

## CSCU Accessibility Policy for Electronic Information and Technology

### **Background and rationale**

The Connecticut State Colleges and Universities (“CSCU”) provides equal opportunity to its educational and administrative services, programs and activities in accordance with federal and state law. CSCU is committed to ensuring equal access to information, programs, and activities through its information technologies, web pages, web-based applications, operating system-based applications, digital instructional content, services, and resources (“electronic information and technology” or “EIT”). Therefore, digital information, websites, technology, coursework, and email need to be accessible by all in an understandable way. This is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, Section 508 of the 1973 Rehabilitation Act as amended and the State of Connecticut’s Universal Website Accessibility Policy for state websites.

### **Purpose of the Policy**

The purpose of the CSCU Accessibility Policy for EIT (“CSCU Accessibility Policy” or “Policy”) is to establish standards for the accessibility of EIT considered necessary to ensure compliance with applicable local, state and federal regulations and laws. CSCU is committed to designing, developing, and procuring EIT that is accessible to all individuals with disabilities.

### **Implementation of the Policy**

CSCU Institutions are required to develop local procedures to implement, monitor and ensure compliance to the established standards in this Policy.

### **Enforcement of the Policy**

Enforcement of this Policy is the responsibility of institutional and system leadership.

### **Compliance of the Policy**

All CSCU administrators, faculty, staff, and students are responsible for fulfilling the requirements of the Policy.

Non-compliance may result in barriers that impact students’ ability to succeed within our institutions as well as faculty or staff members’ ability to successfully complete their duties. If those actions are deemed in violation of applicable laws, the responsible individual, institution, or system may be at risk for litigation or loss of federal funding.

### **Policy Statement**

This Policy extends to the electronic information and technologies used in administrative services and in and out of the classroom, and applies to their procurement, design, development, implementation, ongoing maintenance and use. Providing equal and effective electronic information and technology access is the responsibility of all CSCU administrators, faculty, staff and students.

*The review of this Policy will occur biennially.*

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**Definitions**

"Accessible" means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.

"Archived EIT" refers to EIT developed, maintained, procured, materially revised, or hosted by the institution before this Policy's effective date and is retained by the institution solely for informational or regulatory purposes.

"CSCU" or "CSCU institution(s)" includes the CSCU System Office, the four constituent Connecticut State Universities, Charter Oak State College, and twelve Connecticut State Community Colleges.

"Disability" means a physical or mental impairment that substantially limits one or more major life activities.

"Electronic information and technology" or "EIT" includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term includes, but is not limited to, the internet and intranet websites, content delivered in digital form; including, but not limited to, word processing documents, PDFs, presentations, publications, and spreadsheets which are scanned, uploaded, posted, or otherwise published or distributed electronically, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, and personal response systems ("clickers"). It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This term includes telecommunication products (such as telephones), information kiosks, Automated Teller Machines (ATMs) transaction machines, computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources. In cases where multiple telecommunication devices exist within the same location (and it is not reasonable to ensure all devices meet Policy standards), at least one telecommunication device must be accessible. Experimental electronic information and technology in a production environment are not exempt from this Policy.

"Equally effective" means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium.

"Legacy EIT" refers to EIT developed, maintained, procured, materially revised, or hosted by the institution before this Policy's effective date and that remains in active use. Legacy EIT must be updated to be in compliance with the applicable standards and guidelines described in the Procedures section of this Policy, or the content must otherwise be made available in an equally effective accessible format and in a timely manner to any individual requesting access. The unit responsible for its maintenance must make it compliant with the applicable standards or provide an equally effective accommodation.

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Each college, department, program, or unit must establish its own priorities and timetables for updating legacy EIT; or plan for its transition to archival status or its removal. Priority must be given to creating accessible EIT for core institutional information such as course work, registration, advising, admission, and catalogs; and student, faculty, and staff information.

“New EIT” refers to EIT developed, maintained, procured, materially revised, or hosted by the institution after this Policy’s effective date.

