SUNY COLLEGE OF ENVIRONMENTAL SCIENCE AND FORESTRY
ADMINISTRATION POLICY LIBRARY

WEB ACCESSIBILITY POLICY

Section 1, General

Web Accessibility Policy

Responsible Executive: VP Administration

POLICY STATEMENT

ESF requires its Web content to be accessible to everyone, including people with physical, sensory, or cognitive impairments, with or without the use of assistive technology.

REASON FOR POLICY

ESF is committed to ensuring equal access to information that is presented online. As part of this commitment, ESF Web content must be accessible to everyone, including individuals with physical, sensory, or cognitive impairments, with or without the use of assistive technology. This policy is in accordance with federal and state laws, regulations, and policies requiring accessibility and equal access for individuals with disabilities. These laws and policies include the: Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973 New York State Human Rights Law.

SCOPE OF POLICY

This policy applies to:

- ✓ President
- ✓ Vice Presidents
- ✓ Deans, Directors & Department Heads
- ✓ Area Managers & Supervisors
- ✓ Faculty
- ✓ Staff
- ✓ Students
- Others

WEB SITE REFERENCES

Vice President for Administration: http://www.esf.edu/administration/

Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973
https://www2.ed.gov/about/offices/list/ocr/504faq.html

New York State Human Rights Law
https://dhr.ny.gov/law

W3C Web Content Accessibility Guidelines (WCAG) 2.0
http://www.w3.org/TR/WCAG20/

Vendor Product Accessibility Template 2.0 Form
http://www.itic.org/policy/accessibility/

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CONTACTS

Specific questions should be directed to the following:

Subject	Contact	Telephone	Office E-Mail / Web Address
Policy Clarification and General Information	Joseph Rufo- Vice President of Administration	(315) 470- 6622	jlrufo@esf.edu

DEFINITIONS

Accessible	Able to be used by all individuals, including individuals with disabilities, with or without assistive technology.
Alternative Text	Also known as "alt text," a word or phrase that can be inserted into an HTML document that tells viewers the nature or content of an image.
Archived Web Content	Web content that: (1) is at a minimum five years old; (2) is maintained exclusively for reference, research, or recordkeeping; (3) is not altered or updated after the date of archiving; and (4) is organized and stored in a dedicated area or areas clearly identified as being archived.
Assistive Technology	Any software or hardware that allows access to information technology for individuals with disabilities. Examples include special input devices (e.g., head or foot mouse, speech recognition), screen-reading software, and screen magnifiers.
Equally Affective Alternative Access	An alternative format or medium that communicates the same information in as timely and effective a fashion as does the original format or medium. For interactive or service pages, equally effective means the end result is accomplished in a comparable time and with comparable effort on the part of the requestor. To provide equally effective alternate access, alternates are not required to produce the identical result or level of achievement for persons with and without disabilities, but must afford persons with disabilities 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.

External Websites	Websites that are not part of ESF's domain and/or within ESF's control, but that are used to access ESF programs, services, and/or activities. Examples include publishers' websites for providing course instruction and external ticketing services.
Fundamental Alteration	A change so significant that it affects the essential nature of the instruction, program or activity provided.
Screen Reader	Software that allows a computer to identify and convert text to speech.
Undue Administrative or Financial Burdens	A significant disruption, expense and/or difficulty posed by the provision of accessible information technology. When a department is concerned that the provision of accessible information technology will pose undue financial or administrative burdens, it must proceed according to the procedures in this policy.
Voluntary Product Accessibility Template	A document which evaluates how accessible a particular product is according to web accessibility. It is a self-disclosing document produced by a vendor which details each aspect of web accessibility requirements and how the product supports each criteria.
Web Content	The textual, visual, or aural content that is encountered as part of the user experience on websites. It may include—among other things—text, images, sounds, videos, and animations. For purposes of this policy, web content also includes forms and documents accessible through ESF websites.
Web Content Accessibility Guidelines	A series of standards developed by the World Wide Web Consortium, the main international standards organization for the internet, that promotes usability and best practices to ensure Web access for individuals with disabilities.

PRINCIPLES

This policy applies to all ESF organizational departments; all new and existing ESF websites with the exception of archived Web content; and all ESF websites, whether they are created, designed or maintained internally or by an outside vendor. This policy does not apply to individual webpages published by students, employees, or non-ESF organizations that are hosted by ESF and do not conduct ESF-related business. Individuals and organizations responsible for these webpages are encouraged to adopt ESF's policy and Web standards.

PROCEDURES

      I.   <u>Web Standards</u>

All new, newly-added, or modified online content and functionality published after the effective date of this policy must be accessible and conform to *Web Content Accessibility Guidelines 2.0 Level AA*, except where doing so would impose a fundamental alteration or undue burden as established through the Exceptions procedure.

