

Beyond Compliance: Building a Sustainable Digital Accessibility Program in an Academic Library

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Overview

- Understand the requirements of legal mandates and implications
- Recognize the scope and complexity of digital accessibility compliance, using USC Libraries as a case study
- Identify strategies for embedding accessibility practices, engaging vendors, and supporting learners

Scope of Disability

- 1.3 billion people (16%) worldwide
- 14% of the U.S. population
- Less than 10% of all published books are in accessible formats
- Inaccessible digital services are **NOT** a technical inconvenience
- Barrier to education, research, and civic participation

2025 European Accessibility Act

Effective June 28, 2025

- Frontlist e-books must be available in an accessible format
- E-commerce interfaces must be accessible

By 2030

- backlist titles also need an accessible (may be handled on-demand)
- EAA includes an exception for “disproportionate burden” (e.g. financial)

2026 Americans with Disabilities Act (ADA) Title II Updates

Effective April 24, 2026

- Applies to all publicly funded entities
- Mandates “nondiscrimination on the basis of disability in State and local government services”
- Covers Websites, mobile apps, digital course materials
- Federal agencies covered by Sections 504 & 508 of the Rehabilitation Act of 1973

Technical Standard: WCAG

- W3C's Web Content Accessibility Guidelines (WCAG) – technical benchmark
- WCAG 2.1 AA – for both EAA and ADA Title II
- While publishers work towards frontlist and backlist compliance, users may that specific titles be prioritized for accessible versions

POUR - The Four Principles of Accessibility

- 1. Perceivable** - Alt text on images, captions on instructional videos
- 2. Operable** - Keyboard navigation across library website and e-resource portals
- 3. Understandable** - Plain language on forms, consistent navigation menus
- 4. Robust** - Compatibility with screen readers across ILS and digital collections

Alt Text



Caption:

Figure 10.1 The Arctic route through Moscow to the North, 2015–2016.

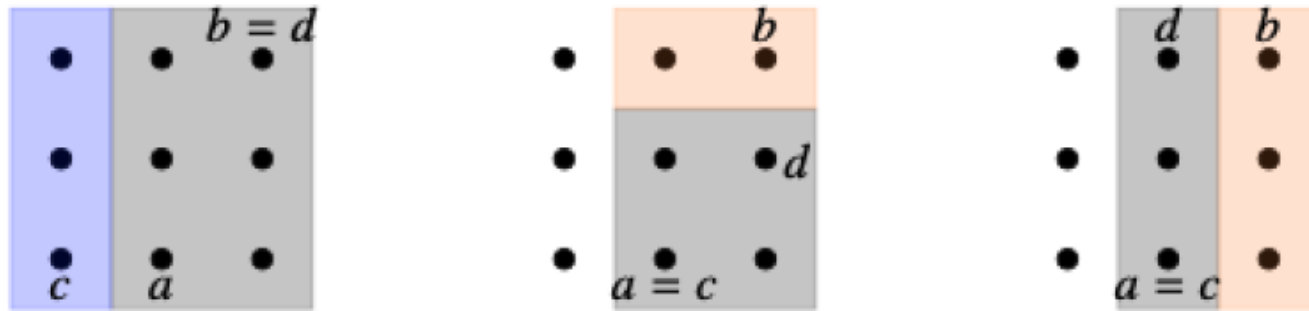
Alt Text:

A 200 Kilometer scale map of eastern Europe, the western part of Russia, and Scandinavia; entries for Syria, Afghanistan, Nepal, India, etc. have lines pointing to Moscow, which has a line going to Murmansk in the far north, and to Saint Petersburg in the mid-west, which then follows onto Murmansk as well. From Murmansk arrows go to the Finland border the crossing points of Storskog in the far north, Raja-Jooseppi a bit further south, and Salla further south but still in the top one-quarter of the Finnish territory.

