University of Colorado **Anschutz Medical Campus**

Campus Administrative Policy

Policy Title: **Digital Accessibility**

Policy Number: 5012A **Functional Area:** Information Technology

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Effective: August 1, 2024

Approved by: Terri C. Carrothers
Executive Vice Chancellor for Finance and Administration, CU Anschutz

Applies to: CU Anschutz

A. INTRODUCTION

The University of Colorado Anschutz Medical Campus 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(s), shall establish and maintain structures for: providing training for faculty and staff who use, create, purchase, or maintain Information and Communication Technology ('ICT') for the university in the scope of their employment for CU; compliance governance; purchasing ICT; and processing reasonable accommodations and modifications regarding ICT." This policy establishes those responsibilities, standards, compliance, and governance structures for the Anschutz Medical Campus as required by APS 6011.

B. POLICY STATEMENT

Technology services and applications that are procured, developed, maintained, and used by the CU Anschutz 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 Anschutz community. 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 technology goods and information services

2. Process for overcoming known accessibility barriers:

    The Anschutz Medical Campus is committed to responding to accessibility concerns and providing reasonable accommodations or modifications in a timely manner. If you experience a barrier, and/or learn about a barrier that affects your or someone else's ability to access CU Anschutz websites, videos, online forms, or other digital content, technologies and/or services, please provide detailed information to the appropriate campus resource as outlined on the Campus Accessibility webpage.

    Please also visit the CU Anschutz 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 University of Colorado 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 Digital Accessibility Administrator (DAA) will determine if appropriate alternatives are

available and can be implemented. If the alternatives cannot be implemented in a timely manner, the DAA 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 Digital Accessibility Administrator (DAA) 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.

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 them accessible in accordance with campus standards defined in Section B.1 of this policy and the Anschutz Medical Campus Digital Accessibility Standards. 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 Digital Accessibility Administrator (DAA) for information regarding responsibilities and advice on best practices.

C. ANNUAL REPORTING

In accordance with APS 6011, the CU Anschutz Chief Information Officer may provide an annual digital accessibility status report to the CU IT Governance committee. At a minimum, this status report should note changes to standards, barriers to compliance with respect to the standards set out in Section B.1 of this policy, and identified accessibility barriers for broadly-used systems.

Notes

1. History

   - July 1, 2018: Adopted/Approved by the Chief Information Officer
   - November 1, 2019: Revised. Amended to ensure compliance with APS 6011: Digital Accessibility and expanded to cover both campuses.
   - August 1, 2024: Policy 5012 was recast into separate policies for Denver (5012D) and Anschutz (5012A). 5012A was updated to ensure compliance with state and federal law.

2.	Cross References/Appendix

- Digital Accessibility Standards and Resources
- 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

3.	Notes

- Reviewing Officer: Executive Vice Chancellor for Administration and Finance
- Responsible Officer: CIO & Vice Chancellor for Information Strategy & Services