

# CU Boulder Campus Standards for the Accessibility of Information and Communication Technology Policy

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## A. Introduction

This document establishes the official university standards for digital accessibility in accordance with, and as a supplement to, the [CU Boulder Policy on Accessibility of Information and Communication Technology](#) and [APS 6011: Digital Accessibility](#).

## B. Statement of Purpose

CU Boulder is legally, morally, and ethically committed to communicating information to all individuals in a manner that enables them to achieve their academic and professional goals and aspirations. To achieve its commitment to maintaining accessibility in the digital environment, the university has established a digital accessibility program. The Chief Digital Accessibility Officer is the Associate Vice Chancellor for Integrity, Safety and Compliance, who, in collaboration with the Information and Communication Technology Accessibility Review Board (ICTARB), is responsible for maintaining the program. Additional information about the program is available at <https://www.colorado.edu/accessible-technology/>.

## C. Scope

This document is designed to help ensure that all digital technology used by any university program, service or activity is meaningfully accessible to individuals with disabilities.

These Standards apply to all CU Boulder schools, colleges, departments, centers, institutes, administrative units, offices, and authorized organizations, as well as to content created for these units in-house or by external entities. These Standards apply to all digital technology used to conduct university business, except digital technology created or published by students, faculty, or staff for personal use. When student content is created in an academic context and shared for peer review, faculty must be prepared to provide accommodations.

## D. Legal Background

The Digital Accessibility Standards are intended to comply with the related requirements of the following civil rights laws, including, but not limited to:

### **The Americans with Disabilities Act (ADA)**

The *ADA* is a civil rights law that prohibits discrimination against people with *disabilities* in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. Universities are covered by this law. An individual with a disability is defined by the ADA as a person who has a physical or mental 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 perceived by others as having such an impairment.

- Title I of the ADA requires the university to provide qualified individuals with disabilities an equal opportunity to benefit from the full range of employment related opportunities available to others. It requires that employers make reasonable accommodations and reasonable modifications, unless doing so would result in undue hardship.

- Title II of the ADA requires the university to provide people with disabilities an equal opportunity to benefit from all of its programs, services, and activities. It provides that the university may be required to make reasonable accommodations and modifications to programs, services or activities unless the university demonstrates that the requested accommodation or modification would “fundamentally alter” such programs, services or activities.

### **Section 504 of the Rehabilitation Act of 1973 (“Section 504”)**

Section 504 is a federal law that protects the rights of individuals with disabilities in programs and activities that receive federal financial assistance from the U.S. Department of Education. Section 504 provides that qualified individuals with a disability shall not, solely by reason of their disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Standards are also informed by other laws that specifically address digital technology, including:

### **The Telecommunications Act of 1996**

Section 255 of the Telecommunications Act of 1996 requires telecommunications products and services to be accessible to people with disabilities to the extent access is “readily achievable.” If manufacturers cannot make their products accessible, then they must design them to be compatible with adaptive equipment used by people with disabilities, where readily achievable.

### **The 21st Century Communication and Video Accessibility Act (CVAA)**

Title I of the 21st Century Communication and Video Accessibility Act addresses communications access to make products and services using Broadband accessible to people with disabilities. Title II of the CVAA makes it easier for people with disabilities to view video programming on television and the Internet.

## **E. Accessibility Guidelines**

### **Web Content Accessibility Guidelines (WCAG)**

The campus uses the most recent adopted version of the [Web Content Accessibility Guidelines](#) (WCAG) level AA as a guideline for accessibility of digital content. WCAG is developed by W3C, an organization that maintains standards for creating content on the internet. W3C develops WCAG standards in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. The WCAG principles and guidelines explain how to make web content more accessible to people with disabilities. WCAG is thorough, but does not cover every circumstance. Therefore user experience also informs CU Boulder’s evaluation and delivery of accessibility.

## **F. Notes to Assist in Comprehension of Campus Accessibility Standards**

### **Proactive Accessibility and Accommodation Requests**

CU Boulder is legally, morally, and ethically required to afford all qualified individuals with equal access to programs, services and activities, and effectively communicate with individuals with disabilities in a timely manner. Refer to the [Accessibility of Information and Communication Technology Campus Policy](#). In order to provide access in an equally effective and inclusive manner with substantially equivalent ease of use, information and communication technology must be provided in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability. Due to this obligation, CU Boulder strives to make its services and resources accessible proactively,. This means creating and maintaining accessible information and communication technology, lessening, or preventing, the need for an individual with a disability to request accommodations. This also saves resources because it reduces the need for remediation to fix problems.

### **Campus Offices and Roles**

At CU Boulder, there are three main offices that support accessibility.

#### **Digital Accessibility Office**

The [Digital Accessibility Office](#) (DAO) operates in the digital realm, and predominantly serves content creators and service managers at the time of creation or procurement. The DAO supports individuals and departments in learning about and implementing best practices to address accessibility proactively. The university is required to address the process for access when known digital accessibility barriers exist. according to the [Regent Laws and policy](#).

#### **Disability Services**

[Disability Services](#) (DS) operates in both the digital and physical realms to provide support and accommodations to students with documented disabilities. Disability Services can be contacted at [dsinfo@colorado.edu](mailto:dsinfo@colorado.edu).

#### **The ADA Compliance Office**

The [ADA Compliance Office](#) (ADA Compliance) operates in both the digital and physical realms to provide support and accommodations to employees, visitors, and students outside of the residential and academic spheres. It is also where a student can file a complaint about other potential disability related barriers on campus.

Procedures regarding how requests are made differ based on the role the person plays who is making the request. The three main categories are student, employee, and member of the outside community. (If another person is making a request on behalf of a person with a disability, such as a faculty member making a request on behalf of a student, the procedures are based on the role of the individual with a disability.) In all academic and housing cases, student requests go to DS, DS then handles interactions with other departments. For both employees and outside visitors, most requests go to ADA Compliance. When students need

accommodations for student employment or extracurricular activities and content, they should contact ADA Compliance. These offices communicate and coordinate, as needed, with the Digital Accessibility Office, but do not directly service digital accessibility matters. The DAO does directly service digital accessibility.

## **G. Campus Accessibility Standards**

Members of the university community should follow the standards in this section to adhere to the campus ICT accessibility policy.

Faculty or staff needing support or guidance when implementing these Standards can contact the Digital Accessibility Office by contacting the IT Service Center at 303-735-4357 or [oithelp@colorado.edu](mailto:oithelp@colorado.edu).

### **1. Course Materials**

#### **a. Introduction**

All course materials should be designed to be proactively accessible to as many students as possible.

Examples of digital components of a class that should be accessible include:

- Word Docs, potentially including, but not limited to class syllabi
- PowerPoint presentations
- Google Apps (Docs, Slides, etc.)
- External websites (Wordpress, etc.)
- Digital textbooks
- PDFs, potentially including, but not limited to class syllabi
- Video content, in-video quizzing tools
- VoiceThread or other synchronous platforms
- Canvas or other learning management systems

Some training may be required to learn how to create certain accessible materials. Faculty and staff members will have access to resources to support them in creating accessible content. The practices outlined in the subsections below increase the likelihood that every student has an equitable opportunity in the course to succeed using their own abilities and learning preferences and will reduce the need for accommodations for individual students.

#### **b. Digital Accessibility and Course Accommodations**

In addition to the work that faculty and staff do to make course content proactively accessible, the [Alternate Format Production and Access Center \(AFPAC\)](#) and [Disability Services](#) will provide course content in an accessible format to students who are registered with Disability Services, if they have an approved accommodation. Services from AFPAC and Disability Services are only available when a student has an approved accommodation and accessible

content is required; services from the DAO are available regardless of approved accommodations. If a student with an approved accommodation requests course content in an accessible format, they should receive access to that content no later than when other students can access the course content.

