

AHEAD Association on Higher Education And Disability®

The Association on Higher Education And Disability (“AHEAD”) is a nonprofit membership organization committed to full participation and of persons with disabilities in higher education and society. With over 30 state and regional affiliates, AHEAD’s membership includes over 2,700 faculty, staff and administrators representing approximately 1,800 colleges and over 2,000,000 students with disabilities. Our members strive to ensure that institutions of higher education comply with civil rights protections by providing integrated opportunities through developing infrastructures and practices that provide seamless access, as well as providing reasonable accommodations, including accessible information and communications technologies.

In enacting the ADA and its amendments (Title 42 Chapter 126 USC; Sec. 12101(a) (5)) Congress found that individuals with disabilities continue to encounter various forms of discrimination, including the discriminatory effects of barriers in electronic and information technologies, and failure to make modifications to existing facilities and practices. AHEAD believes that the refresh of Section 508 of the Rehabilitation Act as well as the Telecommunication Act Accessibility Guidelines under the Communications Act can help professionals in our field move in the direction of equal access with a consistent set of guidelines. In addition, the adoption of WCAG 2.0 as proposed by the United States Access Board will have a unifying and clarifying effect, except for the negative effects it may have on the usability of technology by people with low vision. We support the adoption of WCAG 2.0, with the exception that we believe the previous standards of 1194.22(d) regarding enlargement should be retained in the new Rule, since they provide better functionality to end users and clarity of design to technology and web developers.

Higher education has been given a clear mandate by the departments of Justice and Education that it cannot adopt inaccessible technologies (as indicated in the 2010 Joint Dear Colleague Letter re: Electronic Book Readers, the resolutions with Louisiana State University and the University of Montana, among many others). Updating the standards to WCAG 2.0, with the inclusion of the previous 1194.22(d) enlargement guidelines, will provide much-needed guidance to not only higher education, but also to the larger United States business community, and thereby better accessibility to our citizenry overall.

Sincerely,



Stephan J. Smith
AHEAD Executive Director



Bea Awoniyi
AHEAD President