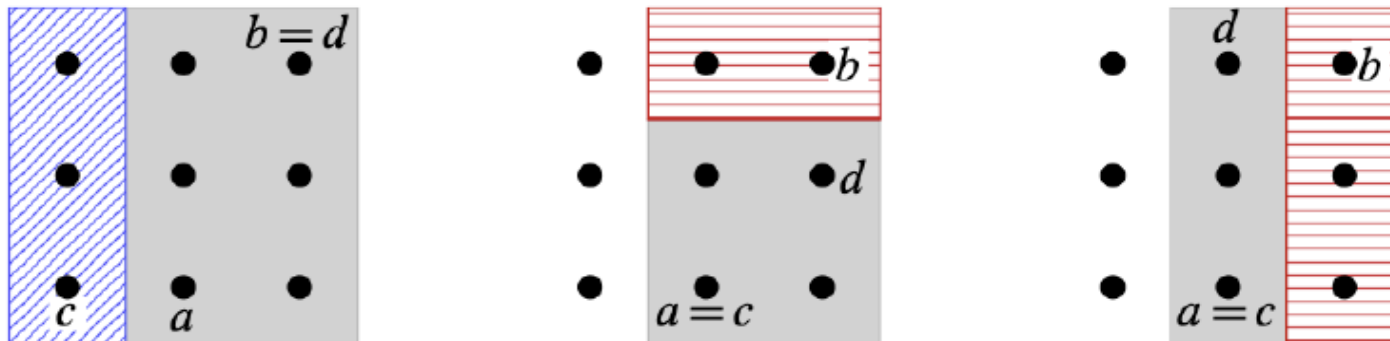
Source: Taylor & Francis. [Accessible content in Asian Studies](#)

Color Alone Is Not Sufficient

Original version:

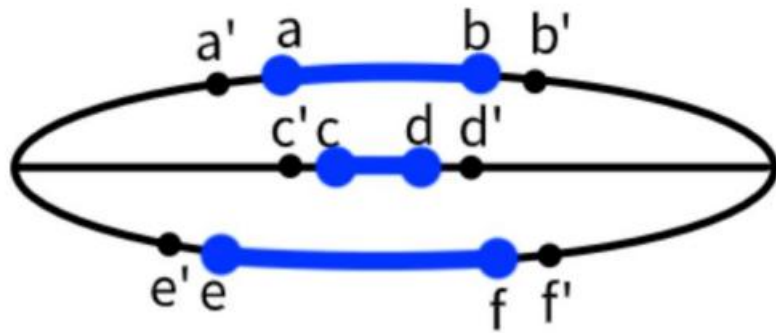


Revised accessible version:

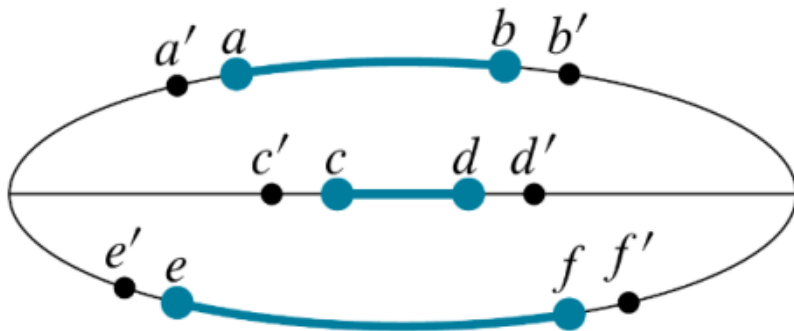


Color Contrast Matters

Original version:



Revised accessible version:



Revised Accessible Version

- Always check color contrast of figure elements against adjacent color(s)
- Use tools like [WebAIM: Color contrast checker](#)
- Minimum contrast ratio: 4.5:1 for text colour contrast against background colour
- Original contrast: 2.44:1
- Revised contrast: 4.61:1

Video Captions & Transcripts

Examples of accessible video content:

- On a generalization of Chen's iterated integrals ([Chrome](#), [FireFox](#))
- [Generating iPS Cells from MEFS through Forced Expression of Sox-2, Oct-4, c-Myc, and Klf4](#)
- [2005 California Social Work Hall of Distinction induction](#)
- [Holocaust Survivor | Ray Kaner | USC Shoah Foundation](#)

Author Guidelines from Publishers

- American Historical Association
- AMS Guidance for Making Mathematics Accessible
- Routledge/CRC Accessible Content Page Inclusive Publishing
- Society for Industrial and Applied Mathematics
- Springer Nature Accessible Content for Book Authors
- Taylor & Francis Alt Text Guide for Journal Authors

University of Southern California Case: From Complaint to Compliance



University of Southern California

- Private research university founded in 1880
- 23 academic units
- University Park and Health Sciences campuses
- Largest private sector employer in Los Angeles
- **46,000** Students
- **24,583** Faculty and staff

OCR Case 09-23-2634

- Investigation by the U.S. Department of Education's Office for Civil Rights (OCR)
- Three accessibility barriers:
 - Inaccessible Keyboard Navigation
 - Insufficient Color Contrast
 - Missing Visual Focus Indicators
- Resolution agreement reached in December 2023

