

POLICY

Effective Date: April 15, 2021

Approved by: President Sabah Randhawa

Authority: See Below

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 INFORMATION TECHNOLOGY**

This policy applies to all faculty, staff, and student employees.

Authority:

[Section 508 of the Rehabilitation Act of 1973, Appendix A to Part 1194 – Section 508 of the Rehabilitation Act: Application and Scoping Requirements, the Americans with Disabilities Act of 1990, ADA Amendments Act of 2008, Section 503 and Section 504 of the Rehabilitation Act of 1973, Washington State Policy 188.](#)

Preamble:

Western Washington University (“Western” or “University”) is committed to ensuring all covered technology is accessible as well as providing full access to all its programs and activities. Western also 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.

In order to maintain equal opportunities for all individuals, the goal of this policy is to achieve accessibility as a proactive need, rather than a reactive response. While timely accommodation is required whenever accessibility is not achieved, an accommodation-only strategy is insufficient to ensure equal access to all individuals.

Definitions:

Accessible:

Information technology that affords a person with a disability 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.

POLICY

Equivalent Access:

Content and interaction provided to users with disabilities that is similar or identical to that provided to users without disabilities, in a form that produces a similar user experience. Users should be provided direct access to the same content, unless providing direct access is not possible due to technical or legal limitations.

Covered Technology:

All public-facing content, including websites, applications, documents, media, blog posts, and social media content. Certain non-public-facing content may also be included. Examples include but are not limited to all electronic content used for official business to communicate: emergency notifications, initial or final decisions adjudicating administrative claims or proceedings, internal or external program or policy announcements, notices of benefits, program eligibility, employment opportunities or personnel actions, formal acknowledgements or receipts, questionnaires or surveys, templates or forms, educational or training materials, and web-based intranet.

1. Director, Office of Civil Rights and Title IX Compliance Ensures Compliance

The Director, Office of Civil Rights and Title IX Compliance is responsible for ensuring compliance with this policy.

2. Western Employees Follow this Policy

- A. Employees, including students working in an official Western capacity, who create, maintain, or otherwise manage and/or operate digital content for an official Western purpose are subject to and have responsibilities to meet Western's commitment under this policy, which include, but are not limited to, completing the website accessibility training and as editing responsibilities increase take additional trainings commensurate with responsibilities.
- B. Employees who purchase, acquire, and/or use, to the extent practicable, hardware and/or software products shall follow information technology purchasing guidelines
- C. Employees who create content within the university Learning Management System (LMS) must complete required training opportunities as set forth by the IT Accessibility Committee

3. Departments and Units are Responsible for Web Accessibility

The University relies on a combination of responsibilities within the following units to ensure compliance with this policy:

POLICY

- A. The IT Accessibility Committee is tasked with:
 - a. Developing standards and guidelines/processes in consultation with the ADA Coordinator.
 - b. Coordinating the evaluation and procurement of enterprise covered technology
 - c. Overseeing and coordinating the University's efforts to provide training and education on policy compliance to faculty, staff, and students
 - d. Reviewing and authorizing requests for exceptions to the policy in consultation with the ADA Coordinator.
 - B. Web Communication Technologies (WebTech) is tasked with:
 - a. Maintaining standards for website accessibility, submitted to the IT Accessibility Committee in consultation with the ADA Coordinator.
 - b. Maintaining the training modules for all Western website content editors
 - c. Maintaining and monitoring the website barrier reporting mechanism.
 - C. ATUS is tasked with:
 - a. Maintaining standards for Learning Management System (LMS) accessibility, submitted to the IT Accessibility Committee
 - b. Maintaining the LMS accessibility training
 - c. Coordinating LMS support
 - D. The Disability Access Center is tasked with:
 - a. Providing accommodations for students with disabilities, including but not limited to converting digital documents to braille.
 - E. The Dean of Libraries or designee is tasked with:
 - a. Responsibility for Library technologies and databases
 - b. Maintaining the E-Resource Accessibility Evaluation Procedure.
4. **Procurement of Covered Technologies Follow the University's Commitment to Accessibility**

This policy applies to the University acquisition of covered technology, procured, developed, substantially modified or enhanced, including software available at no cost. All such acquisitions

POLICY

must be submitted to Business Services who will then forward for appropriate review, evaluation, and approval the requested covered technology to the appropriate offices and other resources to ensure it is accessible by individuals with disabilities, either directly or by supporting the use of assistive technology.

5. Accessibility-Related Complaints Should Be Reported to Western's ADA Coordinator

Alleged violations of this policy and/or accessibility-related complaints should be reported to the ADA Coordinator/Office of Civil Rights and Title IX Compliance using the [PRO-U1600.02A](#) - Discrimination Complaint Procedure.

As part of the complaint process, violations will be referred to the IT Accessibility Committee by the ADA Coordinator for assistance with remediation or replacement. Remediation may include removal of non-compliant material until compliant with this policy.

6. Exceptions to this Policy Must Be in Writing

Exceptions to this policy may be granted where full compliance would impose an undue burden, when an accessible format constitutes a fundamental alteration to the nature of the program, service, or activity; or when the creation of an accessible version is not otherwise possible.

Individuals or departments seeking an exception to procure inaccessible covered content must make that request to the IT Accessibility Committee, who will consult with the ADA Coordinator.