**Responsible Persons**

CSCU Executive Leadership has overall responsibility for the implementation of this Policy. CSCU faculty, staff, and administrators all share in the CSCU responsibility for accessible EIT. Each shall execute this Policy and undertake reasonable efforts to bring EIT developed, maintained, revised, procured, or hosted within their purview into compliance with applicable state and federal law and the technical standards specified above as well as outlined within the procedures section. Creators of any digital content are responsible for meeting accessibility standards.

**Technical Standards**

CSCU’s technical standards for measuring accessibility are those published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). CSCU will endeavor to follow the most current published version of the Web Content Accessibility Guidelines (WCAG), however, the minimum technical standards are (a) WCAG 2.1 Level AA for Web-based EIT and (b) Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT). These technical standards may be updated as needed to remain current with the most recent WCAG guidelines or compliant with applicable law. CSCU will also look for guidance to applicable provisions of the United States Access Board’s Electronic and Information Technology Accessibility Standards under Section 508 of the Rehabilitation Act of 1973 as well as State of Connecticut’s Universal Website Accessibility Policy for State Websites.

**Standards**

1. Standards: Document and Media Accessibility

1.1 Electronic Documents

*1.1.1 Scope*

These standards apply to all electronic documents produced and maintained by all CSCU institutions as well as documents and media produced by third parties. Electronic documents include, but are not limited to, word processing documents, PDFs, presentations, publications and spreadsheets which are scanned, uploaded, posted, or otherwise published or distributed electronically. Documents not currently in use must be made accessible when used or upon request, if the document sought is not currently accessible.

### *1.1.2 Standards*

Electronic documents, optional and required, must be accessible. Electronic interaction with CSCU policies, procedures, notifications, and other documents must be as effective and usable for persons with disabilities as it is for persons without disabilities. Electronic documents must meet the standards outlined in the WCAG Guidelines (as defined in the **Technical Standards** section).

### *1.1.3 Roles*

#### **All Faculty, Staff, Administrators, Contractors, and Vendors:**

- Implement procedures for ensuring that electronic documents produced, maintained or distributed by the department are accessible to individuals with disabilities.

#### **Libraries:**

- Implement procedures for ensuring that materials digitized or hosted by the library are accessible to individuals with disabilities.

### *1.1.4 Resources*

#### **Faculty and Staff involved in Centers for Teaching and Learning, Course Design, Distance Education, Accessibility/Disability Services, Information Technology, Webmasters:**

- Provide accessible document instruction and support for campus community members.

## 1.2. Digital Media Accessibility and Captioning

### *1.2.1 Scope*

Media resources used in all CSCU programs and activities must be accessible. This includes, but is not limited to, media that is instructional, informational, marketing, and promotional as well as institution-wide, live-streaming events. CSCU events that are live streamed through third party platforms are not subject to this Policy. However, events streamed on a third-party platform but embedded within a CSCU website are within the scope of the Policy.

### *1.2.2 Standards*

All video content created and produced by CSCU and posted on an external-facing CSCU website must provide, at the time of posting, captioning that is 99% accurate, synchronous, complete, and properly placed, or is otherwise consistent with industry standards. Audio resources must be transcribed and be 99% accurate. This includes any CSCU Massive Open Online Courses (MOOCs).

Upon request from any member of the public, all audio or video content created and produced at CSCU and posted on a CSCU website prior to the effective date of this Policy must be captioned within five business days of the request.

All such requests are encouraged to be submitted via the “Report a Web Accessibility Concern” form (See Section 6.3). Any such requests received through another channel should be entered into this form by a member of the CSCU community upon receipt.

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### 1.2.3 Roles

#### **All Faculty, Staff, Administrators, Contractors, and Vendors:**

- Purchase only captioned versions of audio/visual media whenever possible. Caption all other media that will be used on the web or in instruction.
- Purchase only transcribed versions of audio media whenever possible.
- Update any non-transcribed audio and any non-captioned video upon use.

#### **Libraries:**

- Maintain collections that include transcribed audio and captioned video resources.
- Obtain collections that include transcriptions/captioning. In instances where collections consist of non-transcribed audio and non-captioned media, seek out accessible alternatives for transcription and captioning.

#### **IT:**

- Continuously assess classroom and presentation equipment to ensure caption-compatibility.

