



SPA

**Contra Costa School of
Performing Arts**

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Policy Type: Governing Board Policy

Policy Name: Title II ADA Policy

Approved: December 14, 2022

TITLE II, ADA POLICY WEB CONTENT, APPS, AND SERVICES

Creation of Content for Web Pages/Sites, Apps, and Services

The School Board authorizes staff members and students to create content, apps, and services that will be hosted by the Board on its servers or School-affiliated servers and/or published on the Internet.

The content, apps, and services must comply with applicable State and Federal laws (e.g., copyright laws, Children's Internet Protection Act (CIPA), Section 504 of the Rehabilitation Act of 1973 (Section 504), Americans with Disabilities Act (ADA), and Children's Online Privacy Protection Act (COPPA)), and reflect the professional image/brand of the School, its employees, and students. Content, apps, and services must be consistent with the ChartHouse Public School dba Contra Costa School of Performing Arts (the School's) Mission Statement, and staff-created web content, services, and apps are subject to prior review and approval of the Executive Director before being published on the Internet and/or used with students.

The creation of content, apps, and services by students must be done under the supervision of a professional staff member.

Purpose of Content of School Web Pages/Sites, Apps, and Services

The purpose of content, apps, and services hosted by the Board on its servers or School-affiliated servers is to educate, inform, and communicate. The following criteria shall be used to guide the development of such content, apps, and services:

1. Educate

Content should be suitable for and usable by students and teachers to support the curriculum and the Board's objectives as listed in the Board's strategic plan.

2. Inform

Content may inform the community about the school, teachers, students, or departments, including information about curriculum, events, class projects, student activities, and departmental policies.

3. Communicate

Content may communicate information about the plans, policies, and operations of the School to members of the public and other persons who may be affected by School matters.

When the content includes a photograph or personally identifiable information relating to a student, the School will abide by all laws and regulations applicable.

Under no circumstances is School-created content, apps, and services to be used for commercial purposes, advertising, political lobbying or to provide financial gains for any individual. Included in this prohibition is the fact no content contained on the School's website may:

1. include statements or other items that support or oppose a candidate for public office, the investigation, prosecution, or recall of a public official, or passage of a tax levy or bond issue;
2. link to a website of another organization if the other website includes such a message; or
3. communicate information that supports or opposes any labor organization or any action by, on behalf of, or against any labor organization.

Under no circumstances is staff member-created content, apps, and services, including personal web pages/sites, to be used to post student progress reports, grades, class assignments, or any other similar class-related material. Employees are required to use the School-specified website, app, or service for the purpose of conveying information to students and/or parents.

Staff members are prohibited from requiring students to go to the staff member's personal web pages/sites (including, but not limited to, their Facebook, Instagram, Pinterest pages) to check grades, obtain class assignments and/or class-related materials, and/or to turn in assignments.

If a staff member creates content, apps, and services related to his/her class, it must be hosted on the School's server.

Unless the content, apps, and services contain student personally-identifiable information, School websites, apps, and web services that are created by students and/or staff members that are posted on the Internet should not be password protected or otherwise contain restricted access features, whereby only employees, student(s), or other limited groups of people can access the site. Community members, parents, employees, staff, students, and other website users will generally be given full access to the School's website(s), apps, and services.

Web content, apps, and services should reflect an understanding that both internal and external audiences will be viewing the information.

School web pages/sites, apps, and services must be located on School-affiliated servers.

The School retains all proprietary rights related to the design of web content, apps, and services that are hosted on School servers, absent written agreement to the contrary.

Students who want their class work to be displayed on the School's website must have completed the media release form during the registration process.

Website Accessibility

The School is committed to providing persons with disabilities an opportunity equal to that of persons without disabilities to participate in the School's programs, benefits, and services, including those delivered through electronic and information technology, except where doing so would impose an undue burden or create a fundamental alteration. The School is further committed to ensuring persons with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as persons without a disability, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any School programs, services, and activities delivered online, as required by Section 504 and Title II of the ADA and their implementing regulations; and that they receive effective communication of the School's programs, services, and activities delivered online.

The School adopts this policy to fulfill this commitment and affirm its intention to comply with the requirements of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, 34 C.F.R. Part 104, and Title II of the Americans With Disabilities Act of 1990, 42 U.S.C. 12131 and 28 C.F.R. Part 35 in all respects.

