Electronic and Information Technology
Accessibility Policy

I. POLICY STATEMENT
Ensuring equal and effective electronic and information technology access is the responsibility of all University administrators, faculty, and staff.

II. POLICY PRINCIPLES
The University will procure and deploy Electronic and Information Technology software, hardware, and services that have been designed and developed to be accessible to people with disabilities.

III. EFFECTIVE DATE
October 21, 2016

IV. APPLICABILITY
All University administrators, faculty, and staff.

V. POLICY MANAGEMENT
Responsible Office: Office of Accessibility and Office of the CIO
Responsible Executive: Provost and Vice President for Academic Affairs
Responsible Officer: Director of the Office of Accessibility and the Chief Information Officer

VI. DEFINITIONS
See Definitions and Procedures

VII. POLICY PROCEDURES
See Definitions and Procedures

VIII. SANCTIONS
Any technology, instructional, administrative, or other, may be taken off-line or decommissioned if not in accordance with applicable federal and state laws, regulations, and guidance, which could include the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 and 508 of the Rehabilitation Act of 1973 as amended.

IX. EXCLUSIONS
Where adherence to this policy is not technically possible, would require extraordinary measures, or no fully accessible Electronic Information Technology product exist, an exclusion may be granted to this policy. If an exclusion is granted, an equally effective access plan must be developed to address issues that could potentially exclude faculty, students, and staff from participation in the programs and services of the University.

X. INTERPRETATION
Director of the Office of Accessibility and the Chief Information Officer.
Web Accessibility

Scope
Official Auburn University web pages developed by or for colleges, departments, programs or units. Personal web pages published by faculty, students, and non-university organizations that are hosted by Auburn University and do not conduct University-related business are encouraged to adopt the WCAG 2.0 standards.

Standards
To adhere to the Electronic and Information Technology Accessibility Policy, all official Auburn University web pages created, revised, or published must meet the Level A and AA requirements of the Web Content Accessibility Guidelines 2.0 (WCAG 2.0).

Upon specific request addressing accessibility, pages must be updated to be in compliance with WCAG 2.0, or equivalent alternatives must be made available in a timely manner.

All official Auburn University web page footers must contain a link to report accessibility issues.

Exemptions
The Office of Accessibility will review reports of non-compliance and requests for exemption(s). The Office of Accessibility will at times request assistance and expertise from the Chief Information Officer, Office of Information Technology, and other University personnel to clarify any request for exemption.

All requests for exemptions should be emailed to the Director of the Office of Accessibility.

Web pages that could qualify for an exemption
- Web pages that have been archived.
- Where compliance is not technically possible or may require extraordinary measure due to the purpose of the page and the nature of the information.

Reporting
A status report summarizing progress towards a fully accessible web space over the past year and designating targets for the upcoming year will be included in an annual report from the Chief Information Officer and the Director of the Office of Accessibility.

Review
This standard and associated standards will be reviewed annually. A review group will be composed of designees from the Office of Information Technology, Office of Accessibility, and distributed IT professionals from units and colleges.
**Assistance**
Office of Accessibility and Office for Informational Technology

- will offer professional development opportunities to IT professionals and campus web masters on creating accessible web pages and software applications using WCAG 2.0 Level A and AA standards;

- will offer professional development opportunities to web content providers throughout campus.
Electronic Media Accessibility

Scope
These procedures apply to media content provided or created by Auburn University that is posted to the web, used as instructional material, or shown at public events. All electronic media will adhere to the Electronic and Information Technology Accessibility Policy, all applicable copyright laws, and the associated standards referenced in this document.

Definitions
Accessible Media: Media that can be read or viewed by people with disabilities, predominantly by those who are low vision, blind, deaf, hard of hearing, or who have a physical disability. Media could include, but not limited to, DVDs, online videos, podcasts or other audio formats.

Captioning: Captions are on-screen text descriptions that display a video product's dialogue, identify speakers, and describe other relevant sounds that are otherwise inaccessible to people who are deaf or hard of hearing.

Closed Captions: Captions are only available when turned on by the user.

Open Captions: Captions are always in view and cannot be turned off.