Web accessibility guidelines include the following:

- Websites must have content that is accessible with a screen reader.
- Websites must include alternative text for any non-text content when necessary to convey meaning (e.g., pictures, graphs).
- Websites must be able to be navigated through use of a keyboard, as an alternative to mouse navigation.
- Websites must not rely on color to convey meaning.
- Websites must provide captions and/or transcripts for all audio/video content.

Archived Web content is not required to meet accessibility guidelines. If an individual with an impairment requires an accommodation to view inaccessible archived content, ESF will provide reasonable accommodations to ensure access to the material.

      II.   <u>Exceptions</u>

Limited exceptions may be granted by ESF's Chief Diversity Officer (CDO), or her/his designee, in specific instances where compliance is not possible or would constitute undue administrative or financial burdens, or where it would create a fundamental alteration. Departments requesting an exception must provide the CDO with a description of the resources available for use in the funding and operation of the service, program, or activity, accompanied by a written statement certifying the reasons for requesting an exception, including the cost of meeting the requirement and the available funding and other resources.

Departments requesting an exception must provide equally effective alternative access to ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits or services as their nondisabled peers. Exception requests must be accompanied by a written statement describing how the department will provide equally effective alternate access.

Any hardware, software, programs or other information technology procured from vendors must be accessible when the information technology will be used by members of the ESF community to access college programs and activities.

- Vendors must describe how their IT products and services are accessible to users, including individuals who use assistive technology.
- Vendors must complete a Voluntary Product Accessibility Template Version 2.0 (VPAT). The VPAT must contain sufficient detail and explanation to convey how the product meets accessibility requirements. VPATs must be submitted to the CDO for review.

III. External Websites and Applications

ESF websites may link to websites and/or applications that are not part of ESF's domain. External websites and/or applications that are used to access ESF services, programs and/or activities by the public must be accessible.

In the event that ESF receives notice that an external website or application used to access ESF services, programs, and/or activities is not accessible, the department or area that directs people to the inaccessible external website or application:

- will contact the host of the external website to report accessibility issues and work toward their resolution
- must provide equally effective alternative access to the services, programs and/or activities until accessibility issues are resolved.

External websites and/or applications may also be used to provide instruction. In the event that an instructor receives notice that a website and/or application used as part of course instruction is not accessible, the instructor who uses the inaccessible external website or application as part of course instruction:

- will contact the host of the external website to report accessibility issues and work toward their resolution
- must provide academic adjustments and auxiliary aids to ensure that students with sensory, motor or cognitive impairments can access the course materials until accessibility issues are resolved
    - Academic adjustments may include equally effective alternative access to course materials.

IV. Complaints

Individuals who believe that there is a violation of this policy should contact the CDO. An individual who files a complaint will be protected against retaliation.

V. <u>Responsibilities</u>

A. President, Provost, Vice Presidents, Deans, Directors, Department Chairs, Managers, and Supervisors

- Ensure that Web content in their areas comply with this policy.
- Ensure that any information technology products purchased to access ESF programs and activities are accessible by (1) requiring vendors to describe how their IT products and services are accessible to users, including individuals who use assistive technology; and (2) requiring vendors to submit a VPAT.

B. Department Web Administrators

- Develop new and redesigned websites, forms, documents, videos, and other content on public facing ESF websites that is accessible and conforms to *Web Content Accessibility Guidelines 2.0 Level AA*.
- Ensure that websites, forms, documents, videos, and other online content published prior to the date of this policy are remediated or replaced.
- Provide reasonable accommodations to individuals who request access to inaccessible archived Web content. This may include remediating inaccessible content and/or providing content in reasonably convenient and equally effective alternative accessible formats.
- Test websites for accessibility prior to their launch or significant modification.
- Check existing websites for accessibility.
- Interface with external websites that are used to access ESF programs, services and activities to remediate accessibility concerns, and provide equally effective alternative means of access if accessibility concerns cannot be remediated.
- Ensure that any information technology products purchased to access ESF programs and activities are accessible by (1) requiring vendors to describe how their IT products and services are accessible to users, including individuals who use assistive technology; and (2) requiring vendors to submit a VPAT.

C. Course Instructors

- Ensure that websites and/or applications used in course instruction are accessible.
    - Make inquiries about product accessibility when using course materials that are procured or hosted externally.
    - Provide timely and effective alternative means of course access and completion if external websites and/or applications are inaccessible and cannot be remediated.
- Ensure that any information technology products purchased to access ESF programs and activities are accessible by (1) requiring vendors to describe how their IT products and services are accessible to users, including individuals who use assistive technology; and (2) requiring vendors to submit a VPAT.

D. Chief Diversity Officer

- Investigate complaints of non-compliance with this policy.
- Consider and determine exception requests.
- Review VPATs.

REVISION RECORD

MM/DD/YYYY–Policy Implementation	