

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

Approved by ICT Accessibility Review Board May 27, 2016

## **A. Introduction**

This document establishes the official university standards for the accessibility of Information and Communication Technology (ICT) in accordance with, and as a supplement to, the CU-Boulder Policy on Accessibility of Information and Communication Technology.

## **B. Statement of Purpose**

CU--Boulder is 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 an information and communication technology accessibility program. The Chief Digital Accessibility Officer (CDAO) in collaboration with the ICT Accessibility Review Board (ICTARB) is responsible for maintaining the program. Additional information about the program is available at [www.colorado.edu/accessibility](http://www.colorado.edu/accessibility).

## **C. Scope**

This document is designed to ensure that all ICT created, purchased, or used to carry out any university program, service or activity are accessible, with or without a reasonable accommodation, except when an exception has been granted.

These standards apply to all CU-Boulder schools, colleges, departments, centers, institutes, administrative units, offices, and authorized organizations and 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 accommodation.

These standards are intended to comply with the equal opportunity requirements of federal and state laws that apply to CU-Boulder, including, but not limited to, Section 504 of the Rehabilitation Act of 1973, as amended, Americans with Disabilities Act of 1990, as amended, and the Higher Education Opportunity Act.

The standards are also informed by other sources that address digital technology specifically, such as the Telecommunications Act of 1996 and the 21st Century Communication and Video Accessibility Act.

Priority for implementation of the ICT Accessibility Policy and this standard should be given programs, services, or activity that are either highly critical or are broadly used by the campus, a school, or college. Full implementation of the policy is expected to take through fiscal year 2018.

## **D. Best Practice Standards**

**Faculty or staff needing support or guidance when implementing these standards should contact the Office of Information Technology Digital Accessibility Unit by contacting the IT Service Center at 303-735-4357 (or 5-HELP from an on-campus phone) or [help@colorado.edu](mailto:help@colorado.edu).**

1. **Syllabus:** In order for students to have notice of their rights and responsibilities, faculty and instructors shall include a statement regarding reasonable accommodations in their course syllabus. The following is a template that faculty and instructors may use.

*Standard Syllabus Statement*

*If you qualify for accommodations because of a disability, please submit to your professor a letter from Disability Services in a timely manner (for exam accommodations provide your letter at least one week prior to the exam) so that your needs can be addressed. Disability Services determines accommodations based on documented disabilities. Contact Disability Services at 303-492-8671 or by e-mail at dsinfo@colorado.edu. If you have a temporary medical condition or injury, see Temporary Medical Conditions: Injuries, Surgeries, and Illnesses guidelines on the Disability Services website and discuss your needs with your professor.*

*In the event that software or services are known not to be accessible are used in the course faculty must also provide notice to students as part of the syllabus accessibility statement. The following is a template that may used.*

*This course requires the use of [name description of tool] which is currently not accessible to users using assistive technology. If you use assistive technology to access the course material, please contact your faculty member immediately to discuss.*

- 2. Course Materials & Textbooks:** Students with print-related disabilities can request their textbooks and instructional materials (including electronic content and services) in an alternate format from Disability Services to ensure equal access at the same time as all students registered in a course. Production of alternate formats can be time-intensive, and while most files can be provided within two weeks, others can take as long as four months to procure and format for use. In keeping with the spirit of the Accessibility of Information and Communication Technology policy faculty should give preference to course materials with an alternate format available.

The Higher Education Opportunity Act requirements stipulate that book lists are, to the extent practically possible, provided to the student at time of registration. Faculty are responsible for providing book lists to the Campus Bookstore in advance of registration as required by the campus policy on Faculty Notification to Campus Bookstore of Required Texts policy <sup>1</sup>approved by Deans Council. In the case of classes with large sections or classes taught by non-tenure track faculty it is the responsibility of the department to ensure the book lists are provided to the Campus Bookstore. The academic department chair or chair of the departmental curriculum review committee is accountable for ensuring the bookstore receives book lists. To assist departments in the responsibilities the bookstore will provide the chair or their designee a listing of courses for which materials have not been adopted.

The Office of Information Technology (OIT) and the Campus Bookstore shall establish a process to ensure booklists are provided to students in advance of registration when feasible. The Campus Bookstore shall publish preferred publishers who provide textbooks with alternate format. Faculty may not enter into contracts on behalf of the University for course materials and should consult with the Campus Bookstore for such agreements.

