

# Information and Communication Technology Accessibility Policy Cover Page

1. University Official/Committee/Office responsible for this policy: Information Technology Services and Equal Opportunity, Inclusion and Resolution Services
2. Sponsor Name: Sam Scozzafava, Vice President for Information Technology/CIO
3. Policy Status: ☒ New Policy

☐ Revision of an Existing Policy

☐ Technical correction/update only

1. Policy Contact Name: Jenny Gluck, Associate CIO Phone: 315-443-5772 E-mail: [jsgluck@syr.edu](mailto:jsgluck@syr.edu)
2. Policy Reference Number: [ *xx.xx.xx* ] *(Policy Administrator use only)*
3. Policy Category(ies):

☒ University Governance**,** Ethics, Integrity, and Legal Compliance

☒ Faculty Teaching and Research

☒ Academic Rules, Student Responsibilities & Services

☒ Employment, Workplace Rules, Benefits and Governmental Notices

☒ Administrative and Financial

☒ Information Technology

☒ University Facilities, Equipment, and Property

☐ Public Safety, Environmental Health, and Emergency Management

☒Campus and Governmental Notices

1. Date Established: xx/xx/20xx
2. Date Policy is Effective: xx/xx/20xx
3. Date Last Revised: [*mm/dd/yyyy*]
4. Next Review Date: [*mm/dd/yyyy*]
5. Does this policy require recurring communication?

☐ Yes - Frequency\_\_\_\_\_\_\_\_\_\_\_

☒ No

1. Impact Statements:
   1. Identify any additional financial or other resources that may be needed to implement this policy and/or any potential revenues/cost savings that may result.

There are costs associated with employee or third-party time to convert, assess, and provide equivalent alternatives to our information and communication technologies and associated content.

* + - There are costs associated with captioning video content as it is produced as well as providing real-time captioning services for events when it is provided and/or requested.
  1. List any potential fines or penalties that could be levied against the university by a governmental body or regulatory agency as a result of non-compliance with this policy. If none, please indicate.
     + See Section II of the policy.
  2. Assuming implementation of this policy, identify any potential public relations issues that may need to be addressed by the university within the local campus community and/or the general public (if applicable).
     + If the policy is **not** adopted, the University can expect on-going public relations issues and ramifications of non-compliance in terms of litigation and audits.
     + The University can also expect that many people will lose faith in the University’s stated commitment to inclusion and diversity.
* If proposing a policy revision, clearly reference in the space below the current affected policy, the revision(s) requested, and the rationale for the change. Use additional pages as necessary.
* NA

# Information and Communication Technology Accessibility Policy

# General Policy Statement

This policy is to ensure that members of the Syracuse University community and their guests can effectively access University content and information and communication technologies. This policy covers all content and technology, including websites, web-based and mobile applications, email, webconferencing, video conferencing, video streaming, instructional materials, electronic documents, blended and online courses, and all academic and administrative software applications acquired or adopted after the effective date of this policy. The policy also provides a method to ensure that communication at University-wide events is accessible and enables full participation. It is the University’s aim to make content and technology accessible to current and prospective students, faculty, staff, alumni, visitors, and the general public.

# Reason for Policy/Purpose

Information and Communication Technology (defined below in Section V.B.) -- especially the Internet -- is essential to the educational mission of the University, including in teaching and learning, research, and critical administrative and employment functions. Syracuse University values diversity, and accessible Information and Communication Technology is an important component of an inclusive University. This policy serves to integrate accessibility into all levels of Information and Communication Technology at the University, thus enabling full participation by all.

# Policy

1. **Accessibility of Information and Communication Technology**

In its commitment to diversity and inclusion, Syracuse University will seek to ensure that individuals with disabilities are afforded equal access to Information and Communication Technology used by the University and its constituents. As such, and except as set forth below in Section III.B., the University commits that Information and Communication Technology products and services acquired, adopted, developed or updated after the effective date of this policy, shall be accessible to individuals with disabilities.

Syracuse University further commits that it will use best efforts to ensure that University-wide events and communication about and at such events is accessible and enables full participation.

As a means of measuring accessibility, unless excluded below in Section III.B., all Information and Communication Technology at a minimum shall comply with the [University ICT Accessibility Policy Standards.](https://answers.syr.edu/x/AAowAg)

1. **Exclusions**

Certain Information and Communication Technology may be excluded from the mandates of this policy, including:

* 1. Individual Web pages published by students, employees, or non-university organizations that do not conduct University-related business. While all parties are encouraged to adopt the University’s Information and Communication Technology policy and standards, students, employees, or non-university organizations that do not conduct University-related business fall outside of the jurisdiction of this policy.
  2. Archived web pages and course content do not have to comply with the Standard unless specifically requested by a University student, faculty, or staff member with a disability.
  3. In order to use non-captioned video, the video must be contained in a secure, password-protected environment, there must be no students requiring captioning and the video can only be used for a single term. Other exclusions to captioning include student work and raw footage that will never be archived after the current use, as well as video with foreign language subtitles, and instructor-made videos that record feedback to an individual student who doesn’t require captioning.
  4. Single instance, specialized software or hardware purchased for individual use.
  5. When compliance is not technically possible, would require a fundamental alteration, or would result in an undue burden, exceptions to the policy may be granted through the exception review process (outlined below in Section V.A.) and shall be appropriately documented.

# To Whom Does This Policy Apply

☒ Students ☒ Faculty ☒ Staff ☒ Guests/Visitors ☒ Other Vendors & Suppliers

# Appendices

## Procedures

1. Compliance

Assessment of Information and Communication Technology products and services acquired or developed after the effective date of this policy shall follow the process outlined on the [Procurement Accessibility Review](https://answers.syr.edu/x/Dym8Ag) web page. All ICT purchase requests will be reviewed for accessibility and a report submitted to the ICT Accessibility Assessment Committee. The ICT Accessibility Assessment Committee can approve the purchase, approve the purchase with conditions or deny the purchase.

If denied, exceptions to the policy may be granted by the Information and Communication Technology Accessibility Compliance Committee (“ICT Accessibility Compliance Committee”).

Whenever an exception is granted, the University must use reasonable efforts to develop a plan for the functional academic or administrative unit seeking the exception to provide equally effective alternate access to the information or service of the technology to students or employees with disabilities who have a need to access the information or service.

All approved exception requests are termed such that they will need to be evaluated every two years or at the time of the contract renewal of the product or resource.

1. Assistance

Requests for assistance with Information and Communication Technology Accessibility can be sent to [accessibleIT@syr.edu](mailto:accessibleIT@syr.edu) or by calling 315-443-2677. Additional information can be found on the [ITSaccessibility.syr.edu](http://itsaccessibility.syr.edu/) website.

1. Complaints

Any individual who has complaints about the accessibility of the University’s Information and Communicaton Technology should contact Information Technology Services at 1-205 Center for Science and Technology, Syracuse University, Syracuse, NY 13244; by email: [help@syr.edu](mailto:help@syr.edu); or by telephone: 315-443-2677.

If a person does not receive a satisfactory resolution from Information Technology Services, they should contact [Equal Opportunity, Inclusion and Resolution Services (EOIRS)](http://www.syr.edu/hcd/equal-opportunity.html). EOIRS is responsible for coordinating compliance efforts under various laws including Titles VI, IX, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. Contact EOIRS at 005 Steele Hall, Syracuse University, Syracuse, NY 13244-1520; by email: [ada@syr.edu](mailto:ada@syr.edu); or by telephone: 315-443-4018.

## Definitions

* **Accessible.** A person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.
* **Archive Web Site or Page.** A Web site or page no longer in use but subject to records retention plans.
* ***Assistive Technology*.** Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities for individuals with disabilities.
* ***Electronic Document*.**Any file that is posted or distributed electronically. These files usually are created, edited and viewed or otherwise encountered with desktop and cloud productivity software and can be saved in a local file format or stored online for collaboration and presentation purposes. Common examples of software used to create such files include Microsoft Office, Apple Pages, Numbers, Google Documents, Sheets, and Adobe Acrobat, Illustrator, and Designer products.
* ***Fundamental Alteration.*** A change to a Syracuse University program or service that alters the essential purpose of the program or service or any of its components.
* ***Standards and Guidelines.*** Following the University’s guidelines and standards will add functionality and usability for all users, including users of assistive technology. The current Information and Communication Technology standard and web accessibility guidelines are available on the University’s knowledge repository, [Answers: Web Accessibility Standards and Examples](https://answers.syr.edu/x/AAowAg).
* ***Information and Communication Technology*.** Information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any technology-based equipment. Information and Communication Technologies include but are not limited to: academic and administrative software applications; websites and web-based or mobile applications; interactive online services: web conferencing, live-streaming, live chat and discussion board functions; search engines and databases; electronic communications and electronic content: email, electronic documents, electronic books and electronic reading systems, course content, class assignments; library and course-related reference materials; multimedia (audio and video); personal response systems (“clickers”); telecommunications; audio and video technologies; and self-contained closed systems: ATMs, printers and copiers.
* ***Information and Communication Technology Accessibility Compliance Committee*.** This is the committee responsible for reviewing requested exceptions to this policy. The **Information and Communication Technology** Accessibility Compliance Committee is co-chaired by the Vice President of Information Technology / Chief Information Officer and the University’s ADA/503/504 Coordinator. Membership includes faculty and student representation schools and colleges and staff representation from Academic Affairs, Division of Enrollment and Student Experience, Equal Opportunity Inclusion and Resolution Services, Human Resources, Information Technology Services, Office of Marketing and Communication, Office of Disability Services, Office of University Counsel, Purchasing Department, and SU Libraries. Others may be invited to serve *ex officio* by request and or recommendation, at the discretion of the Chief Information Officer in consultation with the Committee. Communication regarding *ex officio* requests or recommendations should be submitted directly to the Chief Information Officer.
* ***Information and Communication Technology Accessibility Assessment Committee*.** This is the committee that is responsible for reviewing new University-wide ICT purchases to ensure they comply with this policy. The **Information and Communication Technology** Accessibility Assessment Committee includes the University’s ADA/503/504 Coordinator, Director of the Office of Disability Services, Director of ICT Accessibility Services, and the Associate Chief Information Officer, Academic Services, ITS.
* **Information Technology.**  Any equipment or interconnected system or subsystem of equipment, that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.  The term information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.
* ***Mobile Applications.***Mobile web content, mobile web apps, native apps, and hybrid apps developed for handheld devices such as smartphones, tablets, and more.
* ***Restricted Access to the Technology*.** Products installed in locations with restricted access such as data centers, and which are not interacted with except during maintenance, are not required to be accessible.
* ***Standard.* Electronic and Information Technology Accessibility Standards as set forth in Section 508 of the Rehabilitation Act of 1973 and any subsequent changes provide a baseline for Information and Communication Technology.**
* ***Telecommunications*.**  The transmission, between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information when sent and received.
* ***Undue Burden.*** Where compliance is a financial hardship, or is significantly difficult in that it may require extraordinary measures due to the nature or intent of the Information and Communication Technology. If compliance would result in such a hardship, the University will make reasonable efforts to provide access through other means. Financial hardship is determined within the context of the entire University budget.
* ***University*.** Any campus, unit, program, association, or entity of Syracuse University.
* ***University-Wide Event.* A**n event, other than academic classes scheduled as part of the curriculum, that is held in a University building or outdoor space on University owned or operated property and that is open to the campus community, including students, faculty, and staff. University Events may include conferences, seminars, commencement, public forums, training, concerts, live theatre productions, live events with speakers, and extracurricular and intramural activities.
* **Web-based Applications.**Usually provided by self-hosted and third-party contracted services, web-based applications are any services that are provided online through a web-browser, but not specifically in a web page format. Examples include, but are not limited to administrative portal, webmail, learning management system, web-conferencing, course catalog, student advising, and data warehouse.
* ***Web Page*.**A single Internet address (aka URL) that contains content that must be viewed or otherwise encountered by using a web browser. Usually, multiple web pages are linked to define a website.
* ***Website*.**A group of connected web pages regarded as a single entity, or several closely related themes, such as a college, department or office website. A website usually consists of a home page and related sub-pages.

## Policy Review

The Office of the Vice President for Information Technology / Chief Information Officer will initiate a review of and make necessary revisions to this policy at least once every two years with the input of a review group. The review group will include, but not be limited to the members of the Information and Communication Technology Compliance Committee.

## Other Related Policies and Documents

**Federal and State Regulatory Requirements**

* + [Americans with Disabilities Act as amended](http://www.ada.gov/2010_regs.htm) (ADAAA)
  + [The Rehabilitation Act of 1973, Section 504](https://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPE504.html)
  + [The Rehabilitation Act of 1973, Section 508](https://www.access-board.gov/the-board/laws/rehabilitation-act-of-1973)
  + [New York State Human Rights Law](http://www.dhr.ny.gov/law)

**Syracuse** University Policies

* + [Syracuse University’s Non-Discrimination on the Basis of Disability Policy](http://supolicies.syr.edu/ethics/nonD_disability_policy.htm)
  + [Syracuse University’s Non-Discrimination and Equal Opportunity Policy](http://supolicies.syr.edu/ethics/nonD_equal_policy.htm)

**Additional Documents**

* + NACUA Notes: [Building An Accessible Digital World: The Obligation To Make Electronic Resources Accessible](http://counsel.cua.edu/res/docs/accessibledigitalworld.pdf)
  + EDUCAUSE: [IT Accessibility Risk Statements and Evidence](http://net.educause.edu/ir/library/pdf/accessrisk15.pdf)

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