

Policy Title:	Electronic and Information Technology Accessibility Policy
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Governing Body:	Southern Oregon University	Policy Number:	FAD.087
Policy Contact:	Director of Human Resources	Date Revised:	
Custodial Office:	Finance and Administration	Date Approved:	July 14, 2020
Approved By:	President	Next Review:	July 2023
Related Policy:			

### Revision History

Revision Number:	Change:	Date:
	Initial version	July 2020

### A. Purpose

Southern Oregon University is committed to providing equal and integrated access for all students with disabilities to academic, social, cultural, housing and recreational programs. SOU does not discriminate on the basis of disability in administration of its programs or activities, and has an institutional commitment to provide full and equal opportunities for individuals with disabilities who are otherwise qualified to participate in, benefit from, and enjoy all the programs and services of the University.

This policy extends to the University’s electronic and information technologies and applies to their procurement, development, implementation and ongoing maintenance.

This policy is in accordance with federal and state laws, including the Americans with Disabilities Act of 1990 (ADA), the Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, and Section 508 of the Rehabilitation Act as amended.

The purpose of this policy is to provide processes by which University administrators, faculty and staff will create, obtain, and maintain all electronic and information technology (EIT) in a manner that ensures EIT is accessible to individuals with disabilities.

These policies and procedures apply to the following areas:

- Web Accessibility
- Instructional Materials Accessibility
- Document Accessibility
- Electronic Media Accessibility
- Software, Hardware and Systems Accessibility
- Procurement

## B. Definitions

Accessible – 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.

Disability – A physical or mental impairment that substantially limits one or more major life activities.

Electronic and Information Technology (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 electronic and information technology includes, but is not limited to, the internet and intranet websites, content delivered in digital form, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems (clickers) and office equipment such as classroom podiums, copiers and fax machines. 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), computers, ancillary equipment, software, firmware and similar procedures, services (including support) and related resources.

## C. Policy Statement

### **1. Web Accessibility**

#### 1.1 Scope

These policies and procedures apply to all University web pages and programs used to conduct University business and activities, including web resources used in courses.

#### 1.2 Standards

All web pages, websites and web-based software published, hosted or used by the University will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 published by the W3C as follows. All pages will meet level AA guidelines with limited exceptions outlined at Appendix A. All University websites, unless technically impossible, will include a link to the University's main accessibility page which includes a statement of commitment to web accessibility.

#### 1.3 Responsibility

All Departments and Programs:

- Will comply with the web accessibility standards when creating web content, sites and programs.
- Will ensure that online activities are hosted in accessible environments and that online content follows standards outlined by this policy.

Information Technology:

- Will provide instruction and support for campus community members who create webpages and documents so the individuals who author web content can be trained according to these standards.
- Will ensure that any Content Management System and other web production or web object creation software proposed and supported by IT will be accessible and will produce accessible web pages.

## **2. Instructional Materials Accessibility**

### 2.1 Scope

This policy applies to all electronic instructional materials (syllabi, textbooks, presentations, handouts, etc.). This includes electronic instructional materials delivered within the University'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.).

### 2.2 Standards

All electronic instructional materials, optional and required, will be accessible and as effective and usable for persons with disabilities as they are for persons without disabilities. Instructional materials and activities will be made available to all students at the same time. All instructional materials must meet all applicable standards and guidelines outlined in this policy.

### 2.3 Responsibility

All Departments and Programs:

- Will ensure that instructional materials comply with all requirements outlined in this policy.
- Will ensure that departmentally owned classrooms use and deliver accessible EIT.
- Will ensure that all departmental computer labs provided for student use will have assistive technologies including, but not limited to, accessible computer stations, screen reading software, and screen magnification.
- Will ensure that applications developed on campus (web, desktop, etc.) are accessible according to the principles of WCAG 2.0 AA level standards.

Faculty and Instructional Staff:

- Will create and present accessible courses and instructional material.

Disability Resources, Information Technology and Instructional Support:

- Will provide instruction and support for campus community members creating online courses and online instructional content.

Information Technology:

- Will use only accessible EIT in IT designed and supported technology classrooms. Will monitor informational IT web pages and implement the EITA recommended lab software and procedures found on those pages.
- Will coordinate support for campus units needing assistance with accessibility in departmentally supported technology classrooms.
- Will serve as a clearing house for information about assistive technology and modifications recommended for departmental computer labs.

Hannon Library:

- Will maintain an accessible website.
- Will work with a third party vendor to provide an accessible library services platform that includes the discovery interface which is used for searching the library collection, including journals, books and videos, both online and physical.
- Will conduct quarterly accessibility scans to ascertain whether any new content is inaccessible. Will address any new accessibility issues that occur.

### **3. Document Accessibility**

#### 3.1 Scope

This policy applies to all University produced and maintained or distributed electronic documents. 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. Legacy documents must be made accessible upon request. Departments will designate a person responsible for making legacy documents accessible and will publish contact information for that person as well as anticipated timelines for availability of accessible versions once the request has been made.

#### 3.2 Standards

Electronic documents must be accessible. Electronic interaction with University 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 and guidelines outlined in the [Guidance on Applying WCAG 2.0 to Non-web information and Communications Technologies](#), published by the W3C as the Working Draft, December 13, 2012. PDF documents will comply to the PDF/UA standard (ISO 14289).

#### 3.3 Responsibility

All Departments, Programs and University Employees:

- Will follow the accessibility requirements outlined in this policy when creating and using electronic documents.
- Will provide accessible document instruction and support for campus community members.

Hannon Library:

- Will implement procedures for ensuring that materials digitized or hosted by the library for research purposes are accessible to individuals with disabilities.
- Will mediate any requests for accessible versions of digitized documents that were created before accessibility procedures were in place.

Disability Resources and Information Technology:

- Will work to coordinate campus-wide PDF solutions.

### **4. Electronic Media Accessibility**

#### 4.1 Scope

All departments will purchase and produce only accessible multimedia and update existing inaccessible media as it is put into use. All media resources used in University programs and activities must be accessible. This includes but is not limited to media that is instructional, informational, marketing or promotional.

#### 4.2 Standards

Video media resources will be closed captioned and audio-described and audio resources will be transcribed.

#### 4.3 Responsibility

All Departments, Programs, Instructors and Staff:

- Will purchase only captioned versions of audiovisual media whenever available. Will ensure all other media that will be used on the web or in instruction is captioned.
- Will purchase only transcribed audio and audio-described versions of audiovisual media whenever available.
- Will update any non-transcribed audio and any non-captioned/non-described video that is in current use.

- Will create captioned versions and audio-described versions of media when creating content for public or student use.
- Will use only transcribed audio and closed-captioned media with audio-descriptions that are made available in a timely manner to the class and will only assign such media as course material, whether optional or required.

#### Hannon Library:

- Will maintain a collection of captioned video resources that are available for faculty, staff, and student use.
- Will purchase the captioned version whenever possible when purchasing new videos for the library collections.

#### Disability Resources and Information Technology:

- Will incorporate captioning and media accessibility information into training.
- Will ensure all classroom and presentation equipment is caption-compatible and the default is on all TVs, etc.
- Will maintain and continue to provide instruction on media accessibility (such as captioning and audio-describing media and transcribing audio) as well as how to show captioned media in classrooms.
- Will incorporate into faculty training on AV equipment information about accessibility.

#### Marketing and Communications:

- Will produce only new communications and promotional materials that are captioned, audio-described or transcribed.

### **5. Software, Hardware and Systems Accessibility**

#### 5.1 Scope

All software, hardware and systems purchased 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 and content management systems, library and email systems, and administrative management systems such as 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. Software that is accessed through a web-browser must also be accessible and is discussed under Section 1 of this policy.

#### 5.2 Standards

Southern Oregon University will use the following standards to determine accessibility:

[US Access Board's Guide 508 Standards – Software Applications and Operating Systems](#)

#### All Departments, Programs and University Employees:

- Will ensure their software, hardware, local interfaces and modifications and electronic systems are accessible.
- Will ensure all applications developed on campus (web, desktop, mobile, etc.) are accessible.

#### Information Technology:

- Will ensure that assistive technologies are immediately available to students working in campus labs or on publicly-accessed campus computers.
- Will ensure that assistive technologies are available in a timely manner for campus employees including student employees.

## **6. Procurement**

### 6.1 Scope

This process applies to all University purchases of EIT software, hardware, and services.

### 6.2 Standards

Purchase orders and contracts for EIT must include the following clause:

“Contractor acknowledges that no University funds may be expended for the purpose of information technology equipment and software for use by employees, program participants, or members of the public unless it provides blind or visually impaired individuals with access, including interactive use of the equipment and services, that is equivalent to that provided to individuals who are not blind or visually impaired. In addition, Contractor acknowledges that such information technology equipment and software will provide 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.”

### 6.3 Responsibility

All Departments, Programs and University Employees:

- Must purchase or otherwise acquire accessible EIT, in accordance with this policy.

This policy and/or the appendix may be revised at any time without notice. All revisions supersede prior policy and are effective immediately upon approval.

## D. Policy Consultation

Faculty Senate, IT Technical Committee and Policy Council. Policy was posted on May 15, 2020 for community comment.

The Policy Contact, defined above, will write and maintain the procedures related to this policy and these procedures will be made available within the Custodial Office.

## Appendix A: Required A & AA Standards

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Below is a list of single-A (AA) and double-A (AAA) standards from WCAG 2.0 that are required for SOU web content. All requirements are described in greater depth on the WCAG Quick Reference Guide located at: <http://www.w3.org/WAI/WCAG21/quickref/> .

- 1.1 Non-text Content - All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, **except for**:
  - Controls, Input: If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Success Criterion 4.1.2 for additional requirements for controls and content that accepts user input.)
  - Time-Based Media: If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content. (Refer to Guideline 1.2 for additional requirements for media.)
  - Test: If non-text content is a test or exercise that would be invalid if presented in text, then text alternatives at least provide descriptive identification of the non-text content.
  - Sensory: If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide descriptive identification of the non-text content.
  - CAPTCHA: If the purpose of non-text content is to confirm that content is being accessed by a person rather than a computer, then text alternatives that identify and describe the purpose of the non-text content are provided, and alternative forms of CAPTCHA using output modes for different types of sensory perception are provided to accommodate different disabilities.
  - Decoration, Formatting, Invisible: If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it is implemented in a way that it can be ignored by assistive technology.
- 1.2 Time-based Media - alternatives will be made available.
- [1.2.4 Captions](#) are provided for all [live audio](#) content in [synchronized media](#).
- [1.2.5 Audio description](#) is provided for all [prerecorded video](#) content in [synchronized media](#).
- 1.4 – Distinguishable
- [1.4.3](#) The visual presentation of [text](#) and [images of text](#) has a [contrast ratio](#) of at least 4.5:1, except for the following:
  - Large Text: [Large-scale](#) text and images of large-scale text have a contrast ratio of at least 3:1;
  - Incidental: Text or images of text that are part of an inactive [user interface component](#), that are [pure decoration](#), that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
  - Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.
- 2.4 – [Navigable](#)- Provide ways to help users navigate, find content, and determine where they are.
- [2.4.6](#) Headings and [labels](#) describe topic or purpose.

- [2.4.7](#) Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.
- 3.2 – [Predictable](#)- Make Web pages appear and operate in predictable ways.
- [3.2.3](#) Navigational mechanisms that are repeated on multiple [Web pages](#) within a [set of Web pages](#) occur in the [same relative order](#) each time they are repeated, unless a change is initiated by the user.
- [3.2.4](#) Components that have the [same functionality](#) within a set of [Web pages](#) are identified consistently.
- 3.3 – Input Assistance- Help users avoid and correct mistakes.
- [3.3.4](#) For [Web pages](#) that cause [legal commitments](#) or financial transactions for the user to occur, that modify or delete [user-controllable](#) data in data storage systems, or that submit user test responses, at least one of the following is true:
  - Reversible: Submissions are reversible.
  - Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.
  - Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.