

# Digital Accessibility Policy

## Policy Statement

The University of Arizona Global Campus (UAGC) is committed to fostering a digital environment that ensures equal access to information, technology, and services for all members of our community, including students, faculty, staff, and individuals with disabilities. This policy aligns with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Section 508 compliance requirements, and the U.S. Department of Justice (DOJ) Title II final rule (2024). Our goal is to provide accessible digital resources that support academic success, professional development, and community engagement.

## Definitions

- **Digital Accessibility:** The practice of designing digital content, tools, and technologies to be usable by people of all abilities, including those with disabilities.
- **Equally Effective Access:** Access that ensures individuals with disabilities can obtain, engage with, and utilize digital content with the same ease and timeliness as individuals without disabilities.
- **Assistive Technology:** Tools and software such as screen readers, voice recognition software, and alternative input devices that provide digital access to content for individuals with disabilities.
- **Reasonable Accommodations:** Modifications or adjustments that provide equal access without fundamentally altering the nature of a program or service.

## Scope

This policy applies to all digital content, services, and platforms owned, operated, or used by UAGC, including but not limited to:

- University websites and web applications
- Learning management systems (LMS) and course materials
- Mobile applications and third-party digital services
- Electronic documents (e.g., PDFs, Word documents, presentations)
- Multimedia content (e.g., videos, podcasts, live-streamed events)
- Campus communication tools (e.g., email, student portals, library databases)

## Standards and Compliance

### Summary of Accessibility Standards

UAGC adheres to the following laws, regulations, and standards to guide our requirements for accessibility of digital content, technology, and services:

- Americans with Disabilities Act (ADA), Title II, as amended.
- Section 504 of the Rehabilitation Act of 1973
- Revised Section 508 Standards of the Rehabilitation Act
- The Web Content Accessibility Guidelines, published by the World Wide Web Consortium

The university shall:

- Require all newly developed, significantly updated, and any digital content currently in use to meet current accessibility standards as defined.
- Ensure third-party vendors and contractors adhere to accessibility standards in procurement agreements.
- Provide accessible alternatives for essential digital resources when immediate compliance is not possible. (see Alternative Request Process)
- Conduct regular accessibility audits and usability testing to identify and resolve barriers.

***Compliance will be verified through a combination of Accessibility Conformance Report (ARCs), Voluntary Product Accessibility Template (VPAT) evaluations, internal accessibility testing, contractual obligations, and periodic reviews.***

## Responsibilities

Each department and unit within UAGC must adhere to the guidelines within this policy to ensure that all digital content, services, and platforms under their management comply with accessibility standards. If guidance or support is needed, departments are encouraged to consult with the ADA Coordinator for assistance in meeting compliance requirements.

- **ADA Coordinator:** Ensures compliance with the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and other accessibility regulations. This role involves overseeing policy implementation, coordinating reasonable accommodations for students, ensuring digital and physical accessibility, providing training on accessibility best practices, and addressing complaints related to disability access. The ADA Coordinator also collaborates with institutional departments to integrate accessibility into university operations and monitor compliance.
- **Accessibility Committee:** To assist in overseeing accessibility initiatives. Responsible for reviewing Alternative Requests, assessing, and recommending accessibility improvements, providing guidance on accessibility training and policy development, ensuring ongoing monitoring of accessibility compliance.
- **Staff:** Staff who create content are responsible for ensuring the content meets accessibility standards and for maintaining accessibility of content or digital resources.
- **IT and Web Development Teams:** Ensure university websites, apps, and online platforms comply with accessibility standards.
- **Procurement and Legal Departments:** Include accessibility requirements in vendor contracts and review compliance documentation.

## Third-Party Vendors and Digital Accessibility Compliance

UAGC recognizes that third-party vendors play a critical role in providing digital services and products used by the university. To ensure compliance with digital accessibility standards, all third-party vendors providing digital content, platforms, software, or services must adhere to the following guidelines:

### Procurement and Contractual Requirements

- All contracts for digital services must include an accessibility compliance agreement requiring conformance with UAGC current standards.

- Vendors must provide an Accessibility Conformance Report (ARCs), Voluntary Product Accessibility Template (VPAT), Higher Education Community Vendor Assessment Toolkit (HECVAT), or an equivalent accessibility report.
- Accessibility compliance must be assessed as a critical component of vendor selection.

### Vendor Review and Approval Process

- Products are reviewed and should be accessible prior to launch. If a vendor's product does not meet UAGC current standards, a **remediation plan** must be submitted, detailing steps and provide specific detail for timeliness in achieving compliance.
- Alternative solutions must be evaluated in cases where a vendor's product cannot be made fully accessible. Unless it is determined to be **technically infeasible** due to limitations in technology or physical conditions, an alternative solution will not be approved if other vendors offer accessible options that meet the required standards.

### Ongoing Monitoring and Compliance Enforcement

- UAGC will conduct **accessibility audits** of vendor-provided services.
- If a vendor fails to meet compliance requirements within an agreed-upon time, UAGC reserves the right to terminate or reconsider the contract.

### Accessibility Alternative Request Process

In cases where full accessibility compliance following UAGC standards is not technically feasible, an **Accessibility Alternative Process** must be followed:

1. **Prioritize accessibility first:** Digital content should be designed to be fully accessible whenever possible.
2. **Use alternatives only when necessary:** If a tool cannot be made fully compliant, an alternative may be provided **only if it ensures equally effective access**.
3. **Document and review:** All alternative access measures must be:
  - Justified with an explanation of why full compliance is technically infeasible.
  - Temporary, with a plan for remediation.
  - Monitored for effectiveness and timeliness.

See **Appendix A: Accessibility Alternative Process Policy** for full guidelines.

