

Public Comment #1

Organization: NewView Oklahoma

Name: John McMahan

Oklahoma Resident

Applicable Publishers: All

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?
2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

Submission date:

9/11/2023. [Compliant].



September 29, 2023

Oklahoma State Department of Education
2500 N Lincoln Blvd
Oklahoma City, OK 73105

Re: 2023 Oklahoma Textbook Bid Public Comment

Frog Street Press, LLC provides the following response to public comments submitted to the Oklahoma State Textbook Committee Board.

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?

Frog Street is an Early Childhood Education company. Our digital resources are provided for use by teachers only, and do not include traditional student textbooks one would typically associate with adoptions for grades K-12.

As such, Frog Street is committed to equity and accessibility across all of our products including our Teacher Portal. We maintain WCAG 2.1 and Section 508 compliance which fully meet the requirements of the Oklahoma Electronic and Information Technology Accessibility Act. Frog Street recently submitted a comprehensive VPAT accessibility conformance report to the Oklahoma State Textbook Committee. If users have additional questions, accommodation requests, or any other support needs, they are encouraged to contact our support team at support@frogstreet.com or 800-884-3764.

2. Have designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

Frog Street's teacher-facing digital resources have undergone professional testing by a reputable third party that specializes in accessibility for educational organizations. The Frog Street Teacher Portal demonstrates both WCAG 2.1 and Section 508 compliance which fully meet the requirements of the Oklahoma Electronic and Information Technology Accessibility Act.

Teaching Strategies, LLC Digital Accessibility Statement**For****The Oklahoma State Textbook Committee**

Teaching Strategies, LLC (Teaching Strategies) believes that all children deserve a nurturing, engaging, and high-quality learning environment designed to support their unique needs throughout the critical, formative years. An essential component of our commitment is to ensure that educators who use our digital products have an accessible digital experience so that our resources can be used to their optimum potential, including by those individuals with disabilities.

In the spirit of our mission to provide full access to our resources to all Oklahoma educators, our goal is to meet the Web Content Accessibility Guidelines 2.1 (WCAG Level A and AA), and the Americans with Disabilities Act (ADA) Title III, Section 508 of the Rehabilitation Act of 1973, which is the basis for the Oklahoma Electronic Information Technology Accessibility (EITA) Act. We continue to develop our digital accessibility initiatives, which include partnering with industry leading accessibility experts at Level Access, Inc., to develop comprehensive testing and to implement remediation, as well as to integrate accessibility into our development practices.

Teaching Strategies Cloud product, which includes online access to digital textbooks, has been professionally tested and the resulting VPAT is provided to demonstrate our compliance with WCAG 2.1 A and AA standards. Further we continue to work toward the latest standards of WCAG 2.2 A and AA. Our Cloud product VPAT is submitted separately, per the state's request.

As you can see, Teaching Strategies is committed to achieving the digital accessibility needs of our Oklahoma users.

Submitted by Teaching Strategies, LLC



October 1, 2023

Alpha Plus does not plan to offer a statement for public comment, but does have a representative available for questions.

Public Comment: Publisher Response Statements from Bedford, Freeman & Worth Publishing Group LLC

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?

This statement is in regards to Macmillan Learning (legally known as Bedford, Freeman & Worth) submission for Oklahoma State's 2023 Math bid.

We have reviewed the standards outlined in Information and Communication Technology Accessibility Standards ([V 2.0 effective in March 2020](#)) and are currently in compliance with all areas except as outlined in our VPAT. We expect all outstanding issues to be complete by the end of the year. Our mission at Macmillan Learning is to inspire what's possible for every learner. That means no matter their demographics or abilities, we strive to provide learners with the best chance possible to succeed and flourish in their educational experience.

