



### **My Virtual Academy Website Accessibility Policy**

My Virtual Academy, MVA, prohibits discrimination on the basis of race, color, creed, national origin, disability, sex, and age. MVA is committed to making its electronic and information technologies accessible to individuals with disabilities by meeting or exceeding the requirements as contained in Section 504 of the Rehabilitation Act of 1973, 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. This act prohibits discrimination in services, programs, and activities in any form of education and requires institutions to provide individuals with disabilities equal access to electronic information and data comparable to those who do not have disabilities, unless an undue burden would be imposed on the institution. The decision regarding this “undue burden” will be made by the President of My Virtual Academy or his designee after considering all resources available for use in the funding and operation of the Academy’s services, programs, or activities. This undue burden statement will contain the reasons for reaching this conclusion in compliance with 28 C.F.R. Part 35.164 and will ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by My Virtual Academy. My Virtual Academy is committed to meeting the spirit exemplified in this law by meeting the technical requirements and criteria that are used to measure conformance within this law ensuring accessibility of its website to people with disabilities. New and updated web content produced by our organization will meet W3C WAI’s Web Content Accessibility Guidelines 2.1, Level AA conformance.

To accomplish this goal My Virtual Academy has contracted with a third-party, CQL Inc. The MVA website homepage contains a link to the My Virtual Academy Web Accessibility Policy and includes a link to a form allowing users to submit feedback on the site; this information will be compiled and considered during the review process.

### **Website Accessibility Resolution Procedure**

As a user, if you encounter difficulty in accessing the My Virtual Academy website, our online curriculum, or MVA online internet based enrollment services, we want to help you resolve your issue! For this reason, we have adopted a Web Accessibility Form with a step-by-step approach to addressing your specific grievance.

1. A Web Accessibility Form is provided as an active link at the bottom of the MVA website. This form must be completed and submitted using the “SUBMIT” button to MVA Web Accessibility Coordinator, Mr. Aaron Brown at the following email address: [aaronb@atsedu.net](mailto:aaronb@atsedu.net).
2. Web Accessibility Coordinator Brown will acknowledge receipt of the form within two (2) working days. The Web Accessibility Coordinator will investigate the complaint, and develop a written remediation plan in consultation with third parties as necessary. If



this issue cannot be totally resolved, Web Accessibility Coordinator Brown will determine the nature of the corrections made and respond to the claimant in writing within seven (7) working days explaining the corrective action(s) taken. The Web Accessibility Coordinator will maintain a log recording the complaint, the claimant's contact information, and the accommodation made to resolve the complaint.

3. If the claimant is dissatisfied with the action taken, he or she may file a formal complaint in writing within 10 days. This written complaint must include the claimant's name, address, email address, and phone number; a full description of the problem; a description of what efforts have been made to resolve the problem informally; and a statement of the remedy requested. This formal grievance complaint is to be filed with the President of My Virtual Academy, Mr. Howard Weaver, 18901 15 Mile Road, Suite 200, Clinton Township, MI 48035. Mr. Weaver may be contacted by Voice – 800-297-2119, Fax – 586-465-9481, Email – [howardmindfocus@aol.com](mailto:howardmindfocus@aol.com). President Weaver will resolve the complaint within seven (7) working days.

My Virtual Academy will maintain detailed logs recording the contact information of the grievant, the nature of the complaint, the resolution made and the date of follow up with the grievant.

**4. At any time during this process, a person who is dissatisfied may file a complaint with the office for Civil Rights.**

Anyone who remains dissatisfied and believes that he/she has been subjected to discrimination based upon his/her disability in violation of Section 504 Rehabilitation Act of 1973 and its implementing regulations ("Section 504") and Title II of the Americans with Disabilities Education Act, as amended ("ADA"), may file a complaint directly with the U.S. Department of Education's Office for Civil Rights ("OCR"). The OCR can be reached at:

U.S. Department of Education  
Office for Civil Rights  
1350 Euclid Avenue, Suite 325  
Cleveland, Ohio 44115  
(216) 522-4970 (phone)  
(216) 522-2573 (facsimile)  
[OCR.Cleveland@ed.gov](mailto:OCR.Cleveland@ed.gov)



