

Marquette University Policies and Procedures



Accessible Technology Policy

Policy section: Computing, Equipment, IT, University

Resources Effective date: September 1, 2017

Replaces policy: New policy

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Why Do We Have This Policy?

- The purpose of this policy is to promote equal access to Marquette University electronic information resources, technologies and services for students, employees, guests and visitors, including those with disabilities. To that end, Marquette University requires that electronic and information technology (EIT) be designed, developed, managed, acquired or procured to be accessible to the widest range of users possible, in accordance with federal and state law.
- In order to ensure broad access to such resources, this policy establishes standards for the design, acquisition or use of web-based information and other information technology.
- Ensuring equal and effective electronic and information technology access is the responsibility of all university faculty and staff.
- This policy is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), the Amendments Act of 2008, Section 504 of the rehabilitation Act of 1973, and Section 508 of the 1973 Rehabilitation Act, as amended. This policy will be reviewed and revised as necessary.

What Is The Policy?

Scope

This policy applies to all electronic information technology (EIT) which includes the following areas:

- Web-based information and services, including those associated with courses/instruction, departmental programs, University-sponsored activities, employment, administration and university services.
- Hardware and software to be utilized, developed, purchased or acquired by Marquette University.
- Environments specific to information technology – including classroom and general use computer facilities, on-line instruction, distance learning, places of employment, libraries and resource centers
- Exemptions: May be granted; (examples include, but are not limited to, undue burden (difficulty/expense), hardware/software specific to research/development in which no user requires accessibility accommodations, and hardware/software for which no equivalent accessible option is available (non-availability)).

Standards

The Marquette University Accessible Technology Policy is guided by the widely accepted standards established in the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines document, version 2.0 (WCAG). These guidelines are organized around the following four principles, which lay the foundation necessary for anyone to access and use electronic and Web content. Anyone who wants to use the Web must have content that has the following attributes:

- Perceivable - Information and user interface components must be presentable to users in ways they can perceive.
 - This means that users must be able to perceive the information being presented (it cannot be invisible to all of their senses)
- Operable - User interface components and navigation must be operable.
 - This means that users must be able to operate the interface (the interface cannot require interaction that a user cannot perform)
- Understandable - Information and the operation of user interface must be understandable.
 - This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding)
- Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
 - This means that users must be able to access the content as technologies advance. (as technologies and user agents evolve, the content must remain accessible)

Relevant links:

- [WCAG 2.0 AA](#)
- [Section 508 of the Rehabilitation Act of 1973](#)
- [ADA](#)

Definitions

- Electronic Document; information recorded in a manner that requires a computer or other electronic device to display, interpret, and process it.
- Equal Access; means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.
- Functionally equivalent; a modification or accommodation made to ensure equal access and ease of use comparable to an individual without a disability.
- Official Web Pages; are those webpages that have been created by the University, colleges, schools, departments or other administrative units, for University business.
Official University webpages clearly convey a relationship to the entire University and support and advance the University's mission.
- Legacy Web Page; web page published prior to the effective dates outlined in this policy.
- Mobile Application; a mobile application is a software application developed specifically for use on small, wireless computing devices, such as smartphones and tablets, rather than desktop or laptop computers
- Multimedia; a production that presents information in more than one sensory channel.
- Website Redesign; any phase during the development or maintenance of a web site in which significant alteration or update is made to the visual design, institutional branding, information architecture, or technical functionality of the site. Minor content updates are not considered web site redesign projects.
- Web-based Information / Applications; the use of Internet web technologies to deliver information and services, to users or other information systems/applications.
- Web Page; a single internet address (URL) that contains content that must be viewed through a web browser. Usually, multiple web pages are linked to define a website.
- Website; a group of connected web pages regarded as a single entity, or several closely related topics, such as a college, department, program or office website. A website usually includes a home page.

Third Party Vendor Procurement policy -

Purchasing requirements:

- Marquette University requires that electronic and information technology

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(EIT) be designed, developed, managed, acquired or procured to be accessible to the widest range of users possible, in accordance with federal and state law. To that end, this policy will help ensure purchased EIT is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), the Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, and Section 508 of the 1973 Rehabilitation Act, as amended.