#### **Communications/Marketing:**

- Produce all multimedia communications and promotional materials that are captioned or transcribed.
- Produce all digital communications including emails, newsletters, social media posts and website announcements that meet accessibility standards.
- Assess and update existing inaccessible communications and promotional materials upon use.

### 1.2.4 Resources

#### **Libraries:**

- Serve as a resource for faculty seeking to identify materials that are captioned prior to purchase.

#### **Centers for Teaching/Faculty Development:**

- Incorporate captioning and media accessibility information into training.
- Provide assistance in creating videos and coordinating captioning services.

#### **Accessibility/Disability Services:**

- Coordinate captioning services on behalf of students registered with Accessibility/Disability Services.
- Provide guidance for establishing account(s) with third-party captioning vendors.
- Provide assistance to faculty who have students registered with Accessibility/Disability Services in their classes.

#### **Faculty and Staff involved in Centers for Teaching and Learning, Course Design, Distance Education, Accessibility/Disability Services, Information Technology, Webmasters**

- Maintain and continue to provide instructions on media accessibility (such as captioning media and transcribing audio) as well as how to show captioned media in classrooms.
- Incorporate accessibility into faculty training on AV equipment.
- Ensure digital media services provide for closed captioning and audio description services.

## 2. Standards: External-Facing EIT

### 2.1 Web Accessibility

#### 2.1.1 Scope

These standards apply to all Connecticut State College and University (CSCU) institution web pages and programs in digital format, including all digital instructional material, made publicly available. The scope covers all content produced internally or through a 3rd party.

A “CSCU website” has four elements:

1. It is a “website or web-based application;”
2. It is “external-facing;”
3. It resides “within a CSCU-controlled domain;”
4. It is “used to conduct CSCU business by CSCU faculty or staff.”

To the extent that any digital material does not meet all four requirements, it is not a CSCU website subject to the requirements of the Policy.

#### 2.1.2 Standards

Web pages, websites, digital instructional material, and web-based software published, hosted, and/or linked to by all CSCU institutions are to meet the standards and guidelines outlined in the applicable WCAG Guidelines (as defined in the **Technical Standards** section).

#### *Roles*

##### **All Faculty, Staff, Administrators, Contractors, and Vendors:**

- Comply with the web accessibility standards (as defined in the **Technical Standards** section) when creating web content, sites, and programs.

##### **IT, Webmasters, Media, Communications, Content Owners**

- At least bi-monthly, run accessibility checks on external-facing websites and provide content owners with details for remediation or correct issues if feasible.

#### 2.1.4 Resources

##### **Faculty and Staff involved in Centers for Teaching and Learning, Course Design, Distance Education, Accessibility/Disability Services, Information Technology, Webmasters:**

- Provide instruction and support for campus community members creating CSCU institutional websites, website pages and content so that individuals who author web content can be trained according to these standards.
- Recommend that any digital content authoring tool or platform proposed and supported by central IT conform to WCAG and ATAG standards.

### 3. Standards: Internal-Facing EIT

#### 3.1 Instructional Materials Accessibility

These procedures apply to digital instructional materials (including but not limited to websites, documents, media, syllabi, textbooks, presentations, and handouts). This includes digital instructional materials delivered within the institution's learning management system, in face-to-face classes, or in an alternate fashion (email, blogs, etc.) and electronic instructional activities (online collaborative writing, web conferencing, etc.).

##### *3.1.2 Standards*

Internally facing digital instructional materials, optional and required, must be accessible and as effective and usable **upon request** for persons with disabilities as they are for persons without disabilities. Instructional materials must meet applicable WCAG standards and guidelines as outlined in these procedures and be made available to all students at the same time. If the materials cannot be identical, an equivalent alternative must be provided.

##### *3.1.3 Roles*

###### **All Faculty, Staff, Administrators, Contractors, and Vendors:**

- Provide instructional materials that comply with all requirements outlined in these procedures.
- Maintain physical and virtual classrooms that use and deliver accessible information and communication technology.
- Ensure assistive technologies such as screen reading software and screen magnification in computer labs provided for student use.
- Check that applications developed on campus (web, desktop, etc.) are accessible according to principles of WCAG 2.1 AA level, WAI-Aria 1.1, and ATAG 2.0 standards (extrapolated as needed for non-web environments).

