

# ACCESSIBLE TECHNOLOGY POLICY

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**Approved by:** Administrative Council

**History:** 2023

**Related Policies:** Technology Use

**Related Forms, Procedures and References:** Tech Services (<https://www.alverno.edu/Tech-Services/>) | Residence Hall Tech Services (<https://www.alverno.edu/Tech-Services-ResLife/>) | EIT Accessibility Contact Form ([https://docs.google.com/forms/d/1S\\_KE81DPUzTvKfhFpKr80iRIET3ab2\\_jZaT89U8cX5g/viewform/?edit\\_requested=true](https://docs.google.com/forms/d/1S_KE81DPUzTvKfhFpKr80iRIET3ab2_jZaT89U8cX5g/viewform/?edit_requested=true))

**For Questions Contact:** Technology Services | 414.382.6336 | RC 109B | [helpdesk@alverno.edu](mailto:helpdesk@alverno.edu)

Alverno College is committed to providing accessible electronic information and technology resources, technologies and services for students, employees, guests and visitors, including those with disabilities. To that end, the College has established a policy requiring that electronic and information technology (EIT) be designed, developed, managed, acquired or procured to be accessible to the widest range of users possible, in accordance with federal and state law.

In order to ensure broad access to such resources, this policy establishes standards for the design or use of web-based information and other information technology.

Ensuring equal and effective electronic and information technology access is the responsibility of all college faculty and staff.

In meeting its non-discrimination obligations under Title III of the Americans with Disabilities Act of 1990 (ADA), the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, as amended, Alverno has developed this Accessible Technology Policy. This policy will be reviewed and revised as necessary.

This policy identifies responsibilities and processes to ensure that individuals with disabilities have comparable access to Alverno EIT, identifies the accessibility standards applied by Alverno, identifies Alverno's EIT Accessibility Coordinator and provides information for when an individual identifies inaccessible EIT.

Alverno recognizes that individuals with disabilities may need specific accessibility-related software, hardware or other assistive technology in order to access certain technology. As a reminder, individuals with disabilities are encouraged to request assistive technology or other accommodations in accordance with Alverno's Accessibility Services for Students with Disabilities Policy by contacting the Accessibility Coordinator. While there is overlap between Alverno's commitment to making all EIT accessible and providing accommodations to individuals with disabilities, individuals requesting accommodations must contact Accessibility Services to engage in the interactive process for approved accommodations.

## What Is The Policy?

This policy applies to all electronic information and technology (EIT) which includes the following areas:

- Web-based information and services, including those associated with courses/instruction, departmental programs, College-sponsored activities, employment, administration and college services.
- Hardware and software utilized, developed, purchased or acquired by Alverno College.
- Environments specific to information technology – including classroom and general use computer facilities, on-line instruction, distance learning, places of employment, libraries and resource centers.

## Standards

The Alverno College Accessible Technology Policy is guided by the widely accepted standards established in the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines document, version 2.0 (WCAG), Level AA. These guidelines are organized around the following four principles, which lay the foundation necessary for anyone to access and use electronic and Web content:

- **Perceivable** - Information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented (it cannot be invisible to all of their senses)
- **Operable** – User interface components and navigation must be operable.
- **Understandable** - Information and the operation of user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding)
- **Robust** - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content as technologies advance.

## Definitions

- **Electronic Document;** information recorded in a manner that requires a computer or other electronic device to display, interpret, and process it.
- **Equal Access;** means that 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.
- **Functionally equivalent;** a modification or accommodation made to ensure equal access and ease of use comparable to an individual without a disability.
- **Legacy Web Page;** web page published prior to the effective dates outlined in this policy.
- **Mobile Application;** a mobile application is a software application developed specifically for use on small, wireless computing devices, such as smartphones and tablets, rather than desktop or laptop computers.
- **Multimedia;** a production that presents information in more than one sensory channel.
- **Official Web Pages;** are those webpages that have been created by the College schools, departments or other administrative units,

for college business. Official College webpages clearly convey a relationship to the entire College and support and advance the college's mission.

- Web-based Information / Applications; the use of Internet web technologies to deliver information and services, to users or other information systems/applications.
- Website Redesign; any phase during the development or maintenance of a web site in which significant alteration or update is made to the visual design, institutional branding, information architecture, or technical functionality of the site. Minor content updates are not considered web site redesign projects.
- Website; a group of connected web pages regarded as a single entity, or several closely related topics, such as a college, department, program or office website. A website usually includes a home page.
- Web Page; a single internet address (URL) that contains content that must be viewed through a web browser. Usually, multiple web pages are linked to define a website.

