**Kutztown University Policy GEN-011**

## Digital Accessibility Policy

### A. Purpose

Kutztown University recognizes that compliance with digital accessibility standards increases equitable access to online resources, including for individuals with disabilities. This policy establishes minimum standards for the accessibility of information and communication technology and reflects Kutztown University's commitment to eliminating barriers to access and ensuring compliance with the then-current accessibility guidelines and the Americans with Disabilities Act.

### B. Scope

This policy applies to all information and communication technology acquired, developed, distributed, used, purchased, or implemented by the University and used to provide University programs, services, or activities.

All administrative and academic departments are required to maintain a Digital Accessibility Liaison who is responsible for participating in meetings and annual accessibility reviews regarding the up-to-date accessibility technical guidelines. This liaison will assist their administrative and academic departments in the maintenance of information and communications technology in compliance with the then-current technical guidelines. Any information and communication technology which can no longer be maintained in compliance with the technical guidelines may be required to be removed.

Files should be distributed in a PDF that is fully remediated for accessibility and if cannot be created in an accessible PDF, can be distributed in its native form (such as Word, Excel, and PowerPoint).

All administrative and academic departments must ensure that information and communication technology procured, developed, provided, or delivered must comply with technical guidelines set forth in the then-current accessibility guidelines. All technology purchases must be reviewed and approved following the IT technology procurement process which includes an evaluation of the technology for fit, form, and function as well as a vendor risk assessment and an accessibility review by the Digital Accessibility Advisory Group to ensure compliance with then-current accessibility guidelines.

The following do not fall under the scope of this policy:

- Legacy content need only comply with the version of technical guidelines in place when it was last revised *unless* the content is necessary to provide access to university programs, services, or activities (such as application form), or unless someone requires the legacy content be remediated for accessibility. Any such requests must be prioritized for timely remediation.
- Personal websites and websites for student organizations that receive no university funding and are not used for any university program, service, or activity, including educationally, are exempt from this policy. Assistive technologies are also exempt if they are required to present information in a specific way based on their intended use case.
- Where specialized software in a single–instance or individual productivity software is purchased for individual use and is not required for use by anyone other than the requestor.

C.  **Definitions**

**Accessible:** Content that an individual with a disability can independently engage with, acquire information on, and enjoy the same services as a person without a disability with ease of use.

**Assistive Technology (AT):** Any device, software, equipment, or tool that helps people with disabilities improve, maintain, or increase their functional capabilities. Examples include, but are not limited to, screen readers, magnifiers, closed captioning, speech to text, text to speech, and spelling/grammar tools.

**Digital Accessibility Advisory Group:** Group will include a representative from Information Technology (IT), Disability Services Office (DSO), and University Relations (UR) to review software for accessibility and discuss when an undue burden may apply to digital content.

**Digital Accessibility Standards**: The current guidance from the World Wide Web Consortium's Web Content Accessibility Guidelines.

**Digital Content:** Any university electronic resource, information, or communication accessed or displayed in a digital format such as text, image, audio, virtual document, audio, or video. This includes, but is not limited to, webpages, web-based applications, university-affiliated social media, online instructional content, services, and resources acquired, updated, or developed after (date of approval), except that which falls under the exceptions to this policy.

**Disabilities:** Include difficulties or impairments (temporary or permanent) that limit one or more major life activity, which can include seeing, hearing, understanding, or mobility.

**Equal Effective Alternative Access**: Providing an alternative format in a timely manner that delivers the same content as the original format and is suitable for an individual's disability.

Kutztown University is not required to guarantee that individuals with disabilities achieve the same results or level of success as those without disabilities. However, we must offer appropriate auxiliary aids and services to give individuals with disabilities an equal chance to achieve the same outcome, benefit, or level of success, in compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990.

**Fundamental Alteration**: If a change is made to the content, service, program, or activity that would profoundly modify the nature of the content, service, program, or activity.

**Information and communication technology:** Any electronic system or equipment, and content contained therein, used to create, convert, or communicate data or information. Information and communication technology includes but is not limited to websites, web applications, desktop, and mobile applications, digital signage, digital files, social media, multimedia, and other web-delivered content or and documents**.**

**Legacy Content:** Content contained within a website or another piece of information and communication technology that has not been revised since the date a new set of technical guidelines was adopted.

**Personal websites:** Websites about a specific individual which are not used for any university program, service, or activity. To be considered personal in nature, a website cannot contain resources required for use by students or employees.

**Timely remediation:** Resolving issues preventing access to information and communication technology within the period defined by Information Technology Accessibility Coordinator in conjunction with the Chief Information Officer and Director of Disability Services Office.

**Undue Burden**: Providing an accessible product would result in a significant financial or administrative burden. This should be determined and reviewed by the Digital Accessibility Approval Group.

**University Digital Content:** Digital content that is created, posted, distributed, or published for University Business.

**University programs, services, or activities:** Includes but is not limited to teaching, learning, advising, research, outreach, employment, entertainment, medical services, and other functions of the university.

D. **Policy and Procedure(s) General Accessibility**
All content and aspects of the university's digital content as defined by the then-current guidelines should conform to the digital accessibility standards unless the Director of Disability Services and the Chief Information Officer grant an exception where it is determined that doing so would represent an Undue Burden or Fundamental Alteration. In the case that this is determined, the University will provide Equally Effective Alternative Access to the content where possible.

- **Training**
    i. KU employees can utilize [Web and Online Accessibility](#) as a resource and can also request training for themselves or for their staff on making digital content accessible by reaching out to the Disability Services Office at [dso@kutztown.edu](mailto:dso@kutztown.edu).
- **Procurement and Third-Party Content**
    i. Information and communications technology renewals and/or new purchases must be reviewed and approved by Information Technology prior to purchase. Requesters can initiate purchase requests by submitting requests to the IT Help Center. Doing so will initiate the required IT evaluation for fit, form, and function as well as the required vendor risk assessment and the Digital Accessibility Advisory Group review.

E. **Enforcement**
- Digital accessibility issues can be reported via the [DSO Complaint Form](#) at https://app.kutztown.edu/forms/?ID=DSComplaint.
- Information and communication technology in violation of this policy must be remediated by the responsible unit. If remediation does not occur in a timely manner, materials may need to be removed until fully remediated. Employees who violate this policy may be subject to disciplinary action. Contractors, vendors, and other service providers who violate this policy may face termination of their business relationship with Kutztown University.

F. **Effective Date**
- 3/11/25

G. **Approved by**
- Administrative Council – 2/20/25
- President – 3/11/25

H. **Last Review**
- 3/11/25