###### **Faculty and Instructional Staff:**

- Create and present instructional material that can be made readily accessible.

###### **IT:**

- Facilitate the hosting of online activities in an accessible learning management system and related hosted systems (such as web conferencing) that are accessible.
- Use accessible information and communication technology in IT-designed and supported Technology Classrooms.
- Monitor informational IT web pages and implement accessible software and procedures found on those pages.

###### **Libraries:**

- Provide an accessible tool for searching across all library collections, including, but not limited to, eJournals, databases, and eBooks.
- Ensure all digital collections, including but not limited to databases, eBooks, and eJournals, meet accessibility standards.

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- At least bi-monthly, coordinate accessibility scans to ascertain whether any posted content is inaccessible. The Library will notify content authors if corrections to pages are needed and of reasonable timelines for corrections to be made. The Library will note if corrective action has been taken during the next monthly scan.

#### 3.1.4 Resources

#### **Faculty and Staff involved in Centers for Teaching and Learning, Course Design, Distance Education, Accessibility/Disability Services, Information Technology, Webmasters:**

- Provide instruction and support for campus community members creating online courses and online instructional content.
- Coordinate support for non-central IT and campus units needing assistance with accessibility in departmentally supported technology classrooms.

#### **Accessibility/Disability Services Office:**

- Serve as a clearing house for information about assistive technology and modifications recommended.
- Provide students with assistive technology software and hardware and instruct them how to install and use it.

### 4. Standards: Software, Hardware and Systems Accessibility

#### 4.1 Scope

Software, hardware and systems purchased, developed, and maintained must be accessible and must produce accessible products. Accessible, in this context, means compatible with assistive technology. Examples of software, hardware and systems include, but are not limited to, learning, library, and content management systems, communication and administrative management systems such as email, finance, registration and human resources, and all software, hardware and software services used for student services. Software includes freeware, shareware, desktop, enterprise, subscription and remotely-hosted options.

#### 4.2 Standards

The following standards and guidelines are to be used to assess accessibility:

- [US Access Board’s Guide 508 Standards - Software Applications and Operating Systems](#)
- [How to Meet WCAG \(Quick Reference\)](#)

#### *Procurement*

[Section 508 of the Rehabilitation Act](#) (29 U.S.C. § 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220) requires federal agencies to develop, procure, maintain and use information and communications technology (ICT) that is accessible to people with disabilities - regardless of whether or not they work for the federal government.

The [US Access Board](#) established the Section 508 standards that implement the law and provides the requirements for accessibility.



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Since CSCU receives federal funding, it must adhere to the revised Section 508 standards during the selection and procurement of ICT.

#### 4.3 Roles

##### All Departments, Programs, Instructors, Employees, Contractors, and Vendors:

- Check that software, hardware, local interfaces and modifications and electronic systems are accessible.
- Check that all applications locally developed (web, desktop, etc.) are accessible according to principles of WCAG 2.1, WAI-ARIA 1.1, and ATAG 2.0 standards (extrapolated as needed for non-web environments).
- Alert appropriate staff members about any confirmed issues that a student reports regarding any software or hardware maintained by the institution.
- Follow established Procurement protocols in selecting/purchasing accessible digital content and tools.
  - The Accessibility Requirements Tool (ART) provides an automated tool and pre-determined requirements and solicitation language for standard ICT procurement categories.
  - Partnership on Employment and Accessible Technology (PEAT) offers a step-by-step guide to selecting and purchasing accessible technology.

##### Disability Services Office:

- Make assistive technologies readily available to students working in campus labs or on publicly accessed campus computers.
- Provide students information on how to use assistive technologies on-campus computers and on their personal computers if they prefer to use them.

##### Human Resources:

- Make assistive technologies available in a timely manner for all employees, including student employees.

##### IT:

- Coordinate campus processes for providing campus software, hardware and software system accessibility.

