

## **Systems Engineering Statement on Website Accessibility**

Systems Engineering, Inc. is dedicated to working with you, our valued MLS/association customer, to try to make the public-facing website platform we offer and maintain for your MLS/association accessible to all users, including those with disabilities. To that end, we have taken and continue to take steps to try to have our website platforms operate consistently with the Web Content Accessibility Guidelines (WCAG), to the extent under our control and to the extent otherwise practicable.

This statement is to provide you with information on the efforts we have taken thus far, some of the limitations that we face in taking additional steps, and some steps that you and your members can take to increase and enhance accessibility as to your specific website. We encourage you to share this statement with your association members as well as your IT personnel/vendor.

In an attempt to make this statement as clear as possible, we start with describing some terms used in this statement, followed by a general explanation of the sites we offer and how they are structured. We then discuss the efforts we have made regarding website accessibility, followed by some recommendations and next steps for you and your members.

### **Description of Terms**

The terms **“Site”** and **“Website”** refer to the standalone website(s) we offer to customers for their use. These sites typically consist of a home page, **“System Pages,”** and **“Custom Pages”** (both described below).

The term **“Holder”** is used to refer to a customer that has received a license from us to have a Site or Link (defined below) maintained for that customer’s use. Holders can include MLS/Association Boards, their individual member agents, and the real estate offices/agencies consisting of member agents.

The terms **“System Page”** and **“System Pages”** refer to those Site pages that have set functionality as used across our Site offerings, and they include such pages as search pages, results pages, expanded pages, helpful links pages, and **“my account”** pages. While the Holder has the ability to change and reorder certain fields (such as the listing data fields) on some of these System Pages, the underlying software code and structure as to those pages do not change.

The terms **“Custom Page”** and **“Custom Pages”** refer to Site pages other than the Site’s home page and System Pages. The availability of Custom Pages allows the Holder to create Site pages to contain additional content that the Holder wants to make available on the Site. Using our available **“Admin Tools”** system (discussed below), Holders can add or remove Site Custom Pages as they wish, without our direct involvement. Holders largely control the content and structure of Custom Pages.

The term **“Link”** is used to describe an offering from us that is designed to be **“framed”** into an existing website that we do not host. For example, if a customer has a website with another vendor that they wish to continue using but that website does not have MLS data search/display capabilities, the customer might consider licensing a Link from us to provide those capabilities. Our Links afford users the benefit of incorporating our core System Pages (but not our home page or Custom Page capabilities) into their other vendor-provided website.

The term **“Admin Tools”** refers to the tools in our administration software application that Holders can use to customize or otherwise make changes (e.g., to add, edit, or remove Custom Pages) to certain parts of the Holder’s Site/Link. With the Admin Tools, the Holder controls many aspects of the look, feel, and arrangement of the Site/Link, including the selection and modification of colors, color contrasts, the display selection and arrangement of various menu items, and the ability of the Holder to add, remove, and reorder listing data fields.

## **The Structure of Offered Sites**

Our Website platform system has a multi-tiered structure to allow us to offer websites and linking solutions to accounts we serve at the MLS/association level. This usually consists of Sites/Links for the following: MLS/Association Boards, their individual member agents, and the real estate offices/agencies consisting of member agents.

Each of our MLS/association customers has the ability to hold a Site for its use as part of the licensed services we offer them. That Site is referred to as a **“Board Site.”** If the MLS/association uses a Link instead of a Site, that Link is referred to as a **“Board Link.”** Sometimes we refer to both of these collectively as **“Board Sites/Links.”** Likewise, Sites and Links for Agencies/Offices are referred to as **“Office Sites”** and **“Office Links,”** respectively, and collectively as **“Office Sites/Links.”** Finally, Agent Sites and Links are referred to as **“Agent Sites”** and **“Agent Links,”** respectively, and collectively as **“Agent Sites/Links.”**

Our system code and logic used to build and display HTML elements and their corresponding attributes used within a given System Page is shared throughout the system. That means that Board Sites/Links share much of the same code that is used by Office Sites/Links and Agent Sites/Links. As such, any changes we make to any HTML element/attribute for purposes of WCAG result in the same changes being made for any Site/Link that uses said changed element/attribute.

Our operating software for System Pages on Board Sites/Links is incorporated into and utilized as the System Page software as to Office Sites/Links and Agent Sites/Links tied to that MLS. Likewise, our software for the home page on Board Sites is incorporated into and utilized as the home page software as to Office Sites/Links and Agent Sites/Links tied to that MLS. As such, any changes we make to software for these pages on Board Sites/Links, including for purposes of WCAG, result in the same software changes being made for those pages on corresponding Office Sites and Agent Sites.

