



FINAL POLICY

POLICY APPROVAL TEMPLATE

Instructions: Complete each field with information that pertains to the policy you are proposing. Overwrite or delete all of the guidance in each field before submitting for review. If the field does not apply, leave blank, or list “N/A” to mean Not Applicable.

Policy Name	Electronic and Information Technology Accessibility Policy
Policy Category	Academic, Administrative, Data and Technology Choose an item.
Policy Approved By	President
Responsible Division Head or VP	Provost and Senior Vice President for Academic Affairs and the Senior Vice President of Student and Campus Life
Responsible Department	Offices of Student Accessibility and Advocacy and Digital Learning and Innovation
Responsible AVP or Director	Director of Student Accessibility and Advocacy (SAA) Assistant Dean of Online and Digital Learning
Original Policy Date	5/6/2021
Last Known Revision Date	11/29/2021
Current Policy Effective Date	11/29/2021
Recommended Policy Review Date	11/29/2023
Policy Applies To	Entire Campus
Additional Authority/References	Americans with Disabilities Act Section 504/508 WCAG 2.1 Guidelines

POLICY PURPOSE

To comply with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, as amended (ADA), it is the goal of Albright College to create an equitable college experience for students of all abilities; thus, subject to the exceptions noted below, all academic materials are to be accessible to all students and all necessary accommodations are to be made for students. The purpose of the Albright Academic Accessibility Policy is to provide rules and guidelines regarding the following activities:

- to proactively create accessible courses, content and activities and to redevelop current content in order to minimize the need for individual accommodations as students with differing abilities complete their coursework;
- to provide accommodations for students who require them in a face-to-face, blended, or online course. These accommodations are based on an individual’s specific needs as it relates to their documented disability within the college environment.

BACKGROUND

Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, as amended (ADA) require that institutions which receive federal funding comply with all accessibility laws. As a recipient of student financial aid, Albright College is therefore required to comply with these laws. Colleges not in compliance with applicable federal and state laws have found themselves in challenging situations and open to legal liabilities.

DEFINITIONS

TERM	DEFINITION
<u>Academic Accommodation Letter (AAL)</u>	A letter created by the Student Accessibility and Advocacy (SAA) office that details the specific academic accommodations that are approved for a specific student. The student distributes this letter to the professors when they would like to use their accommodations in a course.
<u>Accessible</u>	Accessible means that individuals with disabilities can independently acquire the same information, engage in the same interactions, and enjoy the same services within the same time frame as individuals without disabilities, with substantially equivalent ease and effectiveness of use.
<u>Accommodated Test Center (ATC)</u>	The testing environment that is overseen by the SAA office to provide testing accommodations for students. The ATC is proctored to ensure test integrity.
<u>Accommodation</u>	The term "accommodation" may be used to describe an alteration of environment, curriculum format, or equipment that allows an individual with a disability to gain access to content and/or complete assigned tasks. They allow students with disabilities to pursue a regular course of study. Accommodations do not fundamentally alter course curriculum or outcomes. The student is legally entitled to all accommodations outlined in the AAL unless to do so is determined to fundamentally alter course requirements. This determination can only be made by the SAA Office through interactive discussion with the professor, student, and other persons, as necessary.
<u>Alternative Text</u>	Alt text (alternative text) is a word or phrase that can be inserted as an attribute in a document to tell viewers the nature or contents of an image. It is typically a brief description of an image, chart, etc. and permits the image or chart to be accessible with assistive technology.
<u>Artificial Intelligence (AI) Captioning</u>	Computer generated captioning that does not utilize humans to proof or edit captions. The error rate is variable depending on the program doing the AI (Artificial Intelligence) captioning.
<u>Assistive Technology</u>	Any piece of equipment that is used to enhance the functional capabilities of students with disabilities. Examples of assistive technologies include screen reading, text magnifier, or speech recognition software.
<u>CART services</u>	CART Service means Communication Access Realtime Translation Service. CART Service is one means of communication access for deaf or hard of hearing individuals who read English fluently.
<u>Captions</u>	A written, word-for-word description of the auditory information being presented on the screen of a video presentation.
<u>Disability</u>	Physical or mental impairment that substantially limits one or more major life activities. Someone has a disability when they 1) have a physical or mental