### EIT Accessibility Coordinator

Alverno has designated the Director of Technology Services to serve as the EIT Accessibility Coordinator to oversee the implementation of this policy. The EIT Accessibility Coordinator will be responsible for an annual budget designated to be used for compliance with this policy.

In addition to overseeing the implementation of this policy, the EIT Accessibility Coordinator will maintain resources to assist individuals in complying with this policy when managing EIT content or procuring new EIT. To request individual or department training regarding EIT Accessibility, contact the EIT Accessibility Coordinator.

### Accessibility Exception Procedure

Recognizing that Alverno's technology-based environment and resources are dynamic, the need to provide accessibility and address barriers is a continual effort. It is the policy of Alverno to work towards consistency with WCAG 2.0 and address barriers in a timely fashion. In certain circumstances, exceptions to this policy may be granted. For instance, this policy does not require adherence to WCAG 2.0 if it is not possible or would constitute an undue administrative or financial burden or result in a fundamental alteration. Alverno will make determinations on the applicability of these exceptions on a case-by-case basis. When an exception is appropriate, Alverno will provide equally effective alternative access to the information.

The College is committed to ensuring web content on the College's websites created or revised after the effective date of this policy is consistent with WCAG 2.0. The EIT Accessibility Coordinator is responsible for ensuring that new and revised content is consistent with the WCAG 2.0, Level AA Standards.

The College will assess web content on a periodic basis as necessary to determine compliance with WCAG 2.0, Level AA and engage in necessary remedial efforts within a reasonable period of time of the completion of such assessments. Assessments will include a review of legacy content developed prior to the effective date of this policy. Individuals can also request that legacy web content be made available when content is inaccessible using the procedure for reporting an accessibility barrier outlined below.

- Conformity to standards may not always be feasible due to undue burden (difficulty/expense), hardware/software specific to research/development in which no user requires accessibility

accommodations, hardware/software for which no equivalent accessible option is available (non-availability).

- Exceptions to this policy may be granted by the "Alverno Technology Steering Committee" in instances where compliance is not possible.
- A completed VPAT Accessibility Exception Request Form may be submitted to the Alverno Technology Steering Committee.
- An approved exception shall include the following:
  - Justification for the exception
  - Plan for alternative means of access for persons with disabilities
  - Date of expiration
  - Appropriate Vice President signature
- The Alverno Technology Steering Committee will maintain records of all VPAT Accessibility Exception Request Form.
- College faculty and staff must provide content and/or services covered by the exception in a functionally equivalent accessible manner upon request, as required by law.
- New web sites, electronic documents, multimedia, and course content created on or after the effective date of this policy must use due diligence to be in compliance fall of 2023.
- New web sites, electronic documents, multimedia and course content created prior to the effective date of this must be brought into compliance based on a timeline developed in collaboration with the Technology Steering Committee and department chairs and directors.

### Submitting Concerns

Individuals who experience a barrier related to EIT should contact a professor or supervisor, or contact the EIT Accessibility Coordinator. When an individual receives information about an EIT accessibility issue, the individual should notify the EIT Accessibility Coordinator.

Questions and concerns regarding EIT accessibility can be submitted by contacting the EIT Accessibility Coordinator or by completing the Electronic and Information Technology (EIT) Accessibility Contact Form. ([https://docs.google.com/forms/d/1S\\_KE81DPUzTvKfhFpKr80iRIET3ab2\\_jZaT89U8cX5g/edit/](https://docs.google.com/forms/d/1S_KE81DPUzTvKfhFpKr80iRIET3ab2_jZaT89U8cX5g/edit/))

In conjunction with Accessibility Services, the EIT Accessibility Coordinator will review the inquiry form or other information provided. The EIT Accessibility Coordinator and the Director of Disability Services and Success, or designees, will assess the concern and the EIT at issue, using internal and external mechanisms to test EIT accessibility. The EIT Accessibility Coordinator and the Director of Disability Services and Success will collectively determine a means of resolution of the accessibility issue, in most cases within 30 days of receiving the concern. The resolution will be communicated to the complainant. If the determination is made that there is not an accessibility barrier, this will also be communicated to the complainant.

**Approval** – The Alverno College Accessible Technology Policy was approved by the Alverno College Administrative Council on May, 3, 2023 and is effective as of this date. An annual review of the policy will be conducted by the Alverno College Technology Committee.