Audio Descriptions: A narration that attempts to describe images or actions in a video that a person who is blind or low vision could only experience if a sighted viewer described the images or actions.

Transcripts: A verbatim document of everything spoken in a media file.

Standards
To adhere to the Electronic and Information Technology Accessibility Policy, all units/departments, administrators, faculty, and staff are responsible for:

• using accessible media for online and on campus classes;
• developing accessible media for all online courses;
• purchasing accessible media that will be used during instruction, training, and other University events;
• producing accessible media for general distribution such as promotional materials, emergency training or announcements, and other media used to highlight University accomplishments and the ongoing work of the University;
• using accessible media during University events and programs open to the public. This could include showing captions for videos shown during the event and providing stenographers and interpreters for speakers.
• ensuring all “multimedia classrooms” are equipped to show open and closed captions;
• ensuring quality and accuracy of accessible media.
Existing Non-Accessible Media

It is the responsibility of the unit/department, administrators, faculty, and staff to:

- transition media materials into accessible products when requested by a person with a disability, when the media will be used in public-facing situations, or will be repurposed for a future time;
- seek an alternative accessible media when it is not possible to make the original choice accessible;
- make a determination as to whether or not the media is essential to a course outline or may be eliminated from a syllabus.

Exemptions

The Office of Accessibility will review reports of non-compliance and requests for exemption(s). The Office of Accessibility will at times request assistance and expertise from the Chief Information Officer, Office of Information Technology and other University personnel to clarify any request for exemption.

All requests for exemptions should be emailed to the Director of the Office of Accessibility and must address each bullet point that is appropriate to the request:

- The subject line should read “Request for Accessible Media Exemption”.
- Explain how the media will only be used for a limited duration, and how the audience will be restricted to a group of users who are not known to need captioning.
- Clearly demonstrate compliance methods attempted.
- Request must clearly explain, in detail, why meeting requirements of the policy creates an undue burden. When claiming an undue burden, the requester must document why, and to what extent, compliance with each provision creates an undue burden while considering all resources available to the requester. Requester must be prepared to provide individuals with disabilities the information and data contained in the media by an alternative method and in a timely manner.
- Request must include a plan for alternative methods for complying with Electronic and Information Technology Accessibility Policy.

Assistance

Office of Accessibility and Office for Informational Technology

- will offer professional development opportunities to distributed IT and campus units on creating accessible videos and online content;
- will coordinate support for distributed IT and campus units needing assistance with accessibility in departmentally supported technology classrooms;
- will assist faculty with the development of accessible videos and other instructional materials.
Instructional and Educational Materials

Scope
This section applies to all instructional materials (syllabi, textbooks, slide presentations, handouts, etc.). This includes 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.). It also applies to educational documents used by colleges to provide access to their programs and services.

Standards
To adhere to the Electronic and Information Technology Accessibility Policy, all materials, optional and required, will be accessible and as effective and useable 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.

Responsibility
Colleges, Departments, and Programs
All Colleges, Departments, and Programs:
- will ensure promotional materials, applications, informational handouts, and other documents needed by students, or by potential students are available in an accessible format;
- will ensure that departmentally owned classrooms are equipped with technology that allows the integration of assistive technology and the viewing of captioned videos;
- 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 software or web applications deployed for instructional use meet the WCAG 2.0 Level A and AA standards for accessibility;
- will assist faculty with the development of accessible course materials.

Faculty and Instructional Staff
Instructional materials (textbooks, handouts, slide presentations, exams, etc.) distributed in class, posted to a website, or made available through a learning management system should be accessible.

Faculty can improve the accessibility of their course by:
- the timely adoption of textbooks and other readings;
- the selection of textbooks and other readings with electronic versions available;
- the selection of videos with captioning;
- the availability of accessible digital copies of slide presentations, handouts, and syllabi;
- the implementation of the WCAG 2.0 Level A and AA guidelines for Canvas and other online courses.
**Exemptions**

The Office of Accessibility will review reports of non-compliance and requests for exemption(s). The Office of Accessibility will at times request assistance and expertise from the Chief Information Officer, Office of Information Technology, and other University personnel to clarify any request for exemption.