## **Efforts to Make System Pages WCAG-Compliant where Practicable**

In connection with our website accessibility efforts, including as related to WCAG 2.0, we have utilized the WAVE Web Accessibility Evaluation Tool found at <https://wave.webaim.org/>. The WAVE site provides a suite of evaluation tools that helps website creators and owners, and authors of web content, make their web content more accessible to individuals with disabilities. As the WAVE site references, the WAVE tools can be used to identify many website accessibility/WCAG errors, and also facilitates human evaluation of web content. The WAVE site and suite of accessibility tools are sponsored by WebAIM and the Utah State University Center for Persons with Disabilities, and we consider it to provide useful tools in trying to achieve the goal of website accessibility.



The WAVE site allows for the examination of a given website as it would be seen through a screen reader. The WAVE tools provide a breakdown of elements of the tested site that do not comply with WCAG. The site breaks down its findings of errors vis-à-vis WCAG into two categories: “Errors” and “Contrast Errors.”

- “Errors” include flagged failures to meet WCAG and/or issues that will impact users with disabilities. Examples of Errors are the absence of alternative text as to an image or where the alternative text is inadequate.
- “Contrast Errors” include flagged instances in which the pages/content on a site fails to meet the foreground to background color contract ratios suggested by WCAG.

The WAVE tools also flag some additional categories, referred to by the terms, “Alerts,” “Features,” “Structural Elements,” and “ARIA.” (ARIA is an acronym for “Accessible Rich Internet Applications,” which is a set of attributes that define ways to make web content and web applications (especially those developed with JavaScript) more accessible to people with disabilities.) Generally speaking, these four categories are used to assist the site owner to improve the site beyond the two categories of errors discussed above.

Through substantial effort, we believe that we have eliminated, corrected, and/or adjusted all “Errors” that were identified by the Wave Tool in our code/software for the System Pages on Board Sites/Links, as well as all “Errors” that were identified by the Wave Tool on the home page code/software for Board Sites, that existed as of the time we conducted our work on your Board Site/Link. Because the corrected code/software for these pages and Sites is used/incorporated in the corresponding Office Sites and Agent Sites, the “Errors” flagged on our code/software for the home page and System Pages of the Board Sites should also be corrected in the similar pages for Office Sites and Agent Sites. (Accordingly, we have evaluated and worked on your Board Site/Link, but not on the Office Sites/Links or Agent Sites/Links associated with your Board Site/Link.)

**Please note that we have NOT taken any steps to address any flagged “Errors” related to the content on Home Pages and Custom Pages or any flagged “Contrast Errors” on any Sites or Links (including yours).** Why? First, because Holders need/want the ability to create and customize their Sites/Links (including by adding content, pictures, videos, and links and through other modifications) and control the look of their Sites/Links. Second, because our taking these steps could cause significant unapproved changes to the appearance of these pages and the content on the Sites/Links and lead to additional Site/Link complications. **We believe the decision to take those steps rests with you, as the Holder** (and we recommend that you do so). Further, because Holders and users add content and data to Sites virtually on a daily basis, any efforts by us to try to “correct” these flagged errors would become outdated/incomplete almost immediately.

## **Our Recommendations to You**

Though we have taken the steps outlined above to improve website accessibility, we strongly encourage you, and your member Agents and Offices, to consider taking the following steps, especially if you desire your Site/Link to achieve WCAG compliance:

- Conduct a compliance audit (using the WAVE Tool or some other reputable WCAG website compliance tool) of your website and content to evaluate and determine (a) what errors including "Contrast Errors," exist and how they can be corrected, and (b) what other improvements to your Site should be made or considered.
- Add an Accessibility Statement to your Site, to let the user know what steps have been taken with respect to making the Site's content accessible and, as appropriate, whether the Site is compliant with any WCAG standards. The Accessibility Statement should encourage users to make contact in the event that they encounter any difficulties or issues in accessing the Site or any of its content. In connection with the same, consider offering call-in telephone assistance when users have difficulty accessing your website information.
- Share this Statement and other information with your members, and encourage your members to take similar steps as to their Sites/Links
- If you do receive a demand letter alleging an ADA website violation, do not ignore it. You should consider promptly consulting with your legal counsel.

We at Systems Engineering, Inc. value our relationship with you and your MLS/association. We stand ready to provide reasonable assistance and support in connection with website accessibility concerns as it relates to the Sites/Links. Should you have any questions concerning website accessibility issues for us or wish to discuss these further, please contact your Sales Representative, Mike Conway at 800-367-8756 or via e-mail at [MConway@Navicamls.net](mailto:MConway@Navicamls.net).