Electronic and Information Technology Accessibility Policy

Effective:

Last Updated: August 1, 2021 (format only)

Responsible University Office: Human Resources

Policy Contact: Director Human Resources, Client Services

Notice:

Effective August 1, 2021 this policy was converted into an easily accessible standalone PDF document. This policy still remains in Part II of the Policies and Procedures Manual and no changes were made to this policy when it was converted to the standalone PDF document.

Policy

In accordance with federal and state laws, including the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, Section 508 of the 1973 Rehabilitation Act as amended, and the Washington Law Against Discrimination, RCW 49.60, Gonzaga University has developed this Electronic and Information Technology Accessibility Policy.

The intent of this Policy is to promote equal access to University electronic information resources, technologies, and services for students, employees, guests, and visitors.

This Policy encompasses the following areas:

1. Web-based information and services — including those associated with courses of instruction, departmental programs, University-sponsored activities, employment, administration, and other University services.

2. Hardware and software to be developed, purchased, or acquired by Gonzaga University.

3. Environments containing information technology — including classroom and general use computer facilities, on-line instruction, distance learning, employee worksites, libraries, and resource centers.

The implementation of this policy will occur over a reasonable period of time as hardware, software, and other relevant electronic and information technology is upgraded, renewed, or replaced. The first phase of implementation will include making University websites and web-based content accessible, including electronic documents and multimedia distributed through the web. Additional phases will include procurement of compliant hardware, software, and associated accessible products and services necessary to replace all non-compliant and partially compliant hardware, software, and associated accessible products and services.

Ensuring equal and effective electronic and information technology access is the responsibility of all University administrators, faculty, and staff.

Definitions

"Accessible" or "Universal Access" means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use to the accessibility standard required by law.

"Individuals with Disabilities" means individuals covered by the Americans with Disabilities Act, as amended, or the Rehabilitation Act, as amended, and other federal and state laws as applicable. Generally, the term "disability" means with respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual, a record of such an impairment, or being regarded as having such an impairment.

"Electronic and information technology" or "EIT" includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, the internet and intranet websites, content delivered in digital form, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems ("clickers"), and office equipment such as classroom podiums, copiers and fax machines. It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This term includes telecommunications products (such as telephones), information kiosks, Automated Teller Machines (ATMs) transaction machines, computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.

"Equally effective" means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium. "Equally effective alternative access" means affording persons with disabilities and 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.

"Legacy websites" include any and all University websites published before the redesigned and upgraded University website.

"ADA/504 Coordinator" is the University employee designated to coordinate this Policy and to assist employees and supervisors in complying with this Policy.

Electronic and Information Technology Accessibility Standards

Web Accessibility

[Web Content Accessibility Guidelines (WCAG) 2.0](), level AA, and Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0, or the current web accessibility standards identified under state and/or federal law shall serve as the web accessibility standards for Gonzaga University. New and redesigned web page and other web resources published, hosted or otherwise provided by Gonzaga University, must be in compliance with these standards. Other existing pages and materials posted to Gonzaga University websites will be made accessible as they are updated or as required by necessity.

Web pages, including legacy or archived pages, that are specifically requested to be made accessible as an accommodation for an individual with a disability must be made accessible or an equally effective alternative must be provided within a reasonable period of time.

Each Gonzaga University affiliated website, including legacy pages, must provide, in plain text, contact information for users to gain assistance when having difficulty accessing the content.

Gonzaga University will conduct random and other audits for compliance with these accessibility standards for online content.

Instructional Materials Accessibility

Electronic instructional materials, optional and required, will be accessible and as effective and useable for persons with disabilities as they are for persons without disabilities.

This standard applies to all electronic instructional materials (syllabi, textbooks, presentations, handouts, etc.) including electronic instructional materials delivered within the University's learning management system or those delivered in an alternate fashion (email, blogs, etc.) and electronic instructional activities (online collaborative writing, web conferencing, etc.).

All instructional materials must meet all applicable standards and guidelines established in this policy.