All requests for exemptions should be emailed to the Director of the Office of Accessibility and must address each bullet point that is appropriate to the request:

- The subject line should read “Request for Accessible Material Exemption”.
- Explain how the materials will only be used for a limited duration, and how the audience will be restricted to a group of users who are not known to need accessible documents.
- Request must include a plan for alternative methods for complying with Electronic and Information Technology Accessibility Policy if a request for accessible materials is made.

**Assistance**

Office of Accessibility, Office for Informational Technology, and Biggio Center:

- will coordinate support for distributed IT and campus units needing assistance with accessibility in departmentally supported technology classrooms;
- will serve as a resource on assistive technology and accessible computer labs;
- will offer professional development opportunities to distributed IT and campus units on creating accessible web pages and software applications;
- will assist faculty with the development of accessible courses and instructional materials.
Procurement of Accessible Technology

Scope
These procedures apply to all University purchases of electronic and information technology software, hardware, and services, especially enterprise-systems or technologies that affect a large number of students, faculty, staff, and/or visitors.

Standards
To adhere to the Electronic and Information Technology Accessibility Policy, Auburn University will deploy electronic and information technology software, hardware, and services that have been designed and developed to be accessible for people with disabilities. The most effective means of providing equitable access to technology is to purchase technology that is accessible.

Procedures
In order to ensure the accessibility of electronic and information technology, those responsible for making decisions about which products to procure must consider accessibility as one of the criteria for acquisition. During the initial stages of researching and selecting new technologies, the Office of Accessibility is available to assist departments and units by working with vendors regarding the accessibility of their products.

Considering accessibility in procurement involves the following steps:

• Vendors must be asked to provide information about the accessibility of their products. The vendor can submit a Voluntary Product Accessibility Template (VPAT). The vendor should be asked to complete an Auburn University Product Accessibility Questionnaire in addition to a completed VPAT.

• All RFPs should request the vendor to supply a VPAT and the Auburn University Product Accessibility Questionnaire.

• The information provided by vendors must be valid and evaluated by those responsible for making the decision about the purchase of the product. The Office of Accessibility and the Office of Information Technology are available to assist those decision makers.

• Those responsible for purchases should inquire from the vendor about their commitment and willingness to address accessibility issues after acquisition.

• VPAT, Auburn University Product Accessibility Questionnaire, and other accessibility information must be submitted, along with other information regarding the purchase to Procurement and Payment Services for approval.

Equally Effective Alternate Access Plan
If no accessible version of an EIT product exists or the product is determined to lack the full range of accessible options, an equally effective alternate access plan must be developed to address issues that could potentially exclude a faculty, student, staff, or visitors from participation in the programs and services of the University.
**Exemptions**
The Office of Accessibility will review reports of non-compliance and requests for exemption(s). The Office of Accessibility will at times request assistance and expertise from the Chief Information Officer, Office of Information Technology and other University personnel to clarify any request for exemption.

All requests for exemptions should be emailed to the Director of the Office of Accessibility and must address each bullet point that is appropriate to the request:

- A subject line that reads “Request for Accessible Technology Exemption”.
- Request must clearly demonstrate compliance methods attempted.
- Request should explain why the purchase of a product is a low risk for creating an environment of non-compliance.
- Request must clearly explain, in detail, why meeting requirements of the policy creates an undue burden. When claiming an undue burden, the requester must document why, and to what extent, compliance with each provision creates an undue burden, considering all resources available to the requester, and must be prepared to provide individuals with disabilities with the information and data involved by an alternative means in a timely manner.
- Request must include, if needed, a plan for alternative methods for complying with Electronic and Information Technology Accessibility Policy.

**Assistance**
Office of Accessibility and Office for Informational Technology:

- will work with colleges, departments, and units prior to purchase to gather more information from vendors regarding the accessibility of their product;
- will reach out to other institutions to discuss their experience with the software or hardware being purchase related to its accessibility;
- provide accessibility testing prior and after purchase of the product;
- work with vendors after purchase to continue the improvement of the accessibility of their product.