Assessing the State of Publicly Available Library Accessibility Information: Guidelines Based on a Review of Policies at SUNY Libraries

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Policy language plays a central role in ensuring that academic libraries are accessible and inclusive to patrons with disabilities. However, relevant accessibility information is often missing from publicly available library policies. This article uses findings from a content analysis of SUNY libraries' public collection development and accessibility policies to gain insight into current trends and develop best practices in the creation of accessibility policy language. Further, it also offers tools and principles for evaluating existing policies.

Introduction

According to recent reports by the National Center for Education Statistics (NCES), over 19% of undergraduate students report having a disability (NCES, n.d.) and just one-third of college students with disabilities disclosed their disability to their institution (NCES, 2022). As a result, a significant number of students may not be receiving the services they require or may not be aware of services that are tailored to their specific needs. Libraries can provide better support if they develop and maintain public policies with clear language regarding accessibility. Providing this information on the library's website, which acts as a digital front door, is essential to be transparent and welcoming to all patrons (Power and LeBeau, 2009, p. 56) and allows disabled patrons to plan their visits (Brunskill, 2020).

This study examines two essential policies that libraries need to have to facilitate accessibility: the collection development policy (CDP) and the accessibility policy. The study analyzes documented accessibility policies and CDPs within State University of New York (SUNY) libraries for accessibility elements. A CDP outlines the framework and criteria for selecting materials and should explicitly address considerations and procedures relating to accessibility when acquiring electronic resources (Levenson, 2019, p. 213). Libraries must also have an accessibility policy or page, which should include a description of all library

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operations and services supporting accessibility, on its website (Vaughan & Warlick, 2020, p. 2).

This study examines a wide range of SUNY academic libraries' current practices with the goal of generating useful observations, and ultimately best practices, applicable to other libraries. A variety of SUNY colleges and universities can be found throughout the state, including research universities, liberal arts colleges, technical colleges, health centers, and community colleges. This breadth of institution types, and the many different research needs served by these libraries, makes SUNY a useful sample for evaluating these types of policies. Moreover, as with many large library systems, SUNY has enacted a system-wide accessibility mandate requiring all its libraries to be accessible to persons with disabilities, which offers an opportunity to explore the initial impact of this type of mandate. This study examines how SUNY libraries have incorporated accessibility guidelines into their publicly available policies to comply with these requirements, and to improve accessibility. The insights from this study have been used to develop recommended best practices both for evaluating existing policies and developing new or improved policy language. Those interested in implementing policies and procedures that support accessibility can find practical insights and strategies from this analysis and the resulting best practices.

Background

SUNY is the public higher education system for the state of New York, with over 60 campuses spread throughout the state. It includes "a mix of 29 state-operated campuses and five statutory colleges—including research universities, liberal arts colleges, specialized and technical colleges, health science centers, land-grant colleges—and 30 community colleges" (SUNY, n.d.-a). In total, these campuses offer over 4,000 undergraduate majors and grant over 96,000 degrees each year (SUNY, n.d.-b). Each campus has its own leadership, infrastructure, and services, including libraries. Although these libraries regularly collaborate on projects, each has its own policies, collections, and services to meet the unique needs of their communities. The flexibility of the system leads to significant differences in how policies are written and applied.

In June of 2019, the SUNY Trustees adopted the Electronic and Information Technology (EIT) Accessibility Policy, which applies to all campuses with a goal of "ensur[ing] appropriate campus and system-level commitment to support equal and integrated access to all of its programs, services, and activities, particularly for individuals with disabilities, especially in the realm of electronic and information technologies" (Office of Information Technology, 2019). Each institution was tasked with developing an Accessibility Plan to achieve this goal, leading many SUNY libraries to seek to improve accessibility processes, policies, and documentation. These efforts included the 2020 formation of the SUNY Library Accessibility Cohort, of which the authors served as inaugural members (SUNY Library Services, 2022).

In light of this recent policy, the aim of our study is to identify and analyze current accessibility practices in SUNY libraries' publicly available collection development and accessibility policies by conducting a content analysis of these policies. We collected all collection development and accessibility policy language from these libraries and used a standardized set of questions to analyze and categorize each library's approach. This data was then used to identify trends within the SUNY system, to compare the policies of SUNY libraries to those of outside institutions, and to identify best practices for libraries interested in making policy improvements.

Literature Review

Accessibility in Libraries

Accessibility in all aspects of library operations is essential for equitable and inclusive access to information and education, which the American Library Association (ALA) has identified as a core component of the Library Bill of Rights (2018). This commitment is codified in many institutional mission statements and mandates, such as SUNY's EIT accessibility policy. Beyond this mission-driven commitment to access, higher education institutions have a legal obligation to make their libraries accessible under state and federal law, including the Americans with Disabilities Act of 1990 (1990). Failure to comply with these requirements can result in legal enforcement by the Department of Education and/or legal action taken by individuals with disabilities (e.g., Regents of the University of California & Disability Rights Advocates, 2013).

Though approaches to accessibility vary significantly between libraries, the major components of accessibility include spaces, services, web presence, and both print and electronic collections. It is often particularly complex for a library to ensure it meets the obligation of having its electronic collections accessible to all users (DeLancey & Ostergaard, 2016, p. 181). As part of SUNY's EIT accessibility policy, institutions are required to follow industry standards and best practices when purchasing and renewing e-resources. A recommended method is to check that e-resources adhere to web accessibility standards, such as Section 508 of the Rehabilitation Act and the World Wide Web Consortium (W3C) Content Accessibility Guidelines (WCAG) (Schmetzke, 2015). Whenever possible, libraries should review a Voluntary Product Accessibility Template (VPAT) which describes how the product complies with accessibility requirements and is provided by many vendors, particularly those that work frequently with academic libraries (Falloon, 2017, p. 141).*