1. **Technical Standards** The School will adhere to the technical standards of compliance identified at www.cocospa.org. The School measures the accessibility of online content and functionality according to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, the Web Accessibility Initiative - Accessible Rich Internet Applications Suite (WAI-ARIA 1.1) for web content, and Section 504 of the Rehabilitation Act of 1973.

2. **Web Accessibility Coordinator** The Executive Director or their designee is the School's web accessibility coordinator(s). That individual(s) is responsible for coordinating and implementing this policy.

3. **Third Party Content** Links included on the Board's website(s), services, and apps that pertain to its programs, benefits, and/or services must also meet the above criteria and comply with State and Federal law (e.g. copyright laws, CIPA, Section 504, ADA, and COPPA). While the School strives to provide access through its website to the online content provided or developed by third parties (including vendors, video-sharing websites, and other sources of online content) that is in an accessible format, that is not always feasible. The School's administrators and staff, however, are aware of this requirement with respect to the selection of online content provided to students. The School's web accessibility coordinator or his/her designees will vet online content available on its website that is related to the School's programs, benefits, and/or services for compliance with this criterion for all new content placed on the School's website after the adoption of this policy.

Nothing in the preceding paragraph, however, shall prevent the School from including links on the School's website(s) to

- a. recognized news/media outlets (e.g., local newspapers' websites, local television stations' websites), or

b. websites, services, and/or apps that are developed and hosted by outside vendors or organizations that are not part of the School's program, benefits, or services.

The Board recognizes that such third-party websites may not contain age-appropriate advertisements that are consistent with the requirements of Policy 9700.01, AP 9700B, and State and Federal law.

4. Regular Audits The School, under the direction of the web accessibility coordinator(s) or his/her/their designees, will, at regular intervals, audit the School's online content and measure this content against the technical standards adopted above.

This audit will occur no less than once every two (2) years.

If problems are identified through the audit, such problems will be documented, evaluated, and, if necessary, remediated within a reasonable period of time.

5. Reporting Concerns or Possible Violations If any student, prospective student, employee, guest, or visitor believes that the School has violated the technical standards in its online content, s/he may contact the Title II coordinator with any accessibility concerns. S/He may also file a formal complaint.

Instructional Use of Apps and Web Services

The School authorizes the use of apps and services to supplement and enhance learning opportunities for students either in the classroom or for extended learning outside the classroom.

The Executive Director or administrative designee will pre-approve each app and/or service that a teacher intends to use to supplement and enhance student learning. To be approved, the app and/or service must have a FERPA-compliant privacy policy, as well as comply with all requirements of the Children's Online Privacy Protection Act (COPPA) and the Children's Internet Protection Act (CIPA) and Section 504 and the ADA.

The School further requires the use of a School-issued e-mail address in the login process.

Annual Training

The School will provide annual training for its employees who are responsible for creating or distributing information with online content so that these employees are aware of this policy and understand their roles and responsibilities with respect to web design, documents, and multimedia content.

One-Way Communication Using School Web Content, Apps, and Services

The School is authorized to use web pages/sites, apps, and services to promote school activities and inform stakeholders and the general public about School news and operations.

Such communications constitute public records that will be archived. When the Executive Director designates communications distributed via School web pages/sites, apps, and services to be one-way communication, public comments are not solicited or desired, and the website, app, or service is to be considered a nonpublic forum.

Grievance Procedures

Any person who believes they have experienced or witnessed inaccessibility on the website or internet is encouraged to immediately report the issue to the Coordinator:

Catherine Foster, Associate Principal (Title II)
Contra Costa School of Performing Arts
2730 Mitchell Drive
Walnut Creek, CA 94598
(925) 235-1130

Complaints regarding such misconduct may also be made to the U.S. Department of Education, Office for Civil Rights.

TITLE II COMPLAINT FORM

Your Name: _____

Date: _____

Date of Alleged Incident(s):

Name of Person(s) you have a complaint against: _____

List any witnesses that were present: _____

Where did the incident(s) occur?

Please describe the events or conduct that are the basis of your complaint by providing as much factual detail as possible (i.e. specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.) (Attach additional pages, if needed):

I hereby authorize Charter School to disclose the information I have provided as it finds necessary in pursuing its investigation. I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief. I further understand providing false information in this regard could result in disciplinary action.

Date:

Signature of Complainant

Print Name

To be completed by the Charter School:

Received _____ by:
Date: _____

Follow-up Meeting with Complainant held on: _____