#### 4.4 Resources

##### IT

- Evaluate vendor documentation that certifies the product meets this Policy’s accessibility standards
- Evaluate product functionality related to accessibility

##### Vendors

- Provide documentation, such as a VPAT, that certifies the product meets this Policy’s accessibility standards

##### HR/Office of Diversity/Equity/Inclusion

- Provide guidance on faculty and staff needs in relation to vendor product where appropriate

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**Accessibility Services**

- Provide guidance on student needs in relation to vendor product where appropriate

**Distance Education/Educational Technology**

- Provide guidance on faculty and student needs in relation to vendor product where appropriate

*5. Standards: Procurement*

*5.1 Scope*

This process applies to all Electronic Information and Technology (EIT) content, software, hardware and services purchased for use by two or more people.

*5.2 Standards*

**5.2.1 Purchase Orders & Contracts**

When CSCU institutions purchase EIT including but not limited to content, software, hardware, and services, it must be accessible. This includes required course materials, like iClickers or MatLab. Purchase orders and contracts for EIT must include the following clause:

“Contractor agrees that no institutional funds may be expended for the purchase of EIT including, but not limited to content, software, hardware, and services for use by employees, program participants, or members of the public unless it provides equal and effective access to all individuals in accordance with federal and state laws and regulations, including, but not limited to the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and Section 508 of the 1973 Rehabilitation Act.”

**5.2.2 RFPs (Request for Proposals)**

The following language is necessary to include in RFPs:

“Please confirm in this proposal that the product/service conforms to the Web Content Accessibility Guidelines (WCAG) 2.1 (minimum Level AA conformance), or the most recent WCAG guidelines, whichever is the current standard, and describe how this compliance has been verified by providing a Voluntary Product Accessibility Template (VPAT) and written description of compatibility of the product/service with commonly used assistive technology products, such as screen readers, and a description of the process used to evaluate such compatibility.”

In some cases, a fully compliant EIT is not available. In this case, RFPs should include the following language:

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“Please include in any proposal that the product/service conforms to the guidelines for accessibility as set forth in Web Content Accessibility Guidelines (WCAG) 2.1 (minimum Level AA conformance) or the most recent WCAG guidelines, whichever is the current standard. If the product/service is not in compliance, please describe plans and a timeframe for achieving compliance by providing a VPAT and written description of compatibility of the product/service with commonly used assistive technology products, such as screen readers, and a description of the process used to evaluate such compatibility. A vendor providing electronic information and technology products or services to CSCU is required to promptly respond to and resolve any complaint regarding the accessibility of its platform.”

### 5.2.3 Open Source/Free EIT

In the case of open-licensed/sourced and/or free EIT, there may not be a VPAT, statement of compliance, or a person to contact regarding the accessibility of the software. It is the responsibility of the person who procures this product to confirm its compliance with the CSCU Accessibility Policy or seek out appropriate staff to assist in the accessibility review of the product.

### 5.3 Roles

#### All Departments, Programs, Instructors, Employees, Contractors, and Vendors:

- Must meet accessibility standards and requirements for all EIT purchases regardless of dollar value.
- Purchase or otherwise acquire accessible EIT, in accordance with these procedures.
- Purchasing guidelines have been revised to record that accessibility factors have been considered.
- Provide written justification where accessibility criteria are not met.

### 5.4 Resources

#### Accessibility Services, IT, Instructional Designers, Webmasters, Digital Accessibility Compliance Committee

- Serve as a resource for EIT purchases and other acquisitions for compliance with accessibility requirements.
- Provide guidance on WCAG Guidelines

## 6. Standards: Accessibility Web Presence/Link

### 6.1 Scope

CSCU Accessibility Policy requires that all Colleges and Universities have a centralized accessibility web link located on the footer of each webpage. This will assist with having a centralized location for accessibility services on campus.

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### 6.2 Standards/Required Information

The accessibility link should provide comprehensive information on accessibility on campus.

The following should be included:

- CSCU Accessibility Policy
- Website Accessibility Statement
- Accessibility Services for Students
- Accessibility Services for Staff/Faculty
- Accessibility Services for Visitors
- Campus ADA Contact Information
- Campus Disability/Accessibility Services Contact Information
- Reporting an Accessibility Barrier
- Link to “Report a Web Accessibility Concern” form  
([See Harvard University example](#))
- Any other relevant policies and/or information.

