Policy type: Administrative
Applies to: Faculty, staff, student employees, students, third party partners, and volunteers

POLICY DATES

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University of Mount Union recognizes the importance of offering an environment of inclusion. The university is committed to diversity and fostering a campus culture of full inclusion for people with disabilities by ensuring that all university constituencies can access its digital information and digital services. The University of Mount Union is committed to striving to make its computers, internet, and other technical resources accessible to people with disabilities in accordance with federal and state laws.

The purpose of this policy is to establish minimum standards for the accessibility of digital information and digital services, as well as the reporting requirements necessary to ensure compliance with the university's obligations under applicable state and federal regulations.

This policy is reviewed on an annual basis with any changes are processed through the Policy Review Committee (PRC). Major changes to this policy must be approved through President Council.

Definitions

Term	Definition
Accessibility	Is the degree to which digital information and resources can be independently accessed and used by as many people as possible, including individuals with disabilities.
Accessible	Affording a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, the university still must ensure equal opportunity to the benefits and opportunities afforded by the technology and equal treatment in the issue of such technology.
Accessibility Standards	For the purpose of this policy, Mount Union's accessibility standards. Mount Union's publicly available web pages must meet the standard set by the Worldwide Web Consortium's Web Content Accessibility Guidelines version 2.0, Level A & AA. All other digital information should be designed to maximize accessibility and must meet the requirements of the Americans with Disabilities Act (ADA).
Americans with Disabilities Act (ADA)	A civil rights law prohibiting discrimination on the basis of disability. An act to establish a clear and comprehensive prohibition of discrimination on the basis of disability.
Digital Information	Information and content delivered through the use of technology including, but not limited to, websites, electronic documents, audio, video, and computer and mobile applications.
Digital service	Includes, but is not limited to, platforms used to deliver digital information, such as websites, web applications, and mobile or computer applications used to deliver educational, administrative, or other services to the university community or general public.
Information System	Is generally defined as any electronic system that stores, processes, or transmits information. For the purpose of this policy, it is any electronic system that stores, processes, or transmits institutional data.

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Term	Definition
Minimum Web Accessibility Standards (MWAS) World Wide Web Consortium (W3C)	Articulate the minimum technical and visual requirements needed to comply with the Policy's accessibility requirements for the university websites and web-enabled content. Articulate the minimum technical and visual requirements needed to comply with the policy's accessibility requirements for the university websites and web-enabled content. The main international standards organization for the World Wide Web. Founded in 1994 and currently lead by Tim Berners-Lee, the consortium is made up of member organizations that maintain full-time staff working together in the development of standards for the World Wide Web.

Policy Details

This policy covers all digital information and digital services and provides requirements for accessibility.

All digital information and digital services acquired, developed, or delivered by any department/office must be accessible and in compliance with Mount Union's accessibility standards. All newly acquired services must have a VPAT (Voluntary Product Accessibility Template) reviewed by Student Accessibility Services. Information on exceptions can be found later in this policy.

For the purpose of this policy, Mount Union's accessibility standards includes the following:
- Mount Union's publicly available web pages must meet the standard set by the Worldwide Web Consortium's Web Content Accessibility Guidelines version 2.0 Level A and AA.
- All other digital information should be designed to maximize accessibility and must meet the requirements of the Americans with Disabilities Act (ADA).

Legacy digital information and digital services are subject to the applicable university web and digital accessibility standards in effect at the time of development and to this policy's specific provisions for legacy digital information and digital services. Legacy digital information and digital services must be made compliant with the university's accessibility standards when any substantial changes or upgrades occur.

The following are not subject to this policy even when hosted on university resources:
- Digital information and digital services of a personal nature
- Student organization websites that do not conduct university business

Student Accessibility, Office of Information Technology, Marketing and Center for Faculty Development work together for the following:
- Implement, review, and provide assistance regarding consulting with departments; guide product evaluations as requested or necessary; processes exceptions; and resolve complaints under this policy.
- Assist with digital accessibility evaluations of software and digital content, training, writing remediation/accommodation plans, consult with vendors/internal developers.
- Address the acquisition, development, and delivery of digital information and services in the following areas:
  - Web Page Support
  - Technology
  - Purchasing digital information and/or services
  - Marketing, recruitment, and communications and
  - Delivery of content (including instructional content, documents, audio/visual content, etc.)

Web Sites (includes CMS, LMS, System web interfaces)

Information Technology, Marketing & Student Accessibility

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All new and redesigned university websites and web-enabled content published after the policy's effective date must comply with these minimum web accessibility standards (MWAS). MWAS are based on web content accessibility Guidelines (WCAG) 2.0 published by the World Wide Web Consortium and are intended to address the following four accessibility principles.

