

Digital Accessibility Policy for Information Technology and Digital Content

	File: Governance Policies
	Policy Title Digital Accessibility Policy for Information Technology and Digital Content
	Policy Summary Fort Lewis College is committed to ensuring that information technology and digital content it creates and/or distributes are accessible to all students, employees, and the public. This policy aligns with federal and state laws, including the Web Content Accessibility Guidelines 2.1, Level A and AA, the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Section 508, and Colorado HB21-1110.

Policy Owner Fort Lewis College President	Approval Date November 7, 2024	Effective Date November 7, 2024
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Search Terms Accessibility, exception, remediation, accommodation, standards	Scheduled for Review Spring 2025
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I. Policy Statement

Fort Lewis College is committed to ensuring that information technology and digital content it creates and/or distributes are accessible to all students, employees, and the public. This policy aligns with federal and state laws, including the Web Content Accessibility Guidelines 2.1, Level A and AA, the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Section 508, and Colorado HB21-1110.

II. Policy Scope

This Policy helps ensure that information technology and digital content used by any college program, service, or activity is meaningfully accessible to all users. All Fort Lewis College schools, colleges, departments, centers, institutes, administrative units, offices, authorized organizations, and content created for these entities, are subject to this Policy. This Policy applies to all digital technology used to conduct college business, except information technology or digital content created or published by students, faculty, or staff for personal use. Faculty must be prepared to provide reasonable accommodations when student content is created in an academic context and shared for peer review.

III. Standards

Fort Lewis College has developed digital accessibility standards to meet the following laws and guidelines:

- [WCAG 2.1 Level AA](#) or higher
- [Section 508 of the U.S. Rehabilitation Act](#)
- [Section 504 of the U.S. Rehabilitation Act](#)
- Colorado State Laws: [Following C.R.S. 24-85-101 to 24-85-104, ARTICLE 85, HB21-1110](#)

IV. Roles and responsibilities

For ownership of policy

The President is the owner of this policy. The President is responsible for reviewing the digital accessibility policy, statement, and plan at scheduled review dates. Final approval can only be given by the President.

For granting exceptions

The President is responsible for responding to exceptions proposed by the Digital Accessibility Committee (DAC) and holds final discretion.

For developing policy, statement, and plan

The DAC is responsible for overseeing and updating the digital accessibility statement, policy, and plan; responding to inquiries; providing a point of contact for audits or remediation by third parties; and coordinating the distribution of training and resources to the greater Fort Lewis College community. The DAC also provides progress-to-date reports on digital accessibility efforts, updated quarterly.

For procedures implementing policy

Information Technology and the Digital Accessibility Committee are responsible for creating, or hiring a third party to create, a plan with clear procedures on how to address digital accessibility issues and maintain digital accessibility moving forward.

For following policy

All employees are responsible for ensuring accessibility of the digital content and information technology they create, following the College's digital accessibility standards.

For notification of policy and support of skill development

All campus departments and entities are responsible for ensuring their faculty and staff are aware of the College's digital accessibility standards and have access to resources needed to learn about these standards.

For enforcement of policy

The President holds ultimate responsibility for enforcing the digital accessibility policy, although supervisors, department chairs, and Human Resources may assist in enforcement efforts when necessary.

For notification of policy

The policy librarian works with the Marketing and Communications web team to update the policy library accordingly.

V. Maturity

The College conducts an annual self-assessment during scheduled reviews to evaluate its accessibility maturity level, updating this status to demonstrate ongoing commitment.

Self-assessment levels

- Inactive: No awareness or recognition of need.
- **Launch: Recognized need, planning initiated. (Current stage)**
- Integrate: Roadmap in place, well-organized approach.
- Optimize: Incorporated organization-wide, consistently evaluated.

Good faith progress

Fort Lewis College is committed to providing equitable access to our digital content and information technologies. Our ongoing digital accessibility efforts aim to ensure that all Fort Lewis College services, programs, and activities are accessible, providing equal access to information and services. At our current level of digital accessibility maturity, we strive to

promptly address digital accessibility concerns or offer reasonable accommodations. Fort Lewis College's publicly posted digital accessibility statement includes a contact form and phone number to request support.

Why we are at this stage

Fort Lewis College faces organizational limitations in responding to and improving digital accessibility systems and processes. Limited staffing, budget, and resources have contributed to a buildup of digital accessibility challenges over time. However, in response to HB21-1110, Fort Lewis College is developing a plan to continually improve digital accessibility and provide reasonable accommodations when necessary.

V. Plan and procedures

The Fort Lewis College digital accessibility plan is in development. The plan aims to create a campus-wide roadmap for addressing existing digital accessibility issues and maintaining accessibility moving forward.

The goals of the plan are as follows:

- Define and audit the current inventory of digital content and information technology
- Define roles and responsibilities per existing digital content and information technology type
- Prioritize and address existing accessibility issues in order of greatest impact
- Create an internal procedure and role structure for responding to inquiries per content type
- Train staff and faculty on digital accessibility best practices and remediation tools
- Prioritize hiring staff and faculty with digital accessibility experience
- Ensure digital accessibility procedures occur at all stages of the product lifecycle: procurement, design, development, user experience, and quality assurance
- Create and publicly post a digital accessibility progress-to-date report, updated quarterly

VI. Exceptions and remediation

The DAC may require that inaccessible portions of digital content or information technology be made compliant by designated staff or vendors, with costs charged to the unit responsible. If responsibility for inaccessible content cannot be identified, the DAC may ask the department that owns it to remove it until it is made compliant.

Upon request by an individual unable to access specific digital content or information technology, the content must be updated to comply with the policy or reasonable accommodations provided if the content cannot be remediated in a timely manner. The department that created the content is responsible for its accessibility and for making reasonable accommodation in response to a request.

DAC may recommend exceptions to this policy, which the President or their designee may grant under specific circumstances, such as fundamental alteration or undue financial and administrative burden.

VII. Disclaimer

This Policy sets forth internal guidelines and expectations aimed at promoting and enhancing digital accessibility at Fort Lewis College. Fort Lewis College reserves the right to alter the Policy at any time without prior notice. This Policy does not create any contractual or legal obligation for Fort Lewis College, nor does it establish any contractual or legal rights for members of the Fort Lewis College community or the public.

VIII. Definitions

- **Digitally Accessible:** Perceivable, operable, and understandable digital content that enables an individual with a disability to access the same information, engage in the same interactions, and enjoy the same services offered to other individuals, with the same privacy, independence, and ease of use as exists for individuals without a disability.
- **Digital Content:** Any content in digital form, including websites, text, audio, video, and images.
- **Fundamental Alteration:** Significant change to the essential purpose of a program or service.
- **Information Technology:** Any electronic system, software, or equipment used to create, convert, communicate, or duplicate data or information.
- **Undue Financial and Administrative Burden:** Significant difficulty or expense that is beyond the College's ability to address with current staffing and budget resources.
- **Reasonable Accommodations:** Adjustments or modifications to ensure individuals can access services, programs, or activities equally, regardless of ability.

IX. Formal Approval

This policy is formally approved by:

Name: Steve Schwartz
Role: Interim President
Department: President's Office