### 6.3 Reporting and Responding to Accessibility Issues

The CSCU Accessibility Policy expects CSCU websites to indicate commitment to accessibility by including a link to this Policy from each website. The “Report a Web Accessibility Concern” form will be linked to from the Policy page, providing the primary means for users to submit requests or express concern about a particular CSCU website.

Each CSCU institution will designate a responsible individual to triage requests submitted via this form and route them to the relevant webmaster and campus Disability/Accessibility Services Contact or Compliance Specialist for follow-up. Webmasters who learn of a user accessibility issue through other channels also should submit the issue using the “Report a Web Accessibility Concern” form so that all such concerns can be catalogued centrally. Webmasters should ensure that prompt efforts are undertaken to address any reported barriers to access. If webmasters are unable to address the issue promptly, the webmaster and the Disability/Accessibility Services Contact or Compliance Specialist should contact the campus ADA Contact to discuss options for an accommodation.

### 6.4 Roles

#### **IT, Webmasters, Communications**

- Provide and maintain a website/page/link dedicated to this Policy’s web presence standard

#### **Accessibility Services/HR/Diversity/Equity/Inclusion**

- Provide timely and relevant information related to the policy’s web presence standard

### 6.5 Resources

#### **Webmasters, IT**

- Provide guidance and support on the creation of a web presence

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- Create Website Accessibility Statement page following the template provided by the [W3C Web Accessibility Initiative](#)

#### **Accessibility Services/HR/Diversity/Equity/Inclusion**

- Provide guidance and information for the web presence
- [W3C Web Accessibility Initiative Accessibility Statement Generator](#)

### 7: Standards: Accessibility Training

#### *7.1 Scope*

The CSCU Accessibility Policy requires that all agents of the institution, including faculty and staff, who create or contribute to the creation or procurement of websites, software, applications, electronic course content, or the content provided in any of these, must complete annual EIT Accessibility training. New hires must complete the training requirement within the first six months of employment. Completing this training not only fulfills a compliance requirement but also provides the CSCU community with the necessary baseline understanding of creating accessible course materials, websites and other electronic content and systems for persons with disabilities. This training is critical in the CSCU's ability to fulfill the mandate of the Americans with Disabilities Act which states that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefit of services, programs, or activities offered by CSCU.

#### *7.2 Standards*

The following standards apply to anyone who creates, manages, purchases or edits content or instructional materials within the CSCU system.

- All Instructors, Employees, Contractors, and Vendors
  - General awareness of different types of disabilities and barriers
  - Access vs. accommodation and social vs. medical model
- Instructors, Employees
  - Familiarity with assistive technologies used by students, faculty and staff
  - Familiarity with relevant laws and policies
  - Familiarity with WCAG standards and how they apply to instructional materials, IT software and websites
  - Using accessible design principles to help create more accessible instructional documents, including Word documents, PowerPoints and PDFs.
  - Using accessibility evaluation tools to assess the accessibility of instructional materials
  - Ability to add/edit captions to multimedia content
- Contractors, Vendors
  - Understanding of Section 508, VPATs and a purchasing workflow that only accepts acquisition of accessible electronic information technology

#### *7.3 Roles*

All roles listed below should use the provided list of resources to learn about accessibility and meet the relevant standards outlined in section 7.2.

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- All department and program staff
- Content creators
- Content/tool selectors
- EIT purchasers
- Webmasters
- Disability/Accessibility Services staff
- Faculty
- Human Resources staff

#### 7.4 Responsibilities/Resources

##### All Departments, Programs, Instructors, Employees, Contractors, and Vendors

- [Introduction to Web Accessibility](#)
- [How People with Disabilities Use the Web](#)

##### Instructors, Employees

- [Accessible Documents: Word, PowerPoint and Acrobat online course from WebAIM](#)
- [Accessibility Fundamentals: Disabilities, Guidelines and Laws from Deque University](#)
- [Reference Guides \(cheat sheets\) for Accessible Documents](#)
- [Caption Video Content for Accessibility with Blackboard](#)
- [Blackboard Closed Captioning Instructions](#)
- [Captioning Key from the Described and Captioned Media Program](#)
- [Ally for LMS Help for Instructors](#)