Policies

Library policies play a crucial role in not only the operation of the library but also the way patrons understand the library. At its core, "a policy is actually a type of position statement. It explains the organization's stand on a subject and why there's a rule. It tells the reader how the organization intends to operate" (Campbell, 1998, p. 1). As Nelson and Garcia (2003) noted in their book *Creating Policies for Results: From Chaos to Clarity*, "library policies define what a library values" (p. 8). As such, publicly posted policy language serves as an important way of codifying and communicating library values to both library staff and members of the wider campus community. These dual purposes are both relevant to the role that policies can have with respect to library access for disabled patrons. As Bodaghi, et al. found in their 2016 study, "the lack of a written and clear policy regarding the types of support librarians have to provide for VIPs [visually impaired persons] caused them to feel guilty to request more help from the librarians" (p. 91). This highlights the importance of carefully considering what information is conveyed through policies, particularly regarding accessibility. Most library accessibility policies address accessibility of library spaces and services, while only a minority provide information pertaining to the accessibility of databases and collections as part of their accessibility and collection development policies (Brunskill et al., 2021, p. 944; Pionke, 2020, p. 233; Power & LeBeau, 2009, p. 59; Schmetzke, 2015, p. 133).

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* A completed VPAT is called an Accessibility Conformance Report (ACR), but the acronym VPAT will be used for this article as it is generally used to refer to both the template and the completed reports.

Collection Development Policies

In addition to library accessibility policies, information pertaining to the accessibility of databases and collections should also be included in collection development policies (CDPs). A CDP "is a plan that guides the library's selection of materials, deselection, and treatment of materials once acquired or obtained through contracts and licenses" (Johnson, 2018, p. 82). Academic libraries can utilize CDPs to communicate their "collection priorities, initiatives, goals, and cooperative agreements" (Pickett et al., 2011, p. 166) internally among library staff and externally to their communities, including fulfilling accreditation and reporting requirements (Gregory, 2019, p. 29; Torrence et al., 2013, p. 163). Additionally, libraries can use them for training purposes (Mangrum & Pozzebon, 2012, p. 109), to help ensure that selectors understand the collection's focus (Osa, 2003, p. 134), and to maintain consistency in procedures (Gregory, 2019, p. 29).

By clearly describing rationales for the collection's goals and practices, CDPs can enable libraries to demonstrate accountability to their communities (Pickett et al., 2011, p. 166), defend themselves against external challenges to their methods, protect against pressure to obtain or remove specific materials (Gregory, 2019, pp. 31-32), and preserve intellectual freedom (Garnar & Magi, 2021., pp. 37-39). Furthermore, a visible policy can clarify why certain items cannot be purchased (Johnson, 2018, p. 87) or why previously purchased items are canceled, for example inaccessible electronic resources (Falloon, 2016a, p. 8).

In scholarly literature, CDPs are widely acknowledged as indispensable tools for academic libraries (Levenson, 2019, p. 207). Even so, studies reveal that many academic libraries lack CDPs or refrain from making documentation public (Levenson, 2019, pp. 208-209). Moreover, many libraries with CDPs do not update them frequently, only reviewing them every five years or more (Clement & Foy, 2010, p. 15; Torrence et al., 2013, p. 162). A policy from five to ten years ago is outdated and will not address newer formats, current priorities and philosophies, and collection limitations (Levenson, 2019, p. 210), particularly in the case of e-resources.

Creating and maintaining a CDP can be difficult and cumbersome (Snow, 1996, p. 193). The absence or neglect of such a policy is generally attributed to a shortage of staff, funding, time, and/or resources (Straw, 2003, p. 84). Some libraries without policies contend that it is safer not to publicize their internal guidelines (Vickery, 2004, p. 340). Critics of CDPs describe them as unnecessary (Snow, 1996, p. 191), static (Hazen, 1995, p. 29), "too prescriptive or too vague" (Mangrum & Pozzebon, 2012, p. 109), and difficult to adapt to more contemporary collection building practices and influences (Horava & Levine-Clark, 2016, p. 98). In his article weighing the merits of CDPs, Vickery (2004) states that "in practice most libraries either do not have an up-to-date policy document, or do not make effective use of it when they do have one" (p. 337).

Interestingly, among libraries with CDPs, the policies vary widely (Gregory, 2019, p. 29), from traditional, comprehensive plans to brief statements (Horava & Levine-Clark, 2016, pp. 97-98). As Horava and Levine-Clark (2016) confirmed, some libraries have simplified or eliminated their policies to be more agile in their decision-making (p. 101).

In addition to traditional print monographs, the administration of electronic resources should be governed by a comprehensive CDP that is publicly disclosed and continually updated (Johnson, 2018, p. 92; Mangrum & Pozzebon, 2012). Johnson (2018) recommends that CDPs include factors specific to e-resources, such as selection criteria, accessibility for people with disabilities, and for-

mat preferences (p. 92). Professional organizations, such as the ALA, have also emphasized the importance of including accessibility in the selection process (Schmetzke, 2015, pp. 115-116). In 2009, the Council of the American Library Association recommended that "all libraries purchasing, procuring, and contracting for electronic resources and services require vendors to certify that they comply with Section 508 regulations, Web Content Accessibility Guidelines 2.0, or other criteria that become widely accepted as standards of accessibility evolve" (pp. 1-2). In determining whether products meet these standards, Levenson (2019) noted: "Vendors in compliance with these standards should be able to supply their Voluntary Product Accessibility Template (VPAT) for consortia or individual institution subscriptions and purchases. This is an integral criterion to include in the CDP regarding the selection of e-resources" (p. 213). It is important to recognize that ongoing changes in web accessibility best practices and evolving legal requirements may also necessitate regular CDP reviews and updates (Levenson, 2019, p. 213).

Best practices recommend including accessibility criteria, statements, and technical requirements in a CDP, which clarifies how libraries approach e-resources and how vendors can comply (DeLancey & Ostergaard, 2018, pp. 8-9; Ostergaard, 2015, pp. 162-163; Schmetzke et al., 2015, p. 172). Unfortunately, research indicates that libraries often overlook accessibility when selecting resources and implementing policies (Schmetzke, 2015, p. 133). Schmetzke's 2015 study confirmed that libraries often neglect to incorporate accessibility elements into their CDPs (p. 133). A 2019 LYRASIS survey of over 1,000 galleries, libraries, archives, and museums revealed that only one-third of respondents had an accessibility policy for acquiring e-resources (Ashmore et al., 2020, p. 215). A study from 2018 determined that 20% of libraries surveyed had a policy, but most respondents reported that they only obtain accessible materials "some of the time" (Peacock & Vecchione, 2020, pp. 4-5).