- Perceivable – Information and user interface components must be presentable to users in ways they can perceive.
- Operable – User interface components and navigation must be operable.
- Understandable – Information and the operation of user interface must be understandable.
- Robust – Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

The goal of the MWAS is to make content delivered on a university website or web enabled accessible content perceivable, operable, understandable, and robust to a person with disabilities, including persons with any of the following disabilities:

Visual Impairments:
Visitors to web sites with blindness and other severe visual impairments typically use screen-reading software to access web content. Visitors with low vision may use additional methods such as enlarging screen fonts, software magnification of the screen, and/or enabling high-contrast display.

Color Blindness:
Visitors with a color blindness may have difficulty distinguishing between certain color combinations, different shades of the same color, or may be unable to read text that contrasts poorly with a background color.

Deafness or Hard of Hearing
Visitors with audio impairments rely on text transcripts, captioning, and other alternatives to audio content.

Motor Disabilities
Visitors may have difficulty or the inability to use pointing/clicking devices due to disease, injury, and/or congenital conditions. This can impact response times and navigation within web forms and page controllers.

Cognitive Disabilities
Visitors may have learning disabilities, conditions affecting reading comprehension, attention deficit and distractibility disorders, problems with memory and retention, and related conditions.

Website Compliance Guidelines

The guidelines are structured by compliance checkpoints. Each checkpoint is an item to consider when reviewing your content for accessibility. Required elements must be implemented to maintain the minimum website accessible standards. Recommended elements should be considered and implemented as possible and/or when appropriate.

Text Alternatives – Provide text alternatives for any non-text content so that it conveys the equivalent meaning/purpose of the non-text content. Required: Use the alt attribute of the HTML image tag to provide a description of images when the image presents additional content that is not fully represented by surrounding text in the page. Describe the meaning of the image and what it conveys to your visual visitors. This is especially important for images that convey information, such as infographics. Use a blank alt attribute for graphics images that are purely decorative. When using a graphic as a link, use the alt attribute to indicate the link target. Recommended: Use CSS for decorative elements rather than inline images.

Multimedia Captions and Transcripts – Provide captions and/or transcripts for prerecorded audio and video contents. Required: Full-text, verbatim, captions that are synchronized with the presentation should be provided for all video content. Captions should identify when sound effects or audio cures are used, where appropriate. Full-text, verbatim transcripts are provided for audio recordings. Transcripts should identify when sound effects or audio cures are used, where appropriate. Video or audio content does not "auto play" on page load. Purely decorative and/or background

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videos are exempt from this requirement. Recommended: Provide a second, user-selectable, audio track that includes audio descriptions of video content.

Content Organized Independent of Style – Create content that does not lose information or structure when style and presentational elements are removed. Required: Content needs to convey the same meaning and maintain the same structure if stylesheets are disabled. Properly nested HTML headings and semantic HTML elements should be used throughout. Lists should be marked up in HTML as lists. Paragraphs as paragraphs. Blockquotes as blockquotes. Etc. Pages use a title element in the head of the document. Recommended: Primary site navigation menus should use HTML unordered lists. Pages use a language attribute in the body element. Content sections are identified using ARIA landmark roles. Tab order through page elements corresponds with the visual display order.

Conveying Information with Color – Any information conveyed with color must also be available without color. Required: Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. Web editors should avoid color combinations that may impair usability for visitors with common forms of color blindness.

Sufficient Contrast for Color Combinations – Content must be displayed with sufficient color contrast for those visitors with low-vision or color deficits and must be fully functional when viewed in grayscale (black & white screen). Required: The visual presentation of text and images of text has a contrast ratio of at least 4.5:1 for content body type, and 3:1 for large text (e.g., headings). Color contrast for non-essential meta data (author, date, categories, etc.) is exempt from the contrast ratios.

Resizable Text – Text must be resizable and must not require horizontal scrolling. Required: Text can be resized by the user without assistive technology up to 200 percent without loss of content or functionality.

HTML Tables – It is recommended to use HTML tables only for tabular data. Avoid using HTML tables for layout purposes. When implementing HTML tables use row and column headers, and associate data cells with header cells on complex tables. Required: Identify row and column headers with the <th> tag. Simple HTML tables have scope set on table header cells. Recommended: Do not use HTML tables for page or content layout. Use the summary attribute to explain the purpose and structure of the table. Use the caption element to provide a descriptive title of the table. Complex HTML tables (those with multiple rows, column spans, etc.) use headers and id attributes to associate data cells with header cells.

