CU | University of Colorado **Denver**

Campus Administrative Policy

Policy Title: **Digital Accessibility**

Policy Number: 5012D   Functional Area: Information Technology

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Effective: November 1, 2019
Date Last Amended/Reviewed: October 22, 2019
Date Scheduled for Review: July 1, 2026
Supersedes: Digital Accessibility (July 1, 2018)

Approved by: Chancellor, University of Colorado Denver

Prepared by: Access and Usability Manager
Reviewing Officer: Senior Vice Chancellor for Administration and Finance | CFO,
                                           University of Colorado Denver

Responsible Office: Associate Vice Chancellor for Information Technology

Applies to: CU Denver

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A.   **INTRODUCTION**

The University of Colorado Denver strives to ensure that people of all abilities have access to the same services and content available to people without disabilities, including services and content made available through the use of information technology. In accordance with Administrative Policy Statement (APS) 6011, *Digital Accessibility*, "…each campus Chancellor, or designee, shall be responsible for providing digital accessibility standards and establishing appropriate compliance and governance structures." This policy establishes those responsibilities, standards, compliance, and governance structures as required by APS 6011.

B.   **POLICY STATEMENT**

The Office of Information Technology (OIT) services and applications that are procured, developed, maintained, and used by CU Denver faculty, staff, and students should provide similar functionality, experience, and information access to individuals of all abilities. Examples of technology covered by this policy include web sites, software

systems, electronic documents, learning management system, videos, and hardware equipment.

Accessibility is the responsibility of all members of the CU Denver community. In accordance with APS 6011, section II.D, if you create (or are responsible for) websites, software, videos, or electronic documents and instructional content; or if you procure technology that others will use, it is your responsibility to ensure these technologies and content are accessible to all users. To that end, the key areas surrounding accessibility are as follows:

1.   Campus Standards:

Any and all information and technology—including, but not limited to, computers and ancillary equipment, instructional materials (including online course content, which must strive to be universally designed and inclusive), software, videos, apps, multimedia, telecommunications, or web-based content or products—developed, procured, maintained, or used in carrying out university activities **must be compliant** with Sections 504 and 508 of the Rehabilitation Act of 1973, as amended; the Americans with Disabilities Act of 1990, as amended; Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, developed by the World Wide Web Consortium (W3C); other related local, state, and federal laws; and other related university policies. Per APS 6011, at a minimum, these university standards apply to the following:

- Course Syllabi, textbooks, and other course materials
- Websites and applications (compliant with WCAG 2.1 level AA)
- Closed-captioning and audio description of audio-visual materials
- Digital Signage
- Procuring goods and services

The Office of Digital Education, in partnership with the Office of Information Technology, offers an accessibility software (Ally) that integrates with Canvas, which helps remediate inaccessible documents. Contact the Office of Information Technology for more information about how to activate this tool in your course – help@ucdenver.edu or 303.724.HELP (4357).

2. Process for overcoming known accessibility barriers:

If you experience a barrier, and/or learn about a barrier that affects your or someone else's ability to access CU Denver websites, videos, online forms, or other digital content, technologies and/or services, please send a detailed message to the OIT Service Desk - help@ucdenver.edu or call 303.724.HELP (4357).

Please also visit the Office of Information Technology's accessibility website for additional accessibility resources.

Faculty and staff responsible for the information or technology must undertake reasonable efforts to make it accessible in a timely manner upon becoming aware of non-compliance relative to federal or state law, as well as the University of Colorado System Administrative Policy Statement 5065: Protected Class Nondiscrimination. If the information or technology is required for coursework or for essential job functions, a timely review (five business days) by the Access and Usability Manager (AUM) will determine if appropriate alternatives are available and can be implemented. If the alternatives cannot be implemented in a timely manner, the AUM will consider requiring the removal of access to the information or technology.

3. Campus Governance:

Following are the governance structures responsible for ensuring digital accessibility transparency and risk mitigation. The Access and Usability Manager (AUM) either resides on a particular group/committee, as indicated, or has access to the committees if needed.

- Access and Usability Manager (AUM): The AUM acts as a central resource for leadership, services, and programs related to the Americans with Disabilities Act (ADA) and Title II, sections 504 and 508 of the Rehabilitation Act and relevant standards and university policies for issues pertaining to the Office of Information Technology. Currently, the AUM serves as an advocate and liaison for diversity and inclusion within the Office of Information Technology. In addition, the AUM is the primary manager for training and coaching around inclusive course design practices, client engagement, and strategic planning for the Office of Information Technology and the Office of Digital Education.
- Digital Accessibility Working Group. This is a system-level group charged to examine the accessibility efforts each campus currently has underway. In examining these efforts, the working group will make recommendations to the IT Governance Cabinet around resources needed to fill any gaps and/or areas that will need expanding and additional collaborating with the four campuses within the CU System to maintain a superior level of accessibility at the University of Colorado. The AUM is a member and the campus representative to this group.

- Information Technology (IT) Cabinet: While not a member of this cabinet, the AUM will liaise with the campus Chief Information Officer as necessary to be aware of and resolve digital accessibility initiatives/issues. The IT Cabinet provides executive-level strategy and direction for university-wide technology.
- IT Governance Committee. This is a system-level group consisting of campus Chief Financial Officer and Chief Information Officers. They are responsible for establishing who is empowered to evaluate, prioritize, select, and fund competing IT investment options as well as oversee the implementation of solutions and measure benefits. The AUM is a member and the campus representative to this committee.

4.   Procuring Goods and Services:

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 B.1 of this policy.   This will ensure that products, services and technologies developed at, purchased by, or used at the university are accessible to all faculty, students, and staff, including those with disabilities. This is especially critical for enterprise-level systems and other technologies that affect a large number of students, faculty, and/or staff. Faculty and Staff should consult with the campus Access and Usability Manager (OIT) help@ucdenver.edu or 303.724.HELP (4357 for information regarding responsibilities and advice on best practices.

C.   ANNUAL REPORTING

In accordance with APS 6011, the CU Denver Chief Information Officer   will provide an annual digital accessibility status report to the CU IT Governance committee. At a minimum, this status should note changes to standards, barriers to compliance to standards, and identified accessibility barriers for broadly used systems.

Notes

1.   Dates of official enactment and amendments:
      July 1, 2018: Adopted/Approved by the Chief Information Officer
      November 1, 2019: Adopted/Approved by both Chancellors
      August 1, 2024: Policy 5012 was recast into separate policies for Denver (5012D) and Anschutz (5012A).

2.   History:

      November 1, 2019: Unit-level policy amended to ensure compliance with APS 6011, *Digital Accessibility* and expanded to cover both campuses.

3.   Initial Policy Effective Date: July 1, 2018

4.   Cross References/Appendix:

- University of Colorado Administrative Policy Statement 6011, *Digital Accessibility*
- University of Colorado Administrative Policy Statement 5065, *Protected Class Nondiscrimination*
- Rehabilitation Act of 1973, sections 504, 508
- Americans with Disabilities Act of 1990
- Web Content Accessibility Guidelines (2.1), Level AA
- CU IT Governance Committee