



Approved By: Cabinet
Effective Date: May 8, 2018

Category: General College
Contact: Office of Diversity and Equity
585-245-5020

Policy on Web Accessibility

I. SCOPE

This policy applies to:

- All organizational units of the College.
- All new and existing College websites, including those created, designed, or maintained by a vendor.

This policy does not apply to:

- Archived web content that has not been modified since the effective date of this policy.
- Individual web pages published by students, employees, or non-College organizations that are hosted by the College and do not conduct College-related business. Individuals and organizations responsible for these pages are encouraged to adopt the College's policy and web standards.

II. POLICY STATEMENT

SUNY Geneseo is committed to providing equality of opportunity to persons with disabilities. In keeping with this commitment, the College requires its web content and functionality to be accessible to everyone, including people with physical, sensory, or cognitive impairments, with or without the use of assistive technology.

III. POLICY

A. Web Standards

1. All new or modified online content and functionality published or implemented after the effective date of this policy must conform to Web Content Accessibility Guidelines 2.0 Level AA (WCAG 2.0 AA), except where doing so would constitute a fundamental alteration or impose an undue burden as outlined in section III(D). The content accessibility guidelines include (but are not limited to) the following essential standards:
 - i. Web content must be accessible to users employing screen reader technology.
 - ii. Alternative text must be provided for visual content when necessary to convey meaning.
 - iii. Websites must be navigable by keyboard, as an alternative to mouse navigation.
 - iv. Websites must not rely on color alone to convey meaning.

- v. Websites must provide captions and/or transcripts for all audio and video content.
2. Websites, forms, documents, videos, and other online content published prior to the date of this policy must be remediated by [Sept. 15, 2019].
3. Archived web content is not required to meet accessibility guidelines. If an individual with an impairment requires an accommodation to access archived content, the College will provide reasonable accommodations. In most cases, this will mean that the content will be provided in an accessible format within three (3) business days.

B. Procurement

1. All hardware, software, programs, and other information technology (IT) procured from vendors must be accessible if the IT will be used to access College programs, services, or activities.
 - i. Any person or unit responsible for the procurement of IT used to access College programs, services, or activities must obtain the following information from vendors:
 - a. A description of how the IT product or service is accessible to users, including individuals who use assistive technology; and
 - b. A fully-completed Voluntary Product Accessibility Template (VPAT). Any aspect of a product described in a VPAT as out of compliance must be accompanied by an accessibility roadmap detailing how and when the vendor will bring the product to full compliance.

C. Responsibility

1. President, provost, vice presidents, deans, directors, department heads, managers, and supervisors are responsible for:
 - i. Ensuring web content in their areas comply with this policy.
 - ii. Ensuring vendor-provided, web-based IT products that facilitate access to programs, services, and activities are accessible by obtaining the required information from vendors in advance of procuring the IT.
2. Unit website administrators are responsible for:
 - i. Ensuring that new and updated web pages, forms, documents, videos, and other content on public-facing pages of their unit website conform to WCAG 2.0 AA guidelines.
 - ii. Ensuring that web pages, forms, documents, videos, and other online content published in their unit website prior to the date of this policy are in compliance with WCAG 2.0 AA guidelines by [Sept. 15, 2019].
 - iii. Providing reasonable accommodations to individuals who request access to inaccessible archived web content.
 - iv. Interfacing with third-party web service vendors used by their unit to identify and remediate any accessibility concerns, and to provide equally effective alternative means of access if accessibility concerns cannot be remediated.
3. Course instructors are responsible for:

- i. Ensuring that third-party websites or applications which haven't already been vetted by the College and are used in course instruction are accessible by obtaining the required accessibility information from the vendors
 - ii. Providing timely and effective alternative means of course access and completion if third-party websites and/or applications are inaccessible and cannot be remediated.
4. The chief information officer is responsible for:
 - i. Planning for accessibility across all information technology hardware, software, and systems at the College.
5. The chief diversity officer is responsible for:
 - i. Investigating complaints of non-compliance with this policy.
 - ii. Considering and ruling on exception requests.

D. Exceptions

1. In consultation with the chief information officer, limited exceptions may be granted by the Office of Diversity and Equity in instances where compliance is not possible because one or both of the following conditions apply:
 - i. Compliance would constitute a fundamental alteration of the nature of the web content or service; or
 - ii. Compliance would impose an undue administrative or financial burden.
2. Organizational units requesting an exception must provide equally effective alternative access to ensure that, to the maximum extent possible, individuals with disabilities have the same access to the program, service or activity as their nondisabled peers.
3. Organizational units requesting an exception must provide a written statement detailing the following:
 - i. Reasons for requesting an exception, including the cost of meeting the requirement and available funding and resources.
 - ii. Description of how alternate access will be provided.

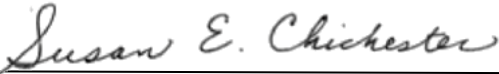
E. Complaints

1. Individuals who believe that there is a violation of this policy should contact the Chief Diversity Officer. An individual who files a complaint will be protected against retaliation.

IV. DEFINITIONS

- A. **Accessible:** Able to be used by all individuals, including individuals with disabilities, with or without assistive technology.
- B. **Alternative Text:** Also known as "alt text," a word or phrase that can be inserted into an HTML document that tells viewers the nature or content of an image.
- C. **Archived Web Content:** Web content that: (1) is maintained exclusively for reference, research, or recordkeeping; (2) is not altered or updated after the date of archiving; and (3) is organized and stored in a dedicated area or areas clearly identified as being archived.

- D. **Assistive Technology:** Any software or hardware that allows access to information technology for individuals with disabilities. Examples include special input devices (e.g., head or foot mouse, speech recognition), screen-reading software, and screen magnifiers.
- E. **Equally Effective Alternative Access:** An alternative format or medium that communicates the same information in as timely and effective a fashion as does the original format or medium. For interactive or service pages, equally effective means the end result is accomplished in a comparable time and with comparable effort on the part of the requestor. To provide equally effective alternate access, alternates are not required to produce the identical result or level of achievement for persons with and without disabilities, but must afford persons with disabilities equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.
- F. **Fundamental Alteration:** A change so significant that it affects the essential nature of the instruction, program or activity provided.
- G. **Screen Reader:** Software that allows a computer to identify and convert text to speech.
- H. **Undue Administrative or Financial Burdens:** A significant disruption, expense and/or difficulty posed by the provision of accessible information technology. When a department is concerned that the provision of accessible information technology will pose undue financial or administrative burdens, it must proceed according to the procedures in this policy.
- I. **Voluntary Product Accessibility Template:** A document which evaluates how accessible a particular product is according to web accessibility. It is a self-disclosing document produced by a vendor which details each aspect of web accessibility requirements and how the product supports each criteria.
- J. **Web Content:** The textual, visual, or audio content that is encountered as part of the user experience on websites. For purposes of this policy, web content also includes forms and documents accessible through SUNY Geneseo websites.
- K. **Web Content Accessibility Guidelines:** A series of standards developed by the World Wide Web Consortium, the main international standards organization for the internet, which promotes usability and best practices to ensure web access for individuals with disabilities.



Signature
Susan E. Chichester
CIO & Director, CIT

May 8, 2018
Date of Approval