**POLICY PRIORITIES**

Feedback: The Policy “has no gradations or suggestions of priorities, which implies that all materials available online need to be equally accessible immediately. The draft policy seeks to apply a single standard uniformly across a wide range of materials and infrastructure. Other institutions have taken a more priority-based approach….”

**DRAFT PRIORITIES TO BE ADDED TO POLICY:**

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.

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].”

Legacy Web Page: web page published prior to the effective dates outlined in this policy.

**UW System**

Upon specific request, information on legacy webpages is to be made available to any individual needing access to such Web content, by revision or otherwise. The unit responsible for the creation of the information on the Web is responsible for providing that access.

Certain legacy pages may have to be converted into alternative formats to make the information accessible. Please contact the [Webmaster](mailto:webteam@uwsa.edu) regarding any accessibility issues.

**UW Madison University Web Accessibility Policy and Departmental Web Presence**

The policy also outlines prioritization guidelines:

- Priority should be given to creating accessible Web pages for core institutional information such as course work, registration, advising, admission, catalogs, and student services information. Units with large Web sites containing core institutional information should establish priorities for ensuring access to these pages according to the pages being used or requested most often. For setting priorities to make legacy Web pages accessible, the following guidance is suggested:  
  
 A. The top 20% of Web pages most frequently used (e.g. that get the largest number of hits) should be placed in the first priority.   
  
 B. Pages required for participation, funding, disability-related services and other key pages needed by people with disabilities, not already in the top 20%, should also be placed in the first priority.   
  
 C. Each department or University entity is responsible for determining the top 20% of Web pages used and other high priority Web pages.   
  
 D. Web pages specifically requested to be made accessible as part of a formal accommodation request shall be made accessible as soon as possible or an equally effective alternative shall be provided. Equally effective means that it communicates the same information in as timely a fashion as does the Web page. Undue administrative or financial burdens may contribute to a determination that alternative formats be used to provide the information to individuals requiring use of the information.

**UW Colleges**

Internet websites published or hosted by UW Colleges before June 1, 2002 will be

considered “legacy sites.” Legacy sites must be in compliance with this policy by

September 1, 2002. Legacy sites must also comply with these additional guidelines.

**Ohio State – DOJ complaint**

Web pages published prior to **06/30/04** are considered Legacy Pages. Legacy pages are subject to the standards in place at the time of their development and to the guidelines for legacy pages provided for in this policy.

As of **06/30/04** each University web site, including Legacy Pages, must indicate, in plain text, a method of contact for users having trouble accessing content within the site. Suggested language:

"If you have trouble accessing this page and need to request an alternate format, contact \_\_\_\_\_\_\_\_\_\_\_\_\_ at \_\_\_\_\_\_\_\_\_.";

Upon a specific request for access by an individual with a disability, legacy pages must be updated to be in compliance with the University's 2004 MWAS or the content of must otherwise be made available to any individual requesting access in a timely manner (Timeliness should be considered in the context of the type of information or service a page provides and generally considered to be within 10 business days.)

Upon specific request for access, Web sites and pages in archive status (e.g. no longer in use but subject to records retention plans) containing core administrative or academic information, official records, and similar information be made available/accessible to any individual eligible for and needing access to such Web content, by revision or otherwise.

Priority must be given to creating accessible Web pages for core institutional information such as course work, registration, advising, admission, catalogs, and student services information. Units with large Web sites must establish priorities for ensuring access to these pages based on time sensitivity of function and frequency of use.

**Implementation Priorities**

1. All new and redesigned Web pages published by any university college, department, program, or unit after, **06/30/04**.
2. Pages that individuals must access in a limited time frame in order to effectively participate in a program, to utilize a service or benefit from information offered by any unit of the University.
3. Annually convert the top 15% percent of the pages (based on frequency of hits among pages managed by any unit) to meet the current (6/30/04) standards.
4. Remaining Legacy Pages.

