



Digital Accessibility # 1705.020

INITIAL EFFECTIVE DATE: June 4, 2021	LAST REVISION DATE: June 4, 2021	RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT Division of Diversity, Equity, and Inclusion/Office of Civil Rights and Accessibility
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POLICY STATEMENT

All digital information and digital services acquired, developed, or delivered by any campus, college, or vice presidential (VP) unit must be accessible and in compliance with the Minimum Digital Accessibility Standards (MDAS). In compliance with the Americans with Disabilities Act (ADA) and Sections 504 and 508 of the Rehabilitation Act of 1973, the Web Content Accessibility Guidelines (WCAG)2.0, Level AA is established as Florida International University’s MDAS. This includes all manual checks as required by the WCAG 2.0, Level AA standard. For non-web digital information and digital services, the Electronic and Information Technology Accessibility Standards under Section 508 of the Rehabilitation Act of 1973 is the minimum standard.

This policy not only applies to Digital Solutions and Digital Information acquired, developed, or delivered on and after the effective date of this policy, but is also retroactive. To achieve full compliance, the University is setting priorities for addressing Learning Management System (LMS) content and functionality by first making accessible: (1) site navigation and templates; (2) key information concerning matters such as course syllabi, calendars, modules, assignments, quizzes, announcements, grades, and procedures for reporting accessibility barriers and requesting academic accommodations, academic adjustments, and auxiliary aids; (3) courses for which there is a strong likelihood or actual notice that they will be attended by one or more students or applicants with disabilities who are impacted by technological barriers to access; (4) the most popular courses available on the LMS that the University identifies; (5) portions of the LMS that are of high importance to students or applicants with disabilities; and (6) LMS content and functionality about which the University has received accessibility complaints or which has been flagged for accessibility problems by individual users.

Nothing in this policy should be construed to mean that any Digital Information or Digital Services, whether web or non-web based, is not subject to the requirements of this policy. Digital Information and Digital Services may be exempt from this policy if substantially equivalent and effective access to Digital Information and Services for similarly situated individuals with and without Disabilities when compliance is not technically possible is provided, requires extraordinary measures due to the nature of the Digital Information or Service, or is available for a short duration to a population whose needs are known and

accounted for. Policy exemptions shall be determined by the Digital Accessibility and Services Committee (DASC).

The most popular courses, listed in order of priority, available on the LMS as identified by the University are:

- Tier 0
First Year Experience (SLS) courses
Gateway Courses
Gateway to Graduation Courses

- Tier 1
Courses with Enrollment Cap 150+

- Tier 2
Non-Gateway UCC Course
Global Learning Courses
Honor College Courses

- Tier 3
All remaining Undergraduate Courses
All Graduate Courses

SCOPE

All University constituencies are entitled to equal access to digital information and digital services. This policy establishes minimum accessibility standards and guidelines that support the University's mission to disseminate knowledge and enable opportunity for every member of its community regardless of ability and in compliance with state and federal law.

REASON FOR POLICY

This policy seeks to establish Minimum Accessibility Standards and Guidelines that support the University's mission to disseminate knowledge and enable opportunity for every member of its community regardless of ability and comply with state and federal law.

The policy will ensure all University constituencies will have equal access to Digital Information and Digital Services. A user regardless of ability must be able to obtain information fully, equitably, and independently.



DEFINITIONS	
TERM	DEFINITIONS
Accessibility Standards	Guidelines contained within <u>Web Content Accessibility Guidelines (WCAG)2.0, Level AA</u> and Sections 504 & 508 of the <u>Rehabilitation Act of 1973</u> and the <u>Americans with Disabilities Act of 1990, as amended.</u>
Accessible	Information or technology that, at a minimum, affords a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same programs and activities as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. Affording a person with a disability 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 benefits and opportunities afforded by the technology and equal treatment in the use of such technology.
Archived	Digital information or digital services which are no longer actively linked to but are subject to record retention plans.
Digital Accessibility and Services Committee (DASC)	A committee comprised, at minimum, of representatives from the Office of University Compliance & Integrity (UCI), the Division of Information Technology (DoIT), the Office of Digital Communications (ODC), the Disability Resource Center (DRC), FIU Online, the Center for the Advancement of Teaching (CAT), and the Office of Civil Rights Compliance, and Accessibility (CRCA).
Digital Information	Information and content delivered through the use of technology including, but not limited to, course content, websites, electronic documents, audio, video, and computer and mobile applications.
Digital Services	Includes, but is not limited to course content, websites, web applications, and mobile or computer applications used to deliver educational, administrative, or other services to the university community or general public.
Digital Solutions	Any software, website, course content, digital/online course materials or document that serves the purposes of instruction, communication, marketing, or business operations, especially those that are public-facing in nature. This may include websites and pages; e-mails; online course materials; documents; and