Alternate formats of materials for students must be provided at the same time that the student at large is able to access the material through regular means. Providing required textbooks and supplemental reading

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<sup>1</sup> The policy states “In order to maintain a single central source of complete information directly accessible by CU-Boulder students, all CU-Boulder faculty shall inform the University of Colorado Bookstore of all required textbooks (graduate and undergraduate) for their courses. Faculty are expected to provide this information to the University of Colorado Bookstore with customary timeliness with respect to established deadlines. It is also strongly recommended that faculty notify the CU Bookstore of all recommended undergraduate course texts as well. Faculty may inform any other textbook sources of their course readings, but they may not require students to purchase books or course material from any particular vendor.”

material lists at the time of registration ensures that students have adequate time to partner with Disability Services to ensure materials are completed prior to first course meeting.

- 3. Websites:** All new and significantly updated web pages, website templates, website themes, and web-based learning tools, published on or after the effective date of CU-Boulder Accessibility of Information and Communication Technology Policy (“Policy”) must be reviewed for compliance by the IT service provider (e.g., server and workstation support, programmers, webmasters, user account administrators), and to the fullest extent feasible, comply with the Web Content Accessibility Guidelines 2.0 AA Success Criteria, [www.w3.org/TR/WCAG20/](http://www.w3.org/TR/WCAG20/). Significantly updated is defined as a modification to the majority of the content, or a change that has substantially altered the usability or design.

The ICT Accessibility Review Board will develop a schedule for remediation of existing web pages, templates, themes, and web-based learning tools. Training and resources will be made available to faculty and staff, including how to make ICT accessible, how to both manually check and use automated tools to ensure the accessibility of content therein, and how to get assistance. Additional information about the ITCARB and resources are available at [www.colorado.edu/accessibility](http://www.colorado.edu/accessibility).

- 4. Closed-Captioning and Audio Description of Audio-Visual Materials (e.g., MediaSite, YouTube, or MP4 files):** Individuals with hearing impairments may require closed captioning in order to access the audio component of video media, and individuals with visual impairments may require audio description in order to access video content. Reasonable accommodations for closed-captioning and audio description for students, faculty and staff must be provided at the same time that the multimedia is shown to the class or audience. Any video media material that is used for participation in a course must be captioned and/or described. If an instructor or other presenter is aware of a reasonable accommodation request at least five days in advance, closed-captioning or audio-describing is required. If providing the captioned or audio-described version at the same time is problematic, the video media shall not be used and alternate accessible materials may be substituted.

Required closed-captioning or audio-describing must ensure accuracy (spell all the words right which for deep or technical content may require a specialist to perform captioning), synchronicity (ensuring that the captions do not lag behind or race ahead of the dialogue), completeness (making sure everything gets captioned and that captions do not use shorthand or are truncated unless absolutely necessary), and placement (ensuring at a minimum that the captions do not obscure visual material on screen and, where possible, help convey soundstage and positioning—e.g., putting the captions on the left and right side of the screen to distinguish between two speakers).

If a reasonable accommodation is requested for a particular course, faculty will arrange for the remaining course materials to be captioned. Resources for closed-captioning can be found on the OIT [Captioning service website](#). OIT’s Captioning service can assist with accommodation requests, which can be accessed by completing a [captioning request form](#). When requested, captioning and/or descriptions will be provided as an accommodation. Attempts to secure permission from the copyright owner will be made but will not delay the accommodation.

OIT shall close-caption non-course related academic content when the Provost or appropriate dean determines that the content is strategic to the campus mission. Faculty seeking grants for educational or outreach activities must include costs for closed-captioning.

Departments have a responsibility to ensure closed-captioning is available on materials related to their program and/or service for which access is unrestricted (e.g., video content available to the general public). Official video media content that represents the university and to which access is unrestricted must be captioned.

All departments, programs, instructors and employees are encouraged to purchase only captioned versions of audio-visual media whenever possible. Audio-described versions of audio-visual media are also recommended for purchase. In general, any non-transcribed audio and any non-captioned/non-described video that is in current use should be updated.

Before submitting a request for closed captioning for a commercially produced multimedia item, contact University Libraries or search [University Libraries How do I ... find videos or DVDs](#) to determine if a captioned version with appropriate licensing is already available.