- For University purchases related to electronic solutions, software and hardware (EIT products or services) MU must receive confirmation from the supplier or a Voluntary Product Accessibility Template (VPAT) that demonstrates compliance with Web Content Accessibility Guidelines document, version 2.0.
- If the supplier, or the provided VPAT, does not indicate that the EIT provides full accessibility, then other EIT must be considered. If no EIT which meets the business needs fully supports accessibility, then a completed [VPAT Accessibility Exception Request Form](#) must be attached to the purchase order upon submission to Purchasing.
- For contracts related to EIT, the requesting department must acknowledge the goods or services meets all university requirements or a completed [VPAT Accessibility Exception Request Form](#) has been signed by the University Compliance Officer.

Accessibility Exception Procedure

- Conformance to standards may not always be feasible due to undue burden (difficulty/expense), hardware/software specific to research/development in which no user requires accessibility accommodations, hardware/software for which no equivalent accessible option is available (non-availability).
- Narrowly tailored exceptions to this policy may be granted by the Electronic Technology Accessibility Committee (ETAC) in specific instances where compliance is not possible.
- A completed [VPAT Accessibility Exception Request Form](#) may be submitted to the ETAC, c/o [Sheila Bernhardt](#).
- An approved exception shall include the following:
 - Justification for the exception
 - Plan for alternative means of access for persons with disabilities
 - Date of expiration
 - Appropriate signatures
- The ETAC will maintain records of all [VPAT Accessibility Exception Request Form](#).
- Legacy pages not deemed high priority or those that have been archived need not comply with WCAG 2.0 Level AA unless specifically requested by an individual with a disability.
- University faculty and staff must provide content and/or services granted such an exemption in a functionally equivalent accessible manner upon request, as required by law.

How Do I Implement This Policy

It is the responsibility of the author/creator (faculty or staff) of all EIT materials to ensure their material is in compliance with this policy. Resources to assist in this process are listed at the end of the policy.

- The following External Accessibility Statement will be linked via footer to all university webpages:

Marquette University is committed to making its websites as accessible as possible to all users, and welcomes comments or suggestions on access improvements. Our goal is to meet the World Wide Web Consortium's (W3C) [Web Content Accessibility Guidelines](#) (WCAG) 2.0, conformance level AA. Please send any comments or suggestions on accessibility to [Sheila Bernhardt](#) at (414) 288-5969.

Websites (Proposed Implementation Schedule)

- New web sites created on or after the effective date of this policy must be in compliance.
- Websites created prior to the effective date of this policy will be migrated to the new Content Management System and brought into compliance according to the following schedule, guided by the Office of Marketing and Communication and Information technology Services:
- Phase 1 - Migrate and remediate the 62 public websites in the OmniUpdate CMS statement of work.
Deadline: September 2017 (16.4% of total)
- Phase 2 - Migrate and remediate up to 60 public websites into the OmniUpdate CMS and address issues on medium-size, off-campus websites.
Deadline: May 2018 (32.6% cumulative of total)
- Phase 3 - Migrate and remediate up to 188 public websites into the OmniUpdate CMS and address issues on smaller off-campus websites.
Deadline: May 2019 (47.7% cumulative of total)
- Phase 4 - Three large websites are hosted off-campus and rely on three different content management systems. Migration to the new OmniUpdate CMS is not practical for these niche cases: [law.marquette.edu](#) (Drupal CMS), [gomarquette.com](#) (CBS Interactive) and [bulletin.marquette.edu](#) (CourseLeaf Catalog). Site owners will take the lead on addressing accessibility issues by May 2019 with guidance from the university's Interactive Team. Begins May 2016; Deadline: May 2019 (96.9% cumulative of total)
- Phase 5 - Migrate and remediate any login-restricted websites.
Estimated count is 12 websites.
Deadline January 2020 (100% of total)

Electronic Documents

- All documents created on or after the effective date of this policy must be in compliance.
- Documents created before the effective date of this policy must be updated and brought into compliance prior to use, including but not limited to use in a course. Compliance with this requirement will be enforced after September 1, 2020.
- In cases where course material cannot be brought into compliance (see Accessibility Exception Procedure) a suitable equivalent experience must be provided to the student by the instructor.

Multimedia

- Multimedia created or obtained on or after the effective date of this policy must be in compliance.
- All multimedia created before the effective date of this policy utilized in online or traditional courses must be brought into compliance prior to use.
- In cases where course material cannot be brought into compliance (see Accessibility Exception Procedure), a suitable equivalent experience must be provided to the student by the instructor.

On line Course Content

- All fully online course content must be compliant as of the effective date of this policy or the next date of use. (Fully online courses at Marquette are defined as categories D1 and D2. See [definitions](#).)
- In cases where material cannot be brought into compliance (see Accessibility Exception Procedure), a suitable equivalent experience must be provided to the student.