

# New Math Data ICT Accessibility Policy

**Effective Date:** February 17, 2025

**Last Review Date:** February 17, 2025

**Version:** 1.0

## 1. Purpose

New Math Data is committed to providing Information and Communication Technology (ICT) products and services that are accessible to all, including people with disabilities. This policy outlines our commitment to comply with State of Texas accessibility standards and related federal regulations, ensuring that our electronic and information resources are usable by the widest possible audience.

## 2. Scope

This policy applies to:

- All ICT (Information and Communication Technology) resources developed, procured, or maintained by New Math Data for use by our employees, contractors, customers, or any external stakeholder.
- All personnel involved in creating, managing, or delivering digital content and services on behalf of New Math Data (e.g., project managers, developers, content authors, vendors, etc.).

Examples of ICT covered by this policy include:

- Websites and web-based applications
- Software systems and mobile applications
- Electronic documents (PDF, Word, PowerPoint, Excel, etc.)
- Multimedia (audio, video)
- Procurement of hardware, software, or third-party digital services

## 3. Relevant Laws, Standards, and Regulations

### 1. Texas Administrative Code (TAC):

- **Title 1, Part 10, Chapters 206 & 213:** Electronic and Information Resources (EIR) Accessibility for state agencies and institutions of higher education.
- Aligns with WCAG 2.0 AA (or the most recent applicable version) and Section 508 guidelines.

### 2. Texas Government Code (TGC):

- **TGC §2054 Subchapter M:** Requires state agencies to ensure that electronic and information resources are made accessible.

### 3. Federal Accessibility Standards:

- **Section 508** of the Rehabilitation Act, as amended.
- **Americans with Disabilities Act (ADA)**, Titles II and III, where applicable.

## 4. Policy Statement

New Math Data will:

1. **Ensure Accessibility Compliance:**

ICT products and services must meet or exceed the State of Texas accessibility rules (TAC 206 & 213), WCAG 2.0 AA requirements, and relevant federal regulations (Section 508).

2. **Incorporate Accessibility from the Outset:**

Accessibility considerations must be embedded in all phases of the ICT lifecycle—planning, design, development, testing, deployment, maintenance, and procurement.

3. **Provide Training & Support:**

All staff and contractors involved in ICT projects shall receive appropriate training or resources in accessibility standards and best practices.

4. **Perform Ongoing Monitoring & Auditing:**

Periodic assessments will be conducted to verify that existing ICT offerings remain compliant and accessible.

5. **Offer Reasonable Accommodations:**

Upon request, reasonable accommodations shall be made to ensure that individuals with disabilities can access and utilize our ICT resources.

## 5. Roles and Responsibilities

1. **Executive Management**

- Ensure organizational commitment and allocate resources (budget, staff, tools) to develop and maintain accessible ICT solutions.
- Promote a culture of accessibility throughout New Math Data.

2. **ICT Accessibility Coordinator**

- Oversee implementation and enforcement of the ICT Accessibility Policy.
- Serve as the primary point of contact for accessibility-related inquiries and issues.
- Coordinate audits, set timelines for remediation, and monitor compliance efforts.

3. **Project Managers / Team Leads**

- Integrate accessibility requirements into project plans and deliverables.
- Coordinate with the ICT Accessibility Coordinator to ensure compliance.

4. **Developers and Content Creators**

- Follow approved accessibility standards (e.g., WCAG 2.0 AA) when designing and developing ICT solutions.
- Regularly validate and test digital outputs with accessibility tools and guidelines.

## 5. Procurement / Vendor Management

- Include accessibility requirements (TAC 206 & 213 compliance, Section 508) in procurement solicitations and contracts.
- Validate that third-party vendors comply with the required accessibility standards.

## 6. All Employees / Contractors

- Understand and adhere to this policy and associated standards.
- Report accessibility barriers or issues promptly to the ICT Accessibility Coordinator or relevant manager.

