



# Idaho State University

## POLICIES AND PROCEDURES

### Electronic and Information Technology Accessibility

ISUPP 1020

#### **POLICY INFORMATION**

**Policy Section:** Governance/Legal

**Policy Title:** Electronic and Information Technology Accessibility

**Responsible Executive:** General Counsel

**Sponsoring Organization:** Disability Services

**Dates: Effective Date:** April 23, 2018 **Revised:** October 2021

**Review Date:** October 2024

#### **I. INTRODUCTION**

Idaho State University provides equal opportunity to its educational and administrative services, programs, and activities in accordance with applicable law. Specifically, as a public university and federal contractor, Idaho State University is required to adhere to Sections 504 and 508 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act. These federal laws require that persons with disabilities have substantially equivalent opportunities to access education and administrative services, programs, and activities as are available to people without disabilities.

#### **II. POLICY STATEMENT**

All Electronic and Information Technology (EIT) used to conduct core university business or academic activities that is procured, created, published, or substantially altered after April 23, 2018, shall meet the Web Content Accessibility Guidelines (WCAG) established by the World Wide Web Consortium (W3C). At a minimum, University websites and software procured by the University must comply with WCAG 2.0, Conformance Level AA., except where the EIT Committee determines that doing so would represent an undue burden or fundamental alteration. In such cases, the University will strive to provide Equally Effective alternative access.

Ensuring Equally Effective EIT access is the responsibility of all University administrators, faculty, and staff. Therefore, in accordance with this policy and applicable law, all administrators, faculty, and staff must ensure all EIT procured, prepared, or maintained by the University is Accessible to individuals with disabilities.

### III. DEFINITIONS

- A. **Accessible:** individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.
- B. **Disability:** a physical or mental impairment that substantially limits one or more major life activities.
- C. **Electronic and Information Technology (EIT):** technology, equipment, and systems used to create, convert, duplicate, manage, transmit, receive, and/or store data or information. This includes, but is not limited to, websites, digital content, search engines, databases, learning management systems, classroom technology, classroom multimedia, telecommunications products, information kiosks, internet and intranet websites, electronic books and electronic book reading systems, computers, and software.
  - 1. Active EIT must be in compliance with the applicable standards and guidelines described in this policy.
  - 2. Legacy EIT (predating April 23, 2018 and accessed less than five times per year) must either be updated to be in compliance with the applicable standards and guidelines described in this policy, or the content must otherwise be made available in an Equally Effective Accessible format and in a timely manner to any individual requesting access. The unit responsible for its maintenance must make it compliant with the applicable standards or provide an Equally Effective accommodation.
- D. **Equally Effective:** the alternative format or medium communicates the same information in as reasonably timely a fashion as does the original format or medium.

### IV. AUTHORITY AND RESPONSIBILITIES

All University web content creators or editors are responsible for ensuring that each piece of web content they create, edit, or maintain on a University website complies with this policy. All web content creators or editors are required to complete any EIT Accessibility Training designated by the EIT Committee.

The Office of the General Counsel, in conjunction with the Office of Disability Services, appoints members of the EIT Committee, which will oversee the policy's compliance with applicable law, make recommendations to the University for implementation of the policy, and review exception requests as outlined below.

## V. PROCEDURES TO IMPLEMENT

- A. **Webpage Accessibility:** All webpages created by or developed for colleges, departments, programs, and units, whether hosted by ISU or by a third party, shall meet the requirements of this policy. Webpages will meet the standards and guidelines expressed in the Web Content Accessibility Guidelines (WCAG) 2.0 AA published by the World Wide Web Consortium (W3C). All pages will meet Level AA guidelines with limited exceptions. All University webpages, unless technically impossible, will link to the University's main Accessibility page ([isu.edu/accessibility](http://isu.edu/accessibility)) which includes a statement of commitment to Web Accessibility and a place to report noncompliance.

Further, if a college, department, program and/or unit webpage does not meet the standards and guidelines outlined, the EIT Committee will notify the noncompliant entity and provide guidance. The entity will have thirty (30) days to update their content or media to meet standards and guidelines. If corrections are not made within the required timeframe, then the page may be taken down until Accessibility requirements have been met.

- B. **Instructional Materials Accessibility:** All electronic instructional materials including, but not limited to, Open Educational Resources (OER), all publisher or instructor created materials, syllabi, textbooks, presentations, documents (original or scanned copies published in any format), interactive content, images, diagrams, audio, video, etc., delivered in any fashion (for example, Learning Management System, Blogs, Web Conferencing, webpage, etc.) shall be Accessible, meeting WCAG 2.0 AA guidelines.

