Information Technology Accessibility Policy

Responsible Officer: Associate Vice President, Information Technology Services and Chief Information Officer
Responsible Office: Information Technology Services, University of California Office of the President
Effective Date: xx/xx/xxxx
Last Reviewed: N/A
Next Review Date: xx/xxxx (5 years forward)
Who is Covered: All members of the UC community, including students, faculty and staff.

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I. Policy Summary

The University seeks to deploy information technology that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies.
II. Policy Definitions

Accessible: Refers to the concept that people with disabilities are able to access and use a product or system, including with the help of assistive technologies. For example, an “accessible” Web site may be designed so that the text can be enlarged by the user, rather than having a fixed font size, or may be designed so that it can be interpreted and “read out loud” by screen reader software used by blind or low-vision people.

Accessible Information Technology: Information technology that has been designed, developed, or procured to be usable by, and therefore accessible to people with disabilities, including those who use assistive technologies.

Assistive Technologies: Adaptive, rehabilitative devices that promote greater independence for individuals with disabilities by changing how these individuals interact with technology. Examples include special input devices (e.g., head or foot mouse, puff-and-sip switches, speech recognition), screen-reading software, and screen magnifiers.

UC Location / Location: Physical sites with a University of California presence, including, but not limited to UC campuses, medical centers and UC managed national labs.

Usability: Refers to how easily, effectively, and efficiently users can use a product or system to achieve their goals, and how satisfied they are with the experience.

III. Policy Text

A. Policy Statement

The University of California is committed to supporting an information technology (IT) environment that is accessible to all, and in particular to individuals with disabilities. To this end, the University seeks to deploy information technology that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies. An accessible IT environment generally enhances usability for everyone. By supporting IT accessibility, the University helps ensure that as broad a population as possible is able to access, benefit from, and contribute to its electronic programs and services.

Under this policy, all UC Locations must:

- Establish an IT Accessibility Program as defined in the UC IT Accessibility Requirements.
- Adhere to the UC IT Accessibility Requirements.
- Develop, purchase and/or acquire, to the extent feasible, hardware and software products that are accessible to people with disabilities.
• Promote awareness of this policy to all members of the University community, particularly those in roles that are responsible for creating, selecting, or maintaining electronic content and applications.

B. Scope

This policy applies to all UC Locations and to all members of the University of California community. This policy applies to UC managed laboratories to the extent that the provisions of this policy are not superseded by those of the Department of Energy.

IV. Responsibilities

A. Implementation of the Policy

Chancellors, Medical Center Directors, and UC Managed Laboratory Directors are responsible for facilitating and ensuring implementation of this Policy at their Locations.

The Associate Vice President for Information Technology Services and Chief Information Officer is responsible for issuing and updating any requirements, standards or guidelines that support this policy and shall facilitate regular communication among Locations to address consistent implementation of this policy throughout the University of California.

B. Revisions to the Policy

The Regents is the Policy Approver for this policy and has the authority to approve any policy revisions upon recommendation by the President.

The Associate Vice President for Information Technology Services and Chief Information Officer has the authority to initiate policy revisions and is responsible for regular reviews and updates consistent with approval authorities and applicable Bylaws and Standing Orders of The Regents.

V. Revision History

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<tr>
<th>Revision</th>
<th>Description</th>
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<tr>
<td>.9</td>
<td>Initial version.</td>
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<tr>
<td>.92</td>
<td>Revised per ITLC comments.</td>
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<tr>
<td>.93</td>
<td>Removed David Ernst’s name.</td>
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VI. Procedures

See: University of California IT Accessibility Requirements
VII. Related Information

- University of California
  - University of California IT Accessibility Requirements
  - Electronic Accessibility at the University of California

- External
  - Americans with Disabilities Act
  - ADA as it applies to electronic information
  - Sections 504 and 508 of the Rehabilitation Act
  - Sections 504 and 508 as they apply to electronic information
  - Web Content Accessibility Guidelines (WCAG) 2.0
I. Summary

This document describes the minimum requirements for UC locations to comply with the UC Information Technology Accessibility Policy. Information technology is a dynamic field and these requirements are expected to be updated as technology and accessibility-related issues evolve.
II. Definitions

**Electronic Information:** Any University information that is made available electronically, e.g. through web pages, websites (including static, dynamic, and/or interactive sites), web applications, or digital displays. Information made available electronically may include documents, course materials, databases, PDFs, video content, online learning systems, and library holdings.