### Training and Support

To uphold accessibility standards, UAGC will connect staff to resources, and technical support to assist faculty, staff, and content creators in implementing accessibility best practices:

- Online training modules.
- Accessibility evaluation tools and guidance.
- Consultation and assistive technology support.

## Reporting and Feedback Mechanism

Individuals who experience accessibility barriers are encouraged to reach out to the ADA Coordinator or complete the online [reporting form](#). All reports will be reviewed, and timely corrective actions will be taken.

## Review and Continuous Improvement

This policy will be reviewed annually to align with evolving accessibility standards, technological advancements, and align with updates to WCAG and ADA regulations.

For questions or assistance regarding accessibility, please contact:

### ADA Coordinator

Email: [Leah.Belsley@uagc.edu](mailto:Leah.Belsley@uagc.edu)

Phone: 866.711.1700 x 20705.

## Appendix A Policy: Accessibility Alternative Process:

The UAGC Accessibility Alternative Process (AAP) ensures that when digital resources, tools, or platforms are not fully accessible, an alternative means of access that is timely, equitable, and effective is provided. This aligns with UAGC Digital Accessibility Policy, Section 504 of the Rehabilitation Act, Title II of the ADA, and Section 508 compliance requirements. To receive approval to implement, departments must submit a request to the Accessibility Committee for review and approval. Implementation of an approved AAP must:

- Ensure that users can access information and technology in a timely and equally effective manner.
- Ensure comparable functionality, ease of use, and autonomy to individuals with disabilities.
- Maintain the level of engagement and interactivity as the original.
- Be documented and regularly reviewed to ensure continued compliance with the UAGC Digital Accessibility Policy.

### Primary Expectation: Conformance with current guidelines:

- *Digital content and applications must be fully accessible whenever possible.*
- *Alternatives will not be approved for use as a default replacement for accessibility compliance.*
- *Proactive accessibility planning is required when adopting new technologies, designing course content, or University sponsored events.*

### Distinction of Alternates and Academic Accommodations:

*Academic Accommodations are provided to students with disabilities through the Office of Student Access and Wellness. Academic Accommodations are required by the ADA and Sect. 504 of the Rehabilitation Act of 1973.*

- *Academic Accommodations are provided only after completion of the required request process. Examples include extended time for quizzes and exams, ASL interpretation, and alternative formats of course materials. Accommodation does not adjust the fundamental learning objectives of a course.*
- *Title II of the ADA requires that their programs services and activities from the point of implementation and are available without additional request. Meaning institutions must proactively ensure the absence of accessibility barriers. This differs from academic accommodations that are provided to individuals on a case-by-case basis only after a request has been made.*

**Use of AAP:**

*This process will only permit the use of alternatives under the following:*

- *Technically infeasible: Full compliance with the identified accessibility standards is not technically possible. In the context of the Americans with Disabilities Act (ADA) Title II, "technically infeasible" is used to describe situations where meeting a specific accessibility requirement would be impossible due to limitations in technology.*
- *Equally effective access is ensured: Any alternative must provide the same information, interaction, independence, and timeliness as the original.*
- *Temporary: Alternatives are to be used on a temporary basis; the department responsible for the alternative implementation must also document the justification for the use of the alternative and develop a clear plan for remediation.*

*To determine if an alternative is appropriate, consider the following:*

1. *Can compliance be achieved?*
2. *Is the tool, resource, or application essential, and no accessible equivalent exists?*
3. *Can an alternative provide equal access that includes the same information, interaction, and independence?*
4. *Will the alternative create delays or require additional steps for use?*

*Documentation requirements for AAP:*

- *Any use of alternatives must be documented, including:*
  - *Why an alternative was chosen,*
  - *Steps taken to ensure equal effectiveness,*
  - *Remediation plan for long-term accessibility compliance.*
    - *Include review cycle (e.g., annually, or biennially) to ensure alternative remains temporary.*

**Exceptions to Compliance:**

**Limited exceptions for this policy are permitted under Title II of the ADA. The exceptions are:**

**Archived Web Content**

Web content that is no longer actively used and meets all the following criteria is exempt from WCAG 2.1 AA compliance:

- Created before the compliance deadline or is a reproduction of pre-existing physical media (e.g., paper documents, audiotapes, film negatives).
- Retained solely for reference, research, or recordkeeping.
- Stored in a designated archive section.
- It has not been modified since being archived.

**Preexisting Conventional Electronic Documents**

Documents that were published before the compliance deadline and meet both of the following conditions are generally exempt:

- File types include word processing documents, presentations, PDFs, or spreadsheets.
- The documents were publicly available before the compliance deadline but are no longer applicable or in use. However, documents actively used for applications, services, or participation in programs must comply with WCAG 2.1 AA.

### **Third-Party Content Not Under University Control**

All digital content posted to the university's website, learning management system, social media, or classrooms must meet accessibility requirements, regardless of whether it is developed internally or by a third party. If third-party content is used, the university is responsible for ensuring it complies with accessibility standards.

In limited cases, certain third-party content may be exempt from full accessibility compliance if:

- The content is hosted on an external platform where accessibility modifications are beyond the university's control.
- The vendor provides an **equally effective** alternative to ensure accessibility for users with disabilities.

When selecting third-party content, the university will prioritize accessible materials and require vendors to demonstrate compliance with accessibility standards.

### **Password-Protected Individualized Documents**

Secure documents that meet all the following conditions are exempt:

- Are specific to an individual, property, or account.
- Are password-protected or otherwise secured.
- Are not intended for broad public access. However, reasonable accommodation must still be provided upon request.

### **Preexisting Social Media Posts**

Social media posts made before the compliance deadline do not need to meet WCAG 2.1 AA. New posts, however, must adhere to accessibility standards.