INFORMATION TECHNOLOGY ACCESSIBILITY – WEBSITE AND MOBILE APPLICATION STANDARDS AND ACCESSIBILITY

I. <u>Purpose</u>

In Board Policy 280.1, the Board of Trustees of the University of Arkansas adopted the Worldwide Web Consortium Content Accessibility Guidelines as its goal for University websites. The purpose of this policy is to provide guidance to the campuses, divisions, and units of the University of Arkansas System in implementing those standards.

II. WCAG 2.1 Guidelines

The guidelines and success criteria for WCAG 2.1 are organized around the principles that content be perceivable, operable, understandable, and robust enough that it can be interpreted reliably by a wide variety of users, including those with assistive technologies. Effective June 24, 2024, the U.S. Department of Justice issued a final rule revising the regulation implementing Title II of the Americans with Disabilities Act (ADA) to require public entities to comply with WCAG 2.1 Level AA by April 24, 2026. The following guidelines are set forth to assist the campuses, divisions, and units of the UA System in meeting WCAG 2.1 standards:

- A. Websites, online tools, supporting web products and services, and mobile applications should conform to and/or support WCAG 2.1 Level AA where feasible.
- B. Website-related contracts and technology purchases should conform to WCAG 2.1 Level AA where applicable. Preferred language for vendor contracts may be obtained from a University purchasing office or the Office of General Counsel.
- C. All personnel responsible for existing websites, web-based content, and web-based applications (including mobile applications) must use good-faith efforts, subject to the requirements and exceptions of the applicable laws, to delete noncompliant materials or bring the websites into conformance with WCAG 2.1 Level AA. As part of this effort, each campus or other unit shall develop a policy and Implementation Plan, to be approved by the Chancellor or chief executive of the unit, that includes the following components:
 - a. Formation of a committee, which should generally include appropriate persons from Marketing/Communications, Information Technology, Disability Services, Academic Affairs, Procurement, and other appropriate stakeholders. The committee membership may be adapted as appropriate for the campus or unit. The Committee should be charged with helping to identify and prioritize actions necessary to further the Board Policy and campus policy;

- b. Procurement and utilization of a software tool, which should be used in connection with diagnosing any problematic areas that may currently exist and conducting periodic audits going forward;
- c. Training for web developers and content editors so that new content complies with WCAG 2.1 AA Success Criteria;
- d. Developing a plan for remediating legacy pages, including the identification of available personnel to assist with remediation efforts and the creation of a system of prioritization based on criteria such as the following:
 - i. web pages that have been specifically requested to be made accessible as part of a formal accommodation request;
 - ii. web pages that experience a high volume of traffic;
 - iii. web pages that can be remediated with relative ease;
 - iv. web pages required for participation, funding, disabilityrelated services, and other key pages needed by persons with disabilities;
 - v. web pages that provide core institutional information, such as information pertaining to admissions, housing, registration, financial aid, employment, and educational materials;
 - vi. web pages categorized as an "A" item under WCAG 2.1 Success Criteria; and
 - vii. online course materials.
- e. Developing a plan for periodic compliance audits and updates, using a combination of software, input from students or other users with disabilities, and informed professional judgment;
- f. A status report regarding progress toward a fully accessible web space over the past year and targets for the upcoming year should be included in annual reports to the Chancellor or chief executive of the unit and Disability Services Coordinator where applicable.
- D. Each website should contain contact information for users to convey information regarding accessibility problems. The information may be directed to the site's webmaster and the campus's Office of Disability Services or other designee. The contact information may take a variety of forms, such as an e-mail address or a link

to a contact form on the site. The website's "contact" or "about us" page is the recommended location for this information. Additional means of seeking input from University students regarding accessibility issues should be encouraged.

- E. Each campus or unit should periodically test its website for accessibility and report accessibility issues to the webmaster for that website.
- F. Upon being made aware of an accessibility issue on a website, the webmaster should:
 - a. Acknowledge receipt of the issue, with a copy to the Disability Services Office;
 - b. Open an accessibility case for recording the issue and the action taken;
 - c. Verify that the issue presents an accessibility issue; and
 - d. Treat the issue as an important matter, addressing any time-sensitive needs of the user promptly. If the work requires substantial effort, the user shall be promptly notified of the expected delivery.
- G. Conformance with WCAG 2.1 Level AA guidelines may occasionally be an undue burden due to the nature of the content, the lack of accessible solutions, or an unreasonably high cost associated with meeting the goal.
 - a. In such circumstances, each campus or unit shall strive to provide reasonable accommodations to students or other users in regard to accessing the content and services provided on the website. Persons responsible for managing programs and activities must be prepared to provide the content or service in an alternative manner or format (*e.g.*, electronic text files or audio descriptions) upon request.
 - b. If the site's webmaster, in consultation with the campus's Disability Services Office (where applicable) and the Office of General Counsel, determines that information or content on a website cannot be made accessible or that doing so would constitute an undue burden or fundamental alteration, the campus or unit will engage in an interactive process with the user about alternative methods for providing the information or services and will provide an equally effective alternative format or service.
- H. Each campus or unit will designate a person or persons from whom the following can be obtained:
 - a. WCAG 2.1 guidelines; and

- b. Informational materials and technical assistance for designing and implementing websites that meet accessibility guidelines and for evaluating the accessibility of websites and those under development.
- I. Each campus or unit will designate a person to whom concerns regarding compliance with this policy or complaints of disability discrimination should be directed. Each campus or unit shall also establish a policy for review of such complaints.

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