# 6. Procedures

## 6.1 Accessibility in Design & Development

- **Requirements Gathering:** Include accessibility as a key requirement from the earliest stages.
- **Design Reviews:** Incorporate color contrast checks, keyboard navigation checks, text alternatives for images, and other best practices.
- **Development Standards:** Follow WCAG 2.0 (or higher) guidelines for each ICT component.
- **Testing Protocols:** Conduct both automated and manual accessibility testing (e.g., screen reader compatibility, keyboard-only navigation, color contrast tools).
- **Documentation:** Maintain clear documentation of accessibility features and known issues.

## 6.2 Accessibility in Procurement

- **Solicitation & Contracts:** Ensure procurement documents explicitly require accessibility compliance with TAC 206 & 213, as well as Section 508.
- **Vendor Evaluation:** Evaluate vendor-provided Voluntary Product Accessibility Templates (VPATs) or accessibility conformance reports.
- **Acceptance Testing:** Reserve the right to test or request proof of accessibility before finalizing any purchase.

## 6.3 Training & Education

- **Employee Training:** Provide routine training sessions or online modules on state and federal accessibility standards.
- **Resource Materials:** Maintain a repository of quick reference guides, checklists, and tutorials on accessibility best practices.
- **Vendor & Partner Engagement:** Require vendors to demonstrate understanding of accessibility obligations.

## 6.4 Reporting and Remediation

- **Issue Reporting:** Maintain a channel (e.g., email or ticket system) to collect accessibility-related feedback from employees, customers, or the public.
- **Remediation Process:** Develop an action plan for addressing identified accessibility gaps within a reasonable timeframe, prioritizing based on severity.
- **Escalation:** Unresolved or critical issues should be escalated to Executive Management for immediate attention.

## 6.5 Continuous Improvement

- **Periodic Audits:** Schedule annual or biannual reviews of digital assets for compliance.
- **Policy Review:** Review and update this policy and associated procedures at least once a year or when standards change.

## 7. Exceptions

New Math Data aims for full compliance; however, some exceptions may apply:

- **Fundamental Alteration:** If meeting an accessibility standard fundamentally alters the nature of the product or service, a documented exception process must be followed, along with providing an alternative accommodation if feasible.
- **Undue Burden:** If compliance imposes significant difficulty or expense, approval for an exception must be obtained from Executive Management and alternative means of access must be provided.

Any exception must be thoroughly documented and include:

1. A description of the noncompliant product or service.
2. Justification for why compliance is not feasible.
3. Proposed alternative methods or accommodations, if available.

## 8. Enforcement

- **Internal Oversight:** The ICT Accessibility Coordinator and Executive Management will oversee enforcement of this policy.
- **Noncompliance:** Employees or contractors found to be in noncompliance may be subject to corrective actions, which could include further training, reprimand, or contract termination, as applicable.

## 9. Definitions

- **ICT (Information and Communication Technology):** An umbrella term for all forms of technology used to handle communications and digital information (hardware, software, networks, websites, etc.).
- **WCAG (Web Content Accessibility Guidelines):** A series of guidelines developed by the World Wide Web Consortium (W3C) outlining best practices for web accessibility.
- **Section 508:** Federal law requiring Federal agencies' ICT to be accessible to people with disabilities.
- **VPAT (Voluntary Product Accessibility Template):** A vendor-generated report that evaluates how accessible a product is according to Section 508 standards.

## 10. Review and Revision History

Version	Date	Description	Author / Editor
1.0	February 17, 2025	Initial Policy Release	Jeffery McLaughlin

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## Signature and Approval

By signing below, management confirms that this document is accepted as the official ICT Accessibility Policy for New Math Data, effective on the date indicated.

A handwritten signature in black ink, appearing to read "Jeffery McLaughlin". The signature is written in a cursive style with a large initial "J" and "M".

**Jeffery McLaughlin**  
**Principal Consultant, Executive Sponsor**  
**Date:** February 17, 2025