Digital Accessibility Policy

Policy Statement

Grinnell College is committed to providing equitable access to digital information and information technology, including services and the physical and virtual environments in which information technology is used.

Ensuring equal and effective electronic and information technology access is the responsibility of all College administrators, faculty, staff, and College-sponsored student organizations. These responsibilities include the:

- use of Web page design standards that provide access for all, including those with disabilities;
- use of hardware and software products that promote universal design and access; and
- provision of accessible technology-related work environments that accommodate all users.

Summary

Grinnell College provides equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. This policy extends to the college's digital and information technologies and applies to their procurement, development, implementation, and ongoing maintenance. This policy addresses the following areas:

- Web accessibility;
- instructional materials accessibility;
- document accessibility;
- electronic media accessibility;
- software, hardware, and systems accessibility; and
- procurement.

Purpose

Incorporating principles of universal design in the development, acquisition, and implementation of information technology and related resources helps the college to ensure that these resources (documents, Web pages, information, services, etc.) are accessible to the widest possible audience.

This policy will help ensure that all individuals have access to information and information technology associated with administration and services, courses of instruction, departmental programs, and College-sponsored activities.

Legal Requirements

- [Americans with Disabilities Act](#)
- [Section 504 of the Rehabilitation Act of 1973](#)
- [Section 508 of the Rehabilitation Act Amendments of 1998](#)
- [Higher Education Opportunity Act of 2008](#)
- [Iowa Civil Rights Act](#)

Guidelines

The Dean of the College (or designee) is responsible for interpreting the Digital Accessibility Policy and providing executive authority, with consultation as necessary, over all digital accessibility within the scope of this policy.

The following circumstances may qualify as exemptions from this policy:

1. 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 department, program, or unit of the college would not be considered a valid reason for an exemption.
2. Where compliance would result in a fundamental alteration of the information resource, application, or service, and not satisfy the original intent.
3. Where the product is not currently in compliance, but efforts are underway to fix the defects by a defined date.

An exemption to this policy may be made by submitting an exemption request form to be reviewed by the Dean of the College (or designee) and the Chief Information Officer (or designee). Non-compliant information technology must not be purchased or developed prior to receiving an exemption approval.

Accessibility Standard

[Web Content Accessibility Guidelines (WCAG) 2.0](#), level AA, shall serve as the Web accessibility standards ("College Web Accessibility Standards") for Grinnell College.

Web Accessibility

- All new and redesigned Web pages published for, hosted by, or otherwise provided by the College or any of the College's departments, programs, or offices, must comply with the College Web Accessibility Standards.
- All pages created or last updated prior to February 1, 2018 must be made accessible in accordance with the implementation timeline indicated in Appendix A
- Web pages, including Legacy or archive pages, that are specifically requested to be made accessible as an accommodation for an individual with a disability shall be made accessible, or an equally effective alternative must generally be provided within 10 business days.
  - Information-based pages must communicate the same information in an accessible format, and with an equivalent level of accuracy.
  - Interactive or service pages must provide for completion of a process (e.g. registration) in a time interval comparable to that of users with no disabilities, and with comparable effort on the part of the requestor.
- Each Grinnell College-affiliated Web site shall indicate on each page (e.g., in the footer) the method to request an alternatively formatted copy of the page content for users having difficulty accessing the content.
- All Grinnell College generated content (including PDFs, Web forms, etc.) available on a page or discoverable by a search engine must be made compliant with the College Web Accessibility Standards.

Instructional Materials Accessibility

This policy applies to all electronic instructional materials (including, but not limited to, syllabi, textbooks, presentations, and handouts) delivered within the college's learning management system, in face-to-face classes, or in an alternate fashion (online learning systems, email, course Websites, blogs, etc.) and electronic instructional activities (online collaborative writing, Web conferencing, etc.).

All faculty, departments, and programs will:

- ensure that instructional materials comply with all requirements outlined in this policy;
- ensure that all classrooms use and deliver accessible electronic and information technology;
- ensure that all computer labs provided for student use will have assistive technologies including, but not limited to, accessible computer stations, screen reading software, and screen magnification;
- ensure that all applications developed on campus (Web, desktop, etc.) are accessible according to principles of the College Web Accessibility Standards,

WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-Web environments); and
- create and present accessible courses and instructional materials.

Document Accessibility

This policy applies to all College-produced or -distributed electronic documents. Electronic documents include, but are not limited to, word processing documents, PDFs, presentations, publications, and spreadsheets that are scanned, uploaded, posted, or otherwise published or distributed electronically. All documents available on a page or discoverable by a search engine must be made accessible or be removed from electronic publication.

- Electronic documents must meet the standards and guidelines outlined in the [Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies](), published by the W3C as the Working Draft on 5 September, 2013.

Electronic Media Accessibility

All media resources, whether optional or required, used in College programs and activities must be accessible. For example, this includes, but is not limited to, media that is instructional, informational, marketing, and promotional.

- Video media resources must be closed-captioned and audio-described and audio resources must be transcribed.
- All classroom and presentation equipment must be caption-compatible and captions should be enabled by default on all compatible display equipment (e.g., TVs).
- All departments, programs, instructors, and employees:
  - When purchasing audiovisual materials:
    - must purchase a captioned version if one is available.
    - must purchase a transcribed audio and audio-described version if one is available.
  - Will ensure that all other media that will be used on the Web or during instruction is captioned.
  - Will update any non-transcribed audio and any non-captioned/non-described video that is in use.
  - Will use only transcribed audio and closed-captioned media with audio-descriptions that are made available in a timely manner to the class.

