Interim Digital Accessibility Policy

Policy Number [X-XX]

Commonwealth University of Pennsylvania

Approved by University Senate, [Date of Approval]

Revised [Date of Revision]

Responsible Office: [Insert Division or Office]

1. Purpose

Commonwealth University of Pennsylvania recognizes that complying with digital accessibility standards expands equitable access to online resources for all users, including individuals with disabilities. This policy establishes minimum requirements for the accessibility of information and communication technology and reflects Commonwealth University's commitment to removing barriers and ensuring compliance with current accessibility guidelines and the Americans with Disabilities Act.

2. Scope

2.1 This policy applies to all information and communication technology (ICT) acquired, developed, distributed, used, purchased, or implemented by the University in support of University programs, services, or activities.

2.2 Files should be distributed as fully remediated, accessible PDFs. If an accessible PDF cannot be created, files may be distributed in their accessible native formats (e.g., Word, Excel, PowerPoint). All members of the University community who create, manage, or disseminate information and technology must ensure that such information and technology comply with this Policy and conform to 28 CFR § 35.200 Subpart H. Allowable exceptions are outlined in 2.5.

2.3 Videos should include captions and high-quality audio. Live-streamed events embedded within the University website should be subject to accessibility requirements and include live transcription. Course video content must have accurate captions or transcripts. All multimedia content should have alternative, accessible formats when possible.

2.4 All administrative and academic departments must ensure that any ICT procured, developed, provided, or delivered complies with the technical guidelines set forth in the

current accessibility standards. All technology purchases must follow the University's IT procurement process, which includes an evaluation of the technology for fit, form, and function; a vendor risk assessment; and an accessibility review by the Digital Accessibility Advisory Group to ensure compliance.

2.5 **The following are not within the scope of this policy:**

2.5.1 **Legacy content** is only required to comply with the technical guidelines in place at the time it was last revised, unless the content is needed to provide access to University programs, services, or activities (e.g., application forms), or unless an individual requires the legacy content to be remediated for accessibility. Such requests must be prioritized for timely remediation.

2.5.2 **Personal websites and student organization websites** that receive no University funding and are not used for any University program, service, or activity (including educational purposes) are exempt. Assistive technologies are also exempt if they must present information in a specific manner consistent with their intended use.

2.5.3 **Specialized or single-instance productivity software** purchased for individual use that is not required for use by anyone other than the requestor.

3. Definitions, Roles and Responsibilities

3.1. **Definitions**

3.1.1. **Accessible**: Content that an individual with a disability can independently engage with, acquire information on, and enjoy the same services as a person without a disability with ease of use.

3.1.2. **Accessibility Rider:** A legal document formalizing an agreement between vendor and Commonwealth University to adhere to the university's accessibility requirements, outlining vendor obligations to ensure digital accessibility compliance as part of their contract with the University.

3.1.3. **Accessibility Roadmap:** A plan between vendor and the University to bring vendor's solution to accessibility compliance requirements under an established timeline as part of a contractual agreement or renewal.

3.1.4. **Americans with Disabilities Act (ADA):** U.S. civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including employment, education, transportation, and access to public and private spaces.

3.1.5. **Assistive Technology (AT)**: Any device, software, equipment, or tool that helps people with disabilities improve, maintain, or increase their functional capabilities. Examples include, but are not limited to, screen readers, magnifiers, closed captioning, speech to text, text to speech, and spelling/grammar tools.

3.1.6. **Digital Accessibility Advisory Group**: Group will include a representative from Information Technology (IT), University Disability Services (UDS), Commonwealth Academic Technology Supports Center (CATS), and Strategic Communications and Marketing to review software for accessibility and discuss when an undue burden may apply to digital content.

3.1.7. **Digital Accessibility Standards**: The current guidance from the World Wide Web Consortium's Web Content Accessibility Guidelines.

3.1.8. **Digital Content**: Any university electronic resource, information, or communication accessed or displayed in a digital format such as text, image, audio, virtual document, audio, or video. This includes, but is not limited to, webpages, web-based applications, university-affiliated social media, online instructional content, services, and resources acquired, updated, or developed after (date of approval), except that which falls under the exceptions to this policy.

3.1.9. **Disabilities**: Include difficulties or impairments (temporary or permanent) that limit one or more major life activity, which can include seeing, hearing, understanding, or mobility.

3.1.10. **Equal Effective Alternative Access**: Providing an alternative format in a timely manner that delivers the same content as the original format and is suitable for an individual's disability. Commonwealth University is not required to guarantee that individuals with disabilities achieve the same results or level of success as those without disabilities. However, we must offer appropriate auxiliary aids and services to give individuals with disabilities an equal chance to achieve the same outcome, benefit, or level of success, in compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990.

3.1.11. **Fully Remediated:** all identified accessibility barriers have been fixed and the digital content (website, document, application, etc.) now conforms entirely to recognized accessibility standards, Web Content Accessibility Guidelines (WCAG), required by the ADA.

3.1.12. **Fundamental Alteration**: If a change is made to the content, service, program, or activity that would profoundly modify the nature of the content, service, program, or activity.

3.1.13. **Information and Communication Technology**: Any electronic system or equipment, and content contained therein, used to create, convert, or communicate

data or information. Information and communication technology includes but is not limited to websites, web applications, desktop, and mobile applications, digital signage, digital files, social media, multimedia, and other web-delivered content or and documents.

3.1.14. **Legacy Content**: Content contained within a website or another piece of information and communication technology that has not been revised since the date a new set of technical guidelines was adopted.

3.1.15. **Personal Websites**: Websites about a specific individual which are not used for any university program, service, or activity. To be considered personal in nature, a website cannot contain resources required for use by students or employees.

3.1.16. **Timely Remediation**: Resolving issues preventing access to information and communication technology within the period defined by Information Technology Accessibility Coordinator in conjunction with the Chief Information Officer and Director of Disability Services Office.

3.1.17. **Undue Burden**: Providing an accessible product would result in a significant financial or administrative burden. This should be determined and reviewed by the Digital Accessibility Advisory Group.

3.1.18. **University Digital Content**: Digital content that is created, posted, distributed, or published for University Business.

3.1.19. **University Programs, Services, or Activities**: Includes but is not limited to teaching, learning, advising, research, outreach, employment, entertainment, medical services, and other functions of the university.

3.1.20. **Web Content Accessibility Guidelines (WCAG 2.1AA)**: A set of internationally recognized standards that ensure digital content is accessible to people with disabilities, meeting specific criteria for usability, readability, and navigability.

3.2.   **Roles and Responsibilities**

3.2.1. University Disability Services: Provides guidance regarding developments in the legal and regulatory landscape.

3.2.2. Information Technology (IT): Helps operationalize accessibility policies by integrating accessibility requirements into procurement, development, design, and implementation processes.

3.2.3. Commonwealth Academic Technology Supports Center (CATS): Plays a central role in supporting the creation, delivery, and ongoing maintenance of accessible academic content and learning environments.

3.2.4. Strategic Communications and Marketing: Plays a key role in ensuring that the University's public-facing digital materials meet accessibility standards and reflect the institution's commitment to inclusive communication.

3.2.5. Faculty: Ensure the course materials used in their coursework are fully remediated and accessible for their students.

4. Policy

4.1.1. Commonwealth University complies with Title II of the Americans with Disabilities Act (ADA) and the WCAG 2.1 AA accessibility standards by ensuring that multimedia content, site navigation, reading levels, and keyboard functionality are accessible. Content that cannot be maintained in compliance may be subject to removal. Third-party tools, services, and integrations must also meet these accessibility requirements.

4.1.2. All content and aspects of the university's digital content as defined by the current guidelines should conform to the digital accessibility standards unless the Chief Accessibility Officer/ADA Coordinator grant an exception where it is determined that doing so would represent an Undue Burden or Fundamental Alteration. In the case that this is determined, the University will provide Equally Effective Alternative Access to the content where possible.

5. Procedures, Standards, and Guidelines

5.1.1. Training

    5.1.1.1.   CU employees can request training for themselves or for their staff on making digital content accessible by reaching out to the Disability Accessibility Advisory Group at cually@commonwealthu.edu

5.1.2. Procurement and Third-Party Content

    5.1.2.1.   Information and communications technology renewals and/or new purchases must be reviewed and approved by Information Technology or Academic Technology and Support prior to purchase. Requesters can initiate purchase requests by submitting requests to the IT Help Center. Doing so will initiate the required IT evaluation for fit, form, and function as well as the required vendor risk assessment and the Digital Accessibility Advisory Group review.

    5.1.2.2.   An Accessibility Rider should be considered for technology contracts. Vendors signing the rider indicate they are committed to upholding Commonwealth University's accessibility requirements and would be included for review by the Digital Accessibility Advisory Group.

5.1.2.3.   If a vendor cannot commit to requirements in the Accessibility Rider, University staff must work with the vendor to secure assurances and commitments toward eventual compliance with Commonwealth University's accessibility requirements. This should include an accessibility roadmap that identifies issues to be addressed and establishes timelines for eventual compliance.

6. Compliance and Enforcement

6.1.1. Every University policy will undergo a regular review on a five-year cycle, with approximately 20% of the total policies inventory being reviewed each year.

6.1.2. All policy reviews will be conducted by the responsible Senate Committee to assure that the policy remains relevant and aligns with applicable federal and state laws and regulations, PASSHE Board of Governors policies, and other University policies, procedures, standards, or guidelines.

6.1.3. Digital accessibility issues can be reported via the [Digital Accessibility Concern Form](#)

6.1.4. Information and communication technology in violation of this policy must be remediated by the responsible unit in active partnership with the University to ensure that the content is either updated to conform to the standards or made available in an alternative accessible format in a timely manner. If remediation does not occur in a timely manner (not to exceed 60 days), materials may need to be removed until fully remediated. Adherence to this policy is required, and noncompliance may result in disciplinary measures in accordance with institutional procedures. Contractors, vendors, and others service providers who violate this policy may face termination of their business relationship with Commonwealth University.

7. Additional Information

7.1.   **Supporting Documents**

7.1.1   [Website Content Accessibility Guidelines (WCAG 2.1)](#)

7.1.2   [April 2024 Update to ADA Regulations](#)

7.1.3   [Accessibility Resource Guide for Digital Accessibility](#)

7.2.   **History**

7.2.1. This is a new policy.

7.2.2. Effective Date

7.2.3. **Related Policies -**

7.2.4. **Contacts for Additional Information and Reporting**

Commonwealth University Disability Services, Chief Accessibility Officer and ADA Coordinator, Tess Fosse, 570-389-4491, tfosse@commonwealthu.edu