Accessibility Policies

While libraries vary in how they share accessibility information with patrons, one common approach is to have a dedicated space for this information on their websites. For example, a 2016 survey of Association of Research Libraries (ARL) members found that posting on the library's website was the most common way of sharing information about accessibility (Spina & Cohen, 2018). In total, 94% of the surveyed libraries reported having accessibility information on their website (Spina & Cohen, 2018). Therefore, it is unsurprising that studies on library accessibility information have focused on examining what is included on these web accessibility pages rather than solely on information formally labeled as a policy.

An early example of such a project is the 2009 study by Power and LeBeau, which found that only slightly more than half of the websites surveyed included details on services for disabled patrons that "were easy to find and provided important basic information" (p. 60). A 2011 study of websites of libraries that are members of the Association of Research Libraries (ARL) found better results, with 88% of libraries having a disability services webpage, but did find that the actual content of those pages was widely variable (Cassner et al., 2011). A later review of ARL member websites in 2021 found only a slight increase to 93% having a disability services webpage. That study went on to conclude that:

> users with disabilities at ARL libraries who are trying to assess whether they will be able to successfully navigate the library space and find a suitable place to study, or get assistance other than book retrieval and information about accessibility

> software, will typically not find the needed information on libraries' accessibility webpages. Indeed, they might not be able to even locate the accessibility page to begin with, given that fewer than half had a link to it from their homepage that was not concealed within a dropdown menu, and almost a quarter did not link to it from their homepage at all (Brunskill et al., 2021, p. 946).

Another recent study of library accessibility webpages, focused specifically on four-year degree granting institutions in Virginia, found that, "[o]f the 40 libraries examined in this study, only 11 (27.5%) included policy or program content related to library accessibility for patrons with disabilities on their official websites in the summer of 2018" (Vaughan & Warlick, 2020, p. 4). Taken together, these studies show that there is wide variation across institutions in how accessibility is addressed on their website, if it is addressed at all.

The importance of this publicly posted information can hardly be overstated. As Brunskill (2020) has argued, it can "help reduce barriers to access by allowing users with disabilities to review information about the library's accessibility resources, services, and facilities without requiring them to disclose information about their disability" (p. 769). During Brunskill's interviews with students with disabilities, "[m]ore than one participant indicated that the lack of needed information could lead them to either avoid visiting the library altogether or could lead to their being overwhelmed or frustrated once they arrive" (p. 778), demonstrating how publicly posting this information can have a direct impact on who feels welcome in the library.

A library accessibility policy can refer to any policy language that covers accessibility for disabled users from web accessibility to the accessibility of library facilities. As with all policies, these documents set the tone for how accessibility is addressed at the library. As Ashmore, et al. (2020) have noted: "[p]olicies are key to creating the framework to make accessibility a priority for libraries" (p. 215). In addition, policy language "can inform day-to-day decision making for practitioners, thereby reducing uncertainty and resulting in more seamless access to resources for users with disabilities" (Rosen & Grogg, 2019, p. 40), which is particularly important given that studies have shown "a lack of awareness of disability-related issues" (Oud, 2019, p. 177) among library employees and a lack of confidence in how to respond to inquiries regarding accessibility (Pionke, 2020).

Despite the impact these policies can have, they are not universally adopted at all institutions or with respect to all work done in libraries. While no comprehensive study has been conducted across all academic libraries in the United States, several smaller-scale studies have found that, despite its import, many libraries still lack accessibility policy language. The 2019 LYRASIS survey found that fewer than 30% of respondents had formal policy language regarding any types of digital content covered by the survey (Rosen & Grogg, 2019). A study of academic libraries in the Northwest concluded that "the libraries and universities considered often lacked a comprehensive policy to facilitate library services being able to meet those [accessibility] needs" (Peacock & Vecchione, 2020, p. 4). Furthermore, a 2020 study focused on institutional repositories found that only 25% of respondents had policy language around accessibility or even accessibility standards for content in institutional repositories (Anderson & Leachman, 2020).

Research Questions

Based on our review of the literature and our knowledge of the SUNY libraries, we developed the following research questions to guide our content analysis:

1. Have the libraries in our study made their own practices around accessibility publicly available through formal policies or other public, online documentation?
2. Do the libraries in our study address the accessibility of materials in their CDPs? For those that do, how is accessibility addressed?
3. Which types of accessibility information do libraries publicly address on their websites?
4. Does the nature of the online accessibility information shared by the libraries in our study differ from previous research findings found in the literature on this topic?
5. Based on our findings, what are the best practices for publicly sharing accessibility information on a library website?

Methods

Defining "Policy"

Though clear definitions of both collection development and accessibility policies are available throughout the literature, we found that, in practice, it was sometimes difficult to determine whether the language on a given webpage technically constituted a policy. Information about library practices and procedures often appeared without language clearly designating it as official policy; pages containing accessibility policy language, for example, might simply be titled "Accessibility," and CDP language might be included on a LibGuide labeled "Library Materials," for example. We chose to evaluate as library policy all language about library practices and procedures made available to users, whether or not the library labeled it "Accessibility Policy" or "Collection Development Policy." Though we had access to some internal policies, because accessibility information is most valuable when available to users with accessibility needs, only policies that were publicly available on a library's website were considered in this study (Brunskill, 2020, p. 769).

Collecting Policies

To ensure the assembly of a comprehensive list of policies, we thoroughly browsed each SUNY library's website and used Google searches to seek out policies that might be buried on the institution's site.* For example, to locate the CDP for SUNY Oneonta, one author would first click through all potentially relevant menus that branched from the library's homepage. Whether or not they located a CDP via that method, that author would then conduct a Google search for phrases such as "Oneonta library collection development" (without the quotation marks), review the results and rephrase the query until they were confident they had found all posted policy language. We collected links to all policies in a spreadsheet; at this stage, the authors included all "edge cases"—pages and documents about accessibility or collection development that may or may not ultimately be considered a "policy." At some institutions, multiple pages were relevant to accessibility and/or collection development, and we collected all links. To evaluate all policies on a level playing field, we used the Internet Archive Wayback Machine to collect snapshots of all pages linked in the spreadsheet as of May 2022.†

* We did not evaluate SUNY's five statutory colleges in this study–four Cornell schools and colleges and the New York State College of Ceramics at Alfred University–as the SUNY EIT Policy does not apply to them.

† The Wayback Machine was unable to archive a small number of sites reviewed. In these cases, we reviewed the live webpage instead of an archived copy.

Evaluating Policies

Next, we used Google Forms to evaluate the content of these archived pages (see form text in Appendix). We inductively developed and honed each form by testing it against several different policies, evaluating the accuracy and appropriateness of the form content, and adjusting the content as necessary over several iterations. The form questions were initially drafted based on our collective expertise and experience in library accessibility within the SUNY system. Additionally, throughout this inductive process, we drew on studies such as Brunskill (2020), Brunskill, et al. (2021), and Ezell, et al. (2022) to ensure the questions were comprehensive and reflected general best practices identified in the literature. Questions from the final CDP review form include topics such as: "Is accessibility for users with disabilities mentioned explicitly?" and "Are VPATs specifically mentioned in the policy?" Questions from the accessibility policy review form include topics such as: "Is physical space accessibility covered?" and "Is circulating equipment and software covered?" Both forms included space for the addition of contextual remarks.

Each web page was reviewed and evaluated by two of the three authors. All evaluations were then reviewed for consistency: all three authors reviewed any discrepancies between evaluations and determined the most accurate assessment based on a re-review of the page and the contextual remarks in the original form response. During this process, we identified and excluded from the results several webpages which we determined did not include policy language, and which therefore did not align with the policy evaluation metrics in the forms.

Limitations

Availability of Policies

Although we decided that the optimal approach to this study was to evaluate only publicly available policies, this method has potential drawbacks. It is conceivable that some libraries have substantial accessibility standards or practices that are still works-in-progress or under review, and these efforts are not credited or acknowledged via our methods. Similarly, we only evaluated library policies but, when a library did not have a policy, we did not investigate why. At some institutions, the development and publication of policies—and particularly accessibility policies—may be seen as being under the purview of another unit on campus, rather than as a library-specific project. While we would argue that library-specific policies are of great value, as discussed in the literature review, we again may be eliding campus or unit-wide standards and efforts with the specificity of our parameters.

Defining "Accessibility"

One issue discovered across multiple CDPs was the ambiguity of the word "accessibility," which has multiple meanings not always clarified by context. This term is used to refer both to accessibility for disabled users and to accessibility in a variety of locations, such as references to accessing resources off campus. While in many cases the surrounding context makes the meaning clear, this is not always the case. As an example, the CDP of Reed Library at the State University of New York at Fredonia includes the statement that: "The primary criterion for selecting any item is its relevance to Fredonia's undergraduate and graduate curriculum. Other concerns when we evaluate information resources include their content, accessibility, and viability" (2022). For purposes of this study, we interpreted this as a reference to accessibility for disabled users, although that cannot be definitively determined in context. Such

ambiguity in language means that various readers of this policy, particularly those who are not library employees, may interpret the policy differently.

Asking the Right Questions

Lastly, we recognize that our assessment was only a first examination of what we considered "essential" to any given accessibility or CDP. Despite developing our assessment forms inductively and repeatedly testing our content evaluations before applying them to our entire policy dataset, we ultimately discovered that several policies mentioned accessibility elements we had not addressed in our questions, including service animals, emergency evacuation procedures, and sensory spaces. Future policy evaluations could examine how institutions make available accessibility information about these and other elements and determine if it is a best practice to include some, or all, the elements in policy language.

Results and Best Practices

Availability of Information

Ultimately, of the 59 SUNY campuses included in this study, we determined that 32 had a publicly available accessibility policy. Thirty-two campuses—though not necessarily the same campuses—also had a publicly available CDP. Seventeen campuses had both an accessibility and collection development policy, and 12 had neither policy. Just over half of campuses (31) had only one policy or the other.

The fact that so many institutions do not have any publicly available accessibility information was a significant finding. Given the vital role of policies in setting and communicating library values (Nelson & Garcia, 2003, p. 8), an absence of relevant and publicly available policy language could result in library decision-makers overlooking accessibility considerations. In addition, some patrons might conclude that the library does not prioritize accessibility and inclusion. Moreover, the existing evidence that patrons with disabilities do value and rely on the public availability of accessibility information (Brunskill, 2020), suggests that the absence of this information may deter some patrons from visiting the library or using its services. This means that, even if some libraries included in this research do have internal policy language related to accessibility considerations, this is likely insufficient to adequately serve all patrons.

Institution Type

Because SUNY includes so many different types of institutions, each with a library designed to meet the needs of the institution's specific programs and students, we were able to identify trends in how different types of institutions approach collection development and accessibility policy creation. Our study demonstrated that SUNY community colleges were significantly less likely to have publicly available collection development or accessibility policies than other types of institutions: only 13 out of 30 community colleges in the SUNY system had each type of policy, whereas over half of the nine doctoral degree granting institutions, 13 comprehensive colleges, and seven technology colleges had each type of policy.

