## ADMINISTRATIVE POLICY STATEMENT

**Policy Title:** Digital Accessibility  
**APS Number:** 6011  
**APS Functional Area:** INFORMATION TECHNOLOGIES  

<table>
<thead>
<tr>
<th>Brief Description:</th>
<th>CU is committed to communicating information to all individuals in a manner that enables them to achieve their academic and professional goals and aspirations.</th>
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</thead>
<tbody>
<tr>
<td>Effective:</td>
<td>January 1, 2019</td>
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<tr>
<td>Approved by:</td>
<td>President Bruce D. Benson</td>
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<tr>
<td>Responsible University Officer:</td>
<td>Vice President of Administration</td>
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<td>Responsible Office:</td>
<td>Office of Information Security</td>
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<td>Policy Contact:</td>
<td>Office of Information Security</td>
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<td>Supersedes:</td>
<td>N/A</td>
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<tr>
<td>Last Reviewed/Updated:</td>
<td>January 1, 2019</td>
</tr>
<tr>
<td>Applies to:</td>
<td>Universitywide. The system administration is considered a campus for the purposes of this policy and is required to adopt any campus requirements herein.</td>
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**Reason for Policy:** To define roles and responsibilities to ensure that CU maintains accessibility in the digital environment, the university has established a digital accessibility program. Governance authority rests ultimately with the President and Chancellors; this policy defines roles and responsibilities to assist the President and Chancellors.

### I. INTRODUCTION

The Americans with Disabilities Act of 1990 (ADA), as amended, and Section 504 of the Rehabilitation Act of 1973 require that higher education institutions afford all qualified individuals with equal access to programs, services and activities, and effectively communicate with individuals with disabilities.

In addition to complying with the law, CU is ethically committed to communicating information to all individuals in a manner that enables them to achieve their academic and professional goals and aspirations. To maximize CU’s potential to achieve its legal and ethical commitments in the digital environment, the university has established the following policy to complement its digital accessibility program.

### II. POLICY STATEMENT

A. Each campus\(^1\) Chancellor, or designee, shall be responsible for providing digital accessibility standards and establishing appropriate compliance and governance structures.

1. At minimum, each campus standard shall detail requirements for:

   - Course syllabi, textbooks and other course materials.
   - Compliance with Web Content Accessibility Guidelines 2.0 AA\(^2\) for websites and applications.
   - Closed-captioning and audio description of audio-visual materials.

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\(^1\) The system administration is considered a campus for the purposes of this policy and is required to adopt any campus requirements herein.

\(^2\) Note: [WCAG 2.0](https://www.w3.org/WAI/WCAG21//index.php) uses the three levels of conformance (A, AA, AAA), with AAA being the highest level.
• Digital signage.
• Procuring goods and services.
• Process for providing access when known accessibility barriers exist.
• Campus governance to ensure transparency and risk management.

2. When implementing this policy the campuses and system administration will consider the following principles:

• Unified commitment to inclusiveness through improving digital accessibility.
• Increasing awareness and empathy to improve campus climate for students and staff with disabilities.
• Coherent policies and standards around the procurement, development, implementation and support of systemwide websites, services and applications to ensure their accessibility.
• Clear accountability for accessibility at system, campus, and departmental levels.

B. Annually, each Chief Information Officer will provide a digital accessibility status (changes to standards, barriers for compliance to standards, identified accessibility barriers for broadly used systems) to the CU IT Governance Committee.

C. The CU IT Governance Committee has established a CU Digital Accessibility working group. Annually, the working group will provide recommendations for changes to the goals, principles, or policies to the CU IT Governance Committee. Members of the working group are appointed from each campus by the CU IT Governance Committee and will include representatives who are responsible for accessibility for IT systems, support of students and employees with disabilities, and procurement of IT services. The committee will appoint a chair who will provide periodic updates. Additionally, the working group has the following goals:

1. Provide guidance and support of accessibility during procurement, development, implementation and support of systemwide websites, services and applications.
2. Coordinate the development and maintenance of systemwide accessibility education and training resources for all employees.
3. Establish and support accessibility testing processes and standards (expectations for internal testing as well as requirements for third-party testing).
4. Promote CU’s accessibility efforts locally and nationally.

D. Faculty and staff who use, create, purchase, or maintain information or communication technology (ICT) for university programs, services, and activities in the scope of their employment are responsible for making it accessible in accordance with campus standards defined in section II.A. Faculty and staff should consult with the campus authority for more information regarding responsibilities and advice on best practices.

III. HISTORY

• Adopted: January 1, 2019.
• Last Reviewed: January 1, 2019.