5. **Digital Signs:** The use of digital signs across campus afford the opportunity to push dynamic, branded content to specific audiences. Digital signs for use in any public CU-Boulder program, service or activity must be made accessible, for example, by replication of information in an accessible medium.

OIT will publish standards that apply to digital signs that identify permanent spaces in a facility (e.g., room numbers, restrooms, etc.) or provide directional and informational content pertaining to accessible entrances, toilets, parking, means of egress, TTYs and Assistive Listening Systems, and elevators. OIT will maintain and disseminate standards. Purchase and installation of digital signs must be reviewed by the OIT Digital Accessibility Team in order to ensure that system requirements, installation instructions, training and support materials are in compliance with accessibility and branding standards. Deviations from the standard must be approved by the ICT Accessibility Review board as described in section E. Physical accessibility compliance is overseen by the campus ADA coordinator.

6. **Procuring Goods and Services:** Any ICT good or service procured for use in a CU-Boulder program, service or activity must be reviewed and made accessible to the extent feasible in compliance with the following:
  - a. Full implementation of the ICT accessibility procurement standards are expected to take through fiscal year 2018:
    - i. During calendar year 2016 the campus CDAO, or designee, shall review procurement for ICT services used by the campus as a whole or broadly used by a single school or college. The purpose of the review is to ensure compliance with campus ICT accessibility standards. It shall be the responsibility of campus departments for non CDAO reviewed procurement (e.g., services used by a single department, unit, or individual) maintain required documentation, and consult with the CDAO as appropriate regarding exceptions to this standard.
    - ii. During calendar year 2017 the campus CDAO, or designee, shall review all procurement for services broadly used by the campus, a school, or college, or a departmental unit to ensure compliance with campus ICT accessibility standards. It shall be the responsibility of campus departments for non CDAO reviewed procurement to maintain required documentation, and consult with the CDAO regarding exceptions to this standard.

- iii. During fiscal year 2018 the campus CDAO, or designee, shall review all procurement for non-individual use proposals, contracts, or other service arrangements to ensure compliance with campus ICT accessibility standards.
- b. Organizational Unit directors/chairs or their designees are, with guidance from the Procurement Service Center and the CDAO, responsible for ensuring that request for proposals, contracts, or other service arrangements for the acquisition of digital technology include requirements to adhere to [Web Content Accessibility Guidelines \(WCAG\) 2.0 AA Success Criteria](#). Best practices for complying with WCAG 2.0 AA are available at [W3C Web Accessibility Initiative's Guidelines for How to Meet WCAG 2.0](#). For digital technology services which are broadly used by the campus, a school, or college the IT service provider must ensure that accessibility is independently validated (either by the IT service provider or a third party) rather than solely relying on vendor assertions.
- c. If more than one good or service is available and meets some, but not all, of the relevant provisions of WCAG 2.0 AA, the good or service that best meets the standard must be procured unless an exception is granted by ICTARB (see section E for exception process details).
- d. Any solicitation or supplier contract that includes procurement or adoption of ICT goods and services shall include the following provision. This applies whether or not the contract involves actual payment:

*The university affords equal opportunity to individuals in its employment, services, programs and activities in accordance with federal and state laws. This includes effective communication and access to electronic and information communication technology resources for individuals with disabilities. [Supplier] shall: (1) deliver all applicable services and products in reasonable compliance with applicable university standards (for example, Web Content Accessibility Guidelines 2.0, Level AA or Section 508 Standards for Electronic and Information Technology as applicable); (2) upon request, provide the university with its accessibility testing results and written documentation verifying accessibility; (3) promptly respond to and resolve accessibility complaints; and (4) indemnify and hold the university harmless in the event of claims arising from inaccessibility.*

- e. Any solicitation or supplier contract that includes software development services shall include the following provision:

*The university affords equal opportunity to individuals in its employment, services, programs and activities in accordance with the laws. This includes effective communication and access to electronic and information communication technology resources for individuals with disabilities pursuant to CU-Boulder's Accessibility of Information and Communication Technology Policy ("Policy") and CU-Boulder Campus Standards for the Accessibility of Information and Communication ("Standards"). To this end, [Software Developer] shall: (1) read, review, and understand the Policy and Standards; (2) develop software with intent to comply with the Policy and Standards (which currently require compliance with WCAG 2.0 Level AA); (3) prior to delivery of any software, test it for compliance with the applicable Standards and report testing results to university in a VPAT or other format specified by the university; (4) use best commercial efforts to modify the software to maximize accessibility compliance and otherwise*

*resolve any identified accessibility compliance issues; and (5) ultimately deliver software that complies with the Policy and Standards, to the extent feasible as determined by university. Pending verification of compliance with this provision, University is authorized, but not required, to withhold any payment to [Software Developer] pursuant to this agreement. [Software shall not be considered in compliance with this provision unless or until the university Chief Digital Accessibility Officer, the ICT Accessibility Program Manager, or designee has approved.]*

Revisions to this provision are highly discouraged but if necessary must be reviewed and approved in accordance with the exception procedure outlined below, in coordination and consultation with Procurement Service Center and the Office of University Counsel.

- f. As part of the evaluation there will be criteria checklist that will be reviewed to ensure accessibility is met. The CDAO will be responsible for maintaining and publishing evaluation criteria checklists in consultation with the ICTARB.
- 7. Other Digital Content:** Departments have a responsibility to ensure communications intended for large audiences (for example, emails, promotional materials, maps, and materials in PDF format) related to their program and/or service are accessible. Official content that represents the university and is available to the general public must be accessible. Members of the university community may find additional resources, including tips and examples, on the [Accessible Technology website](#). In addition, faculty can receive assistance in addressing accessibility for other digital course content from OIT.

## **E. Exceptions**

- 1. Expedited review:** The following are exceptions that can have an expedited review by the CDAO and will be summarized for the ICTARB:
  - a. After consultation with the CDAO, in collaboration with Disability Services and the campus ADA coordinator, hardware and software tools specific to sponsored research that has deliverable deadlines may be considered for an expedited review. The expedited review will consider if accessible alternatives exist, if any software or hardware user will need accessible features, and if research includes legitimate physical exclusions (as determined by the Institutional Review Board). As a part of the review, the department must provide a position description of the *essential job functions* of any employee users so that ICTARB is enabled to provide follow up guidance to the department, if needed. It is the responsibility of the department to provide required documentation for an expedited review (e.g., alternatives evaluated, positions with essential job functions, and IRB determinations). Documentation of this exception shall be made by including the following statement in the procurement file: “This purchase is made under Section E. 1. General Exceptions of the CU-Boulder Campus Standards for the Accessibility of Information and Communication Technology Policy;
    - i. Small-dollar procurements (\$5,000 or less): statement shall be included in the Purchase Order comments or included with Procurement Card documentation;
    - ii. Large-dollar procurements (over \$5,000): requesting department shall include statement in the comments section of the purchase requisition.
  - b. Hardware or software for which, after consultation with the CDAO, no equivalent accessible option is available. It is the responsibility of IT service providers to take reasonable measures to determine that no equivalent option is available and provide notification to the CDAO. Notwithstanding provisions in this policy, any digital technology services which are broadly used by the campus, a school, or college require review by the ICTARB.

All other exceptions are discouraged, should be requested only when truly necessary, and must be approved in accordance with the process set forth below.

2. **Review Process:** ICTARB will maintain and publish the exception review processes in consultation with campus governance groups, such as Boulder Faculty Assembly, Boulder Campus Staff Council, and IT governance committees. Any exception to the Policy or these standards must be reviewed and approved only under the circumstances and process as follows:
  - a. Requests for exceptions must be made in writing and submitted to the ICTARB.
  - b. The basis and rationale for the requests must be based on issues other than cost alone. A timeline and plan of how to resolve and provide accessibility must also be submitted as part of the exception request.
  - c. If the ICT is required for coursework or for essential job functions, a timely review by the ICTARB will determine if appropriate alternatives are available and can be implemented. If the alternatives cannot be implemented in a timely manner, the ICTARB can require the removal of access to the information or technology.

Unless the ICTARB determines otherwise, all requests and determinations are made on a case-by-case basis. ICTARB will review on at least an annual basis and update, as needed, the Policy and these Standards.

