**Accessibility Policy for****Information and Instructional Technology**

***FINAL DRAFT UPDATE May 2018***

**No:\_\_\_\_\_\_\_**

**Date:\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Authority:** UWM Non-Discrimination Policy S-47 UW Discriminatory Conduct Policy

Wisconsin State Policy on Accessibility

The Americans with Disability Act of 1990 together with its 2008 Amendments

Section 504 of the Rehabilitation Act of 1973  
UWM Administration

**Initiator:** Chancellor’s ADA and Accessibility Advisory Committee (ADAAAC)

**Responsible Party:**

1. **Purpose**

The purpose of this document is to provide guidance to UWM administrators, faculty, and staff in order to fulfill UWM’s commitment to provide equal access to Information and Instructional Technology to individuals with disabilities. Information and Instructional Technology includes web-based information, digital information tools, print materials and any supplemental documentation provided to students, faculty, staff and community.

The creation and dissemination of knowledge is a defining characteristic of universities and is fundamental to the University of Wisconsin-Milwaukee’s mission to promote learning, discovery, and engagement. The use of digital and web-based delivery of information is increasingly central to carrying out the University's vision to be the best place to learn and work for students, faculty and staff. Acknowledging this fact, UWM is committed to ensuring equal access to information.

**II. Policy**

The University of Wisconsin-Milwaukee is committed to creating an accessible and inclusive experience for all members of the campus and the larger community by providing equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. This policy extends to the University’s Information and Instructional Technologies and applies to their procurement, development, implementation and ongoing maintenance.

All members of the university community are responsible for ensuring that such information and technology are compliant with this policy and the related standards and guidelines.

This policy provides standards by which University administrators, faculty, and staff acquire, develop, distribute, use, purchase or implement all Information and Instructional Technology.

**III. Accommodations**

This policy acknowledges that accessibility and accommodations are complementary. This Accessibility Policy does not eliminate the need for accommodations for students or employees. Reasonable accommodations are provided by the Accessibility Resource Center (ARC) for students and Human Resources for employees.

**IV. Definitions**

"**Accessible**” means that individuals with disabilities are able to independently 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 integrated manner with substantial equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally and independently as a person without a disability.

“**Disability**” means a physical or mental impairment that substantially limits one or more major life activities.

“**Information and Instructional Technology**" means anything that supports the teaching, learning, research, and administrative operations of the campus. It includes, but is not limited to, internet and intranet websites, content delivered in digital form, search engines and databases, classroom technology, personal response systems ("clickers"), and all office equipment. This term also includes telecommunication products, information kiosks, Automated Teller Machines (ATMs), transaction machines, ancillary equipment, and related resources.

“**Learning Management System (LMS)**” is a software application for the administration, documentation, tracking, reporting and delivery of educational courses or training programs. It includes, but is not limited to, software platforms like D2L and Canvas, textbook software, open source learning materials and vendor created learning modules.

**“Legacy Pages”** are web pages published before January 1, 2017

“**Reasonable Accommodations”**

* For students – accommodations are determined by the Accessibility Resource Center (ARC) counselor and the student through an interactive, individual process with consideration given to the disability documentation, past history, functional limitations, and student self-report.
* For employees - accommodations are assistance or changes to a position or workplace that will enable an employee to do his or her job despite having a disability.

**V. Standards**

Any Information and Instructional Technology acquired, developed, procured, maintained, or used in carrying out university activities must be compliant with the World Wide Web Consortium’s (W3C) standard: current Web Content Accessibility Guidelines (WCAG.) (Version 2.0, Level AA (as of 2017).

WCAG provides useful metrics for products and services that are not specifically web-based as well as criteria for measuring web accessibility. In addition, all Information and Instructional Technology needs to comply with Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended, and other related local, state, and federal laws, and related university policies.

**VI. Scope**

These standards and guidelines apply to the following areas:

**Web Accessibility -**  All University web pages and programs used to conduct University business and activities including web resources used in courses, and web-based software published, hosted or used (including remotely hosted sites and software). All University websites, unless technically impossible, will link to the University’s main Accessibility page which includes a statement of commitment to accessibility.

**Instructional Materials** – All instructional materials delivered within the University’s learning management system, in face-to-face classes, or in any alternate fashion. Instructional materials including, but not limited to, discipline specific technologies, syllabi, online textbooks, open educational resources (OER), iBooks, MOOCS, online collaborative writing presentations, handouts, web conferencing, tests, email, chat or blogs. All information and instructional materials need to be designed accessibly. Instructional materials and activities need to be made available to all students at the same time to the greatest extent possible.

**Document Accessibility** - All produced, maintained or distributed documents including, but not limited to, word processing documents, PDFs, presentations, publications and spreadsheets.

**Electronic Media** - All produced, purchased, distributed or maintained multimedia including, but not limited to, images, audio files, video, e-text, eBooks and eBook reading systems. Video resources will be closed captioned and audio-described and audio resources will be transcribed. (Reliance solely on automatic caption generators like YouTube Captions does not meet UWM’s standards for accessibility.)

**Software, Hardware and Systems** - All produced, purchased, distributed or maintained software, hardware and systems including, but not limited to, equipment with accompanying software, learning and content management systems, library resources, email systems, digital signs, classroom technologies, administrative systems and databases such as finance, registration, student information and human resources. Software includes freeware, shareware, desktop, enterprise, subscription and remotely-hosted options such as web-browsers or cloud services.

**Procurement** - All University purchases of Information and Instructional Technology including, but not limited to, grant money purchases, P-Card purchases, low dollar orders and individual discipline specific purchases. The University’s procurement processes need to include accessibility evaluation. Prospective vendors will be required to also submit a Voluntary Product Accessibility Template (VPAT), and such accessibility will be taken into consideration in making procurement decisions. All University procurement will contain provisions for compliance with applicable federal and state laws and regulations regarding accessibility.

**VII. Priorities**

Beginning (***date when this policy goes in to effec***t), all new and redeveloped Information and Instructional Technologies including web pages, web applications, and web content, created by UWM, on websites and subdomains used for UWM’s academic divisions, academic departments, and administrative offices shall conform to WCAG 2.0 AA.

**Legacy Pages** – Web pages published before January 1, 2017. Legacy pages are to be made accessible upon request for access by an individual in a timely manner. Complicated pages may require more time. In those cases, the responsible unit will respond to the request (within 10 business days) with an action plan indicating when the item may become accessible.

When legacy Information and Instructional Technologies cannot be brought into compliance, campus units are responsible for providing equally effective alternate access: Based on timeliness, accuracy of content and delivery in an equivalent manner as the original product.

The accessibility conversion of all other Legacy Pages is an ongoing process.

For setting priorities to make other legacy Web pages accessible, the following guidance is suggested:

* Course materials.
* Web pages that provide core institutional information including: admissions, registration, advising, catalogs, student services information, housing, financial aid and employment.
* Top 20% of web pages most frequently used. Each Department/College/Unit is responsible for determining their top 20%.

**Statement of Accessibility on all Web Pages and Web-based Applications**:

All web pages and web-based applications (including legacy pages) must display in a consistent location (e.g., menu or text in the banner or footer) a statement, or link to a statement, referring to a commitment to accessibility by the University. In addition, each page must have a link allowing users to contact the designated responsible position or positions within a college, department, program, or help desk (instead of individuals, who often change positions or duties).

The link may point to the Universities’ accessibility statement: <http://uwm.edu/accessibility/> or for full statements on web pages, the suggested language is:

“The [name of department or unit] is committed to making its websites accessible to all users, and welcomes comments or suggestions on access improvements. Please send comments or suggestions on accessibility to [position to contact].”

**VIII. Oversight**

Implementation, training, education, technical support and the monitoring of compliance

according to the standards and recommendations set forth in this policy will be overseen by the

Chancellor or the Chancellor’s designee.

**IX. History**

This is the first campus policy to address this issue. There are other system policies and initiatives that preceded this including the white paper: Commitment to Universal Design in Education on University of Wisconsin Campuses (November 5, 2004) as well as the UW System Accessibility Statement (date unknown).

**X. Timeline**

* All UWM units/departments/schools need to have a plan in place that establishes a timetable of priorities for the accessibility of web pages, resources and equipment by 2018.
* All new Information and Instructional Technology need to be accessible at the time of purchase.

**XI. The following resource provides information to assist the UWM community in understanding and meeting its accessibility goals.**

* UWM Accessibility page <http://uwm.edu/accessibility/>