	applications - including third-party products such as learning management systems and mobile apps.
Disability	A person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability.
Instructor	University departments/units, administrators, faculty, staff, and/or colleges.
Document	A physical or electronic artifact. Includes PDFs, word-processing documents, presentations (PowerPoint), publications, and e-mails produced or distributed by the university.
Learner	Any user accessing course content including faculty/staff in professional development platforms.
Course	Any structured learning environment in which a student receives credit and/or credential for completing.
Legacy Solutions	Any digital solution launched before the initial effective date of this policy. Legacy solutions will work with the Office of Digital Communications to comply with accessibility requirements herein and within the Digital Communications Standards policy.
Learning Management System (LMS)	A software application which the University makes available to students and applicants and uses to plan, create, administer, document, track, report, deliver, and maintain electronic educational courses and course content and assess student performance including by enabling collaboration and communication among members of the class and between the class and instructor, by supporting the assessment of learning outcomes; and by supporting formative and summarize feedback to students.
Learning Management System Content	Any information published to the Learning Management System by an Instructor for consumption by a Student or an applicant regardless of ability. This does not include information published to the LMS that the University determines will not be delivered or available to Students or applicants who have relevant disabilities such as for a course where none of the enrolled Students have Disabilities, the material is published after the drop-add date, and the materials are not intended for use in future editions of the course or other course. Such determinations will be made by the DASC and based on evidence not stereotypes.
Minimum Digital Accessibility Standards (MDAS)	Standards in accordance with the <u>Web Content Accessibility Guidelines (WCAG)2.0, Level AA.</u>

<p>Web Governance Software</p>	<p>Software that monitors websites and identifies errors and weaknesses as they relate to accessibility, quality assurance, search engine optimization and other factors. This software must provide continual monitoring and reporting of the University’s entire web portfolio.</p>
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ROLES AND RESPONSIBILITIES

Operations

I. Administration

1. The office of CRCA consults with campuses, colleges, and VP units on compliance with this policy.
2. The DASC implements, reviews, and provides technical assistance regarding the MDAS; guides product evaluations as requested or necessary; processes exceptions; and resolves complaints under this policy.
3. The Chief Information Officer creates and charges a Digital Accessibility and Services Team in DoIT to collaborate with DASC to assist with digital accessibility evaluations of software and digital content, training, writing remediation/accommodation plans, consulting with vendors/internal developers, and filing exceptions.
4. Each campus, college, and VP unit with an IT security coordinator will designate an accessibility coordinator, and notify the DASC of the appointment or any change in the designee. The accessibility coordinator, through a local structure, will implement the requirements of this policy. This structure must address the acquisition, development, and delivery of digital information and services in the following areas:
 - a. Information technology (IT) and web support;
 - b. Purchasing digital information and/or services;
 - c. Business and transactional processes;
 - d. Marketing, recruitment, and communications; and
 - e. Delivery of content (including instructional content, policies, procedures, etc.).