**UC Location / Location:** Physical sites with a University of California presence, including, but not limited to UC campuses, medical centers and UC managed national labs.

III. Requirements

A. **Information Technology Accessibility Program**

The purpose of the IT Accessibility Program is to establish processes to address IT accessibility in a systematic fashion at each UC Location, using local structures and practices as appropriate. The Chancellor must designate an individual, and/or a committee to develop and oversee the Program and to promote coordination with systemwide IT accessibility initiatives. Any designated individual and/or committee must represent a broad range of functional areas and be able to address academic, research, and administrative concerns and needs.

Locations are encouraged to be innovative in addressing IT accessibility. At a minimum, the Program must include the following:

1. **Authority and Responsibility:** Assignment of roles, authority, responsibilities, and accountability for achieving policy compliance.
2. **Audience:** A strategy to address the different needs of the academic, research, and administrative functions and to support IT accessibility for decentralized academic and research activities.
3. **Prioritization:** A process to prioritize effort that takes into consideration local needs, practices and available resources, including providing access to centralized IT accessibility support.
4. **Design Process:** A strategy to incorporate accessibility into the design and authoring process of electronic information resources.
5. **Procurement:** A procedure to incorporate IT accessibility into the procurement process, including establishment of a formal means for evaluating the accessibility of products or systems under consideration for procurement.
6. **Training:** A training plan for personnel who develop and maintain electronic information resources, author web content, or make IT related purchases.
7. **Awareness Campaign**: A communication plan and campaign to raise awareness about IT accessibility.

8. **Compliance Monitoring**: Processes for monitoring compliance, including compliance with any standards listed in this Requirements document.

9. **Evaluation**: An evaluation process to measure the effectiveness of the Program.

10. **Exception Process**: A process for determining exceptions and for ensuring the development, documentation, and communication of effective alternate forms of access.

**B. Standards**

Compliance to standards listed in this section must be considered high priority in the development and implementation of the Location’s IT Accessibility Program and must be measured as part of the formal Program evaluation process.

1. **Web Standard**
   Electronic information must meet the Web Content Accessibility Guidelines (WCAG) 2.0 at level AA Success Criteria. More information about the World Wide Web Consortium’s (W3C) standards for accessibility can be found at the W3C website.

2. **New Development and Purchases**
   New development and purchases must receive higher priority over the retrofit of existing electronic information resources.

Additional standards for other electronic information resources may be identified over time and added to this Requirements document.

**C. Exceptions**

Conformance to standards may not always be feasible due to the nature of the content, the purpose of the resource, the lack of accessible solutions, or an unreasonably high administrative or financial cost necessary to make the resource accessible. However, these difficulties do not relieve University programs or services from their IT accessibility obligations. University managers of programs and services must be prepared to provide content and/or services in a suitable alternative format (e.g., electronic text file or audio description) upon request.

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V. Related Information

- **University of California**
  - University of California IT Accessibility Policy
  - Electronic Accessibility at the University of California

- **External**
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What Is IT Accessibility, and Why It’s Important

The UC has released a draft Policy on information accessibility for comment. The official comment period ends July 22, 2013. The goal is to make the digital environment across the UC System an inclusive one for people with disabilities. This document provides background to help understand accessibility and its importance.

People with disabilities (deaf/hard-of-hearing, blind/low-vision, motor impairments, learning/cognitive disabilities) use a wide range of adaptive technologies to access materials on the Web or in other electronic form. This material can be much more accessible to them than hard-copy documents or items stored at a fixed physical location.