Six Actions

| Action | Requirements | Deadline |
|------------------------------------|--|---------------------|
| 1. Adopt an Accessibility Standard | Adopt a recognized standard (e.g., WCAG 2.1 Level AA). | 30 days |
| 2. Post Public Notice | Post an accessible notice on its website detailing how to report barriers and request access. | 30 days |
| 3. Conduct a Comprehensive Audit | <ul style="list-style-type: none"> Complete a comprehensive audit of all university web pages, including vendor-hosted and third-party sites Conduct manual testing using detailed protocols covering keyboard access, color contrast, alt text, heading structure, and more Submit detailed testing results to OCR | 120 days |
| 4. Remediate All Barriers | <ul style="list-style-type: none"> Remediate all identified barriers to conform with the adopted accessibility standard If full remediation is not immediately possible, USC must provide equally effective alternative access For vendor technologies that cannot be immediately fixed, provide interim alternate measures and require vendors to complete remediation within six months Replace non-compliant vendors if they fail to remediate timely | 6 months |
| 5. Develop a Sustainability Plan | Develop and submit a comprehensive plan to maintain accessible features, including: <ul style="list-style-type: none"> Updated testing and remediation protocols Revised procurement protocols and language Ongoing training for web developers, procurement officials, and content creators Clear designations of responsibility Dedicated funding sources | 1 year |
| 6. Update Protocols | Collaborate with OCR to update testing and remediation protocols based on OCR's review until equal access is achieved. | Ongoing after audit |

University-Wide Response

- Comprehensive digital inventory of all web properties
- Appointment of Digital Accessibility Director
- Development of a campus-wide policy
- Integration of accessibility into procurement process
- Development of Training programs

Building Campus-Wide Framework

- Governance and leadership structure
- Communication and cultural commitment
- Policy and standards adoption
- Comprehensive audit and assessment
- Procurement and vendor management
- Training and capacity building
 - Support systems and resources
 - Technology solutions and implementation
- Continuous improvement & learning

USC Libraries

- 23 libraries & information center
- 270 staff members
- Library Facts and Figures
- Mission and Vision
- Strategic Themes
 - Access
 - Library environments
 - Collaboration
 - Leadership

USC Libraries Unique Position

- 28 library websites (approximately half hosted by external vendors)
- 3 million+ e-books and e-journals across dozens of platforms
- 3.3 million locally digitized items in institutional repositories
- 1,500+ licensed databases
- 400,000+ streaming media titles
- Libraries do not own most of the content or platforms

USC Libraries' Effort

- Audit and remediate websites
 - Establish quarterly website review process
 - Document remediation efforts
 - Develop plan for retroactively fixing legacy digitized content
 - Migrate in-housed hosted sites
- Collaborate with vendors
- Training and knowledge sharing
- Update Accessibility and Disability Services statement

Working with Vendors: Key Considerations

- Vendor accessibility policy, reports, and standards
- ASPIRElist for evaluating vendor accessibility
- Procurement process integration
 - USC Digital Accessibility Procurement Supplier Survey
 - Accessibility Conformance Report (ACR) using the Voluntary Product Accessibility Template

Lessons Learned: Lesson 1

Implementing Without Disrupting

- Integrate accessibility into existing workflows
- Identify key integration points
- Conduct periodical accessibility review
- Build staff capacity and accessibility literacy

Lessons Learned: Lesson 2

Collaborating with Vendors

- Recognize limited control on most digital content
- Start with VPAT/ACR documents and Equally Effective Alternate Access Plan (EEAAP)
- Conduct quarterly vendor accessibility reviews
- Leverage contract renewal, consortium purchasing power, and peer advocacy
- Include accessibility requirements in RFPs
- Establish escalation paths in service agreements

Lessons Learned: Lesson 3

Supporting Learners

- Coordinate with campus partners - three-way partnership:
 - USC Libraries
 - Student Accessibility Services
 - Office of Institutional Accessibility & ADA Compliance
- Provide accessible e-reserves, alternative format coordination, accessible research guides and instruction
- Shift from reactive to proactive service model

Lessons Learned: Lesson 4

Sustaining the Program

- Secure institutional commitment and embedded accountability structures
- Establish: a named owner, a written policy, a reporting mechanism, and a feedback channel for users
- Prioritize by impact, legal risk, and feasibility
- Plan with a 1-3-5 year horizon

Ongoing Challenges

- Balancing automated software scans with manual testing
- Managing workload and developing specialized skillsets
- Navigating vendor dependency:
 - Resolving issues in locked-down user interfaces
 - Slow to respond to change requests
 - Locked-down system
 - Regular audits and upkeep
 - Obtaining the most current VPAT reports

BEYOND BOUNDARIES: New Modes of Access and Accessibility through Emerging Technologies Symposium

Thank You!

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Organised by:

