

# **UCCS CAMPUS POLICY**

**Policy Title: Digital Accessibility** 

Policy Number: 700-008 Policy Functional Area: Information Technology

Effective: August 7, 2025

Approved by: Jennifer Sobanet, Chancellor

Responsible Vice Chancellor: Vice Chancellor for Administration and Finance (VCAF)

Office of Primary Responsibility: Assistant VC of Technology & Chief of Information Technology (CIO)

Policy Primary Contact: Assistant Vice Chancellor of Technology & CIO, helpdesk@uccs.edu

Supersedes: N/A

Last Reviewed/Updated: N/A

Applies to: Administration, Faculty, Staff, Students and Vendors

Reason for Policy: This policy establishes a Digital Accessibility Policy for UCCS and identities formal practice to comply and to implement the CU Administrative Policy Statement #6011.

# INTRODUCTION

The University of Colorado Colorado Springs campus strives to ensure that people of all abilities have equal access to the same programs and activities as people without disabilities, including services and content made available through the use of information and communication technology (ICT). Title II of the Americans with Disabilities Act (ADA) requires the university to provide people with disabilities an equal opportunity to benefit from all 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 for modification would fundamentally alter such program, services, or activities.

In accordance with Administrative Policy Statement (APS) #6011, Digital Accessibility, "Each campus chancellor, or designee(s), shall establish and maintain structures for: 1) providing training for faculty and staff who use, create, purchase, or maintain ICT for the university in the scope of their employment for CU; 2) compliance governance; 3) purchasing ICT; and 4) processing reasonable accommodations and modifications regarding ICT." This policy establishes those responsibilities, standards, compliance, and governance structures for the UCCS campus as required by APS #6011.

#### II. POLICY STATEMENT

Accessibility is the responsibility of all members of the UCCS community. Technology services and applications that are procured, developed, maintained, and used by the UCCS faculty, staff, and students should provide similar functionality, experience, and information access to individuals of all abilities. Examples of technology covered by this policy include websites, web applications, software systems, electronic documents, learning management systems, videos, and hardware equipment. To that end, the key areas surrounding accessibility are as follows:

#### A. Digital Accessibility Standards for UCCS

Any and all information and technology—including, but not limited to, computers and ancillary equipment, instructional materials (including online course content, which must strive to be universally designed and inclusive), software, videos, apps, multimedia, telecommunications, or web-based content or products—developed, procured, maintained, or used in carrying out university activities, must be compliant with Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended, *Web Content Accessibility Guidelines* (WCAG) 2.1 Level AA, developed by the World Wide Web Consortium (W3C), and other related university policies and local, state, and federal laws. The campus uses the most recently adopted version of the Web Content Accessibility Guidelines (WCAG) level AA.

At a minimum, these university standards apply to the following:

- 1. Course syllabi, textbooks, and other course materials (i.e., PDFs, Word documents)
- 2. Websites and applications
- 3. Closed captioning and audio description of audio-visual materials
- 4. Digital signage
- 5. Canvas or other LMS's
- 6. Procuring technology goods and information services
- 7. Email and other forms of digital communication

### B. Process for Overcoming Known Accessibility Barriers

UCCS strives to make services and resources available proactively to lessen or prevent the need for an individual with a disability to request an accommodation. UCCS is also committed to responding to accessibility concerns and providing reasonable accommodations or modifications in a timely manner. If you experience a barrier, and/or learn about a barrier that affects you or someone else's ability to access UCCS websites, videos, online forms, or other digital content, technologies and/or services, please provide detailed information to the appropriate campus resource as outlined on the <a href="Campus Accessibility webpage">Campus Accessibility webpage</a>. The campus CIO and the Digital Accessibility Committee will monitor concerns and address them in a timely manner.

Faculty and staff responsible for the information or technology must undertake reasonable efforts to make it accessible in a timely manner upon becoming aware of non-compliance relative to federal or state laws. If the information or technology is required for coursework or for essential job functions and an accommodation is being requested, a timely review by either HR or Disability Services will determine if appropriate accommodations are available and can be implemented. If the accommodation being requested or an alternative accommodation cannot be implemented in a timely manner, HR or Disability

Services will consider requiring the removal of access to the information or technology in conjunction of necessary campus partners.

#### C. Campus Governance

A Digital Accessibility Committee shall be comprised of individuals from the following departments: Information Technology, UCCS Campus Store, ADA Coordinator, Communications, Disability Services, Kraemer Family Library, Faculty Resource Center, Faculty Representative, University Counsel, as well as a student representative chosen by other members of the committee. The committee shall be responsible for the following:

- 1. Approve campus digital accessibility standards and best practices.
- 2. Review and grant any exceptions to the policy and standards.
- 3. Determine the content and frequency of trainings.
- 4. Periodically review and update the policy and standards, setting and maintaining high standards for digital accessibility, providing guidance, and ensuring compliance with accessibility policies.

The committee may create subgroups to focus on specific areas such as training, technical standards or website compliance.

Following are the governance structures responsible for ensuring digital accessibility transparency and risk mitigation. The campus Chief Information Officer (CIO) acts as a central resource for leadership, services, and programs related to the Americans with Disabilities Act (ADA) and Title II, sections 504 and 508 of the Rehabilitation Act, and relevant standards and university policies for issues pertaining to the Office of Information Technology. They will work in collaboration with the Digital Accessibility Committee and committee chair for guidance as needed.

#### D. Procuring Goods and Services

Faculty and Staff who use, create, purchase, or maintain information or communication technology (ICT) for university programs, services, and activities in the scope of their employment are responsible for making them accessible in accordance with campus standards defined in Section II.A. of this policy. This will ensure that products, services and technologies developed at, purchased by, or used at the university are accessible to all faculty, students, and staff, including those with disabilities. This is especially critical for enterprise-level systems and other technologies that affect a large number of students, faculty, and/or staff. Faculty and Staff should consult with the campus Digital Accessibility Committee and CIO for information regarding responsibilities and advice on best practices.

# E. Annual Reporting

In accordance with APS #6011, the UCCS Chief Information Officer may provide an annual digital accessibility status report in conjunction with the Digital Accessibility Committee Chair to the CU IT Governance committee. At a minimum, this status report should note changes to standards, barriers to compliance with respect to the standards set out in Section II.A. of this policy, and identify accessibility barriers for broadly used systems.

# III. KEY WORDS

A. Access / Accessible / Accessibility - The opportunity for persons with disabilities to participate in,

- utilize, benefit from, and enjoy the same facilities, programs, and services as non-disabled persons, with or without reasonable accommodation.
- B. Information and Communication Technology (ICT) Refers to a broad range of technological tools and systems used to create, store, transmit, retrieve, and share information, encompassing everything from computers and networks to telecommunications like telephones and the internet, essentially including all technologies that facilitate communication and information exchange; it's considered a broader term than just "Information Technology (IT)" which focuses primarily on computer systems alone.
- C. Americans with Disabilities Act (ADA) The ADA is a federal anti-discrimination law designed to remove barriers that prevent qualified persons with disabilities from enjoying the same educational and employment opportunities available to non-disabled persons.
- D. **Disability** An individual with a disability is a person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment.
- E. **Digital Accessibility** The practice of designing digital content and technology so that people with disabilities can use them without barriers.
- F. **Section 504 of the Rehabilitation Act of 1973 -** A federal law that prohibits discrimination against people with disabilities in programs and activities that receive federal financial assistance.
- G. **Section 508 of the Rehabilitation Act of 1973 -** A federal law that requires federal agencies to make their electronic and information technology accessible to people with disabilities.
- H. **Web Content Accessibility Guidelines (WCAG) -** A set of technical standards that help make the web more accessible to everyone.
- I. Reasonable Accommodation A modification or academic adjustment that will enable a qualified student, job applicant or employee with a disability to participate in the educational process or the application process or to perform essential job functions or university events. Reasonable accommodation also includes modifications or adjustments to assure that a qualified individual with a disability has the rights and privileges in employment and access to education equal to those of non-disabled employees or students. A reasonable accommodation must not create an undue hardship on the university.
- J. Undue Hardship An action requiring significant difficulty or expense, when considered considering factors such as the university's size, financial resources, and the nature and structure of its operation. In determining whether an accommodation would impose an undue hardship on the university, factors to be considered include: the nature and cost of the accommodation requested, the overall financial resources involved in the provision of the reasonable accommodation, the overall financial resources of the university, the composition, structure and functions of the workforce of the university, and the impact of the accommodation upon the operation of the university, including the impact on the ability of other employees to perform their duties and the impact on the university's ability to conduct business.

## IV. RELATED POLICIES AND OTHER RESOURCES

A. Administrative Policy Statements (APS) and Other Policies

- 1. UCCS Policy 300-021 Disability Access and Accommodation Policy
- 2. CU APS #5065 Protected Class Nondiscrimination
- 3. CU APS #6011 Digital Accessibility
- 4. UCCS Policy 300-017 Discrimination and Harassment Policy

#### B. Other Resources

- 1. Web Accessibility Statement
- 2. FRC Accessibility Resources and Training
- C. Frequently Asked Questions (FAQs)
  - 1. Accessibility Standards and Resources
  - 2. Rehabilitation Act of 1973, Section 508
  - 3. Rehabilitation Act of 1973, Section 504
  - 4. Americans with Disabilities Act of 1990
  - 5. Web Content Accessibility Guidelines (2.1), Level AA
  - 6. CU IT Governance Committee

# V. HISTORY

Initial policy approval August 7, 2025

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Legal sufficiency approval

Signature: (Till fuller Gruig)

Email: tluber@uccs.edu

# UCCS Policy 700-008 Digital Accessibility\_vF

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