All electronic instructional materials, optional and required, must be Accessible and as Equally Effective and usable for persons with Disabilities as they are for persons without Disabilities. Instructional materials must be made available to all students at the same time.

1. All Departments and Programs must:
  - a) Ensure instructional materials comply with all requirements outlined in this policy.
  - b) Ensure classrooms use and deliver Accessible EIT.
  - c) Ensure all computer labs and media production studios provided for faculty and student use will have assistive technologies, including but not limited to Accessible computer stations, screen reading software, and screen magnification. Studios will include documentation or guidance on how to create Accessible media content.
  - d) Ensure all applications developed on campus (web, desktop, etc.) are Accessible according to principles of WCAG 2.0 AA level, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments).

- e) Follow the Accessibility requirements outlined at [isu.edu/accessibility](http://isu.edu/accessibility) when creating and using electronic documents.
  - f) Ensure group email content is Accessible to all recipients.
2. Faculty and Staff must:
- a) Create and present Accessible courses and instructional material.
  - b) Follow the Accessibility requirements outlined at [isu.edu/accessibility](http://isu.edu/accessibility) when creating and using electronic documents.
  - c) Ensure group email content is Accessible to all recipients.
3. Educational Technology must:
- a) Provide instruction and support for campus community members creating online courses and online instructional content, including creation and maintenance of a Faculty and Staff Accessibility training site for instruction and support.
  - b) Facilitate hosting of Accessible online activities in the University's learning management system and related hosted systems (such as web conferencing).
4. The Office of Disability Services must:
- a) Compile and maintain data to track compliance with the policy and procedures and make recommendations for addressing problems.
  - b) Provide a place to report accessibility issues and violations regarding Instructional Materials.
  - c) Refer unresolved issues to the EIT Committee
5. Document Accessibility: All documents that are produced by, maintained by, and/or distributed by ISU, such as but not limited to Word documents, PDFs, presentations, and spreadsheets that are scanned, uploaded, posed, or in some other manner published or distributed electronically shall be Accessible, meeting WCAG 2.0 AA guidelines.
6. Multimedia Accessibility: All multimedia resources, including but not limited to media that are instructional, informational, or used for marketing and promotional purposes through the LMS and all other external platforms, including but not limited to YouTube, Zoom, and Vimeo, shall be Accessible.
7. Video media resources must be closed captioned and audio-described and audio resources must be transcribed and meet the standards and guidelines outlined in the WCAG 2.0 AA Guidelines.

- a) Update any non-transcribed audio and any non-captioned/non-described video that is in current use.
  - b) Newly produced communications and promotional materials must be captioned, audio-described, or transcribed.
  - c) All videos (professionally or internally produced) used in courses and shared on campus webpages or video storage sites (such as YouTube, Vimeo, Box etc.) must be captioned.
- C. Software and electronic systems procurement: All purchases of software and electronic systems must include the following clause in the legal terms:
- Accessibility Requirements: If applicable, Vendor warrants the products and services provided under the Agreement conform to the applicable accessibility requirements of WCAG 2.0 AA, Section 508 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. Vendor represents it is committed to promoting accessibility of its products and will remain committed throughout the term of this Agreement. Vendor agrees to promptly respond to and resolve any complaint regarding accessibility of its products and services. If products provided under this Agreement do not fully conform to WCAG 2.0 AA, Vendor shall advise University in writing of the nonconformance prior to execution of this Agreement and shall provide University a plan to achieve conformance to WCAG 2.0 AA, including but not limited to, an intended timeline for conformance.
- D. Exceptions to the EIT policy are permissible only in those instances where a risk assessment is conducted that examines the implications of non-compliance with this policy, where the requestor is committed to providing Equally Effective access to the non-compliant material, and where an EIT Exception Request Form has been reviewed and approved by the EIT Committee.

## **VI. REPORTING ACCESSIBILITY PROBLEMS**

The University is committed to providing Accessible content to all members of the campus community. Individuals who encounter inaccessible EIT or who wish to request certain content in an Accessible format may fill out the [Inaccessible EIT Reporting Form \(link TBD\)](#). Individuals may also contact Disabilities Services directly at [disabilityservices@isu.edu](mailto:disabilityservices@isu.edu) to report an Accessibility issue and request assistance.

## **VII. REPORTING COMPLAINTS OF DISCRIMINATION ON THE BASIS OF DISABILITY:**

Individuals who believe they have been discriminated against on the basis of Disability are encouraged to file a complaint with the Office of Equity and Inclusion.

**VIII. ATTACHMENTS**

A. EIT Exception Request Form (link TBD)

B. Inaccessible EIT Reporting Form (link TBD)

**IX. RELATED LAWS**

A. Americans with Disabilities Act, 42 U.S.C. §§12101 *et seq.* (1990)

B. Rehabilitation Act of 1973, 29 U.S.C. § 701 *et seq.* (1973)

PRESIDENTIAL CERTIFICATION:

Approved: \_\_\_\_\_ Date: \_\_\_\_\_

*Kevin Satterlee*  
*President, Idaho State University*

~~IDAHO STATE UNIVERSITY~~



**Idaho State  
University**

POLICIES AND PROCEDURES ~~(ISUPP)~~

Electronic and Information Technology Accessibility

ISUPP 1020

## **POLICY INFORMATION**

**Policy Section:** Governance/Legal

**Policy Title:** Electronic and Information Technology Accessibility

**Responsible Executive:** ~~Disability Services~~ General Counsel

**Sponsoring Organization:** ~~General Counsel~~ Disability Services

**Dates:** ~~Effective Date:~~ April 23, 2018

**Revised:** October 2021

**Annual Review:** ~~April 23, 2019 Date:~~ October 2024

## **I. INTRODUCTION**

~~Electronic and Information Technology (EIT) is a major source of information for many individuals. The Americans with Disabilities Act of 1990, the ADA Amendments Act of 2008, and Idaho State University provides equal opportunity to its educational and administrative services, programs, and activities in accordance with applicable law. Specifically, as a public university and federal contractor, Idaho State University is required to adhere to Sections 504 and 508 of the Federal Rehabilitation Act of 1973 as amended and Title II of the Americans with Disabilities Act. These federal laws require that persons with disabilities have the same opportunity substantially equivalent opportunities to access education and administrative services, programs, and activities as are available to people without disabilities.~~

## **II. POLICY STATEMENT**

~~Idaho State University (ISU or University) is committed to ensuring that individuals with disabilities have access to the increasing amount of EIT on its campuses. This includes the accessibility of websites and website content, instructional materials, documents, multimedia, and accessibility of software, hardware, and systems.~~

All Electronic and Information Technology (EIT) used to conduct core university business or academic activities that is procured, created, published, or substantially altered after April 23, 2018, shall meet the Web Content Accessibility Guidelines (WCAG) established by the World Wide Web Consortium (W3C). At a minimum, University websites and software procured by the University must comply with WCAG 2.0, Conformance Level AA., except where the EIT Committee determines that doing so would represent an undue burden or fundamental alteration. In such cases, the University will strive to provide Equally Effective alternative access.

Ensuring Equally Effective EIT access is the responsibility of all University administrators, faculty, and staff. Therefore, in accordance with this policy and applicable law, all administrators, faculty, and staff must ensure all EIT procured, prepared, or maintained by the University is Accessible to individuals with disabilities.

### III. DEFINITIONS

- A. ~~“Accessible” means that:~~ individuals with disabilities ~~can~~are able to independently acquire the same information, engage in the same interactions, and enjoy the same services ~~as those within the same timeframe as individuals~~ without ~~a disability, and are able to do so in an equally effective manner~~disabilities, with substantially equivalent ease of use.
- B. ~~“Disability” means having:~~ a physical or mental impairment that substantially limits one or more major life activities.
- C. ~~“Electronic and Information Technology” or “(EIT” means):~~ technology, equipment, and systems used to create, convert, duplicate, manage, transmit, receive, and/or store data or information. This includes, but is not limited to, websites, digital content, ~~electronic books,~~ search engines, databases, learning management systems, classroom technology, classroom multimedia, telecommunications products, information kiosks, internet and intranet websites, electronic books and electronic book reading systems, computers, and software ~~and office equipment.~~

- 1. ~~V.~~ Active EIT must be in compliance with the applicable standards and guidelines described in this policy.

2. Legacy EIT (predating April 23, 2018 and accessed less than five times per year) must either be updated to be in compliance with the applicable standards and guidelines described in this policy, or the content must otherwise be made available in an Equally Effective Accessible format and in a timely manner to any individual requesting access. The unit responsible for its maintenance must make it compliant with the applicable standards or provide an Equally Effective accommodation.

D. **Equally Effective:** the alternative format or medium communicates the same information in as reasonably timely a fashion as does the original format or medium.