## 8. Standards: Exceptions

### 8.1 Scope

The CSCU Accessibility Policy requires that all digital information and digital services developed, acquired, managed, or otherwise meet the CSCU accessibility standards. **If an exception is required, the college or university must document the process by which the college or university will ensure to provide effective access, with substantially equivalent ease of use, to digital information and digital services for eligible individuals in a timely manner.**

### 8.2 Required Information

Exception requests must contain the following elements in order to be considered:

#### 8.2.1 Requesting Unit Contacts

Contact information for the below parties:

- The individual making the request
- The requesting unit
- The staff responsible for oversight and administration of the Equally Effective Access Accommodation Plan (EEAP)

#### 8.2.2 Rationale

The requesting unit must document how this request fits into one or more of the following categories:

- Compliance is not technically possible or feasible given current technology

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- The digital information or digital service is used by a limited audience, when the audience is known, and whose needs can be accounted for in advance
- For third party, vendor delivered products, no accessible alternative for the digital information or digital service exists
- The EIT that best meets the college or university needs is not the most accessible option, when other more accessible options have been considered
- Making the Digital Information or Digital Service accessible would require extraordinary measures that constitute an undue burden to the university

Note: For the purposes of determining if an undue burden exists, CSCU is considered to be a single entity, and thus a burden would be analyzed according to the impact to the system as a whole and not to the unit requesting the exception.

### 8.2.3 Equally Effective Access Accommodation Plan (EEAAP)

This plan should address how access barriers in the digital information or digital service will be mitigated, and any benefits or opportunities afforded by the digital information or digital service will be provided, in a timely manner for eligible individuals who are unable to effectively use or interact with the digital information or digital service.

Depending on the nature of the digital information or digital service, examples of an EEAAP might include:

- Providing an alternative that effectively provides an equivalent result, e.g. an alternative software that performs the same or similar function.
- Providing assistance to the eligible individual either in-person or over the phone.
- Providing the digital information in a format that meets our accessibility standards.

This plan should take into account the critical nature and timeliness of the digital information or digital service and address a method to ensure that the eligible individual can access the accommodation without any adverse consequences resulting from the need for the accommodation. For example, any deadlines imposed by the digital information or digital service that are not met due to the use of an accommodation must be waived, and the requesting unit must have a plan to ensure this occurs.

Timeliness should be considered in light of the nature of the digital information or digital service. The accommodation plan should also address the timeline for delivering the accommodation, and the process by which any benefits or opportunities afforded by the digital information or digital service will be provided to the eligible individual.

### 8.2.4 Communication Plan

The requesting unit must document a plan to ensure that eligible individuals are made aware of the availability of the EEAAP, and the steps they must take to request access, if applicable. These communications should be readily accessible in the same places that any other general communication regarding access to the digital information or digital service are present.

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### 8.2.5 Compliance Plan

Requesting units should document their plan to bring the digital information into compliance with our accessibility standards.

These plans might include:

- Contract language obligating the vendor of third-party digital information or digital services to bring their software or content into compliance within a period of time.
- For internally developed digital information or digital services, a timeline for making them accessible and compliant with CSCU accessibility standards.
- Detailed collaboration with the vendor to bring their digital information or digital service into compliance.
- Advocacy for accessibility by contributing to open source products and services.

The requesting unit must, if the digital information or digital service is not internally developed, have a compliance plan if the third party fails to make their digital information or digital service accessible.

Examples include:

- Contract termination
- Financial penalties
- Selection of an alternative product
- Development of accessible front end
- Replacement with internally developed alternative
- Contributing to an open source product or service's accessibility features

### 8.2.6 Accessible Alternative Justification

The requesting unit must document if their purchasing process evaluated other alternatives that were more accessible. If so, the requesting unit must explain what accessibility reasons necessitate the selection of the less accessible option. If accessible alternatives did not exist at time of use or purchase, the unit must document their plan to ensure that a search for a more accessible alternative is conducted when the contract or exception expires.

Link to Board Resolution and Staff Report:

[BR 20-123 CSCU Approval of the CSCU Accessibility Policy for Electronic Information & Technology.pdf](#)