Document Accessibility

Except as provided below, this section applies to all electronic documents produced, maintained, or distributed by or for the University including, but not limited to, word processing documents, PDFs, presentations, electronic publications, and spreadsheets.

Newly created 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 World Wide Web Consortium as the Working Draft, dated December 13, 2012, or the current web accessibility standards identified under state and/or federal law. Existing inaccessible documents will be updated according to published University priority levels and needs.

Accessible Electronic Media

The University shall purchase and produce only accessible multimedia and update existing inaccessible media as it becomes necessary and practical, except as pursuant to Section 7 of this policy.

Media resources in use at the University must be accessible. This includes, but is not limited to, media that is instructional, informational, or promotional.

Video media resources must be closed captioned and audio-described. Audio resources must be transcribed.

Software, Hardware, and Systems Accessibility

Software, hardware, and systems developed, purchased, or acquired by Gonzaga University shall be accessible and must produce accessible products. This includes, but is not limited to, learning and content management systems, library and email systems, and administrative management systems such as finance, registration, and human resources.

EIT accessibility for software, hardware, and systems requires compliance with the [US Access Board's Guide 508 Standards - Software Applications and Operating Systems](#) .

Procurement

Gonzaga University shall purchase only EIT software, hardware, and services that are in compliance with the EIT accessibility requirements detailed in this Policy.

To ensure that the EIT accessibility requirements are satisfied, it is recommended that all purchase orders or contracts with hardware or software vendors contain the provisions set forth below or substantially similar language.

- Vendor hereby warrants that the products or services to be provided under this agreement comply with the Gonzaga University accessibility requirements.
- Vendor agrees to promptly respond to and resolve any complaint regarding accessibility of its products or services, which is brought to its attention.
- Vendor further agrees to indemnify and hold harmless Gonzaga University or any university entity using the vendor's products or services from any claim arising out of its failure to comply with the aforesaid requirements.
- Failure to comply with these requirements shall constitute a breach and be grounds for termination of this agreement.

All University employees must contact and work with ITS to ensure that any hardware and software products they are considering for purchase on behalf of the University are accessible and to ensure that accessibility requirements are included in the specifications.

Exceptions

In the event an employee perceives that complying with this policy in a particular situation introduces an undue burden or would result in a fundamental program alteration, the employee will report the concern to the Chief Information Officer or the ADA/504 Coordinator. The Chief Information Officer and the ADA/504 Coordinator will jointly undertake an evaluation process, consulting affected faculty and staff, appropriate experts, and/or users, and considering appropriate information and legal guidance. The Chief Information Officer and the ADA/504 Coordinator will jointly issue a written summary report of the evaluation with a determination and justification for or against an exception to this policy based on an undue burden or fundamental program alteration. Justification for an exception must include the cost of meeting the accessibility requirement, available funding and other resources, and a plan for providing equally effective alternate access. The ADA/504 Coordinator will maintain records of all evaluations, related documentation and summary reports. Exceptions to this policy will be communicated to the President's Office via the Chief of Staff.

When exceptions to this policy are granted, appropriate accommodations will be provided as needed.

Future Technologies

As new technology is developed, this Policy will be modified to address the new technology based on the procedures, standards, and responsibilities listed herein.

Training, Support, and Resources

The University shall provide training, support, and resources necessary to assist employees in achieving compliance with this Policy including, but not limited to, webpage design and creation, classroom instructional material, production of media content, and classroom technology.

Compliance

The ADA/504 Coordinator shall oversee compliance with this Policy and with state and federal law prohibiting discrimination on the basis of disability and requiring reasonable accommodation. Questions or concerns regarding compliance with this Policy or complaints of discrimination should be directed to the ADA/504 Coordinator [509-313-5996].

Each individual employee and supervisor responsible for web content, instructional materials, or document creation must also understand this Policy and how to provide accessible content. These employees and supervisors must also monitor and evaluate the content of their web pages, electronic instructional materials, electronic documents, and electronic media regularly for accessibility.