II. Responsibilities

Position or Office	Responsibilities
<p>Unit Accessibility Coordinators</p>	<ol style="list-style-type: none"> 1. Implement the requirements of this policy for their respective campus, college, or VP unit. 2. Develop and implement a local structure addressing the acquisition, development, and delivery of digital



	<p>information and services as specified in this policy.</p> <ol style="list-style-type: none"> 3. Ensure that faculty, staff, and student employees who acquire, develop, and deliver digital information and services comply with this policy (see responsibilities below). 4. Ensure their campus, college, or VP unit’s digital services indicate a method of contact for difficulty in accessing digital information or digital services. 5. Submit an Annual Digital Accessibility and Services Report and Plan by the third Friday in January to CRCA for review and approval. 6. Complete annual digital accessibility training. 7. Facilitate training their campus, college, or VP unit faculty, staff, and student employees who acquire, develop, and deliver digital information and services.
Office of Civil Rights, Compliance, and Accessibility (CRCA)	<ol style="list-style-type: none"> 1. Provide guidance to campuses, colleges, and VP units. 2. Track accessibility coordinator(s) for each campus, college, and VP unit. 3. Grant exceptions to the policy as appropriate, in consultation with the DASC, Dean, or VP of the requesting unit, and/or the appropriate academic oversight group. 4. Take and resolve complaints about the policy. 5. Coordinate annual digital accessibility training with DASC and the Center for the Advancement of Teaching. 6. Review and approve each campus, college, or VP unit’s Annual Digital Accessibility and Services Report and Plan or assist in remedying any deficiencies.



<p>Digital Accessibility and Services Committee</p>	<ol style="list-style-type: none"> 1. Implement, review, and provide technical assistance to campuses, colleges, and VP units on MDAS and compliance with this policy. 2. Guide product evaluations as requested or necessary. 3. Consult with CRCA on exception requests. 4. Develop and deploy accessibility training and professional development. 5. Take and resolve complaints about the policy. 6. Evaluate digital information or digital services when complaints are received.
<p>Digital Accessibility Services Team Within DoIT</p>	<ol style="list-style-type: none"> 1. Partner with the CRCA and DASC to determine training content, provide delivery of content, and track training completion institutionally. 2. Assist with digital accessibility evaluations of software and digital content, writing remediation/accommodation plans, and filing of exceptions for campuses, colleges, and VP units. 3. Consult with vendors and internal developers to ensure the assessment tool is meeting the needs of the university. 4. Effectively coordinate communication of accessibility requirements to campuses, colleges, and VP units, ensuring all units are informed.
<p>Campus, College, Vice Presidential Unit</p>	<ol style="list-style-type: none"> 1. Designate one or more accessibility coordinator(s), and notify the CRCA who is responsible or if changes in designation occur. If the unit has an IT security coordinator, the unit must identify an accessibility coordinator. 2. Ensure all digital information and digital services are accessible and in

	<p>compliance with the MDAS whether acquired, developed, or delivered.</p> <ol style="list-style-type: none"> 3. Respond within one business day to individuals who express difficulty accessing digital information or digital services and elevate a description of the response to the accessibility coordinator and the DASC. 4. Make accessible or provide an equally effective alternative within 10 business days of a specific request. Make legacy and archived digital information and digital services accessible according to the procedures specified. 5. If applicable, request exceptions to this policy using the Accommodation-Based Exception Request Form. 6. Forward any complaint received to the DASC using the Digital Accessibility and Services Complaint Form within one business day of receipt. 7. Comply with any actions as determined necessary (as a result of a complaint) by the CRCA or DASC.
<p>Faculty, Designers, Staff, and Student Employees who Acquire, Develop, and/or Deliver Digital Information and Services</p>	<ol style="list-style-type: none"> 1. Understand and implement the MDAS and available accessibility assessment tools. 2. Inform and approve, as applicable, unit decisions related to acquisition, development, and delivery of digital information and services. 3. Be aware of, complete, and appropriately disseminate training and technical assistance. 4. Assist in evaluating digital information, services, and delivery. 5. Respond to users encountering accessibility barriers. 6. Make digital information available in accessible formats.



RELATED RESOURCES

[Web Content Accessibility Guidelines \(WCAG \)2.0, Level AA](#)

[Electronic and Information Technology Accessibility Standards under section 508 of the Rehabilitation Act of 1973.](#)

[Digital Communications Standards Policy](#)

CONTACTS

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HISTORY

Initial Effective Date: June 4, 2021

Review Dates (*review performed, no updates*): N/A

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