	impairment that substantially limits one or more major life activities, 2) have a record of such an impairment, or 3) are regarded as having a physical or mental impairment.
<u>OCR</u>	Optical Character Recognition. This process turns an image into readable text.
<u>SAA</u>	Student Accessibility and Advocacy: the office on campus that is responsible for reviewing documentation and engaging students in an interactive process to determine necessary accommodations in the college environment.
<u>Universal Design</u>	Proactive design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.
<u>WCAG</u>	Web Content Accessibility Guidelines (WCAG) 2.1 defines how to make Web content more accessible to people with disabilities. This is the widely accepted rule for online accessibility compliance.

POLICY TEXT

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act require that Albright College ensure that its programs, services, goods, and facilities are accessible to individuals with Disabilities.

Albright College, in compliance with state and federal laws and regulations, including the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, does not discriminate based on Disability in administration of its education-related programs and activities, and has an institutional commitment to provide equitable educational opportunities for disabled students who are otherwise qualified.

Subject to the exceptions noted below, Albright College is committed to providing equitable access to information technology, digital materials, services, and the environments in which information technology is used. Subject to the exceptions noted below, all faculty are responsible for ensuring access to their Web content, Web applications, digital materials, environments, and services to the greatest extent possible in accordance with the following practices.

Subject to the exceptions noted below, the College will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines ([WCAG 2.1](#)) Level AA for all web-based electronic information, communication, and technology.” Further, subject to the exceptions noted below, it will follow the Guidance on Applying WCAG 2.1 to Non-Web Information and Communications Technologies (WCAG2ICT).

Please note that Albright’s commitment to follow WCAG 2.1 Level AA for all web-based electronic information, communication, and technology only applies to web-based electronic information, communication, and technology that are used for Albright-related business.

Personal web pages or websites published by students, employees or non-college organizations that are not used to conduct College-related business are outside the scope of this policy.

A summary of WCAG 2.1 requirements are as follows. Please refer to the original WCAG 2.1 document for complete information.

- All images, except those that are decorative, must have Alternative Text, Captions, or an explanation in the surrounding text. This includes graphics, charts, and diagrams. When an image is complex, a hyperlink will be provided for an appendix which will contain a complete

written explanation of the information that the graphic was intended to relay.

- Tables must have header rows or alternative text.
- ALL videos must be Captioned. All live, online classes should be presented in the recommended platform which provides a minimum of AI captioning.
- PowerPoint presentations must be in proper reading order for screen readers, alternative text applied to images and an accessible layout.
- Document files should be provided in Word or HTML whenever possible.
- PDF files must be readable, searchable, and accessible. Optimal Character Recognition (OCR) must be performed on all PDF documents.
- High-contrast colors should always be used.

Specific applications of the WCAG 2.1 standard are as follows:

- **Instructional Materials:** All electronic instructional materials, optional and required, must be accessible. This includes, but is not limited to, syllabi, textbooks, presentations, and handouts delivered within the college's learning management system, via email or via another electronic means for face-to-face classes as well as e-learning courses. It also includes electronic instructional activities such as instructional videos, online collaborative writing, Web conferencing, blogging, etc.
- **Documents:** All documents used for student learning are produced, maintained or distributed electronic documents must be Accessible. This includes, but is not limited to, word processing documents, PDFs, presentations, publications, and spreadsheets that are scanned, uploaded, posted, or otherwise published or distributed electronically.
- **Electronic Media:** All electronic multimedia resources used by the College for instruction or other academic purposes must be accessible. Videos must be closed-captioned and audio resources must be transcribed.
- **Universal Design of Learning:** Universal Design for Learning (UDL) is a way of thinking about teaching and learning that gives all students equal opportunity to learn.
 - Multiple means of engagement - tap into learners' interests, offer appropriate challenges, and increase motivation.
 - Multiple means of representation - give learners several ways of acquiring information and knowledge.
 - Multiple means of expression-provide learners alternatives for demonstrating what they know.
- **Software, Hardware, and IT (Information Technology) Systems:** All software, hardware and IT systems used for academic purposes must be accessible and produce accessible products or content, which includes compatibility with assistive technology. Software, hardware, and IT systems include, but are not limited to, learning management, content management and other academic systems.
- **Procurement/Purchases:** The Offices of SAA and Online and Digital Learning will work with DSI to purchase electronic products and solutions, including, but not limited to, software, operating systems, Web-based applications, video, and multimedia, that meet or exceed the above Accessibility standards. The College recommends that all requests for proposals from and contracts with vendors include language that outlines this requirement and provides stipulations for how the vendor is expected to demonstrate compliance.

In cases where Web content, Web applications, digital materials or services are not accessible, an individual with a disability may request that the Web content, Web application, digital material or

service be made available in an accessible alternative format or that an equally effective accommodation be provided by the unit responsible for its provision and maintenance. The responsible unit must, upon receipt of the request, either make an accessible alternative format available or provide an equally effective accommodation. For further applicable information that applies in this situation, also see the section on 'Exceptions' below.

Subject to the exceptions noted below, it is the responsibility of the Offices of Academic Affairs, the Offices of Student and Campus Life, and other applicable Albright administration to:

- Provide information to faculty, staff, students, and guests with disabilities in accessible formats upon request.
- Ensure that courses when viewed in their entirety are accessible by all audiences.
- Provide or arrange reasonable accommodations, academic adjustments, and/or auxiliary aids and services, for faculty, staff, and students with disabilities in courses, and maintain appropriate confidentiality of records and communications.

Subject to the exceptions noted below, it is the responsibility of the faculty to:

- Ensure that all videos required or recommended for a course are uploaded into the approved video storage system.
- Ensure that all documents, PowerPoint presentations, PDFs and other media that are required or recommended for a course complies with all components outlined in this policy.
- Comply with all academic accommodations approved by the Student Accessibility and Advocacy (SAA) office as outlined in the students' AAL.
- Notify the SAA office immediately if there are concerns that the approved accommodations will fundamentally alter the course curriculum.
- Ensure that all third-party videos are appropriately captioned with 99% accuracy. If a third-party video is not in compliance, it cannot be used in class.
- Ensure that videos are submitted to the SAA office a minimum of 14 days in advance if faculty requires assistance with faculty-owned video captioning.
- Ensure that live online classes are conducted in a program/ platform that will provide captioning assistance.
- Necessary services may include CART services, Captioning, or other services as required to make coursework WCAG compliant..
- Work with the SAA Office and the Office of Digital Learning and Innovation to create WCAG compliant materials in the most cost-effective manner. This may require the use of alternative modalities of relaying information.
- **Exceptions:** In the rare event that an essential piece of digital content cannot be made accessible, the faculty will work with the SAA office and the Assistant Dean of Online and Digital Learning to address the concern and to determine the best courses of action. A record will be kept identifying the specific piece of course content, the reason that it could not be made accessible, and the course of action taken. For further applicable information that applies in this situation, also see the section on 'Exceptions' below

It is the responsibility of the student to:

- Identify themselves by completing the appropriate application and submitting documentation in accordance with the documentation standards.
- Consult with the director of SAA to determine specific accommodations based on

documentation.