**PENN State – DOJ complaint**

POLICY:

Active EIT:

EIT considered to be active must be in compliance with the applicable standards and guidelines described in the STANDARDS section of this policy.

Legacy EIT:

Legacy EIT must be updated to be in compliance with the applicable standards and guidelines described in the STANDARDS section of this policy, or the content must otherwise be made available in an equally effective accessible format, and in a timely manner, to any individual requesting access. The unit responsible for its maintenance must make it compliant with the applicable standards, or provide an equally effective accommodation.

Each University college, department, program, or unit must establish its own priorities and timetables for updating legacy EIT; or plan for its transition to archival status, or its removal. Priority must be given to creating accessible EIT for core institutional information such as course work, registration, advising, admission, and catalogs; and student, faculty, and staff information.

Archived Information Resources:

Information resources in archive status must be made available in an accessible format to any individual eligible for, and needing access to, such content.  The unit responsible for its maintenance is responsible for providing the information resource in an accessible format.

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

All web pages and web-based applications 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, college, department, program or unit. 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 Penn States’ accessibility statement: [www.psu.edu/accessibilitystatement](http://www.psu.edu/accessibilitystatement), or for full statements on web pages, the suggested language is:

The Pennsylvania State University 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 [helpdesk@psu.edu](mailto:helpdesk@psu.edu).

OR:

“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 the [position to contact].”

Exemptions from the Policy:

The following circumstances may qualify as exemptions from this policy:

Where compliance is not technically possible or may require extraordinary measures due to the nature or intent of the information resource, application or service, a request for exemption must be made.  Lack of sufficient funding for any particular college, department, program, or unit of the University would not be considered for an exemption.

Where compliance would result in a fundamental alteration of the information resource, application, or service, and not satisfy the original intent.

Where, in the case that information resources, applications and services that are procured through third party vendors or contractors; and that no alternative accessible products are available from other third party vendors or contractors, procurement can be made of a non-compliant product.

Where the product is not currently in compliance, but efforts are underway to fix the defects by a defined date.

Training and Resources:

Penn State has identified considerations and helpful hints for faculty, staff, and students that will assist in ensuring the accessibility of EIT maintained by University colleges, departments, programs, and units. Information is centrally located at <http://accessibility.psu.edu/>

REQUESTING EXEMPTION FROM POLICY:

Purchasers and developers of EIT may request exemption from meeting the requirements of this policy by completing the [Policy AD69 Accessibility Exception Request](https://guru.psu.edu/policies/AD69%20Exception%20Request.docx), then submitting it to the ADA Compliance Office for review and approval (if determined to be a justifiable reason for exception).

**University of Montana – DOJ Complaint**

1.4 Implementation Schedule Summary

* By May 16, 2014, the University will identify a strategy to ensure that webpages that provide essential student functions are accessible.
* By December 31, 2014, all University Program and Department websites, including legacy pages, unless technically impossible, will contain a clear statement (or a link to a statement) describing the University’s commitment to web accessibility and a method to report barriers and/or to receive an alternative equally effective accessible format.
* By December 31, 2014, all webpages published or hosted by the University on or after July 30, 2013, will be accessible according to W CAG 2.0 Level AA standard.
* Upon a specific request for access by an individual with a disability, the University will update legacy pages to be in compliance with the WCAG 2.0 Level AA standard, as set forth in Appendix A to this Agreement, or the University will otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

**Miami University – DOJ complaint**

Legacy Pages” means web pages created and published before January 2012.

Policy:

Web Content

Beginning December 14, 2016, all new and redeveloped web pages, web applications, and web content, created by Miami, on websites and subdomains used for Miami’s academic divisions, academic departments, and administrative offices shall conform to WCAG 2.0 AA. A [listing of covered websites](http://miamioh.edu/accessmu/policy-procurement/websites/) can be found at the AccessMU website. In addition, for all websites and subdomains used for Miami’s academic divisions, academic departments, and administrative offices, all web pages, web applications, and web content that were created and published on or after January 2012 shall be made to conform to WCAG 2.0 AA by June 2018.