However, intentional decisions in favor of accessibility are still necessary in order to make digital information compatible with adaptive technology. Specific choices made in each stage of a website's or software application's life cycle, from design, to development, to maintenance and content editing, impact accessibility. These changes involve coding for features that include:

- Clear and consistent document structure;
- Controls for multimedia content;
- Keyboard access to all objects on screen;
- Alternate text for images;
- Captioning of video content.

Details on these and other ways to create accessible content are discussed on the UC IT Accessibility site.

With the growing complexity of web-based applications and content management systems, accessibility is not simply an extra feature to be tested at the end of a project. Managers must be involved to guarantee purchasing of accessible tools and decisions that promote access throughout the design process.

UCLA and UC are continuing to expand online services to track payments, organize hospital patient records, and moving into delivery of online education. In this environment, accessible design can help make University programs and services available to all. In addition, as more of us use mobile devices, we encounter some of the same problems faced by users with disabilities. Accessible content for users with disabilities will help guarantee future access for everyone, no matter how technology may change.

Guidance for web developers and editors can be found on the UC Accessibility site: http://www.ucop.edu/electronic-accessibility/
UCOD Mission:
This Committee was established in 1982 as an advisory group by the Chancellor. UCOD is comprised of students, faculty, staff, alumni, members of the UCLA Community, and ex-officio members. The Committee’s charge is to analyze and identify problems, propose solutions, and make recommendations on matters of particular concern to persons with disabilities. To facilitate the Committee’s functioning the Chancellor’s ADA & 504 Compliance Office reserves UCOD meeting rooms, provides courtesy parking for off-campus voting members, distributes meeting minutes and proposed agendas.

UCOD Bylaws Section V. Specific Functions and Responsibilities
The UCLA Committee on Disability has general responsibility to:
A. Act as a resource for the campus and community regarding disability-related topics. Refer campus and community individuals and entities to University offices whose functions are to address the issue raised.
B. Provide a forum at Committee meetings for individuals, campus and community entities concerning UCLA policies, procedures, attitudes, services, practices and architectural and program accessibility for people with disabilities.
C. Inform the responsible campus offices about issues raised at Committee meetings.
   • Request follow up from, or make recommendations to campus offices to which matters have been referred.
D. Develop programs, educational materials and activities that create awareness about disability issues.
E. Make resources and information about UCLA disability services and programs available to the UCLA community and the public through informational materials and websites.
F. Submit an Annual Report to the Chancellor’s Advisory Group on Diversity. Interface with that Committee as needed.

Chairs/Leadership
1. Eileen Fowler, PhD, Chair
2. Open, Vice-Chair
3. Donna Bryan, B.S., Chair, By-Laws Sub-committee
4. Lloyd Nicks, Chair, Communications Sub-committee
5. Open, Chair, Membership Sub-committee
6. Dimitra Kuruppu, Chair, Programs & Activities Sub-committee

Voting Members
Undergraduate Students (3)
Graduate Student Representatives (3)
Faculty (2)
Alumni Representative (1)
Staff (4)

Assistant to UCLA Committee on Disability

Community Representation
1. UCLA Retiree
2. Learning Disabilities Specialist, SMC

Advisors, Collaborators, Former Officers
Representation
1. Career Center
2. UCLA LGBT Campus Resource Center
3. M. Hilton MS Achievement Center, Dept. of Neurology
4. Center for Community Learning
5. Office for Students with Disabilities
6. Cultural and Recreational Affairs
7. Tarjan Center at UCLA

Ex-Officio Representation
1. Disabilities and Computing Program, OIT
2. Staff Affirmative Action Office
3. Cultural and Recreational Affairs
4. ADA/504 Compliance Office
5. Office of Ombuds Services
6. Insurance & Risk Management
7. Office for Students with Disabilities
8. Diversity Outreach, Faculty Diversity and Development
9. Dean of Students Office
10. UCLA Counseling and Psychological Services