### **c. Documents**

Students with disabilities should receive documents in an accessible format. Documents here include, but are not limited to, Microsoft Office files, Google Apps files, and PDFs. A document is generally considered accessible if a student can get to the content on the platform of their choosing and they can customize it to meet their specific disability related needs. Students have the responsibility of developing the skills necessary to use accessible content.

Faculty and their departments are encouraged to make course materials available in an accessible format in an on-going manner to all students, regardless of disability related need. Accessible content gives many students a better learning experience by enabling them to search documents, read content on a variety of devices, and personalize documents with format changes such as font size and color.

When a faculty member has a student with an approved disability related accommodation need, who is attending their class or otherwise participating in their program, they are required to implement the accommodation by providing the student with documents in an accessible format. If a faculty member is unable to create an accessible document, the faculty member can give course material to the AFPAC (in DS) for remediation, so long as this is done in a timely manner. It is not generally acceptable to waive any reading or activity requirements or opportunities for a student who needs alternate format. If there is not enough time for the AFPAC to prepare the materials, it is the responsibility of the faculty member to independently identify how to achieve an accessible format, explore with DS whether an equally effective accommodation is possible, or to not use the material in the course.

Information on topics such as training and creating accessible documents is available on the [Accessible Technology website](#).

### **d. Other Digital Course Content**

Digital content extends beyond documents to include any information, communication, or activity that takes place on a technology such as a computer or mobile device. This includes websites, digital publisher content, open educational resources, and software. This content might or might not be created by faculty or staff.

All forms of digital course content should be accessible to all students. However, it may not be feasible for faculty and staff to directly remediate digital content for accessibility if it was produced by a third party. This is not a reason in and of

itself to not pursue accessibility, however, because the selection of this content in the course or program also comes with the responsibility to provide accessibility. Faculty and staff can and should advocate with the creators for the development and remediation of both accessible content and documentation to support faculty and students in using the product in an accessible way.

To help avoid inadvertently selecting course or program materials that are not accessible, faculty should proactively inquire about the accessibility of the digital content used in their courses. For publisher-generated digital content, consult the [E-Text Accessibility Evaluation Process](#) page. For OIT-supported services, consult the [Accessibility Current Status](#) page. For all other digital content, either contact the vendor for more information, or reach out to [oihelp@colorado.edu](mailto:oihelp@colorado.edu) for support.

Open educational resources (OER) should also be accessible; faculty should consider accessibility when selecting OER for use in their course. Resources on creating and selecting accessible OER are available on [Evaluate Open CU](#).

If digital content is not accessible and cannot be made accessible within a reasonable timeframe to accommodate a student enrolled in a course with an approved accommodation, faculty must contact Disability Services so that DS can work with the faculty member and the student to devise an alternative reasonable accommodation plan for the student.

If a student with an accommodation has difficulty accessing course content, and a barrier is not otherwise known to the faculty member or DS, it is the student's responsibility to contact Disability Services as soon as possible to communicate the issue. Faculty are not required to remediate their course content unless an accommodation request has been submitted by a student registered with Disability Services.

Pursuant to the [Required Syllabus Statements Policy](#), Faculty must include the Disabilities Syllabus Statement from the [Academic Affairs' Required Syllabus Statements](#) website in their syllabus. Faculty should also provide a list in the syllabus of the software that students will need to use in the course. This benefits students who use assistive technology by giving them advance notice so they can let Disability Services and/or the faculty member know if they anticipate encountering accessibility issues with any of the software.

**e. Text Book Titles Availability**

In order for Disability Services to have time to obtain accessible textbooks, it is necessary for students to have access to course reading requirements as soon as possible.

Pursuant to the [Course Materials Submission Policy](#), faculty must inform the campus bookstore of their course materials requirements before the first day of registration, except where impractical or inconsistent with academic freedom.

This responsibility rests with the instructor of record for each course. However, each department is responsible for ensuring that information has been submitted for all its course offerings. The department chair or designee should determine course materials for both assigned and unassigned courses where no information has been submitted, when those course material decisions will not materially affect academic freedom. If no course materials are required or if required materials are not ones the campus bookstore can supply, information to that effect must be submitted to the bookstore.