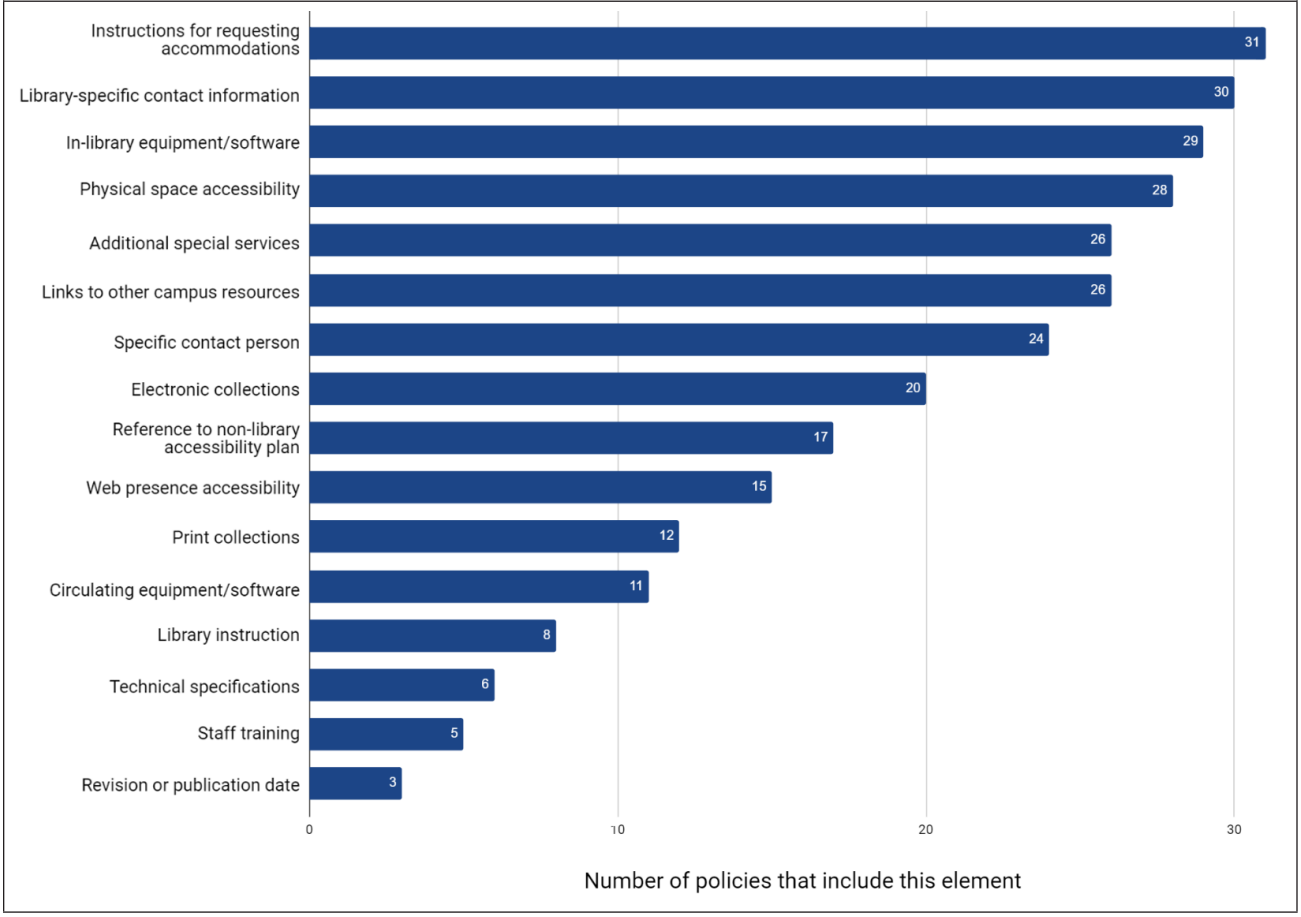
Additionally, we noted that libraries at doctoral institutions (n = 7) were less likely than other types of institutions to include specific information about the accessibility of resources in their CDPs, with only two such institutions mentioning accessibility in those policies, and only one specifically addressing the accessibility of e-resources. Given the importance of research

collections, and particularly e-resources, for these types of institutions and the programs they offer, this seems potentially problematic and worthy of more study.

Commonly Covered Topics in Accessibility Policies

Of the elements we assessed, the one most frequently included in accessibility policies was instructions for requesting accommodations, with 31 of the 32 campuses including this information (see Figure 1). A large majority of policies also included library-specific contact information (n = 30), information about in-library accessibility equipment or software (n = 29), and information about the accessibility of physical spaces (n = 28). These findings are an important first step towards creating generalizable guidelines regarding the type of accessibility information that is relevant to most types of libraries and to a broad range of library patrons. While these commonly covered topics are far from the only important accessibility information that should be included in this type of public documentation, they do suggest some of the minimal guidance that should be considered by all libraries when creating accessibility policy language.

FIGURE 1
Elements Included in Accessibility Policies (n = 32)



Topics Rarely Covered in Accessibility Policies

At the other end of the spectrum, most policies did not include a revision or publication date (n = 3), making it difficult for a user (or researcher) to determine how up to date the policy

language is. Only a few policies referenced staff training around accessibility issues (n = 5) or any specific technical standards to which library content adheres (n = 6). Explicitly stating the disability awareness and accessibility training that each staff member has received allows patrons to know what service level they can expect at the library.

Of the training topics and resources that were mentioned across these policies, most were focused on digital accessibility, though three specifically mentioned Project ENABLE, which offers both resources and free, self-paced online training modules and certifications on topics related to accessibility and disability inclusion in libraries, and whose stated goal is to "raise the level of librarians' understanding of and sensitivity for the library and information needs of students with disabilities" (Project ENABLE, n.d.). Only one institution specified how many staff members had completed accessibility training and none specified specific individuals or roles with this training. Given Pionke's (2020) findings that librarians generally feel that they do not have adequate knowledge and training to serve patrons with disabilities, this training demands greater attention in both the professional development of library staff and publicly posted accessibility policies. While these libraries not mentioning staff training does not necessarily mean that staff are not trained, the omission leaves patrons uncertain of the service level they will receive at the library and could therefore discourage them from visiting.

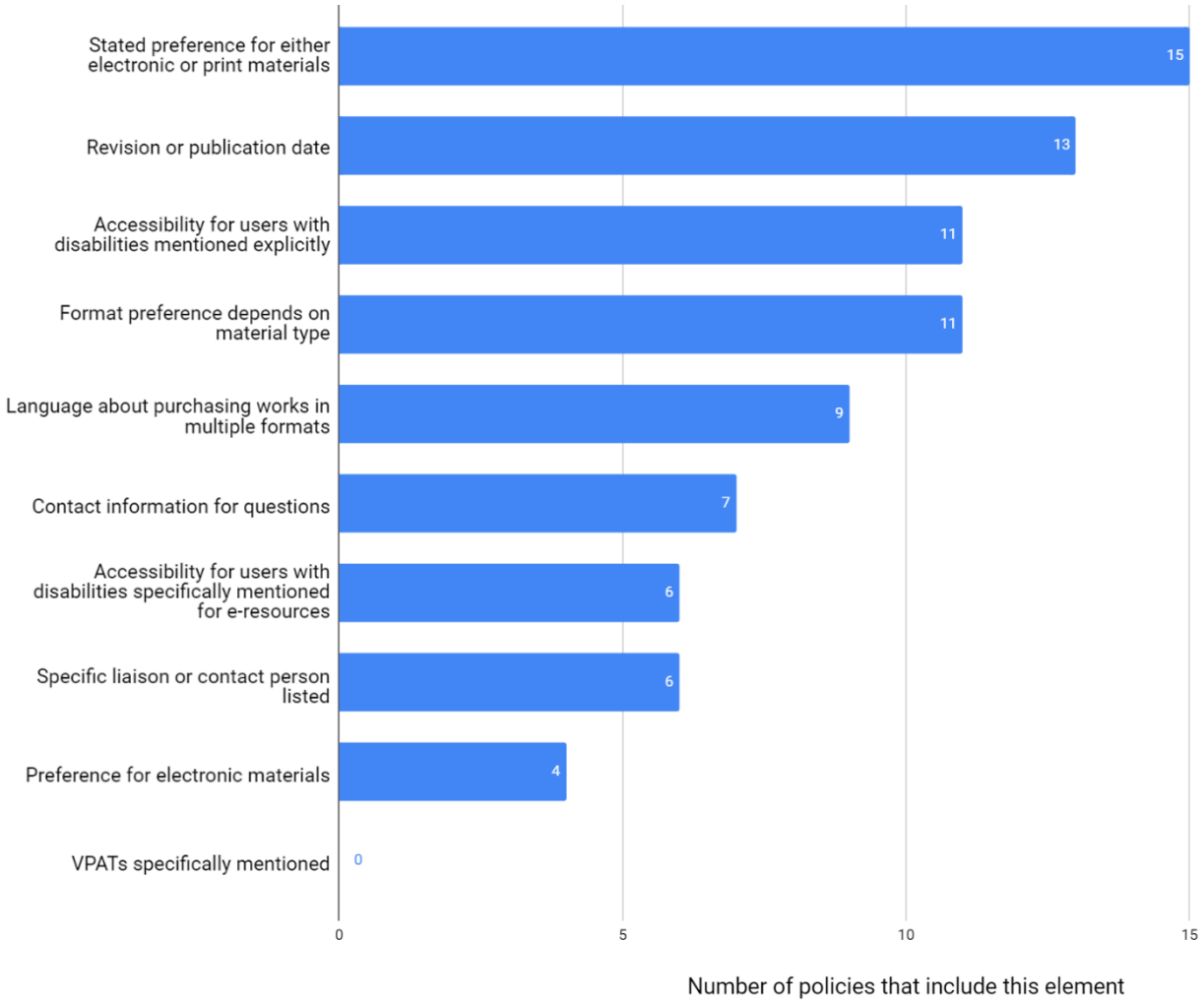
Only eight campuses included information about library instruction in their policies; this information varied significantly from brief mentions that library instruction accommodations were available, to detailed information about the specific technology used in library classrooms, and even to having a designated contact person for library instruction accessibility questions. Although eight out of 32 policies mentioning library instruction represents a higher percentage than found in studies by Ezell et al. (2022), and Graves and German (2018, pp. 565-567), it is nevertheless a disappointingly low percentage given the importance of library instruction at these campuses. As Graves and German note, it is vital that libraries provide information about both the accessibility of instruction spaces and how to request accommodations. In their words, "[s]tudents taking part in library instruction as a part of the information literacy program should be able to discover if the library has the capacity to fulfill their learning needs" (p. 571). Without this information, students may arrive at the library only to discover that library instruction is inaccessible to them, that it is too late for accommodations to be made, and that they may, therefore, be excluded from fully participating in that instruction.

Accessibility Language in CDPs

It is more difficult to generalize about the results of our assessment of CDPs (see Figure 2); of the elements we assessed, the most frequent item included (a stated preference for either electronic or print materials) was represented in fewer than half the policies (n = 17). Only 11 policies explicitly mentioned accessibility for people with disabilities. No policies (n = 0) specifically mentioned VPATs. As discussed in our literature review, these assessments are critical to evaluating the accessibility of vendor-provided digital material. This suggests that a consideration of accessibility is a gap in many CDPs across a variety of types and sizes of institutions and is an area needing more development.

In a particularly noteworthy omission, only six of the CDPs reviewed mentioned the accessibility of e-resources for people with disabilities. Some of these referred to campus

FIGURE 2
Elements Included in Collection Development Policies (n=32)



standards or SUNY's EIT policy, but none specifically referenced web accessibility standards or VPATs. Since VPATs are a common tool used to track accessibility features and issues in electronic resources, the authors were surprised to find that VPATs were never specifically addressed in the CDPs reviewed. This was particularly notable given that approximately a third of CDPs mentioned accessibility for users with disabilities, and at least some institutions specifically addressed VPATs in their accessibility policies. As discussed above, the literature persuasively argues that CDPs demonstrate libraries' priorities, goals, and standards, and that they set a process for collection development work for evaluating new acquisitions. The fact that two-thirds of the SUNY libraries with publicly available CDPs do not discuss accessibility at all, and none of them discuss VPATs, could be interpreted—both by those working in the library and by patrons reading the CDPs—to mean that library do not prioritize these topics.

Incorporating strong language around VPATs, and about specific web accessibility standards, into CDPs can help guide library personnel selecting items for purchase and can demonstrate to patrons how the library approaches accessibility. Weber State University's Stewart Library has a public draft CDP that demonstrates how VPATs can be integrated in a meaningful way. Their draft CDP includes an accessibility section which states:

> Purchased and licensed resources must be as accessible as possible and particularly address the needs of patrons with disabilities. VPAT (voluntary product accessibility template) compliance should be a minimum requirement, with very few exceptions. Exceptions should come with discounted pricing to address the cost of remediation and individual accommodations (n.d.).

Alternatively, some libraries specify the web accessibility standards with which electronic resources must comply. Grand Valley State University Libraries' (2022) CDP, for example, states:

> At minimum, licensed content and platforms comply with the Level AA criteria of the Web Content Accessibility Guidelines (WCAG) 2.0 by the World Wide Web Consortium's Web Accessibility Initiative. Content and platforms which are not compliant must show reasonable progress toward compliance, or otherwise hold the library harmless should an Authorized User file a complaint.

These types of robust accessibility statements demonstrate the library's stance on accessibility, provide guidance to library personnel reviewing resources, and offer clear information for outside parties interested in knowing more about the accessibility levels they can expect.

Collection Development Policy Language About Formats

In our analysis, we checked whether libraries noted a preference for electronic or print formats in their CDPs. Over half of the libraries (n = 17) did not list such a preference. Of those 17 policies, many indicated that it depended on the type of material (n = 11). Some specified a preference for electronic formats (n = 4), although only one of those four libraries cited accessibility as a factor in that preference. It would have been more helpful if we had specified whether the format preference applied to journals or monographs. Following up with libraries that indicated a preference would help determine whether accessibility is an important reason for such a preference. Twenty-eight percent of libraries (n = 9) included language about purchasing materials in multiple formats, which can help to accommodate learners with disabilities and different learning styles (Association of Specialized, Government & Cooperative Library Agencies, 2001).

Clarity and Simplification Are Key

This review of policy language demonstrated that virtually all accessibility policies would benefit from a clearly organized structure and overall simplification. Very few policies had a clear and consistent approach to organization, such as grouping information by function area or physical location within the library. Among those that did section the text by topic, the naming and organization of those sections was often arbitrary. In many cases, information was distributed across multiple webpages or tabs, requiring multiple clicks to find all relevant information tracked through the study instrument. This lack of organization could be particularly challenging for individuals with specific types of disabilities, and for those who use assistive devices that rely on page structure to navigate information efficiently. It could also hinder library employees looking for policy language from answering questions quickly, for example, at a library service point. Compounding the issue, pages and tab names

were often vague and did not clearly indicate the information that would be located there without navigating to it again, necessitating more clicks and increasing the likelihood that users might miss key information.

It is quite evident that consolidating relevant content onto a single page whenever possible, as well as labeling pages and tabs clearly are key to presenting an effective and usable accessibility policy. A recommended best practice, supported by existing studies (e.g., Brunskill, 2020), is to develop an outline of the information with distinct headings and subheadings to simplify navigation both visually and for assistive technologies. In many cases, this would also make it easier to find the relevant language using a search engine. A good example of well-organized accessibility information is the Michigan State University Libraries (n.d.) website. Each page in the navigation menu is clearly labeled and the content on each page adheres to a clear outline structure. Making these types of changes can improve clarity for all patrons and is particularly helpful to those using assistive tools, such as screen readers.

Options to Ask for Help Are Often Included in Accessibility Policies

Nearly all the libraries studied included contact information in their accessibility policies. All but two policies included a library-specific contact—such as an email that goes to a group responsible for accessibility, or the contact information for a specific service point—for questions about accessibility and related topics. Moreover, 24 of the policies included the contact information for a specific individual within the library who could assist with these inquiries, which is consistent with the best practices outlined in the literature (e.g., Longmeier et al., 2022, p. 835). Twenty-six of the policies also offered links to other related services on campus, such as non-library locations with assistive technologies, the campus disability services office, or other accessibility resources available at the institution.

By contrast, only a quarter of CDPs included contact information. While this study did not investigate the reason for this discrepancy, it may be because CDPs are updated less frequently or are seen as having a primarily internal audience. Some SUNY libraries may have recently added a library-specific contact for accessibility questions in their accessibility policies—because the Library Accessibility Guidelines, issued in the wake of the SUNY's EIT Policy, require it (SUNY EIT Accessibility Committee, 2019)—but did not extend the same considerations to CDPs. This lack of contact information, however, makes it difficult for patrons to follow up with questions or concerns about accessibility, particularly when accessibility information is not included in the CDP either.

Eligibility for Accommodations

In our review of 32 policies, we found that a large majority of accessibility policies (n = 31) included generic information (e.g., a contact email address) about how to request accommodations either in the library or on campus more broadly, but very few policies specified who would be eligible for such accommodations or what the request process entailed. This may be, in part, because other departments control accommodations on some campuses; nevertheless, providing this information, or clearly linking to it, would help patrons to determine whether they qualify for the supports they need to use the library.

Maintenance of Up-to-Date Policies

Many policies did not include either a publication or revision date, making it difficult to

determine whether they had been updated recently. Only 9% (n = 3) of accessibility policies included a date. This is consistent with the outcomes of Ezell et al. (2022), who found that nine percent of accessibility pages they surveyed listed the last time the page was updated (p. 232). By contrast, around 40% (n = 13) of CDPs listed a date, perhaps because CDPs are generally more formal documents. Of these, approximately half (n = 6) were updated within the last five years, while the other half (n = 7) were updated within the last six to 12 years. Of those CDPs without explicit dates, some were clearly outdated.

It is best practice for every policy to have a publication or revision date to ensure it remains current. Review and revision are essential for keeping policies effective and reflecting changes, especially for e-resources. If a policy becomes outdated and does not reflect accurate information and current practices, it should be removed from public view. Additionally, it is a best practice to include language about the frequency with which policies should be reviewed.

As an interesting anecdotal observation, some of the CDPs we reviewed were only available in PDF format, which can pose its own accessibility problems for people using some assistive technologies. None of the accessibility policies we examined appeared solely as PDFs.