To start, Bedford, Freeman, and Worth/Macmillan Learning textbooks and course materials have been [Global Certified Accessible](#) by the not-for-profit Benetech since 2019 to provide "born accessible" e-books. This independent, third-party certification is renewed annually, and is based on compliance with the following guidelines:

- EPUB Accessibility 1.0 specification: established by the IDPF (International Digital Publishing Forum) and maintained by the W3C (World Wide Web Consortium)
- W3C's Web Content Accessibility Guidelines (WCAG) 2.0 AA as referenced in the Federal Section 508 Electronic and Information Technology Accessibility Standards (Refreshed 508 Standards)
- Accessibility metadata to promote conformance and discoverability of certified accessible publications

Macmillan Learning produces e-books in EPUB3 format. Our e-books include accessibility metadata, short and long alt text, clear structure and organization, and a variety of navigation methods including page and heading navigation. The e-books reflow and respond to magnification, so the text is readable at 400% magnification.

Since 2017, Macmillan has been providing alternative text for all images inside our e-books, slides, and other resources. Depending on the complexity of the image, we provide both short and extended descriptions. In the last two years we have begun to provide extended descriptions to all users rather than just screen reader users so that students with other print related disabilities, learning or cognitive related disabilities, or that simply prefer a written description to a chart or graph have access to extended description as a resource.

Our videos include closed captions, audio descriptions, and transcripts. Videos are hosted in a customized player that has been tested for compliance to WCAG 2.1 by an accessibility consulting agency that employs assistive technology users for testing.

We actively work with accessibility experts to ensure the best experience for all users in our learning simulations. Many of our interactive simulations provide a rich, enhanced learning experience for all students. Simulations are also tested by an accessibility consulting agency by assistive technology users.

Equivalent Facilitation

We recognize that compliance with accessibility standards is not the equivalent to usability. Because every student has a unique learning experience, we also offer, at no additional cost, all of our educational materials in alternative formats designed to meet students where they are most comfortable. Requests can be made to our accessibility team in advance of the class beginning or throughout the school year by contacting us directly at webaccessibility@macmillan.com. While fulfillment of request can vary depending on the complexity of the request, we aim to provide alternative formats within 5-10 business days of the request being received.

2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

Macmillan Learning partners with [Tech for All](#) to conduct third party testing with users with disabilities. Tech for All uses the following methods for testing:

- I. An accessibility expert conducts an overall technical analysis in order to identify issues of technical compliance that would affect mobility impaired, deaf/hearing impaired, and low vision users. The evaluator inspects each screen using Google Chrome with the Wave and aXe toolbars. Code analysis is conducted using browser Developer Tools.
- II. Keyboard accessibility analysis (for mobility and physically impaired users) is conducted by attempting to thoroughly navigate the website through the keyboard, without using a mouse, using Google Chrome and Safari browsers.
- III. For deaf and hard of hearing users, any audio content is assessed for proper captioning.
- IV. The accessibility for low vision users is evaluated three ways: (1) using the screen magnification, palette, and contrast controls provided by the operating systems; (2) using the font resizing capability offered by the browser, and (3) using Color Contrast Analyzer version 2.2.

- V. An evaluator who is legally blind conducts the screen reader testing. The goal is to identify accessibility barriers that are likely to be experienced by users who are blind. The evaluator works through the website using the JAWS for Windows (v. 2021) screen reader with Google Chrome, and VoiceOver screen reader with Safari browser. Any pages found to have screen reader issues are re-examined in interactive sessions with a sighted evaluator.

A completed Accessibility Compliance Report, with release notes highlighting work since our most recent audit, is available on request. Further information on our commitment to accessibility can be found at <https://www.bfwpub.com/high-school/ca/our-story/accessibility>.

Thank you.

Tonya Stoll

Tonya Stoll
Senior Director
Bedford, Freeman & Worth Publishing Group LLC

Angela Kwok
Project Manager, Educational Materials
Oklahoma Department of Education
2500 N. Lincoln Blvd.
Oklahoma City, OK 73105-4599

October 1, 2023

Dear Oklahoma State Textbook Committee Members,

Big Ideas Learning, LLC appreciates the time and commitment that you continue to dedicate to reviewing and recommending high quality instructional materials for the teachers and students of Oklahoma. Below you will find our response to the questions asked during the public comment period.

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?
 - a. Yes, we are not aware of any areas of non-compliance with the Oklahoma Electronic and Information Technology Accessibility Act.

2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?
 - a. Yes, our materials have been professionally tested and a VPAT is available upon request.

We look forward to working with you. Please let us know if you have any questions or require additional information.

Sincerely,



Robert M. Onsi
Chief Product Officer

Big Ideas Learning is proudly supported by



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(o) 513-229-1510
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NGL.Cengage.com

September 21, 2023

See below for Cengage Learning, Inc. response to your questions.

- 1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?** The VPAT provided for WebAssign conforms to the Oklahoma Electronic and Information Technology Accessibility Act by providing evidence as to how the platform complies to WCAG 2.0. Because WCAG criteria is built into Section 508, the results of the VPAT align to the requirements of Section 508.
- 2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?**
The platform WebAssign, used to deliver these titles, complies to both WCAG and Section 508.

Please let me know if you have any questions.

Thank you,
Nancy Fite
Bid Specialist

September 29, 2023

Attn: Angela Kwok
2500 N. Lincoln Blvd.
Standards and Learning Suite 315
Oklahoma City, OK 73105-4599

RE: OK Public Comment: Publisher Response Statements

Dear Ms. Kwok:

Please accept this letter in response to two public comment questions for publishers.

- 1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?** <https://oklahoma.gov/omes/services/information-services/is/policies-and-standards/accessibility-standards.html>
 - Curriculum Associates meets this requirement. Our student bookshelf with eBook meets WCAG 2.0AA with documented exceptions. We are in the process of optimizing our Teacher Toolbox resources for WCAG Compliance to the greatest extent possible. It should be noted that Curriculum Associates provides NIMAC with NIMAS versions of the student textbook and student-facing, printable ancillaries for the procurement of accessible print versions.
- 2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?**
 - Curriculum Associates has an ACR for the student bookshelf with student eBooks, which has been professionally tested by our internal compliance team and reviewed by a third-party accessibility vendor. For the Toolbox, we are actively working on documenting our current compliance, but we do not currently have a finalized ACR for that area of the product, as that platform is not yet fully compliant. As noted above, we are in the process of optimizing Toolbox resources for WCAG compliance to the greatest extent possible, and this includes PDFs of the Teacher's editions (with documented exceptions).

We are eager for the opportunity to serve Oklahoma districts. Please contact me at 800-225-0248 or RFPs@cainc.com if you have any questions.

Sincerely,



Emily McCann
Senior Vice President, Marketing



September 28, 2023

In response to your request for information:

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?

At McGraw Hill, we are working to create universally accessible products available to all learners. To achieve this and continuously improve the accessibility of our products, our teams engage with external experts and communities of accessibility advocates. For example, we are deeply connected with the Book Industry Study Group and the Software & Information Industry Association to ensure the software and content we produce is accessible and usable by all learners.

We have included the current ACR for the Open Learning student platform on which the product is delivered. We are in the process of remediating both the teacher and student experience and expect to have a new ACR available in March 2024.

The known accessibility features of the Reveal Math content include:

- Built-in text-to-speech tools and screen reader compatibility for the eBook and most HTML-based resources.
- Closed captions and transcripts for video and audio materials.
- Alternate text for images
- Content does not rely exclusively on color to convey critical information.
- Compatible with screen magnification software to resize content.
- Compatible with word prediction and text-to-speech tools.
- Highlighters are provided in the four standard colors (yellow, rose, green, blue)
- All navigation elements and menu items have keyboard shortcuts.
- Meets all requirements for color contrast standards

We are committed to regularly updating our ACR's, inclusive of new content.

Additionally, McGraw Hill is compliant with the National Instructional Materials Accessibility Standard (NIMAS) and provides files of the core student content to NIMAC for use in developing alternate accessible formats. We are committed to working with all of our education partners to meet the needs of students and teachers. In the event that alternative formats for content are required, we will work with the district to evaluate the options and, wherever possible, provide the necessary content.