Legacy Pages shall be [made accessible upon request](http://miamioh.edu/accessmu/access-form/index.html) of a qualified student with a disability. [Exceptions to these requirements](http://miamioh.edu/accessmu/policy-procurement/exceptions/index.html) for certain types of content may be found at the AccessMU website. Any requests for exceptions for specific content should be directed to the Accessible Technology Coordinator.

**Oregon State**

* When contacted and offered technical assistance, units with identified high priority legacy pages must cooperate with the Office of Equity & Inclusion to make their web pages consistent with WCAG 2.0 Level AA. Units will be notified if their legacy pages have been deemed high priority and will be provided technical assistance, as needed. High priority pages will be identified by:
  + The top 20% of web pages most frequently visited as defined by Central Web Services
  + Pages required for participation, funding, disability-related services and other key pages needed by people with disabilities not already in the top 20%
  + Other pages determined to be of the most importance in providing university services online (core institutional information)
* All legacy pages must indicate in plain text a method for users having trouble accessing the site to report that inaccessibility. This could be in the form of contact information after the “Copyright 2010…Disclaimer” statement on the bottom of every OSU page.

**Univ of Hawaii at Manoa**

WEB ACCESSIBILITY IMPLEMENTATION PROCEDURES

PRIORITY OF IMPLEMENTATION

1. Priority should be given to creating accessible Web pages and resources for core institutional information such as course work, registration, advising, admission, catalogs, and student services information. Units should establish priorities for ensuring access to the pages and resources being used or requested most often. For setting priorities to make Web pages and resources accessible, the following guidance is suggested:
2. All new and revised web pages should be made accessible at the time of creation or revision.
3. The top 20% of existing Web pages and resources most frequently used (e.g. that get the largest number of hits) should be placed in the first priority for review, and made accessible as needed. Pages and resources required for participation, funding, disability-related services and other key information or functions needed by people with disabilities, not already in the top 20%, should also be placed in the first priority. Each department or college entity is responsible for determining the top 20% used and other first priority Web pages and resources.
4. Any remaining pages and resources providing core institutional information or functions should be reviewed, and made accessible as priority 2.
5. All other Web pages and resources should be reviewed, and made accessible as priority 3.

**Auburn University**

Web pages published prior to January 24, 2011 are considered Legacy Pages. Legacy pages should be made accessible or provided in alternate format upon request. Legacy pages should include a contact for users having difficulty using the page.

Upon specific request addressing accessibility, legacy pages should be updated to be in compliance with WCAG 2.0, or equivalent alternatives should be made available in a timely manner. Depending upon the type of information, the services provided by the web page, or the complexity of the content, a timely resolution should be considered.

**Purdue University**

Do Web pages created prior to the effective date of the University’s accessibility requirements (March 15, 2010) need to be made Accessible?

A4. Legacy pages must be updated in a timely manner to be in compliance with the WCAG 2.0, Level AA, or the content must be made available in an Equally Effective format to any individual requesting access.

**Southwestern Oklahoma**

* Upon a specific request for access by an individual, legacy pages must be updated to be in compliance with the WCAG 2.0 Level AA success criteria. Legacy webpages are those published for 2 years or longer.

**University of Arkansas**

Developing a plan for remediating legacy paging, including the identification of available personnel to assist with remediation efforts and the creation of a system of prioritization based on criteria such as the following:

i. web pages that have been specifically requested to be made as a part of a formal accommodation request

ii. web pages that experience a high volume of traffic

iii web pages that can be remediated with relative ease

iv. web pages requested for participation, funding, disability-related services, and other key pages need by persons with disabilities

v. Web pages that provide core institutional information, such as information pertaining to admissions, housing registration, financial aid, employment an educational materials

vi. web pages categorized as an “A” item under WCAG success criteria

vii. online course materials