# Accessible Technology

*University Operations – Information Services*

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| **EWU Policy 203-05** | **Authority: EWU Board of Trustees** |
| **Effective: May 10, 2019** | **Proponent: Vice President of Business & Finance** |

**Purpose:** This policy provides information and processes by which University personnel will create, obtain and maintain all electronic and information technology in a manner that ensures accessibility for individuals with disabilities.

**History:** This policy updates a previous version dated February 24, 2017 and was adopted by the Board of Trustees on May 10, 2019.

**Scope**: This policy applies to all information technology that EWU develops, procures, or uses.

## CHAPTER 1 – PURPOSE

Eastern Washington University (EWU) values diverse experiences and perspectives and strives to fully include everyone who engages with EWU. Inaccessible information technology (IT) negatively impacts people with a variety of disabilities. This document provides guidance to EWU personnel for fulfilling EWU's commitment to equal access through the provision of accessible IT.

EWU makes its offerings accessible to individuals with disabilities in accordance with Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act as amended (ADA), the State of Washington OCIO policy 188, and the Washington Law Against Discrimination. This commitment includes access to IT that EWU develops, procures, or uses, such as websites, software, hardware, and media.

## CHAPTER 2 – ACCESSIBILITY STANDARDS

With respect to this policy, "accessible" IT means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and use the same services as a person without a disability in an equally effective and integrated manner.

### 2-1. STANDARDS

A person with a disability should be able to obtain the information as fully, equally, and independently as a person without a disability. Although this might not result in identical ease of use compared to persons without disabilities, it still must ensure equal opportunity to experience the educational benefits and opportunities afforded by the technology.

If a technology cannot be made accessible, EWU will provide equally effective alternate access to qualified individuals with disabilities.

Technologies and standards evolve at a rapid pace. EWU looks to the current Web Content Accessibility Guidelines (WCAG) developed by the World Wide Web Consortium (W3C) Level AA or equivalent as a goal for meeting its IT accessibility commitments. These guidelines provide criteria for measuring web accessibility and also provides useful metrics for products and services that are not specifically web-based.

### 2-2. STATEMENT OF ACCESSIBILITY

University webpages and web-based applications should, whenever possible, include a link to a webpage that includes EWU's commitment to accessibility and contact information for the Accessible Technology Coordinator.

### 2-3. EXAMPLES OF IT COVERED BY THIS POLICY:

- University electronic resources, websites and University hosted websites
- Campus-wide software applications

- Electronic materials and applications
- Web-based applications
- Emergency communication

### 2-4. TECHNOLOGY PROCUREMENT

New technology purchased for EWU will conform to accessibility standards, if the technology is commercially available and its purchase does not result in undue financial and administrative burdens or a fundamental alteration. Any requests to purchase technology that does not conform to accessibility standards must be approved in advance as meeting one of these exemptions by the Chief Information Officer. EWU may take into account a contractual commitment from a vendor to make any non-conforming technology conform to the standards before it is made available to EWU. In any case, EWU must test the product to verify that the product meets the vendor's representations. EWU shall not use the product until the vendor satisfies its commitment to make the product conform or best conform to the relevant accessibility standards.

# CHAPTER 3 – PROCEDURES

### 3-1. TRAINING & WEBSITE DEVELOPMENT

EWU will develop and provide training for employees who are responsible for administering or maintaining technologies covered by this policy.

Training will be conducted for any staff responsible for creating or distributing information involving accessible technology. Training must include review of this policy, the accessible technology plan and employees' responsibilities to ensure that web design, documents, classroom technologies, and multimedia content are accessible.

EWU will design an online resource center to help campus units work toward improving their IT accessibility.

### 3-2. ACCESSIBLE TECHNOLOGY TEAM

The Vice President for Business & Finance will appoint an Accessible Technology Coordinator (ATC). The ATC will lead audits of current EWU technology systems, handle grievances and lead accessibility improvement efforts.

Accessibility audits will be conducted at regular intervals under the direction of the ATC. All problems identified during an audit will be documented, evaluated, and, if necessary, remediated within a reasonable period of time.

The ATC will lead the Accessible Technology Team, comprised of representatives of key areas identified during technology audits:

- Information Technology

- Marketing and Communications
- Student Disability Support Services
- Civil Rights, Compliance & Risk Management
- Academic Affairs, Outreach & Engagement
- Faculty Organization appointee
- ASEWU appointee
- Athletics
- Human Resources

The Accessible Technology Team is responsible for the following:
(A) Coordinate periodic audits regarding covered technologies currently used by the university,
(B) Prioritize the need for updating and improving accessibility in covered technologies,
(C) Develop a long-term accessibility plan for the institution,
(D) Develop a plan for making current technologies accessible, and,
(E) Assist in developing and providing training for employees.

### 3-3. HELP WITH ACCESSIBILITY

All questions or concerns about this policy or about covered technologies accessibility should be directed to the ATC.

Further technical and support information regarding this initiative is available at EWU's online accessibility resource center. For individual consultation on making IT accessible, contact the ATC.

### 3-4. GRIEVANCE/COMPLAINT PROCEDURES

Anyone who has a concern about the accessibility of a University technology may file a complaint with the Accessibility Technology Coordinator. The ATC or designee will conduct an investigation and respond in writing to the complainant. The ATC will make good faith efforts to respond within 60 days. The ATC will notify the complainant if additional time is needed for the review. The ATC may coordinate with other appropriate departments in reviewing the concern.

If the complainant is dissatisfied with the response, he or she may file a grievance with the Director of Equal Opportunity. Additional information about the grievance process is set forth in chapter 7 of EWU Policy 402-03 (Accommodating Persons with Disabilities).

## CHAPTER 4 – RESOURCES

The following resources can assist the EWU community in understanding and meeting our accessibility goals. These resources can also be used as a reference for vendors and contractors providing products and services to EWU.

### 4-1. RESOURCES AND SUPPORT FOR IT ACCESSIBILITY

- Web Content Accessibility Guidelines
- Disability Resources for Students

### 4-2. LEGAL AND POLICY RESOURCES

- Washington State Office of the Chief Information Officer Policy 188
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act
- EWU Guideline 501-03 (Supplemental Instructional Materials for Students with Print Access Disability)
- EWU Policy 402-03 (Accommodating Persons with Disabilities)

### 4-3. EXTERNAL COMPLAINT RESOURCES

Individuals have a right to file complaints alleging discrimination with state or federal agencies within the agencies' prescribed time periods. State and federal agencies have their own processes for responding to and processing such complaints. Filing a complaint with a state or federal agency listed below may be done in lieu of or in addition to the university's complaint process.

U.S. Office for Civil Rights
Department of Education
2910 3rd Avenue, Mail Stop 106, Seattle, WA
(206) 442-1636
OCR@ed.gov
www2.ed.gov/about/offices/list/ocr/index.html

Washington State Human Rights Commission
1330 N. Washington St., Suite 2460; Spokane, WA 99201
1(800)233-3247
www.hum.wa.gov