit an annual report documenting when the school conducted its web-site review, the method to be used and standards applied in its review, summarize the findings, identify the steps that will be taken to correct any identified problems, and a timeline for completing those steps. The report will also include information about other web accessibility problems collected, evaluated, and addressed throughout the school year.
- c. The District will designate one person to review all of the annual reports and to monitor steps taken to correct any problems.

Reporting Requirements:

By August 1, 2014, the District will provide OCR with a draft of the notice and the contact information for the District staff member responsible for reviewing the results of the annual reviews and monitoring steps taken to insure compliance.

By October 1st of each following year, beginning October of 2015, for the next two (2) years, a summary of the reports will be prepared and submitted to OCR.

2. By September 1, 2014, the District will develop an accessibility procedure that is posted prominently on its web-site and informs students, employees, parents, guests, and visitors with disabilities, particularly those with visual, hearing, or manual impairments or who otherwise require the use of assistive technology on the basis of disability to access information concerning the District's educational programs that if they have difficulty accessing information on the web-site, they should contact (District Designee at email/phone) and that individual accommodations will be made to ensure access to any web-site content.

Reporting Requirements:

By September 15, 2014, the District will provide OCR with a draft of the procedure and the contact information for the District staff member responsible for arranging for the individual accommodation.

3. The District will develop a resource guide that provides information about web accessibility requirements, standards, and links to reference materials. Each school will be asked to make this resource guide available to those posting information on the web-site and maintaining school and District web-sites.

Reporting Requirement:

By September 15, 2014, the District will provide to OCR for its review and approval a draft or prototype of the resource guide

4. By September 1, 2014, the District will implement the following measures for its website:
- Ensure that there are label tags for all Form fields (e.g. on the Lunch Payment screen); and
 - Ensure that there are alternative attributes tags to match graphics.

Reporting Requirement:

By September 15, 2014, the District will implement the measures specified above and provide OCR with contact information for the District staff members responsible to implementing the above measures.

5. By December 31, 2014, the District will implement the following measures for its website:

Ensure that the website has the following accessible keyboard features:

- Main drop down menu
 - Assistive technology for users of the Accessible Site Menu
 - Menus for keyboard users
 - Style Sheet Information (viewed by screen reader)
 - Ensure that the website has label controls, provides keyboard accessible features, and synchronized captions.
 - Add readable content with assistive technology to Carousel buttons
 - Make Flash information viewable by a screen reader.
 - Provide Flash controls on home pages
- Assurance of accessibility compliance from vendors for websites for library.
Add HTML code in tables to show column headers
- Make Calendar compatible with screen reader
 - Provide labels for drop down boxes in Calendar

Reporting Requirement:

By January 15, 2015, the District will implement the measures specified above and provide OCR with contact information for the District staff members responsible for implementing the above measures.

6. By May 31, 2015, the District will implement the following measures for its website:
- Structure documents for use by assistive technology:

-For all documents created subsequent to April 15, 2014, the District will include appropriate tagging, alternative texts for graphics, column headers for reading, and PDFs including tags on critical information such as watermarks and headings. Such measures will include the addition of alternative text for images and complete alternative text for images with partial alternative text. For updating of PDF documents, the District will give priority to PDF homework and reading postings by teachers and information concerning school programs and activities. For other PDF's on- the site, the District will identify which documents (District policies and procedures, school handbooks, etc.) are used most frequently and update those documents. For all other PDF documents, the District will make corrections when updates are made. If there is an immediate need for a document, the District's Technology Office will provide an individually accommodated copy.

- Provide accessible course information by adding alt tags, captioning, and screen reader compatibility. Add alternative text to images and prescribe reading order in Power Point.

Reporting Requirements:

By January 15, 2015, the District will provide a summary to OCR regarding the progress made towards implementing the measures specified above and provide OCR with contact information for the District staff member(s) responsible for implementing the above measures.

By May 31, 2015, the District will have implemented the measures specified above and provide OCR with contact information for the District staff member(s) responsible for implementing the above measures.

7. Training

By December 31, 2014, the District will develop and conduct training on how to ensure accessibility in web design and implementation. The training will be provided to all staff involved in web design and implementation, including teachers who develop content for on-line instruction. The training will cover, at a minimum, the accessibility procedure referenced in paragraph 2, accessibility plans, and the roles and responsibilities of the District staff to ensure that web design, documents, lessons and multimedia videos or content are accessibility.

Reporting Requirement

By January 15, 2015, the District will provide to OCR documentation of the training provided pursuant to this Agreement, including the name(s) and credentials of the

individual(s) who conducted the training and a list of individuals, by name and title, who attended the training.

The District understands that OCR will not close the monitoring of this Agreement until OCR determines that the District has fulfilled its terms and is in compliance with the regulations implementing Section 504 at 34 C.F.R. Part 104 and Title II at 28 C.F.R. Part 35. The District also understands that, by signing this Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of this Agreement. Further, the District understands that during the monitoring of this agreement, if necessary, OCR may visit the District or any of its schools, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has fulfilled the terms of this Agreement and is in compliance with Section 504, Title II, and the relevant regulations. The District understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. Sections 100.9, 100.10), or judicial proceedings to enforce this Agreement, OCR shall give the District written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

/s/ Charles E. Gobron

Dr. Charles Gobron
Superintendent

4/15/14

Date

On behalf of Northborough-Southborough
Public School District