	Policy Title: **Electronic and Information Technology (EIT) Accessibility Policy**	Policy Number: **9.2.1**
Category: Information Technology Accessibility and Inclusion	**Effective Date:** 4/5/2018 **Prior Effective Date:** N/A	**Policy Owner:** Senior Vice President for Academic Affairs and Provost; Senior Vice President for Administration and Finance
Policy applicable for: All members of the University of Cincinnati community	**Enabling Acts:** University Notice of Non-Discrimination Rehabilitation Act of 1973 (sections 504/508) Americans with Disabilities Act of 1990	**Responsible Office(s):** Administration and Finance; Student Affairs; Equity and Inclusion; Office of the Provost; Central Purchasing; Information Technology; Government Relations and University Communications

Introduction

The University of Cincinnati is committed to enabling an electronic and information technology (EIT) environment that is accessible to everyone, including individuals with disabilities. It is the policy of the university and the responsibility of all faculty and staff to strive to ensure EIT access. Adherence to this policy ensures that the broadest possible population is able to benefit from and contribute to the university's electronic programs and services.

This policy and related procedures establish accessibility standards and expectations regarding the design, development, acquisition and use of electronic and information technology resources.

Scope of Policy

This policy applies to all university electronic and information technology (EIT) for use by University of Cincinnati, students, faculty, staff, visitors and guests including those with disabilities, in order to conduct university business and activities or utilized as part of a course or academic offering or requirement. The policy includes information provided through the university's websites, online learning (or eLearning) environment, and course management systems.

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. A person with a disability must 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 that of persons without disabilities, it still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology.

Individual with a Disability

Federal laws define a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment."

Electronic and Information Technology (EIT)

Technology resources, software, applications, and services used by the university to make information and content available to faculty, staff, students, prospective students, guests, and visitors. EIT resources include, but not limited to, the university's websites, online learning (or eLearning) environment, and course management systems.

Policy

The university requires that EIT resources and content are designed, procured, developed, implemented and managed in a way to be accessible to individuals with disabilities and supports compliance with applicable requirements of Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, and the American with Disabilities Act of 1990, and any other relevant state and local laws.

The university will ensure that individuals with disabilities can access the educational opportunity and benefit of the institution with substantially equivalent ease of use as individuals without disabilities.

The university is committed to enabling full and equal access to content available via EIT resources. As such, the university will utilize the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 AA published by the W3C or most recent, relevant Web Content Accessibility Guidelines as defined by the EIT Coordinator and vetted through EIT Accessibility Governance Process.

Notice of Non-Discrimination

The university will incorporate EIT Accessibility into its existing non-discrimination policies, processes and procedures. The notice of non-discrimination can be found at the following link: UC Notice of Non-Discrimination

Inquiries or Concerns

Students, prospective students, employees, guests, and visitors may contact the university's EIT Accessibility Coordinator with any EIT accessibility inquiries or concerns. The university's EIT Coordinator is Heidi Pettyjohn, Interim EIT Accessibility Coordinator and Director of Strategic Priorities; Office of the Vice President of Student Affairs; email: pettyjhc@ucmail.uc.edu; phone: 513-556-9791; address: 630 Steger Student Life Center, 2801 UC Main Street, Cincinnati, Ohio 45221.

Individuals who are experiencing barriers to information found on university websites may also report their concerns and receive support in accessing information using the eAccessibility Form found on the footer of all university websites. The form can be found at this link eAccessibility Concern Form

Reporting Violations

Students, prospective students, employees, guests, and visitors may report violations of the technical standards used by the university through the university's existing Disability Grievance Procedure.

EIT Accessibility Governance Standards and Procedures

The university's Electronic Information Technology (EIT) Accessibility Committee is established to oversee and support compliance with the Electronic Information Technology Accessibility Policy. The committee is a part of the overall Information Technology Governance, and it is responsible for:

- Enabling compliance with EIT Accessibility Policy
- Defining any changes to the standards set forth in this document in accordance with applicable legal and legislative changes
- Enabling the university-wide processes to ensure that the standards set forth in this document are met in a reasonable amount of time
- Identifying potential gaps in EIT Accessibility compliance, and defining further policies, procedures, standards, processes, and guidelines to remediate the gaps

Decisions made by the EIT Accessibility Committee and approved by IT Governance will be incorporated into relevant university rules, processes and policies.

Governance Representation

Given the above responsibilities, the following offices/units are selected to be represented through EIT Accessibility Governance: Administration and Finance; Government Relations and University Communications; Student Affairs; Equity and Inclusion; Faculty Senate; Student Government; Office of the Vice Provost for Undergraduate Affairs; Office of the Vice Provost for Academic Affairs; and UC Information Technology. Others may be added as appropriate.

Accountability Structure
Senior Vice President for Administration & Finance and Senior Vice President for Academic Affairs & Provost

As policy owners, create and receive appropriate approval for policy implementation; ensure timely and necessary communication of policy to university constituents; represent and advocate for policy at the university level.

All Departments, Programs, Staff and Faculty

All agents of the university will comply with the standards set forth in this policy. All agents of the university, including faculty and staff, who create or contribute to the creation or procurement of websites, software, applications, electronic course content, or the content provided in any of these, must complete the annual EIT Accessibility training course and other training. This includes but is not limited to: accessibility training for all web content authors prior to their access to create web content; accessibility training for all approved purchasers (including university procurement card holders) prior to their access to make purchases; and all faculty who post content in the learning management system. The EIT Accessibility Coordinator will maintain institutional training records.

Deans, Directors and Department Heads

All university deans, directors and department heads will ensure compliance of the EIT Accessibility Policy and its supporting documentation within their units. This includes, but is not limited to, oversight of a process designed to:

- Ensure that all electronic content is created, procured, provided or utilized by their units in compliance with the EIT Accessibility Policy and its supporting documentation.
- Ensure that all web and digital content created within their unit is done so in an accessible format that supports the standards outlined in this policy

EIT Accessibility Coordinator

The university designates an EIT Accessibility Coordinator, who is responsible for coordination and facilitation of the compliance efforts pertaining to the EIT Accessibility Policy and its supporting documentation. EIT Accessibility Coordinator duties include, but are not limited to:

- Handling inquiries or concerns regarding the accessibility of electronic and information technology.

- Compiling and maintaining data to track compliance with the policy and related procedures

- Chairing the EIT Accessibility Governance process to ensure that university processes, policies and standards ensure compliance with applicable laws.

Office of Equal Opportunity and Access

Will collaborate with Internal Audit Office to coordinate a centralized auditing schedule for EIT to ensure compliance of web sites, systems and eLearning content.

Central Purchasing Office

Will create processes and procedures for all purchasers to support compliance at the point of procurement of any third party systems or software. Will incorporate accessibility requirement language into the RFP processes and contract requirements.

Vice President for Governmental Relations and University Communications

Will ensure that policy standards are incorporated into the UC Brand Guide and Strategy, to support a consistent and accessible public web and digital presence,

Vice President for Information Technology and Chief Information Officer

Will ensure that EIT Accessibility Governance is incorporated into an overarching IT Governance Process.

Vice President of Student Affairs

Ensures that all EIT that serves prospective, current and former students is in alignment with this policy. Will ensure that the Disability Services Office is equipped and positioned to support electronic course accessibility and accommodation requirements as stated by this policy and any related procedures.