#### **IV. ~~AUTHORITY AND RESPONSIBILITIES~~**

~~It is the responsibility of each Vice President, Dean, and Director to work toward an accessible EIT environment for all EIT under their purview through consultation with the Disability Services (DS) office, the Instructional Technology Resource Center (ITRC), the Marketing and Communications department and other Information Technology (IT) departments.~~

~~The Director of DS will serve as the EIT Coordinator for the University and will be responsible for the development, implementation and coordination of the University EIT Plan and Policy and for establishing the EIT Committee to assist with oversight and activities associated.~~

#### **IV. AUTHORITY AND RESPONSIBILITIES**

All University web content creators or editors are responsible for ensuring that each piece of web content they create, edit, or maintain on a University website complies with this policy. All web content creators or editors are required to complete any EIT Accessibility Training designated by the EIT Committee.

The Office of the General Counsel, in conjunction with the Office of Disability Services, appoints members of the EIT Committee, which will oversee the policy's compliance with applicable law, make recommendations to the University for implementation of the policy, and review exception requests as outlined below.

#### **V. PROCEDURES TO IMPLEMENT**

A. **Website accessibility: all web pages** Webpage Accessibility: All webpages created by or developed for colleges, departments, programs, and units, whether hosted by ISU or by a third party, shall ~~be accessible. Web pages/web sites~~ meet the requirements of this policy. Webpages will meet the standards and guidelines expressed in the Web Content Accessibility Guidelines (WCAG) 2.0 (~~http://www.w3.org/TR/wcag2ict/~~)AA published by

the World Wide Web Consortium (W3C).- All pages will meet Level AA guidelines with limited exceptions.- All University ~~websites~~~~webpages~~, unless technically impossible, will link to the University's main Accessibility page (isu.edu/accessibility-page) which includes a statement of commitment to Web ~~accessibility~~.

Accessibility and a place to report noncompliance.

~~A.~~ Further, if a college, department, program and/or unit ~~website~~~~webpage~~ does not meet the standards and guidelines outlined, the ~~Marketing and Communications Department~~~~EIT Committee~~ will notify ~~said~~~~the noncompliant~~ entity, ~~where and provide~~ guidance ~~will be provided~~. The ~~department~~~~entity~~ will have thirty (30) days to update their content or media to meet standards and guidelines. If corrections are not made within the required timeframe, then the ~~site will~~~~page may~~ be taken down until ~~accessibility~~Accessibility requirements have been met.

B. ~~Instructional materials accessibility: all~~ Materials Accessibility: All electronic instructional materials, including, but not limited to, Open Educational Resources (OER), all publisher or instructor created materials, syllabi, textbooks, and presentations as well as handouts that are, documents (original or scanned copies published in any format), interactive content, images, diagrams, audio, video, etc., delivered ~~face-to-face in classrooms, within Moodle or any other learning management system, or through other media such as blogs and web conferencing~~ in any fashion (for example, Learning Management System, Blogs, Web Conferencing, webpage, etc.) shall be accessibleAccessible, meeting WCAG 2.0 AA guidelines.

~~B.~~ All electronic instructional materials, optional and required, must be Accessible and as Equally Effective and usable for persons with Disabilities as they are for persons without Disabilities. Instructional materials must be made available to all students at the same time.

1. ~~Document accessibility: all~~ All Departments and Programs must:

- a) Ensure instructional materials comply with all requirements outlined in this policy.
- b) Ensure classrooms use and deliver Accessible EIT.
- c) Ensure all computer labs and media production studios provided for faculty and student use will have assistive technologies, including but not limited to Accessible computer stations, screen reading software, and screen magnification. Studios will include documentation or guidance on how to create Accessible media content.

- d) Ensure all applications developed on campus (web, desktop, etc.) are Accessible according to principles of WCAG 2.0 AA level, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments).
- e) Follow the Accessibility requirements outlined at [isu.edu/accessibility](http://isu.edu/accessibility) when creating and using electronic documents.
- f) Ensure group email content is Accessible to all recipients.

2. Faculty and Staff must:

- a) Create and present Accessible courses and instructional material.
- b) Follow the Accessibility requirements outlined at [isu.edu/accessibility](http://isu.edu/accessibility) when creating and using electronic documents.
- c) Ensure group email content is Accessible to all recipients.

3. Educational Technology must:

- a) Provide instruction and support for campus community members creating online courses and online instructional content, including creation and maintenance of a Faculty and Staff Accessibility training site for instruction and support.
- b) Facilitate hosting of Accessible online activities in the University's learning management system and related hosted systems (such as web conferencing).