## Audits and Compliance Testing

CQL Inc. has been contracted to conduct quarterly audits on the MVA website and whenever any changes are made. It is their responsibility to initiate any required changes to make sure the site will meet W3C WAI's Web Content Accessibility Guidelines 2.1, Level AA conformance. User-generated content is not included in this audit process. User generated content is defined as any document and/or enrollment form submitted by any individual that is outside the control of the Academy and does not otherwise fall under the Academy's Section 504 and Title II obligations. CQL Inc. will maintain detailed logs containing the following information:

- Date of audit
- Auditing tool used
- Results of audit
- Corrective action taken
- Results of re-audit
- Person responsible

Logs will be shared with the Web Accessibility Coordinator, Aaron Brown. The following combination of auditing tools will be used to insure website compliance:

- A-Tester by Evaluera Ltd
- Accessibility color wheel by Giacomo Mazzocato (for contrast measurements)
- Accessibility Developer Tools by Google Accessibility
- WAVE by WebAIM
- Readability Grader by Jellymetrics
- Manual checking conducted by a live user

My Virtual Academy requires the content of all third-party providers meet WCAG standards and applicable guidelines as contained in Section 504 Title II of the Rehabilitation Act of 1973, 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. Emphasis is placed on a compliance culture demonstrating a long-term commitment and plan for accessibility realizing that accessibility must be an integral part of website development. All third party content used on the website is required to provide equal opportunity to educational benefits afforded by the technology and equal treatment in the use of technology.

Content will not be posted on-line unless it passes WCAG standards. MVA policy requires prior to any content being posted on-line it be reviewed and pass web content accessibility guidelines 2.0. Third party content will be audited and tested by CQL Inc. based on W3C WAI's Web Content Accessibility Guidelines 2.1, Level AA. It is the responsibility of CQL Inc. to notify the MVA Web Accessibility Coordinator, Aaron Brown, of any non-compliance. Web Accessibility



Coordinator Brown serves as a gatekeeper preventing posting of any non-compliant materials on the My Virtual Academy website. Accessibility Coordinator Brown is responsible for contacting any non-compliant third parties to determine if they can remediate the content provided. In the event remediation is required after conducting an audit, such content will not be posted online. Two months will be given to resolve the issue found in the audit. Any remediated content will be forwarded to CQL Inc. for re-audit. Failure of a third party vendor to meet WCAG Guidelines will result in the material not being added or used on the MVA website.

This policy will be reviewed annually on April 1. This policy was created on November 6, 2017 by the Web Accessibility Team consisting of the MVA Web Accessibility Coordinator, Aaron Brown, the third party Webmaster Accessibility Coordinator Kevin Germain of Creative Programs and Systems, LLC, Howard Weaver, President of My Virtual Academy and Patricia Fischer, MVA Management Consultant.

This policy applies to all web content produced or updated by My Virtual Academy. In addition, My Virtual Academy will ensure third-party content providers are aware of our web accessibility policy.

### **Compliance Training**

All employees of My Virtual Academy must complete an annual and mandatory comprehensive training program focused on informing employees of our obligations under Section 504 Title II regarding individuals with disabilities. This training will be led by Web Accessibility Coordinator Brown and Melissa Meike, Human Resource Coordinator for Accuracy Temporary Services, Inc. Records documenting attendance are maintained. This training focuses on applicable guidelines contained in Section 504 Title II of the Rehabilitation Act of 1973, 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 and the commitment of MVA to meet the W3C WAI's Web Content Accessibility Guidelines. This training program will be updated annually to include any recent additions or changes as appropriate

New employees will receive an initial orientation which covers the MVA Web Accessibility Policy and the handling of individual's with an impairment as part of the initial on-boarding process to create a culture of awareness and compliance throughout the organization at all times.

### **Policy Distribution**

This policy is published and is accessible on the home page of the MVA and is also contained in the Employee Manual which is updated annually.