2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

We have included a current ACR for the Open Learning student platform on which the product is delivered. The Testing was completed with a professional, external accessibility testing vendor.

Best,

A handwritten signature in blue ink that reads "Kimberly A. Harvey".

Kimberly Harvey
VP, Strategic Services
McGraw Hill

Oklahoma State Department of Education: Standards and Learning Division
Angela Kwok - Education Materials
2500 N. Lincoln Blvd.
Oklahoma City, OK 73120

October 2, 2023

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?

YES

2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

YES. Accessibility is a core value in our work at Open Up Resources, and we believe designing for accessibility benefits ALL students. We have an internal QA team that has tested our web materials, targeting Section 508 compliance. We have not yet published our accessibility compliance reports.

Sincerely,



Lynda English
Director of Research and Proposals
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<https://openupresources.org/>

Our Mission:

Increase equity in K-12 education by making excellent, top-rated curricula accessible to districts and schools.

September 21, 2023

Angela Kwok, M.A., NBCT
Standards and Learning Division - Suite 315
Oklahoma State Department of Education
2500 North Lincoln Boulevard
Oklahoma City, OK 73120

Dear Ms. Kwok:

RE: Public Comment: Savvas Learning Company LLC Response Statements

The following information is accurate and complete:

1. Do the textbooks under consideration conform to the requirements of the Oklahoma Electronic and Information Technology Accessibility Act?

Savvas designs, develops, and tests our products with both the Web Content Accessibility Guidelines (WCAG) standard and Section 508 of the American with Disabilities Act (ADA) in mind. Savvas has provided the Department of Education with Voluntary Products Accessibility Templates ("VPATs") for our existing copyrights reflecting products and features that comply with WCAG 2.0AA criteria.

2. Have the designated textbooks been professionally tested under the Act and accompanied by an Accessibility Compliance Report?

Yes. We use independent 3rd party vendors to create Voluntary Product Accessibility Template (VPAT) for our products as a measure of compliance with the Web Content Accessibility Guidelines (WCAG) version 2.0 AA. We have temporarily supplied VPATs for existing copyrights as part of the submission. Savvas will provide the Oklahoma c2025 VPATs to the Department of Education for review as soon as they are available.

Respectfully Submitted,



Rick Ferrie
V.P. of Accessibility
Savvas Learning Company LLC



CAMBRIDGE
UNIVERSITY PRESS

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New York, NY 10006, USA
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To Whom it May Concern:

Cambridge University Press is committed to ensuring our coursework is accessible for all students. We are in the process of upgrading our content and navigation to adhere to WCAG 2.2 guidelines. Our roadmap has us compliant and audited by September 2024. We would welcome the opportunity to work with your administration and technical team to ensure we are meeting the needs of the state and district, to allow all students to have access to the North American Cambridge Latin Course via our Cambridge Go platform.

Cambridge Go Accessibility Policy

We want everyone who visits Cambridge GO to feel welcome and find the experience rewarding.

To help us make GO a positive place for everyone, we've been using the Web Content Accessibility Guidelines (WCAG) 2.0. These guidelines explain how to make web content more accessible for people with disabilities, and user friendly for everyone.

The guidelines have three levels of accessibility (A, AA and AAA). We've chosen Level AA as the target for Cambridge GO. Cambridge University Press now publishes the majority of its new titles, and many older titles, inaccessible e-book formats either for individual purchase or on platforms suitable for institutions. Where a work is unavailable for purchase in a suitable format, we welcome enquiries from both individuals and institutions to provide one. The Platform has been cross-browser tested. It is optimized for the most stable release of the following browsers: including Mozilla Firefox, Apple Safari, and Google Chrome. Older browsers may offer limited functionality. Desktop Resolution: Minimum width supported is "320Pixels", although we cannot guarantee that content will be optimized at this resolution.

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