Frames/iFrames – Frames or iframes (in-line frames) should be titled for help with identification and navigation. Required: Frames/iframes use the title attribute identifying their purpose and describing their content. Recommended: Do not use hidden frames of hidden iframes. Use CSS or iframes (in-line frames) rather than standard HTML frames.

Keyboard Navigation and Focus – Not all visitors can use a mouse, touchpad, or other point-and-click device. Make all functionality available from a keyboard. Required: Visitors must be able to move focus on the page using a keyboard interface, typically using arrow or tab keys. If keyboard navigation requires more than unmodified arrow or tab keys or other standard methods, the visitor is advised of the method for moving focus. Web based forms must support assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues. Recommended: Ensure tab order for web-based forms moves the visitor through the form in a logical manner (e.g. first name followed by last name; field labels correspond to their form elements, etc.)

Seizures – Pages should be designed to avoid causing the screen to flash more than three times in any one second. Flashing content at certain frequencies is known to cause seizures in some individuals. Required: Do not publish content that flashes three times or more in any one second, or the flash is below the general flash and red flash thresholds.

Navigation and Wayfinding – Provide a method for visitors to skip over long lists of links, such as primary content navigation menus. Clearly identify link targets and inform the user when links open in pop-ups or new windows. Required: Provide a way for users to skip repetitive link lists. Styles should accommodate clear visibility of the keyboard focus indicator. Do not use styles to remove the underline from text links unless there is another way of visually distinguishing clickable text without relying solely on text color. Do not use "click here" or "here" for link text. Identify the

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target of each link, preferably within the context of the link language itself. To accommodate users of touch devices, navigation icons/buttons must use a minimum touch-target size of 48 pixels x 48 pixels. Recommended: Use ARIA landmark roles.

Adequate Time for Tasks – Ensure that users can complete tasks without unexpected changes in content or context that are a result of a time limit.

An Understandable User Experience – Content and information plus the operation of user interface must be understandable. Pages should appear and operate in predictable ways. Required: The language of the page and language of the content can be programmatically determined. Navigational mechanisms that are repeated on multiple pages occur in the same relative order each time they are repeated unless a change is initiated by the user.

Best Practices and Standards Compliance – Follow web best practices and use standards compliant markup for all content. Required: All user interface components can be programmatically determined by assistive technologies. When using hand-crafted HTML ensure all elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique. Provide error feedback for web-based forms.

Procedure Details
In order to support this policy, the following procedures have been put in place.

Training: Will be provided part of orientations for students and employees. Optional sessions will also be offered on an annual basis during compliancy days. These sessions will be provided through the Center for Faculty Development and the Office of Accessibilities within Student Affairs.

Purchasing: When purchasing any new system that is going to provide digital information, such as a Learning Management System (LMS), Content Management System (CMS), Student Information System (SIS), etc. a VPAT is required to be reviewed by Student Accessibility Services and approved.

Current & Legacy: When current and legacy digital information and digital services are specifically requested to be made accessible by or on the behalf of an eligible person, the owning unit must make the digital information or digital services accessible or provide an equally effective alternative within 30 business days.
- For digital information, equally effective means that it communicates the same information with a comparable level of accuracy.
- For digital services, equally effective means that the end result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestion.
- Faculty with current courses that need to be made accessible should work with the Center for Faculty Development to make modifications to their courses and appropriate time will be given for the adjustments to be made.

Current systems or digital information at time of renewal, must be brought to the university minimal standards for accessibility.

Upon specific request for access by or on the behalf of an eligible person, digital information in legacy or archive status containing administrative or academic information, official records, and similar information must be prioritized and made available promptly and in a format that provides effective access.

This policy will be reviewed on a regular basis and as the institution continues to make progress in the area of digital accessibility a five-year plan will be used to continue to make progress in this area.

Responsibilities

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Position or Office	Responsibilities
Office of Information Technology, Marketing & Student Accessibility	Update of Policy & Protection of Data

Contacts

Subject	Office	Telephone	E-mail/URL
	Office of Information Technology	330.823.2854	**IT@mountunion.edu**
	Marketing	330.823.6063	**marketing@moutnunion.edu**
	Student Accessibilities	330.823.7372	**studentaccessibility@mountunion.edu**
	Center for Faculty Development	330.823.4895	**centerforfacultydevelopment@mountunion.edu**

History

This policy was established in 2022.

All changes must be listed sequentially, including edits and reviews. Note when the policy name or number changes.

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