Digital Accessibility Policy

Effective Date: 06/10/2021
Supersedes: None
Issuing Authority: Information Technology
Responsible Officer: Digital Accessibility Coordinator

I. Policy Statement

The University of Tulsa is committed to inclusion and providing equal access and opportunity to qualified students, faculty, staff, and visitors with disabilities through the most recent accessibility standards as set forth by the World Wide Web Consortium (W3C). This Policy addresses the needs of individuals who seek to use and participate in University websites, applications, programs and activities, services, and business. Digital Accessibility refers specifically to digital media content, which includes everything from websites to electronic communications. Websites and applications are measured using industry best practices according to the W3C’s Web Content Accessibility Guidelines (WCAG) 2.1, Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 for web content. The University has adopted this policy to increase the accessibility of TU’s website and web-based applications.

II. Application

This Policy applies to University digital media and deliverables, including websites, electronic communications, web-based applications, software, hardware, equipment, services, systems, platforms, documentation, content, and technologies, as well as third-party service providers used by the University. This includes all components, features, functionalities, upgrades, versions, and releases of these digital media types. Some examples of administrative, research, and academic applications within scope of this policy include the following: websites, video content, audio content, electronic documents and books, content and learning management systems, computers and peripherals, telephones, digital signs, classroom technology, and desktop/mobile/cloud-based applications. Unless a department or site owner receives an exception, all schools, colleges, offices, departments, and University entities will adhere to the Accessibility Standards.

III. Definitions

Accessibility Standards refer to the most recent version of, or successor standards to, W3C’s Web Content Accessibility Guidelines (WCAG) 2.1, Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 for web content, as well as requirements of Sections 504 and 508 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 and Amendments, and their implementing regulations. These standards are considered minimum standards and expectations regarding digital media content.

Testing/Audits refer to internal and field testing of digital media, using both automated and manual testing, to evaluate accessibility and conformance with the Accessibility Standards and WCAG Guidelines. Testing should be documented according to Website Accessibility Conformance Evaluation Methodology (WCAG-EM) 1.0, specifically Methodology Requirement 1.c: Define the web browser,
assistive technologies and other user agents for which features provided on the website are to be accessibility supported.

Site Owner refers to the department or owner with responsibility over the specific digital media content, whether at the University or a third-party supplier/vendor that the University has contracted with to provide digital media content. Responsibility includes design, development, hosting, updating, and/or management of the digital media.

Accessibility Standards Committee refers to a Committee that reviews Requests for Exception and holds responsibility for monitoring and tracking compliance and progress toward conformance with the Accessibility Standards. The Committee will also develop and supervise a prioritization schedule for improving accessibility and provide periodic reports to senior leadership as provided in the ADA Strategic Plan. The Committee will be comprised of members from Information Technology and University Compliance, as well as relevant others when needed.

Request for Exception refers to formal, written requests submitted by departments/site owners to receive an exception to compliance with the Accessibility Standards. These requests are submitted and subject to decision by the Accessibility Standards Committee.

IV. Policy

The University of Tulsa is committed to upholding the standards put in place by the W3C and is continuously working to improve the user experience for all people. It is the policy of the University that all digital media content be accessible. Therefore, University digital media that are created or undergo substantial revisions or redesign are expected to conform to the Accessibility Standards in their display and experience, platforms, and infrastructure. In cases where conformance to these Accessibility Standards is not technically feasible or may require extraordinary measures and undue burden or fundamental alteration because of the nature of the information or purpose, the department/site owners may submit a Request for Exception. In general, the lack of sufficient funds is not considered a valid reason for an exception.

V. Procedures

A. Conformance with Accessibility Standards

All University digital media as described under Application in Section II will conform to the Accessibility Standards. Departments and site owners have responsibility for conformance with the Accessibility Standards, and all departments will identify a site owner who will monitor accessibility for their digital media. University websites will indicate commitment to accessibility by including a link to the Digital Accessibility Policy as well as contact information for the site’s webmaster or manager. In cases where digital media does not currently conform, departments or site owners will begin steps to conform as of April 2021. Departments or site owners of digital media that is not in compliance with the Accessibility Standards will be required to submit a yearly action plan, or more often as requested, including concrete steps taken or to be taken each semester towards compliance until full compliance is attained. These plans should be submitted to the Accessibility Standards Committee, and departments or site owners may be asked for further information or clarification to ensure that the yearly plans make substantive progress. The expense for bringing digital media into conformance with the Accessibility
Standards will be charged to the responsible department. In cases of non-conformance to the Accessibility Standards, the Accessibility Standards Committee may determine that the digital media should be removed until it can be brought into conformance.

B. Testing/Audits

Departments, site owners, third-party suppliers, and Information Technology will be responsible to conduct regular testing/audits of digital media under their responsibility. The testing is conducted to ensure conformance with the Accessibility Standards and will include both automated and manual testing. All Site Owners will provide a yearly written report of all testing results to the Accessibility Standards Committee, or upon request for third-party site owners. These reports should maintain a list of all tests/audits, any issues, and any resolutions, including relevant dates, for documenting accessibility efforts. Site Owners will provide notification to the Accessibility Standards Committee, through the Digital Accessibility Coordinator, of any non-conformance to the Accessibility Standards or of any accessibility complaints from users.

C. Training and Awareness

To assist departments and site owners with conformance to the Accessibility Standards, Information Technology, in collaboration with other knowledgeable parties (such as Student Access, the Faculty Resource Center, and University Compliance) will conduct training and awareness programming every semester. Trainings can include posted content to the Accessibility @ TU Resources page, communication to the community, hosted training, etc.

D. Procurement

All procurement of third-party suppliers for digital media content must comply with this Policy and the Digital Accessibility Requirements Rider. Site owners and responsible departments will ensure that contracts or renewals of contracts with third-party suppliers are accountable to the Accessibility Standards, in collaboration with Purchasing Services, Information Technology, and University Compliance.

E. Requests for Exception

In extraordinary circumstances, departments or site owners may submit a written Request for Exception to conformance with the Accessibility Standards. The Request for Exception should include what the request pertains to, why the request is sought, and plans for alternative means of access. These Requests will be reviewed by the Accessibility Standards Committee in consultation with the department/site owner and others with relevant perspective and expertise, and the Accessibility Standards Committee will render decisions regarding exceptions.

F. Reporting Accessibility Issues

Anyone can report a digital accessibility concern using this form to report it (utulsa.edu/site-issue/). The Site Owners shall resolve all accessibility complaints and directly correspond with anyone who makes a complaint in a timely manner. In any cases where a person is unable to access digital media content, the requested content must be made accessible by the department or site owner, or provided by the department or site owner in an alternative format.
that creates equal access in a timely manner. Site Owners will maintain a list of all complaints and resolutions, including the dates of complaint and resolution, that can be provided to the Accessibility Standards Committee for documenting accessibility efforts.

VI. Digital Accessibility Coordinator

Please direct questions about this Policy to the Responsible Officer:

Responsible Officer: Trisha Salas
Digital Accessibility Coordinator
trisha-salas@utulsa.edu
918-631-2607

VII. Related Policies and Forms

Accommodation Request Policy
Computer Standardization Policy
Digital Accessibility Rider

VIII. Approval

This Policy is approved by the undersigned and effective as of the date written below.

Approved:

Name Paige Francis
Title VP Information Technology and Chief Information Officer

Date Effective: 06/10/2021

Revision Record

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