## **2. Captioning**

### **a. Introduction**

Individuals with hearing impairments and other disabilities may need captioning in order to access the audio component of video media. Faculty, staff, and students are encouraged to caption all video content that they create as part of their role at the university.

All captions should follow [FCC closed captioning rules](#). It is important to ensure both that the audio visual content contains captioning and that the platform or device used to display captioning is capable of handling captions and that the captioning option is enabled.

### **b. Course Accommodations**

Any video media used in a course must be captioned if a relevant disability accommodation request has been submitted by a student. The faculty member will need to plan ahead to ensure that any audio or video course materials used for the remainder of the semester are accessible to the student. The student does not need to request captioning for every individual piece of media that will be used; the request applies to all media that is course content.

There is a 5-day period to arrange for captioning after a student submits an accommodation request; after that, any audiovisual media used must have captions available when it is first shown or made available to the students.

Any additional audio visual media must be submitted to the captioning service at least one week before it will be available to the class. Captioning must be provided at the time when any multimedia is shown to the class; if providing captions is not feasible, the media should not be shown. The [campus captioning service](#) can assist in fulfilling accommodation requests after a [captioning request form](#) is submitted.

### **c. Pre-Recorded Content**

All public-facing pre-recorded video content representing the University or any of its departments or programs must be captioned. Non-captioned video that is in

current use internally that is not public-facing should be made accessible as soon as practically feasible.

**d. Live Content**

All pre-planned public-facing live video content representing the University or any of its departments or programs must have live captioning to the extent technologically feasible. Platforms that support live captioning must be chosen. If an event organizer is aware of an accommodation request at least three business days in advance of an event, captioning is required. Event organizers should contact the live captioning service for support. The organizer of an event is responsible for paying for live captioning unless it was requested as an accommodation.

**e. Procurement**

All departments, programs, instructors, and employees are encouraged to purchase or create captioned versions of audio-visual media whenever possible.

**f. Digital Displays, i.e. Television Screens**

All public facing displays playing content with an audible component must have closed captioning enabled. If they do not have the capacity for closed captions, captions need to be embedded.

**g. Television Content**

Any broadcast or cable television content displayed on campus must have closed captioning and have it enabled.

**h. Departmental Content**

If departments are using televisions or digital screens to publicly display any materials, the audio content must have captions, and the captioning must be enabled.

**3. Audio Description**

**a. Introduction**

Audio description is an oral account of essential visual information for the sake of blind and low vision viewers of a video.

Whereas captions need to accompany all audible video content, there is more nuance about when audio description is appropriate. It is possible to create videos in a way that minimizes the need for audio description. As a result, standards around audio description are less established than those for captioning. To learn more, reference the [UC Berkeley guide to audio description](#). For guidance on a particular video, please contact the DAO at [help@colorado.edu](mailto:help@colorado.edu).

**b. Course Accommodations**

Any video media used for participation in a course should be audio described if a relevant disability accommodation request has been submitted by a student. The Digital Accessibility Office can assist in fulfilling accommodation requests.

**c. Pre-Recorded Content**

All public-facing pre-recorded video content representing the University or any of its departments or programs should have audio description available (which can include sufficient description in the original audio of the video). If a separate audio description track is required, it is necessary to either have two versions of the video available, one with and one without audio description, or to use a player where the audio description can be toggled on and off. More information about audio description and media players is available at [Creating Accessible Videos](#).

**d. Live Content**

Any individual, department, or program associated with the University that is providing pre-planned live-streamed video content should be prepared to provide appropriate audio description upon request. Language should be included in promotional materials that indicates audio description is available upon request with sufficient advance notice.

**e. Procurement**

When purchasing audio-visual media, ask the vendor whether an audio-described version is available, if audio description is necessary.

**4. Digital Signs**

**a. Introduction**

Digital signs are electronic displays that communicate visual and/or audible content.

