INTERIM POLICY

Effective Date: May 21, 2019
Approved By: President Sabah Randhawa

See Also: POL-U1600.02   Ensuring Equal Opportunity and Prohibiting Discrimination and Retaliation

POL-U1600.03   Accommodating Persons with Disabilities
Washington State Policy 188

POL-U1600.07 ENSURING ACCESSIBLE ELECTRONIC INFORMATION TECHNOLOGY

This policy applies to all University faculty, staff, and students.

Introduction

Western Washington University ("Western") seeks to provide an environment in which every individual has an opportunity to learn, work, and contribute, and where full inclusion and respect for all individuals encourages creativity and productivity. When information technology, including web content, is inaccessible, it has an adverse impact on people with disabilities, such as exclusion from information and opportunities.

Western is committed to providing full equal access to all its programs and activities. This includes ensuring that people with disabilities can utilize its website. This commitment is reflected in ensuring compliance with various laws and policies that support people with disabilities: the Americans with Disabilities Act; Sections 504 and 508 of the Rehabilitation Act; Washington State Anti-Discrimination Law; Western Policies 1600.02, *Ensuring Equal Opportunity and Prohibiting Discrimination and Retaliation,* and 1600.03, *Accommodating Persons with Disabilities*; and Washington State Policy 188. Western requires that no qualified person will be denied access to, participation in, or the benefits of, any program or activity of the University because of disability.

Learn more about why Western is part of a larger community committed to web accessibility in higher education: IT Accessibility: What Campus Leaders Have to Say.

This policy provides quality assurance for full implementation of a system of testing and accountability to maintain the accessibility and functionality of all of Western's online content.

Purpose

The purpose of this policy is to further the mission of Western to ensure all individuals have an opportunity to learn, work, and contribute. Our commitment to accessibility is proudly displayed in our "Notice" on Western's web sites. This policy is intended to assist faculty, staff, and students to create, obtain and maintain all Electronic and Information Technology (EIT) in a manner that ensures that EIT is accessible to individuals with disabilities.

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Definitions:

Covered Technologies: Websites, web applications, software systems, electronic documents, E-learning, multimedia and programmable user interfaces. This includes interacting with the technology, access and content.

A Person with a Disability: As outlined in POL-U1600.03, "Accommodating Persons with Disabilities," means:

a) Under 42 USC §12102, a person with a physical or mental impairment that substantially limits one or more major life activities; and/or

b) Under RCW 49.60.040 and WAC 162-22, the presence of a sensory, mental or physical impairment (temporary or permanent) that is:

1) Medically cognizable or diagnosable, or

2) Exists as a record or history; or

3) Known or shown through an interactive process to exist in fact, and

4) Has a substantially limiting effect upon the individual's ability to perform his or her job, the individual's ability to apply or be considered for a job or the individual's access to equal benefits, privileges, or terms or conditions of employment; or

5) The employee must have put the employer on notice of the existence of an impairment, and medical documentation must establish a reasonable likelihood that engaging in job functions without an accommodation would aggravate the impairment to the extent that it would create a substantially limiting effect.

Accessible: 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 integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.

Equally Effective Alternate Access: Afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs. Alternatives are not required to result in identical ease of use compared to that of persons without disabilities nor produce the identical result or level of achievement for persons with and without disabilities.

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Legacy Websites: University websites published before January 1, 2014, that have not been updated, edited, or modified in any way since that date.

Employees: Western's faculty and staff.

1. **Web Accessibility**

    A. Scope

    This policy applies to all content and functionality on the University's web pages (including pages developed by, maintained by, or offered through a third-party vendor or an open source) that constitute a program, service, or activity of the University.

    B. Standards

    All web pages, websites, and web-based software published, hosted, or used (including remotely hosted sites and software) by the University will meet the standards and guidelines outlined in the [Web Content Accessibility Guidelines (WCAG) 2.0 Level AA](#) and the [Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0](#) techniques for web content.

    C. Responsibility

    Vice President for University Relations and Marketing will:

    - Ensure that support is available to have adequate resources (staff and financial resources) to ensure WebTech can make certain all web content and functionality is accessible.

    - Ensure WebTech informs employees and students of their responsibilities under this policy and monitors employees and students' adherence to this policy.