- Give written authorization of approved accommodations via their AAL for any class in which they choose to use their accommodations. The AAL must be given to a professor prior to the expectation of any accommodation. Accommodations are not retroactive.
- To meet with their professors at the beginning of each semester to discuss arrangements for receiving accommodation in each course.
- To notify the Director of SAA immediately if there are any accessibility concerns with their class. It is required that any event which results in a student feeling as if they have not received their approved accommodations be reported within 5 business days to the SAA Office.”

Exceptions:

- Consistent with applicable laws, Albright College will follow WCAG 2.1 Level AA for all web-based electronic information, communication, and technology unless doing so 1) fundamentally alters a program, service, or activity or 2) creates an undue administrative or financial burden.
- Further, for all aspects of this policy for which Albright determines an undue administrative or financial burden exists, or that requires a fundamental alteration of a program or service or activity, the college will provide affected individuals with effective alternative access.
- In providing effective alternative access, Albright will take actions that do not impose on the college any undue administrative or financial burden and that do not require a fundamental alternation of any program or service or activity. Further, in providing effective alternative access, the college will ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits or services as their nondisabled peers.
- Please note that effective alternative access alternatives are not required to produce the identical result or level of achievement for persons with disabilities, but they must afford persons with disabilities an 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.

ASSOCIATED PROCEDURE’S LOCATION

All pertinent procedures are housed within the procedures section of the Policy Website and within the Office of Student Advocacy and Accessibility and the Department of Digital Learning and Innovation.

REVISION LOG

DATE OF REVISION	MAJOR CHANGES <i>(Note: electronic copies of the former versions of the policy must be maintained within the unit, department, or division)</i>
Click or tap to enter a date.	
Click or tap to enter a date.	
Click or tap to enter a date.	

Click or tap to enter a date.	
Click or tap to enter a date.	

IMPLEMENTATION PLAN - For decision-making purposes only. This will not appear in the Final Policy that is posted to the Policy Repository.

Spring 2021

- Policy is shared with the Educational Policy Council and Campus Policy Group for review/feedback.
- Cabinet reviews policy
- Policy reviewed by Chair of Faculty.
- Policy Budget is Proposed

Summer 2021

- Mention of the Policy was shared with EPC again.

Fall 2021

- Several courses will be selected for a pilot program
- Policy review will be completed and will be sent for final approval by the President

Spring 2022

- The office of SAA and Online and Digital Learning will offer training in accessibility best practices.
- Faculty and Staff will begin to review their coursework and audit it for accessible content.
- Inaccessible content will begin to be replaced with accessible content.
- A second pilot program will be created
- Implementation of Blackboard Ally and UDOIT will begin

Fall 2022- Fall, 2025

- The Office of Digital and Online Learning and SAA will develop and implement a systematic plan to move courses toward compliance by approaching those with the most significant need first and moving to those with fewer accessibility errors. Blackboard Ally and student population will be utilized to determine the areas of greatest need.
- Trainings will continue to be offered to faculty.
- Faculty will begin to take ownership of creating and editing their coursework with accessibility in mind.
- SAA and the Office of Digital and Online Learning will assist faculty, as they are able, in the creation of accessible content.

Spring, 2026

- Staff and Faculty will be expected to be in complete compliance with WCAG Level AA

It is the expectation that all faculty will begin to transition their materials into an accessible format immediately with full compliance to be achieved no later than the first day of the 2023 fall semester. If a faculty member is notified that they have a current student with a specific ADA need in their classroom, the faculty will work with the SAA Office and the Office on Digital and

Online Learning to bring all materials into compliance immediately.

DECISION – For decision-making purposes only. This will not appear in the Final Policy that is posted to the Policy Repository.

Date of Draft Policy Review	Click or tap to enter a date.	
Name of Reviewing Committee/Individual		
Date Approved	Click or tap to enter a date.	Comments:
Date Rejected	Click or tap to enter a date.	Comments:
Date Draft Tabled or Further Review Needed (provide comments including plan for re-submission)	Click or tap to enter a date.	Comments: