

# CU-BOULDER CAMPUS POLICY DRAFT

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*Topic: Accessibility of Information and Communication Technology*

Original   X   Revised   

Approved by: \_\_\_\_\_

Philip P. DiStefano Chancellor

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Implementation Period: The ICT Accessibility Review Board shall establish a prioritization schedule defining when different programs, services and activities must be compliant with this policy.

## **A. Purpose**

The Americans with Disabilities Act of 1990 (ADA), as amended, and Section 504 of the

Rehabilitation Act of 1973 require, that higher education institutions afford all qualified individuals with equal access to programs, services and activities, and effectively communicate with individuals with disabilities.

In addition to complying with the law, 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 maximize CU-Boulder's potential to achieve its legal, moral, and ethical commitments in the digital environment, the university has established the following policy to complement its information and communication technology accessibility program.

## **B. Policy and Procedure**

1. CU-Boulder commits to ensuring that the information and communication technology (ICT) that it creates or provides in conducting its programs, services, and activities is accessible to individuals with disabilities, in accordance with applicable law.
2. To facilitate faculty and staff meeting the responsibilities described in section B.3, CU-Boulder shall make training and resources readily available to faculty and staff, including a campus website devoted to providing information regarding accessible ICT. The training and resources shall include specific information for faculty and staff who are responsible for creating, selecting, or maintaining ICT in any university program, service or activity. The training and

resources shall also include 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.

3. Drawing on resources described in section B.2, faculty and staff who use, create, purchase, or maintain ICT for university programs, services, and activities are responsible for making it accessible in accordance with this Policy and the accompanying ICT Accessibility Standards referenced below. Faculty and staff should consult with the Chief Digital Accessibility Officer (CDAO) for more information regarding responsibilities and advice on best practices.
4. CU-Boulder shall appoint and maintain a Chief Digital Accessibility Officer (CDAO) who is responsible for:
  - a. creating, revising, and publishing campus ICT accessibility standards (ICT Accessibility Standards), best practices, and resource information, in collaboration with the ICT Accessibility Review Board, as a supplement to this Policy;
  - b. providing guidance regarding implementation of ICT accessibility standards;
  - c. reviewing and reporting on program effectiveness as appropriate to the Chancellor, Vice Chancellor for Diversity, Equity, and Community Engagement, the Associate Vice Chancellor for Information Technology and the ICT Accessibility Review Board (as described in section 6);
  - d. day-to-day management for the ICT accessibility program;
  - e. maintaining ICT accessibility training content;
  - f. executing any other related responsibilities as assigned by the Associate Vice Chancellor for Information Technology or designee.
5. CU-Boulder will establish and maintain an ICT Accessibility Review Board. Members of the board shall include a cross-representation of faculty, staff, students, and administrators. The Vice Chancellor for Diversity, Equity, and Community Engagement and the Associate Vice Chancellor for Information Technology, or their designees, shall appoint board members. The board, in collaboration with the CDAO, shall advise the Chancellor, Vice Chancellor for Diversity, Equity, and Community Engagement and the Associate Vice Chancellor for Information Technology, of the status of the ICT accessibility program and required program changes. These duties include:
  - a. approval of campus ICT accessibility standards, best practices, and resource information proposed by the CDAO;
  - b. that members of the board, as delegated, review and grant any exceptions to this Policy or the ICT Accessibility Standards;
  - c. determine the content and frequency of trainings, as required by Section B.2. of this Policy;
  - d. periodically review and update this Policy and the ICT Accessibility Standards.
6. Exceptions may be granted by the ICT Accessibility Review Board (as defined in B.4) under certain circumstances including, but not limited to, fundamental alteration, as defined below, or

undue hardship. Exceptions should be narrowly tailored, limited in duration, and should describe the method through which equally effective alternative access will be provided.

## **C. 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.

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.

Fundamental Alteration: means alteration of the essential purpose of the program or service, or any of its components.

Undue Financial and Administrative Burden: means significant difficulty or expense. Because an institution must consider all resources available at the university level when reviewing claims of undue financial and administrative burdens, the decisions to invoke undue financial and administrative burdens must be carefully weighed and sufficiently documented.