Additional Areas for Future Study

By necessity, this study analyzed policy language at SUNY libraries at a specific moment. As SUNY's EIT Policy has only been in place since 2019, and as many of the policies reviewed are either undated or were last updated prior to that time, a potential future avenue for research would be to review policies again in few years to see whether they change in response to the EIT Policy. At the time of our review, only a little more than half of the SUNY libraries had accessibility policy language on their public-facing websites, and only about a third of them had public-facing CDPs that specifically mentioned accessibility for users with disabilities. A follow-up study could determine whether the EIT Policy is successful in increasing these numbers. Additionally, as discussed in the limitations section above, other accessibility topics could have been added to this study and would be interesting avenues for future research.

Another topic that is ripe for further research is why libraries rarely mention VPATs in CDPs and what techniques they use to evaluate the accessibility of electronic resources as part of the collection development process. It would be helpful to know whether those charged with writing and updating CDPs omit VPATs because they believe that VPATs are more appropriately discussed in accessibility policies, or if those responsible for collection development lack awareness of VPATs. It would also be useful to examine how accessibility is or is not considered in collection development decisions, including what standards and tools are used to evaluate electronic resources prior to subscription. While this study observed that VPATs are not mentioned in any SUNY library's publicly available CDP, it was not possible to determine from this research whether VPATs or any other accessibility standards are regularly considered during the review of electronic resources.

It would also be useful to research the rationale for leaving out specific references to VPATs or web accessibility standards. For example, it is possible that some libraries specifically chose to focus on the SUNY EIT accessibility policy language as an indirect reference to the specific tools they use to ensure accessibility; however, this study's methodology did not allow for a determination of these types of motivations. Further research in this area could

fill in this gap in knowledge. For example, a future project to interview librarians at each of these institutions could add additional insights into the reasons for specific choices and allow for further evaluation of non-public policy language.

Conclusion

While our research finds that many SUNY libraries offer valuable accessibility information on their websites, it also reveals opportunities for ongoing improvement at SUNY libraries and beyond. For libraries with publicly available CDPs and accessibility policies, this study highlights the importance of continually reexamining, enhancing, and updating policy language and procedures. Our analysis and the questionnaires we developed through this project can provide a starting point for evaluating existing policy language and for creating a process for continued improvement. For libraries that do not currently have publicly available accessibility language, our research emphasizes the importance of this language, demonstrates its adaptability for libraries of all sizes and types, and offers some concrete best practices to jumpstart the process of creating this documentation.

For SUNY and other systems or library consortia, this research and the related best practices may also indicate a need for model language that libraries can use in writing accessibility-related policies, or for documentation that helps walk librarians through the process of creating this type of policy language. Furthermore, librarians may benefit from consulting disability services on campus and students with disabilities when developing these policies. By offering accessibility information on their website, libraries have the opportunity to demonstrate that they prioritize accessibility and to create a welcoming environment for all library users.

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Appendix. Review of Collection Development Policies

Email
What school's policy are you reviewing?
Is accessibility for users with disabilities mentioned explicitly?
- □ Yes
- □ No

Comments?
Is accessibility for patrons with disabilities specifically mentioned for e-resources?
- □ Yes
- □ No

Comments?
Are VPATs specifically mentioned in the policy?
- □ Yes
- □ No

Comments?
Is there a preference for print or electronic in the policy?
- □ Yes, preference for print
- □ Yes, preference for electronic
- □ Yes, depends on format*
- □ No

If yes in the question above, is accessibility listed as a reason?
- □ Yes
- □ No

Comments?
Is there any language about purchasing works in multiple formats?
- □ Yes
- □ No

Additional comments about the format language?
Is contact information provided for questions?
- □ Yes
- □ No

Is a specific liaison or contact person listed?
- □ Yes
- □ No

Comments on the contact information?
Is there a date on the policy?
- □ Yes
- □ No

Is there a policy publication/revision date on the policy? (time stamps, such as those on Springshare, do not count)
Additional Comments?

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* Our form used the word "format" throughout the analysis process. When reviewing our results, we realized we had not noticed that this should more precisely read "material type"—that is, whether an item is a serial, book, reference item, etc.

Review of Accessibility Policies

Email
What school's policy are you reviewing?
Is physical space accessibility covered?

- □ Yes
- □ No

Comments?
Is web presence accessibility covered? (i.e., website, related systems like LibGuides, social media, etc.)

- □ Yes
- □ No

Comments?
Are print collections covered?

- □ Yes
- □ No

Comments?
Are electronic collections covered? (i.e., databases, ebooks, streaming video, etc.)

- □ Yes
- □ No

Comments?
Is in-library equipment and software covered?

- □ Yes
- □ No

Comments?
Is circulating equipment and software covered?

- □ Yes
- □ No

Comments?
Are special services or supports covered? (i.e., book retrieval, additional support, format conversion, etc.)

- □ Yes
- □ No

Comments?
Is library instruction covered?

- □ Yes
- □ No

Comments?
Are technical specifications listed? (i.e., WCAG conformance levels)

- □ Yes
- □ No

Comments?
Are instructions about how to request accommodations included? (i.e., who is eligible for book retrieval, access to specialized materials, help with assistive technology, etc.)

- □ Yes
- □ No

Comments?
Is staff training covered?
- □ Yes
- □ No

Comments?
Is library-specific contact information provided for questions?
- □ Yes
- □ No

Comments?
Is a specific liaison or contact person within the library listed?
- □ Yes
- □ No

Comments?
Are there links to other on-campus resources?
- □ Yes
- □ No

Comments?
Is the policy arranged by disability type or library functional area or some other system?
- □ Disability Type (i.e., specific resources for autistic patrons or blind patrons)
- □ Library Functional Area (i.e., organized by library service point or department)
- □ Physical Area (i.e., floor, branch, etc.)
- □ Unclear
- □ Other:

Does the policy mention any non-library accessibility plan?
- □ No, None of the below
- □ EIT Accessibility Plan
- □ Campus-wide Accessibility Plan
- □ Other:

Is there a policy publication/revision date on the policy? (time stamps, such as those on Springshare, do not count)
- □ Yes
- □ No

If there is a date, what is the date on the policy?
Additional Comments?