Software, Hardware, and Systems Accessibility

All software, hardware, and systems procured, whether purchased or adopted without cost to the college or users, must be accessible and must produce accessible products unless granted an exception under this policy. Accessible, in this context, means compatible with assistive technology. Examples of software, hardware, and systems include, but are not limited to, learning and content management systems, library and email systems, administrative management systems such as finance, registration and human resources, and all software, hardware and software services used for student services. Software includes freeware, shareware, desktop, enterprise, subscription, and remotely-hosted options. Software that is accessed through a Web-browser must also be accessible according to the Web Accessibility section of this policy.

The US Access Board's Guide 508 Standards - Software Applications and Operating Systems standards must be used to determine accessibility.

- Software, hardware, local interfaces and modifications, and electronic systems must be accessible.
- All applications (Web, desktop, mobile, etc.) developed on campus or with College resources must be accessible according to principles of the College Web Accessibility Standards, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-Web environments).
- Assistive technologies must be available to students working in campus labs or on publicly-accessed campus computers. Whenever possible they should be included in the standard campus computer image to allow for immediate and independent use.
- Assistive technologies must be available as a reasonable accommodation for campus employees with disabilities including student employees.

Procurement and Adoption of Software and Systems

Any information technology - including, but not limited to, computers and ancillary equipment, instructional materials, software, videos, multimedia, telecommunications, or Web-based content or products - developed, procured, maintained, or used in carrying out College activities must be compliant with Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended, the Iowa Civil Rights Act, and other related local, state, and federal laws, as well as other related College standards detailed above.

- All information technology procurements are required to be reviewed for compliance prior to procurement.
- Departments/employees requesting software, hardware, and/or systems will be asked to provide a product Voluntary Product Accessibility Template (VPAT) and any other accessibility information requested by the Chief Information Officer or

designee. This information will be reviewed for compliance with this policy prior to procurement.

- When the college contracts with a third party to provide technology products or services with a user interface or end product, consideration should be given to whether including an accessibility compliance clause or addendum to the contract is appropriate.
- When a contract is renewed, consideration should be given to whether an accessibility compliance clause or addendum to the contract is appropriate if the subject matter is not already addressed in the contract. In addition, an accessibility review of the product is required before submitting the contract to purchasing if the contract does not have an accessibility clause or addendum. If the product is not fully accessible, an accessibility exceptions request must be submitted and the vendor contacted to determine remediation timeframe.

Review Cycle

This policy will be reviewed at least annually by the Dean of the College (or designee).

Last Updated: 2018-08-01

Appendix A-Implementation Timeline

By October 1, 2018, all Web Pages must indicate a method of contact for users with disabilities having trouble accessing content.

All Web pages and documents must be revised to be in compliance with the Grinnell College Digital Accessibility Policy or, in the case of Web pages and documents that are no longer used, removed from the site.   Decisions regarding the order in which Web pages and documents are revised should be made by following the implementation priorities below. Any individual, department, program, or office who requires assistance in evaluating implementation priorities should contact the Assistant Dean for Disability Resources.

1. The 25% most visited Web pages and documents for each site (i.e., that get the largest number of hits) must be in compliance within one year of the effective date of this policy (September 1st, 2019). Communications and Information Technology Services can help to identify frequency of use of pages.
2. Pages required for participation, disability-related services, and other key pages needed by individuals with disabilities not already in the most visited 25% must also be in compliance within one year of the effective date of this policy (September 1st, 2019).
3. Pages and documents no longer in use should be removed or archived, in accordance with record maintenance guidelines, within one year of the effective date of this policy (September 1st, 2019).
4. Remaining Web pages and documents must be in compliance according to the following schedule:
   - Next 25% most visited by September 1, 2020 (50% of Web pages in compliance)
   - Next 25% most visited by September 1, 2021 (75% of Web pages in compliance)
   - Next 25% most visited by September 1, 2022 (100% of Web pages in compliance)

Specific Requests for Access

Upon specific request for access by an individual with a disability, Web pages or documents must be made accessible, or an equally effective alternative provided, within 10 business days of receiving the request. The unit responsible for the creation and maintenance of the information on the Web page is responsible for making it accessible. Equally effective means that the alternative communicates the same information in as timely a fashion as does the original Web page or document. For interactive or service pages, equally effective means that the end result (e.g., registration) is accomplished in

a comparable time and with comparable effort on the part of the requestor. If the context of the information or service the page provides cannot be made accessible within 10 business days, this timeframe may be extended in consultation with the Assistant Dean for Disability Resources.

Appendix B—Implementation Supports

Requests for data on site usage to determine most visited pages can be requested by submitting a technology services desk ticket.

Training on digital accessibility principles and product specific accessibility features will be offered routinely and can be signed up for in advance on the HRs Training site (GrinnellShare log-in required).

Content managers can request access to Site Improve monitoring by submitting a technology services desk ticket.

On-demand training is available through Lynda.com for a variety of digital accessibility topics. A playlist including various digital accessibility courses has been created for easier browsing.

Request for review of document accessibility or assistance in remediation of a document can be submitted via the Document Accessibility Audit workflow (GrinnellShare log-in required).

For additional guidance, contact Autumn Wilke, Assistant Dean for Disability Resources wilkeaut@grinnell.edu or 641-269-3089