4. The Office of Disability Services must:

- a) Compile and maintain data to track compliance with the policy and procedures and make recommendations for addressing problems.
- b) Provide a place to report accessibility issues and violations regarding Instructional Materials.
- c) Refer unresolved issues to the EIT Committee

~~C~~.5. Document Accessibility: All documents that are produced by, maintained by, and/or distributed by ISU, such as but not limited to Word documents, PDFs, presentations, and spreadsheets that are scanned, uploaded, ~~posted~~posed, or in some other manner published or distributed electronically shall be ~~accessible~~Accessible, meeting WCAG 2.0 AA guidelines.

~~D~~.6. Multimedia ~~accessibility: all~~Accessibility: All multimedia resources, ~~such as~~including but not limited to media that are instructional, informational, or used for marketing and promotional purposes, ~~shall be accessible through the LMS and all~~

other external platforms, including but not limited to YouTube, Zoom, and Vimeo, shall be Accessible.

7. Video media resources must be closed captioned and audio-described and audio resources must be transcribed and meet the standards and guidelines outlined in the WCAG 2.0 AA Guidelines.

- a) Update any non-transcribed audio and any non-captioned/non-described video that is in current use.
- b) Newly produced communications and promotional materials must be captioned, audio-described, or transcribed.
- c) All videos (professionally or internally produced) used in courses and shared on campus webpages or video storage sites (such as YouTube, Vimeo, Box etc.) must be captioned.

E.C. Software, hardware, and electronic systems procurement: ~~all~~ All purchases of software, hardware, and electronic systems must include the following clause in the legal terms:

~~“Contractor hereby Accessibility Requirements: If applicable, Vendor warrants that the products and services to be provided under this agreement comply with Idaho State University the Agreement conform to the applicable accessibility requirements, and will provide equal and effective access to all individuals in accordance with federal and state laws and regulations, including, but not limited to the Americans with Disabilities Act of 1990 as amended, and Sections 504 and WCAG 2.0 AA, Section 508 of the Rehabilitation Act of 1973 as amended.~~

~~Contractor, and the Americans with Disabilities Act. Vendor represents it is committed to promoting accessibility of its products and will remain committed throughout the term of this Agreement. Vendor agrees to promptly respond to and resolve any complaint regarding accessibility of its products or services that are brought to its attention.~~

~~Contractor further agrees to defend, indemnify and hold harmless Idaho State University and the State of Idaho from any claim arising out of its failure to comply with the previously mentioned requirements.~~

~~Failure to comply with these requirements shall constitute a breach and be grounds and services. If products provided under this Agreement do not fully conform to WCAG 2.0 AA, Vendor shall advise University in writing of the nonconformance prior to execution of this Agreement and shall provide University a plan to achieve conformance to WCAG 2.0 AA, including but not limited to, an intended timeline for termination of this agreement.”~~  
conformance.

~~D. F.~~ Exceptions to the EIT policy are permissible only in those instances where a risk assessment is conducted that examines the implications of non-compliance with this policy, where the requestor is committed to providing Equally Effective access to the non-compliant material, and where an EIT Exception Request ~~and Corrective Action~~ Form has been ~~prepared~~, reviewed, and approved by the ~~responsible Vice President and the~~ EIT Committee. ~~All exceptions to the policy will be reviewed annually by the Committee and, in consultation with the responsible Vice President, will be amended or revoked as necessary.~~

~~VI. ATTACHMENT~~

**VI. REPORTING ACCESSIBILITY PROBLEMS**

The University is committed to providing Accessible content to all members of the campus community. Individuals who encounter inaccessible EIT or who wish to request certain content in an Accessible format may fill out the [Inaccessible EIT Reporting Form \(link TBD\)](#). Individuals may also contact Disabilities Services directly at [disabilityservices@isu.edu](mailto:disabilityservices@isu.edu) to report an Accessibility issue and request assistance.

**VII. REPORTING COMPLAINTS OF DISCRIMINATION ON THE BASIS OF DISABILITY:**

Individuals who believe they have been discriminated against on the basis of Disability are encouraged to file a complaint with the Office of Equity and Inclusion.

**VIII. ATTACHMENTS**

A. [EIT Exception Request and Corrective Action Form \(link TBD\)](#)

B. [Inaccessible EIT Reporting Form \(link TBD\)](#)

**IX. RELATED LAWS**

A. Americans with Disabilities Act, 42 U.S.C. §§12101 et seq. (1990)

B. Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq. (1973)

**PRESIDENTIAL CERTIFICATION**

Date: \_\_\_\_\_

**Approved by Arthur C. Vailas** \_\_\_\_\_  
**President, Idaho State University**

PRESIDENTIAL CERTIFICATION:

Approved: \_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_  
*Kevin Satterlee*  
\_\_\_\_\_  
*President, Idaho State University*