

# 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 remediate our information and communication technologies and associated content.

There are costs associated with replacing inaccessible legacy applications.

* + - There are costs associated with captioning existing 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. This policy also provides a method to ensure that communication at University events is accessible and enables full participation. All content and technology will be accessible to current and prospective students, faculty, staff, alumni, visitors, and the general public.

# Reason for Policy/Purpose

1. Information and Communication Technology (defined below in Section V.B.) -- especially the Internet -- is essential for everything from teaching and learning, to research, to 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.
2. This policy will ensure Syracuse University’s compliance with federal and state regulatory requirements, including The Rehabilitation Act of 1973 – Section 504; The Americans with Disabilities Act as amended (ADAA); and New York State Human Rights Law.

# Policy

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

In its commitment to diversity and inclusion, Syracuse University will seek to assure 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 shall be accessible to individuals with disabilities.

Syracuse University commits that organizations planning University events shall provide a method to ensure that communication about and at events is accessible and enables full participation.

As a means of measuring accessibility, all Information and Communication Technology at a minimum shall comply with the Federal Government [Standards of Section 508](http://section508.gov/section508-laws) of the Rehabilitation Act of 1973 as issued in 2000. All web pages and web-based or mobile applications created by and for Syracuse University shall comply with the World Wide Web Consortium’s ([Web Content Accessibility Guidelines 2.0 Level AA](http://www.w3.org/TR/WCAG20/) (WCAG 2.0 AA).

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 archived course content that are not available on open networks do not have to comply with the Standard unless specifically requested by a University student, faculty, or staff member with a disability.
  3. Course-related video or audio recording which is intended to be used only one semester and it is confirmed that no one in the course requires captions or a transcript, then captioning and transcription are not required.
  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 by the Information and Communication Technology Accessibility Compliance Committee (defined below in Section V.B.) and shall be appropriately documented.

# To Whom Does This Policy Apply

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

# Appendices

## Procedures

1. Compliance

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 by the Information and Communication Technology Accessibility Compliance Committee and shall be appropriately documented. Whenever an exception is granted, the University must 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.

The request for an Information and Communication Technology Accessibility Policy exception can be submitted using the online Accessibility Exception Request form (*link to form*). The online form requires the requestor to describe the product or resource, the type and current or projected number of users (students, faculty, staff, visitors, and guests), the one-time and annual costs, the vendor’s time frame for improving accessibility, whether the content is course specific, suggested (temporary) method to provide equal and equitable access, and justification(s) for the exception. Alternatively, download the Exception Request form (.doc), complete it and email it to [accessibleIT@syr.edu](mailto:accessibleIT@syr.edu).

The requester will work in consultation with the University’s Information and Communication Technology Accessibility Compliance Committee who will provide the final approval. All approved exception requests are termed such that they will need to be evaluated by the Information and Communication Technology Accessibility Compliance Committee every two years or at the time of the contract renewal of the product or resource.

Full details about compliance procedures and time frames are available on the University’s knowledge repository [Answers: Policy Compliance Time Frames](https://answers.syr.edu/x/dwowAg).

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.
* ***Chief Digital Accessibility Officer*. A person who oversees the University’s Information and Communication Technology Accessibility Policy procedures, training, and implementation, and chairs the Information and Communication Technology Accessibility Compliance Committee.**
* ***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.
* ***Guidelines.*** World Wide Web Consortiums Web Accessibility Guidelines 2.0 AA (WCAG 2.0 AA) and any subsequent updates is the basis for the design and build of websites.
* ***Guidelines and Standards.*** 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*.** The **Information and Communication Technology** Accessibility Compliance Committee is co-chaired by the Chief Digital Accessibility Officer and the University’s Director and 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 Digital Accessibility Officer in consultation with the Committee. Communication regarding *ex officio* requests or recommendations should be submitted directly to the Chief Digital Accessibility Officer.
* **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 must 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 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 all University campuses. University Events may include conferences, seminars, commencement, public forums, training, concert, live theatre productions, live events with speakers, and extracurricular and intramural activities.
* ***WCAG.***Web Content Accessibility Guidelines, version 1.0 published in 1999, version 2.0 published in 2008. WCAG is a working group of the W3C that focuses specifically on accessibility guidelines creation. WCAG is a widely accepted and commonly used standard.
* **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 encoutered 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.
* ***World Wide Web Consortium (W3C).*** The World Wide Web Consortium uses an international community to develop guidelines for the web.

## 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) (ADAA)
  + [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)

v. ICTAP\_11.18