    Vice Provost for Equal Opportunity will:

    - Receive and investigate complaints regarding Western's website from individuals who believe they do not have access to Western's web pages.

    WebTech will:

    - Ensure that any Content Management System and other web production creation software proposed and supported by the University will be accessible and will produce accessible web pages.

- Provide instruction and support for campus community members (employees and students) creating websites and content so that individuals who author web content can be trained in accordance with WCAG 2.0 Level AA Standards.

- Provide instruction and consultation on the use of WAI-ARIA to meet WCAG 2.0 Level AA Standards.

- Enroll new websites and content into our accessibility monitoring platform and designate a WebTech staff member to assess the reports generated by the system.

- Compile and maintain data to track compliance with this policy and make recommendations for addressing problems if found.

All Western employees and students will:

- Comply with the web accessibility standards when creating or modifying web content, sites, and programs.

- Ensure that online activities are hosted in accessible environments and that online content follows standards outlined by this policy.

- Participate in the required training opportunities.

- Attend, at regular intervals, additional trainings as their content authoring capabilities expand in scope.

2. **Electronic Document Accessibility**

A. Scope

This policy applies to all University-produced, 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.

B. Standards

Electronic documents must be accessible. Electronic interaction with University policies, procedures, notifications and other documents must be as effective and useable 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 (Sept. 2013).

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C. Responsibility

WebTech will:

- Provide instruction and support for campus community members creating documents so that individuals can be trained in accordance with WCAG 2.0 Level AA Standards.

- Monitor, via an automated system, documents posted on University websites and work with the content owners to translate those documents into accessible mediums.

All Western employees and students will:

- Follow the accessibility requirements outlined in this policy when creating, modifying, and using electronic documents.

- Attend training as needed in order to create, modify, and use electronic documents.

3. **Electronic Media Accessibility**

All departments will purchase and produce only accessible multimedia and update existing inaccessible media as it is put into use.

A. Scope

All media resources used in University programs and activities must be accessible. For example, this includes, but is not limited to, media that is instructional, informational, promotional, or used for marketing purposes.

B. Standards

Video media resources will be closed-captioned and, if appropriate, audio-described.

Audio resources will be transcribed.

Images used in electronic media will have alternative descriptions provided.

C. Responsibility

Vice President for University Relations and Marketing will:

- Produce communications and promotional materials that are captioned, audio-described or transcribed.

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WebTech will:

- Incorporate captioning and media accessibility information into training.

- Support video caption training and technology, such as use of 3Play, the state caption vendor.

All Western employees and students will:

- Purchase only captioned versions of audiovisual media whenever possible.

- Ensure that all other media that will be used on the web or in instruction is captioned or have alternative text and/or formats.

- Purchase only transcribed audio and audio-described versions of audiovisual media, whenever possible; and if not possible, identify equally effective alternate access.

- Update any non-transcribed audio and any non-captioned/non-described video that is in current use by the department, program, or employee.

- Use only transcribed audio and closed-captioned media with audio-descriptions that are made available in a timely manner to the class. Assign only accessible media as course material, irrespective of whether this is an optional or assigned requirement of the class.

4. <u>Procurement</u>

A. Scope

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

All covered technology acquired, procured, developed, substantially modified, or substantially enhanced after the effective date of this policy, including software available at no cost, must be accessible to and usable by individuals with disabilities, either directly or by supporting the use of assistive technology. WCAG 2.0 Level AA noted above outlines the minimum levels for compliance.

Where a covered technology is not able to be brought into compliance, the system or content owner is responsible to provide individuals with disabilities equivalent access.

B. Standards

Requests for Purchase (RFP) and contracts for EIT must include the following clause:

"Any software applications to be used by the University as a result of this RFP must comply

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and acknowledge the requirements set by the State of Washington for accessibility and provide evidence in meeting those requirements with completing a Voluntary Product Accessibility Template (VPAT)."

VPAT requires compliance with Section 508, prior to the Section 508 refresh in January 2017.

C. Responsibility

Procurement will:

- Adopt VPAT 2.0 by January 2018, which requires compliance with WCAG 2.0 Level AA.

WebTech will:

- Serve as a resource for EIT purchases and other acquisitions for compliance with accessibility requirements.

All Western employees and students will:

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