POLICIES OF COLORADO STATE UNIVERSITY

UNIVERSITY POLICY

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<tr>
<th>Policy Title: Accessibility of Electronic Information and Technologies</th>
<th>Policy ID #: 4-1018-014</th>
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<td>Effective Date: May 24, 2016</td>
<td>Category: 4. Information Technology</td>
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<tr>
<td>Policy Owner: Vice President for Information Technology</td>
<td>Contact(s):</td>
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<td>ATRC Assistive Technology Resource Center</td>
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<td>Web: <a href="http://atrc.colostate.edu/">http://atrc.colostate.edu/</a></td>
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<td>Phone: 970-491-6258</td>
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PURPOSE OF THIS POLICY

Access to information by all members of its learning community is inherent in Colorado State University’s mission as a land grant institution of higher education. In this regard, consideration must be given to the delivery and exchange of information via electronic means at Colorado State University. Much of the University’s instructional and business activity is conducted in whole or in part through electronic means. The University is committed to supporting an electronic and information technology (EIT) environment that is accessible to all, including individuals with disabilities. To this end, the University seeks to deploy EIT that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies. An accessible EIT environment generally enhances usability for everyone. By supporting EIT accessibility, the University helps ensure that a broad population is able to access, benefit from, and contribute to its programs and services.

APPLICATION OF THIS POLICY

All University academic, administrative and business units are subject to this policy.

DEFINITIONS USED IN THIS POLICY

Accessible refers to making EIT equally accessible to and independently usable by individuals with disabilities, so that they are able to acquire the same information, engage
in the same interactions, and enjoy the same services as individuals without disabilities, with substantially equivalent ease of use, using reasonable accommodations when necessary. It does not mean that the means of access must be identical, but that an equally effective means of access is afforded.

* Archived* means a web page or electronic resource that is no longer available online but is still subject to the applicable records retention requirement under University policy.

*Assistive technologies* means devices, tools, and services that promote greater independence for individuals with disabilities, including, as defined by the federal *Technology Related Assistance to Individuals with Disabilities Act of 1988, as amended* (29 U.S. Code § 3002(4)), devices “acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities.” Examples include: special input devices (e.g., head or foot mouse, sip and puff switches, speech recognition), screen reading software, and screen magnifiers.

*ADA/Section 504 Coordinator* means the Director of the Office of Equal Opportunity, who is the person designated to coordinate the University's compliance with Section 504 of the Rehabilitation Act of 1973 (“Section 504”) and Title II of the Americans with Disabilities Act of 1990 (“Title II”), or the director's designee. The Office of Equal Opportunity is located at 101 Student Services Building, Colorado State University, Fort Collins, CO 80523-0160 and may be reached at: Phone: (970) 491-5836; fax: (970) 491-2690; email oeo@colostate.edu.

*Electronic information and technologies (EIT)* includes any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of electronic or digital data or information, such as: web sites, course and instructional materials (Word documents, PDF documents, Power Point presentations, video, podcasts, etc.), courseware, software, other classroom technologies, content management systems, search engines and databases, registration and grades, financial and human resource management systems, telecommunications, and emerging technologies.

*Employee* means any person in the service of the University, including (but not limited to) faculty, administrative professionals, state classified, student employees, and temporary employees.

*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. For interactive or service pages, equally effective means that the end result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestor.
An *individual with a disability* is a person who has a physical, mental, or cognitive impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is regarded by others as having such an impairment. To be certified as an individual with a disability receiving reasonable accommodations, a student must be registered with the Office for Resources for Disabled Students Student Disability Center and an employee must be certified by the office of Equal Opportunity.

“Public-facing” content means any content that is intended for access by the general public, without restrictions. Content that is not public-facing is termed “controlled” content, and encompasses content where authentication or authorization is required for access, and/or content is targeted to and delivered for those enrolled in specific programs, majors or classes.

A *University web page* means a web page created and published by University employees in the scope of University-related business. It does not include web pages published by employees for personal purposes, and not published on University sites. A University legacy web page means a University web page created and published by the Colorado State University prior to the effective date of this policy.

**POLICY STATEMENT**

The University’s commitment to accessibility of electronic information and technology contributes to a rich and effective learning and working environment for members of our community. Access to information by members of the University community is critical to their success as students, instructors, employees and contributors. Accessibility of information transmitted through EIT assists a broad population of our University community, including individuals with disabilities, and those with diverse learning needs.

The application of the principles of accessible design to the delivery of information and resources through EIT is consistent with legal and ethical requirements placed on the University, as well as contributing to an inclusive environment that assists the University to recruit and retain the best students, faculty and other employees. To these ends, it is the express policy of the University to make EIT accessible to the greatest extent that is reasonably practicable.

Ensuring equally effective access as required is the responsibility of those University employees responsible for creating and publishing the content. This is required by federal and state laws, including the Americans with Disabilities Act of 1990 (ADA), the ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, as amended, and
C.R.S. §24-34-801, et seq. Under these laws, the University must make reasonable accommodations as appropriate to remove any barriers that may exist for an individual with a disability. Students requiring reasonable accommodations should contact the Student Disability Center, and employees and others requiring accommodations should contact the Office of Equal Opportunity. Once the individual has been certified to be an individual with a disability, it becomes the University’s responsibility to engage in a good-faith, diligent and timely effort to provide a reasonable accommodation that will allow the individual with a disability, and others similarly situated, to access and use the desired content.

POLICY PROVISIONS

The University is committed to consistently improving accessibility through implementation of accessibility standards. These standards will be progressively developed to provide the knowledge, tools and resources to enable individuals who transmit information electronically to do so in accessible formats. In time, the culture at the University will become one of accessible design with respect to electronic information.

