



## **Website Accessibility Policy**

It is the policy of Learning Express, Inc. that its public website, "learningexpress.com" (the "Website") be accessible to those with disabilities. For the purposes of this policy "accessible" means complying with regulations issued by the Department of Justice under Title III of the Americans with Disabilities Act (the "Regulations") or, in the absence of such regulations, the Web Content Accessibility Guidelines 2.0, success level AA ("WCAG 2.0 AA").

Implementation of this policy is the responsibility of Bill Doyno, Vice President Information Technology in consultation with Vijaikumar Kuppaswamy. He is authorized to retain a third party consulting firm with appropriate qualifications to assist in the implementation of this policy. He shall include in each annual, quarterly or other budget proposal an amount specifically allocated to website accessibility implementation and maintenance.

No later than September 29, 2016, Bill Doyno will conduct an audit of the Website to identify pages and individual page elements that do not generally conform to WCAG 2.0 AA and develop a plan (the "Website Accessibility Plan") to implement this accessibility policy. He may retain a third-party firm to assist with or conduct this audit and assist with development of the Plan.

The Website Accessibility Plan shall describe in reasonable detail how Learning Express will achieve the following:

- Making all newly added web pages at the Website conform to the Regulations or WCAG 2.0 AA as applicable.
- No later than 1 month bring all existing pages at the Website into substantial compliance with the Level A success criteria for the Web Content Accessibility Guidelines 2.0 ("WCAG 2.0 A").
- No later than February 2018 bring all existing pages at the Website into substantial compliance with the Regulations or WCAG 2.0 AA as applicable.
- No later than August 15, 2016 include a notice on the Website home page that it is the policy of Learning Express to make its website accessible to those with disabilities and provide a toll free telephone contact number and an email contact address dedicated to reporting accessibility issues.
- No later than September 29, 2016 require that all third-party vendors providing programming and development services for the Website certify that their work meets the Regulations or WCAG 2.0 AA as applicable.

In addition, the Website Accessibility Plan will include provisions for the following:

- Use of third party web developers that are familiar with the requirements of the Regulations or WCAG 2.0 AA as applicable and of this Policy.
- Training for all in-house development staff, with the first training to be completed for all web development staff no later than October 30, 2016.

- Requiring that any newly installed third party plug-ins used in the Website conform to the Regulations or WCAG 2.0 AA as applicable, and, no later than 36 months from the date of the plan, replacing all existing third party plug-ins with WCAG 2.0 AA conforming plug-ins.
- Regular testing of the Website to determine whether it meets the requirements of the Website Accessibility Plan and prompt correction of any deficiencies.
- Quarterly reporting to the Learning Express President Kathy Troknya concerning the status of implementation of the Website Accessibility Plan.
- A procedure for prompt response to consumer complaints concerning website accessibility that includes confirmation of the issue and its correction.

He will retain the services of appropriate third party vendors to survey changing accessibility technologies and legal standards at least once every two years and make such changes in the Website Accessibility Plan and this Policy as may be needed to improve the accessibility of the website and comply with any applicable governmental regulations or revisions to WCAG 2.0 AA.