CU Boulder Campus Standards for the Digital Accessibility Policy

Approved by the Digital Accessibility Review Board (formerly the ICT Accessibility Review Board) on May 27, 2016

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CU Boulder is legally, morally, and ethically committed to communicating information to all individuals in a manner that enables them to achieve their academic and professional goals and aspirations. To achieve its commitment to maintaining accessibility in the digital environment, the university has established a digital accessibility program. The Chief Digital Accessibility Officer is the Associate Vice Chancellor for Integrity, Safety and Compliance, who, in collaboration with the Digital Accessibility Review Board ("Review Board"), is responsible for maintaining the program. Additional information about the program is available at http://www.colorado.edu/digital-accessibility.

This document is designed to help ensure that all digital technology used by any university program, service or activity is meaningfully accessible to individuals with disabilities.

These Standards apply to all CU Boulder schools, colleges, departments, centers, institutes, administrative units, offices, and authorized organizations, as well as to content created for these units in-house or by external entities. These Standards apply to all digital technology used to conduct university business, except digital technology created or published by students, faculty, or staff for personal use. When student content is created in an academic context and shared for peer review, faculty must be prepared to provide accommodations.

The Digital Accessibility Standards are intended to comply with the related requirements of the following civil rights laws, including, but not limited to:

The Americans with Disabilities Act (ADA)

The ADA is a civil rights law that prohibits discrimination against people with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. Universities are covered by this law. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.

Title I of the ADA requires the university to provide qualified individuals with disabilities an equal opportunity to benefit from the full range of employment related opportunities available to others. It requires that employers make reasonable accommodations and reasonable modifications, unless doing so would result in undue hardship. Title II of the ADA requires the university to provide people with disabilities an equal opportunity to benefit from all of its programs, services, and activities. It provides that the university may be required to make reasonable accommodations and modifications to programs, services or activities unless the university demonstrates that the requested accommodation or modification would "fundamentally alter" such programs, services or activities.

Section 504 of the Rehabilitation Act of 1973 ("Section 504")

Section 504 is a federal law that protects the rights of individuals with disabilities in programs and activities that receive federal financial assistance from the U.S. Department of Education. Section 504 provides that qualified individuals with a disability shall not, solely by reason of their disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Standards are also informed by other laws that specifically address digital technology, including:

The Telecommunications Act of 1996

Section 255 of the Telecommunications Act of 1996 requires telecommunications products and services to be accessible to people with disabilities to the extent access is "readily achievable." If manufacturers cannot make their products accessible, then they must design them to be compatible with adaptive equipment used by people with disabilities, where readily achievable.

The 21st Century Communication and Video Accessibility Act (CVAA)

Title I of the 21st Century Communication and Video Accessibility Act addresses communications access to make products and services using Broadband accessible to people with disabilities. Title II of the CVAA makes it easier for people with disabilities to view video programming on television and the Internet.

Web Content Accessibility Guidelines (WCAG)

The campus uses the most recently adopted version of the <u>Web Content Accessibility</u> <u>Guidelines</u> (WCAG) level AA as a guideline for accessibility of digital content. WCAG is developed by W3C, an organization that maintains standards for creating content on the internet. W3C develops WCAG standards in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. The WCAG principles and guidelines explain how to make web content more accessible to people with disabilities. WCAG is thorough, but does not cover every circumstance. Therefore, user experience also informs CU Boulder's evaluation and delivery of accessibility.

Proactive Accessibility and Accommodation Requests

CU Boulder is legally, morally, and ethically required to afford all qualified individuals with equal access to programs, services and activities, and effectively communicate with individuals with disabilities in a timely manner. Refer to the <u>Digital Accessibility Campus Policy</u>. In order to provide access in an equally effective and inclusive manner with substantially equivalent ease of use, information and communication technology must be provided in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability. Due to this obligation, CU Boulder strives to make its services and resources accessible proactively. This means creating and maintaining accessible information and communication technology, lessening, or preventing, the need for an individual with a di

go to DS, DS then handles interactions with other departments. For both employees and outside visitors, most requests go to the ADA Office. When students need accommodations for extracurricular activities and content, they also go to the ADA Office. Both DS and the ADA Office only handle situations where accommodations have been requested. These offices communicate and coordinate, as needed, with the Digital Accessibility Office but do not directly service digital accessibility matters. The DAO does directly service digital accessibility.

Members of the university community should follow the standards in this section to adhere to the campus digital accessibility policy.

Faculty or staff needing support or guidance when implementing these Standards can contact the Digital Accessibility Office by contacting the IT Service Center at 303-735-4357 or <u>OITHelp@colorado.edu</u>.

1. Course Materials

a. Introduction

All course materials should be designed to be proactively accessible to as many students as possible.

accessible format to students who are registered with Disability Services, if they have an approved accommodation. Services from AFPAC are only available when a student has an approved accommodation and accessible content is

the <u>UC Berkeley guide to audio description</u>. For guidance on a particular video, please contact the DAO at <u>DigitalAccessibility@colorado.edu</u>.

b. Course Accommodations

Any video media used for participation in a course should be audio described if a relevant disability accommodation request has been submitted by a student. Contact the Digital Accessibility Office for support in fulfilling accommodation requests at DigitalAccessibility@colorado.edu.

c. Pre-Recorded Content

All public-facing pre-recorded video content representing the University or any of its departments or programs should have audio description available (which can include sufficient description in the original audio of the video). If a separate

The content of digital signs for use in any public CU Boulder program, service or activity must be as accessible as the constraints of the device allows, according to the guidelines of the most recently adopted/published WCAG level AA standards.

c. Guidelines

Minimum accessibility requirements for digital signs are:

vi. All departments, programs, instructors, and employees are encouraged to purchase or create captioned versions of audiovisual media whenever possible. When procuring audiovisual media, inquiries should be made about the availability of captions and/or audio descriptions for deaf/hard of hearing and blind/low vision audience members.

Exceptions to the accessibility policy and these standards can be granted, if determined appropriate by the Review Board, in specific cases for a limited time period until a more accessible product can be procured or changes can be made to inaccessible ICT products.

Exception requests should be submitted through the ICT Excep