Under this policy, the University will: (a) establish standards and guidelines for making EIT accessible; (b) implement procurement requirements for EIT products and services; (c) provide training, as needed, to departments, faculty and staff to enable them to utilize available software and tools to make EIT accessible; (d) promote awareness of this policy to all members of the University community, particularly those in roles that are responsible for creating, selecting, or maintaining electronic information and technologies; and (e) assign responsibility for accessible design of EIT to the appropriate departments and personnel.

Standards and Guidelines

Many software programs and electronic systems have tools and features already built in that can be easily utilized with no or a minimal amount of training, either self-guided or through training resources offered by the University, to create accessible content. All faculty and staff are encouraged to take the time to investigate and utilize such resources. Resource references are provided online at http://accessibility.colostate.edu (the “Accessibility Website”).

All University web developers creating new and redesigned public-facing University web pages published on or after the effective date of this policy will refer to and strive to apply the most current version of the Web Content Accessibility Guidelines (WCAG) 2.0 AA Success Criteria, http://www.w3.org/TR/wcag20/. All public-facing websites and web-
Based applications must conform to WCAG 2.0 Level AA Success Criteria. Controlled content and functionality on controlled content sites must be made available to users on request (such as by a student’s request to Resources for Disabled Students, the Student Disability Center, or an employee’s request to the Office of Equal Opportunity) in an equally effective and accessible alternative manner.

A University web page is considered “redesigned” if significant alteration or update is made to the visual design of a page or a major revision of the content of a page takes place. All new and redesigned University web pages will meet Level AA guidelines with limited exceptions approved by the University Web Committee’s Subcommittee on Web Accessibility (the “Subcommittee”) or as set forth on the Accessibility Website. Exceptions to this requirement based on technical impracticality or fundamental alteration of a program must be submitted to the Subcommittee for a determination of the standards of accessibility that will be met. University departments and employees must be prepared to provide content and/or services in a suitable alternative format as required.

When the target audience for controlled content includes an individual with a disability, information must be delivered in a suitable alternative, accessible format, or suitable accommodations as described above must be provided.

**Procurement Requirements**

Accessibility will be included as a factor in the procurement process. Prospective vendors will be requested to submit the Voluntary Product Accessibility Template (VPAT) published by the Information Technology Industry Council, describing the accessibility of their products and services, and such accessibility will be taken into consideration in making a procurement decision. All University contracts for EIT will contain appropriate provisions concerning accessibility, as prescribed by the Office of General Counsel.

New EIT should be accessible upon acquisition or implementation to the greatest extent practicable.

**Training**

The Division of Information Technology will offer training and educational resources to University community members, including faculty, web developers and personnel involved with course delivery to ensure accessibility of electronic information.

**Promoting Awareness of Accessibility**
The Subcommittee, ADA/Section 504 Coordinator, Student Disability Center, Division of External Relations, Division of Information Technology, ACNS & Telecom Department, Assistive Technology Resource Center, and other departments and offices as appropriate will collaborate to promote awareness of accessibility of EIT. The University will provide the Accessibility Website to the University community with resources and links to sources detailing how to provide electronic information in accessible formats.

**Responsibility for Accessibility of Electronic Information and Technologies**

Those responsible for the creation of information that is shared through EIT will be responsible for making its content accessible with guidance from the Subcommittee and the Assistive Technologies Resource Center. Upon specific request to make a legacy University web page that is not new or redesigned accessible to individuals with disabilities, the page must be made accessible, or an equally effective alternative provided, within the shortest amount of time that is reasonably practicable after receiving the request. Any such request that cannot be accommodated within three business days must be referred to the ADA/Section 504 Coordinator for review.

Archived web pages do not have to be converted to the WCAG standard unless specifically requested by an individual with a disability or when the web page is redesigned. However, unless it is not reasonably practicable, all legacy University web pages shall, within one year after the effective date of this policy, contain a clear statement (or link to a statement) affirming the University’s commitment to this policy and providing a method to report barriers and/or to receive an alternative equally effective accessible format.

Where accessibility is not reasonably practicable or when it would fundamentally alter a program to make EIT accessible, please contact the Office of Equal Opportunity for assistance. In general, these factors pertain to issues other than cost alone, although cost may be a factor. Examples of exceptions may be innovative, experimental technologies, or new technologies that have not achieved a maturity to the degree that they can be practically deployed in an accessible manner, etc. In such cases, the responsible department or employee may be required to timely provide accessible, equally effective alternate materials or means of access.

**COMPLIANCE ASSISTANCE WITH THIS POLICY**

Compliance with this policy is required. Assistance with accessibility issues and compliance with this policy may be obtained by contacting the ADA/Section 504 Coordinator.

**POLICIES OF COLORADO STATE UNIVERSITY**

Accessibility of Electronic Information and Technologies
Students and prospective students encountering barriers may seek assistance by contacting Resources for Disabled Students\textit{Student Disability Center} or the Assistive Technology Resource Center.

**REFERENCES**

- ADA/Section 504 Coordinator (\textit{Office of Equal Opportunity}): 970-491-5836
- \textit{Student Disability Center}: 970-491-6385 (V/TDD), 100 General Services Building
- \textit{Assistive Technology Resource Center}: 970-491-6258
- \textit{Accessibility by Design}

**APPROVALS**

Approved by Anthony A. Frank, President, June 28, 2016 (effective May 14, 2016)

Revision approved by Lynn Johnson, Vice President for University Operations, on ________________.