POLICY

Effective Date: 
Approved by: 

See Also: POL-U1600.02 Ensuring Equal Opportunity and Prohibiting Discrimination and Retaliation
POL-U1600.03 Accommodating Persons with Disabilities
PRO-U1600.07A Purchasing Electronic Information Technology Software, Hardware, and Services
Washington State Policy 188

POL-U1600.07 ENSURING ACCESSIBLE ELECTRONIC INFORMATION TECHNOLOGY

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

Authority:

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 access to all its programs and activities, including ensuring that people with disabilities can utilize its websites. 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. 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.

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. Western’s commitment to accessibility is linked to at the bottom of its websites. 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.

**Definitions:**

**Covered Technologies:** Websites, web applications, software systems, electronic documents, 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.

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

1. **The Vice Provost for Equal Opportunity, or Their Designee, Receives and Handles Discrimination Complaints Regarding Inaccessible Electronic Information Technology**

2. **The University is Committed to Ensuring Web Accessibility for All Internal and External Users**

   A. This 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. 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 (or other revised standards that may be published in the future per civil rights regulations).

   C. Responsibilities are as follows:

   1) The Vice President for University Relations and Marketing will:

      a) Advocate for adequate resources (staff and financial resources) to ensure Web Communication Technologies (WebTech) can make certain all web content and functionality is accessible.

      b) Ensure WebTech informs employees and students of their responsibilities under this policy and monitors employees and students’ adherence to this policy.

   2) WebTech will:

      a) 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.

      b) 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. Training opportunities are available at the Western Digital Accessibility site.

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

d) Add new websites and content into Western’s accessibility monitoring platform and designate a WebTech staff member to assess the reports generated by the system.

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

3) All Western employees, including students working in an official Western capacity, who create digital content will:

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

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

c) Participate in the required training opportunities, available at the Western Digital Accessibility site.

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

3. The University is Committed to Ensuring Electronic Document Accessibility for All Internal and External Users

A. This 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. Responsibilities are as follows:

1) WebTech will:
a) 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.

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

2) All Western employees, including students working in an official Western capacity, who create digital content will:

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

b) Attend training available at the Western Digital Accessibility site as needed in order to create, modify, and use electronic documents.

4. The University is Committed to Ensuring Electronic Media Accessibility for All Internal and External Users

A. All departments will purchase and produce only accessible multimedia whenever possible and update existing inaccessible media as it is put into use, and if not possible, identify equally effective alternate access.

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

B. Responsibilities are as follows:

1) The Vice President for University Relations and Marketing will:

a) Produce communications and promotional materials that are captioned, audio-described or transcribed, as appropriate for the content.

2) WebTech will:

a) Incorporate captioning and media accessibility information into training.

b) Support video caption training and technology.

3) All Western employees, including students working in an official Western capacity who create digital content will:
a) Purchase only transcribed audio, captioned and/or audio-described versions of audiovisual media, whenever possible; and if not possible, identify equally effective alternate access.

b) Ensure that all other media that will be used on websites is captioned, audio-described or transcribed, as appropriate for the content or have alternative text and/or formats.

c) Resolve any non-transcribed audio and any non-captioned/non-described video that is in current use by the department, program, or employee on existing websites.

5. The University is Committed to Ensuring Accessibility Best Practices in Contracts and Procurement

A. This 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 equally effective alternate access.

B. Responsibilities are as follows:

1) Procurement will ensure successful Requests for Purchase (RFP) submissions adhere to the language outlined in PRO-U1600.07A Purchasing Electronic Information Technology Software, Hardware, and Services.

2) Contracts will enforce the contracts workflow
   a) Require software requestors to request a VPAT
   b) Attach the VPAT or proof of request to the internal contract record
   c) Verify the accuracy of the provided VPAT
   d) Requestor will provide an Equally Effective Alternative Access Plan (EEAAP) document and attach to the internal contract record if there are known accessibility issues.

Or other revised standards that may be published in the future per civil rights regulations.
barriers.

e) When renewal of software occurs, requestor will request an updated VPAT and EEAAP from the vendor

3) WebTech will serve as a resource for EIT purchases and other acquisitions for compliance with accessibility requirements.

4) All Western employees, including students working in an official Western capacity with applicable duties/responsibilities, will purchase or otherwise acquire accessible EIT, in accordance with this policy