## **F. Resources**

### **1. Campus**

- a. Disability Services - determines accommodations for students based on documented disabilities.
- b. Office of Information Technology - OIT has usability testing services available to audit ICT accessibility. This service is available to the creators and purchasers of ICT free of charge.
- c. ADA Coordinator - determines appropriate accommodations for staff and general public.
- d. ICT Accessibility Review Board members - information about the board and contact information can be found on the CU-Boulder [Accessible Technology website](#)
- e. Affiliates of the University of Colorado Boulder who encounter inaccessible ICT that inhibits their ability to engage in their academic work, conduct university business, or participate in university programs or services should submit an ICT accessibility request to the Office of Information Technology Service Center by calling 5-HELP (303-735-4357) or emailing [help@colorado.edu](mailto:help@colorado.edu).
- f. Campus websites with relevant information:
  - i. Accessible Technology
  - ii. [Web Development Guidelines](#)
  - iii. [Policy 10M:Commitment to Needs of Persons with Disabilities](#)
  - iv. [Office of Institutional Equity and Compliance](#)
- g. Policy on Faculty Notification to Campus Bookstore of Required Texts, per Deans Council

*In order to maintain a single central source of complete information directly accessible by CU-Boulder students, all CU-Boulder faculty shall inform the University of Colorado Bookstore of all required textbooks (graduate and undergraduate) for their courses. Faculty are expected to provide this information to the University of Colorado Bookstore with customary timeliness with respect to established deadlines. It is also strongly recommended that faculty notify the CU Bookstore of all recommended undergraduate course texts as well. Faculty may inform any other*

*textbook sources of their course readings, but they may not require students to purchase books from any particular vendor.*

## 2. External

- a. Digital Accessibility:
  - i. [Caitlin Cashin's "What is Digital- Accessibility" Presentation](#)
  - ii. [How to meet the Web Content Accessibility Guidelines 2.0](#)
- b. State and Federal policies:
  - i. [Colorado Accessibility Standards](#)
  - ii. [US Department of Education](#)
  - iii. [Information and Technical Assistance on the Americans with Disabilities Act](#)

## G. ICT Accessibility Review Board

Current ICT Accessibility Review Board members include:

- Catherine Shea as Campus Compliance Director
- Mary Kraus as Vice Provost for Undergraduate Education
- Clayton Lewis representing IT Faculty Advisory Committee
- Gwen Pomper representing ERM Advisory Committee
- John Meister as Disability Services Director
- Michael Roseberry as Campus ADA Coordinator
- Teresa Rausch as Director Procurement Services Center
- Pramila Patel as ICT Accessibility Program Manager
- Dan Jones as Chief Digital Accessibility Officer and board chair

## H. Definitions

**Accessibility**: means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally inclusive manner, with substantially equivalent ease of use. The person with a disability, using auxiliary aids if necessary, must be able to obtain the information as fully, equally and independently as a person without a disability. Although this protocol might not result in identical ease of use compared to that of persons without disabilities, and the means of acquiring information may differ, the protocol still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology.

**Digital Signage**: Digital Signage is an electronic extension of traditional static signage (print, billboards etc.), and can be either static, meaning a one-way communication to the audience with no control of content, or interactive, where the audience requests specific information through an interface to the display, typically a touchscreen.

At UCB, any electronic display shall be considered Digital Signage if it:

- Displays dynamic content primarily controlled/defined by the respective owner/department, and
- Is installed in a space that is typically accessible by the public, and
- Is meant to primarily provide its content to target audiences at targeted times.

**Essential Job Function:** Essential functions “are those functions that the individual who holds or desires the position must be able to perform unaided or with the assistance of a reasonable accommodation. A job function may be considered essential if:

- the position exists for performance of the function;
- a limited number of employees can perform the function, and it, therefore cannot be reassigned; or
- the function is specialized and requires certain expertise to perform it

**Information and Communication Technology:** means any electronic system or equipment, and content contained therein, used to create, convert, communicate, or duplicate data or information. The intent of this definition is to capture an inclusive spectrum of current and emerging technology.

**IT Service Provider:** means any person that designs, builds, implements, supports, or provides an IT service to other University employees, students, or affiliates, using a University IT resource. Examples of IT service providers include: website administrators, workstation support staff, server administrators, software programmers, application developers, data network technicians, user account administrators, and computer center personnel.

**Reasonable Accommodation:** Reasonable accommodation means any change to the work or educational environment, or the way things are usually done, that allows an individual with a disability to apply for a job, perform job functions, participate in the academic environment, or enjoy equal access to programs, services or benefits available to individuals without disabilities.

The university is required by law to provide reasonable accommodation to qualified individuals with disabilities, unless doing so would impose an undue hardship or result in a fundamental alteration of the program or service.