Oklahoma State University Policy and Procedures

DIGITAL ACCESSIBILITY	1-0136 GENERAL UNIVERSITY August 2021

PURPOSE

1.01   The Oklahoma State University (OSU) System is committed to providing equal access to digital information. This policy establishes standards for the accessibility of digital information and services considered necessary to meet the OSU System goals and ensure compliance with applicable law.

DEFINITIONS

2.01   **Accessible** – Refers to the concept individuals with disabilities have access to and use of digital information comparable to the access to and use of digital information without disabilities.

2.02   **Digital Information** – any digital material which can be distributed electronically. This includes, but is not limited to, HTML web pages, digital documents such as Microsoft Word, Excel or Adobe PDF, audio and video, and instructional material in any format.

2.03   **Digital Information Providers** – any individual or group providing digital information on behalf of the OSU System.

2.04   **Information and Communication Technology (ICT) Resource** – any electronic tool or tools used to deliver or interact with digital information. Examples include, but are not limited to, software applications, systems, and web-based services.

2.05   **Legacy Content** – content or pages published before the effective date of this policy.

2.06   **Limited Distribution** – digital information distributed to a select number of individuals not requiring accommodation.

2.07   **New Content** – content or pages created after the effective date of this policy.

2.08   **Redesigned Content** – content or pages altered or updated, including content modifications.

2.09   **Responsible Party** – the individual or individuals providing design, content, or functionality for ICT resources. The individual or individuals overseeing purchasing and procurement processes.

2.10   **Standards** – the digital accessibility standards adopted by OSU.

2.11 **Websites** – a location, connected to the Internet, maintaining one or more pages on the World Wide Web.

RESPONSIBILITIES

3.01   This policy applies to all units of the OSU System, including the following:

Responsible Parties	Role Definition
Vice Presidents, Deans, Department Heads, Directors, Unit Heads	Provide necessary support within the unit for compliance with this policy.
OSU System Information Technology and Communications Departments	Coordinate to provide education, training, and support resources to University community members on compliance with this policy.
Application Developers	Design or revise applications/websites in accordance with this policy.
OSU System employees and affiliates who create, edit, or publish web pages to provide University services, programs, or instruction	Design or revise ICT Resources in accordance with this policy.
Individuals who purchase or implement ICT Resources.	Require compliance to this policy in all digital and/or ICT purchases, licenses, and free resources utilized.

POLICY

4.01   Accessibility Requirements
Digital information will be accessible to persons with disabilities, as specified below. Unless an exemption applies, all units of the University shall:

   A. Ensure ICT resources and digital information adhere to the standards set forth in this policy.

   B. Use University designs consistent with applicable State and federal laws and standards, as well as the University's current level of Web Content Accessibility Guidelines (WCAG). For more information on WCAG, visit http://www.w3.org/WAI/intro/wcag. View OSU Web Standards at https://go.okstate.edu/tos/.

   C. OSU's accessibility requirements should be reviewed annually to determine if any updates to the standards are necessary.

4.02   Exemptions

If adopting the policy would result in a fundamental alteration of the intended function of the OSU System digital information, or pose an undue burden to conform to the standards, units may request an exception. Insufficient funds of a particular unit will not normally be considered a reason for an exception.

The Office of Equal Opportunity will evaluate requests for exceptions and determine whether, and to what extent, exceptions will be granted. If an exception is granted, site owners may be required to make the content on their University web properties available in an alternative accessible format.

The foregoing notwithstanding, all digital information must be made accessible to accommodate a qualified person with a disability upon request.

It is strongly preferred all digital information abide by the standards, as this improves the readability and clarity of the digital information.

In the event digital information does not meet the above exemption criteria, it is necessary to submit an Equally Effective Alternate Access Plan (EEAAP) form to the Office of Equal Opportunity for review. Please email eeo@okstate.edu for instructions and required information.

The conclusion of undue burden or non-availability is an institutional decision to be made by the Office of Equal Opportunity in consultation with the affected unit and others with relevant perspective or expertise.

4.03   Adoption of Standards

From the policy implementation date, all new and redesigned content, ICT resources and digital information shall adhere to the standards set forth in this policy.

Units must submit an outlined transition plan including, but not be limited to, the following:
   A. Conduct inventory for every department to self-identify systems, websites, applications and digital information.

   B. Identify responsible parties for each system and activity within the policy/plan.

   C. Identify audiences and systems by numbers of users.

   D. Test systems for level of compliance.

   E. Go step-by-step through issues.

Units should adopt the standards for legacy content in phases and prioritize highly visible digital information in their transition plan. Transition plans must be submitted to the Office of Equal Opportunity for review. An adoption timeline and transition plan completion dates will be provided following the review.

4.04   Compliance

      A. The Office of Equal Opportunity is responsible for overseeing compliance with State and federal regulations prohibiting discrimination on the basis of disability. Questions or concerns regarding compliance with the policy or standards should be directed to the Office of Equal Opportunity.

      B. Each individual or unit responsible for ICT resources and digital information must also know the policy and how to provide accessible content. Those responsible must also monitor and evaluate their content for accessibility.

      C. OSU System responsible parties and digital information providers are required to attend and track accessibility training.

4.05   Procurement

ICT resources purchased or used fall under the terms of this policy. Responsible parties must account for accessibility among other requirements and decision-making criteria for ICT resource purchase or use decisions.

All procurement shall adhere to this policy and the OSU/A&M Board of Regents Purchasing Terms & Conditions, as well as meet the requirements of the HB2197 Oklahoma Electronic Information and Accessibility Act.

4.06   Consequences for non-conformance to the policy

Failure to comply with the policy may result in temporary or permanent sanctions relating to the individual's use of System resources or other appropriate corrective actions via OSU Human Resources policies.

4.07   Contact Information

Office of Equal Opportunity
eeo@okstate.edu
405-744-9153

Approval:
E-Team, August 2021
Board of Regents, September 2021