**b. Limitations to Accessibility**

The content in digital signs must be as accessible as reasonably possible. However, digital signs are limited in the degree to which they can be made accessible to all people, so any content in a digital sign should first be made available on a fully accessible digital platform such as a departmental website or web-based calendar. Digital signs should only be used as a supplementary way of communicating information.

The content of digital signs for use in any public CU Boulder program, service or activity must be as accessible as the constraints of the device allows, according to the guidelines of the most recent adopted/published WCAG level AA standards.

### **c. Guidelines**

Minimum accessibility requirements for digital signs are:

- i. Captions should accompany any audio content. For more information on captioning, consult the [OIT Captioning](#) service.
- ii. Visual format should follow the most recent adopted/published [WCAG guidelines for distinguishable color](#) and [accessibility best practices for text readability](#). CU Boulder branding colors and branding fonts should only be used in combinations that have [sufficient color contrast](#).
- iii. Follow the most recent WCAG standards with respect to [animation and flicker rates](#).
- iv. Follow ADA requirements around sign placement as indicated on the [Facilities Management Campus Planning Resources](#) page.

The campus [ADA coordinator](#) oversees physical accessibility compliance with respect to physical placement of signs.

## **5. Websites and Other Digital Content**

### **a. Introduction**

Departments and units, including all faculty and staff, have a responsibility to ensure that all digital content related to their programs and/or services is accessible.

### **b. Guidelines**

As noted in Section E, the campus uses the most recent adopted/published version of the [Web Content Accessibility Guidelines](#) (WCAG) level AA as a guideline for accessibility for all ICT, recognizing that replicable user experience is an important part of determining whether or not digital content is accessible. Examples of digital content include websites, online forms, digital maps, emails, and PDFs. Members of the university community can access [resources on creating accessible digital content](#) on the Accessible Technology website. Information on creating [accessible content on Web Express](#) is available on Web Central.

### **c. Accommodations**

If further accommodation is needed for an individual to access this digital content, Disability Services will support the remediation of course materials for students registered with an accommodation, and the ADA office will support employee accommodations and public access accommodations.

## 6. Procurement

### a. Introduction

Any ICT good or service procured for use in a CU Boulder program, service, or activity should be as accessible as possible.

### b. Guidelines

The procurement process should be conducted according to the following guidelines:

- i. The Digital Accessibility Office will publish guidance and review procurement for services as appropriate based on the scope of use to ensure compliance with campus digital accessibility standards. The criteria to determine the type of review is specified on the [ICT Integrity website](#).
- ii. Organizational unit directors or their designees are responsible for ensuring that requests for proposals, contracts, or other service arrangements for the acquisition of digital technology include requirements to adhere to the most recent version of WCAG level AA. The Digital Accessibility Office can be consulted in this process at [ictcompliance@colorado.edu](mailto:ictcompliance@colorado.edu).
- iii. If no fully accessible good or service is available that fulfills the requirements of the procurer, the good or service that best meets the WCAG level AA standard should be procured unless ICTARB grants an exception (See section H, Exceptions, below). The Digital Accessibility Office can be consulted in assessing the accessibility of a good or service or distinguishing between the accessibility of two or more similar goods or services.
- iv. All procurement contracts for ICT should include the appropriate accessibility provisions specified by the CU Procurement Service Center (PSC).
- v. Revisions to the accessibility contract provisions are highly discouraged, but may be adjusted if necessary on a situation-by-situation basis in coordination and consultation with the PSC.
- vi. All departments, programs, instructors, and employees are encouraged to purchase or create captioned versions of audio-visual media whenever possible. When procuring audio-visual media, inquiries should be made about the availability of captions and/or audio descriptions for deaf/hard of hearing and blind/low vision audience members.

## **H. Exceptions**

Exceptions to the accessibility policy and these standards can be granted, if determined appropriate by ICTARB, in specific cases for a limited time period until a more accessible product can be procured or changes can be made to inaccessible ICT products.

Exception requests should be submitted through the [ICT Exception Request form](#) and will be reviewed by the [Information and Communication Technology Accessibility Review Board](#).