# **CU Anschutz Campus Standards for Digital Accessibility**

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## **Introduction**

This document establishes the official university standards for digital accessibility in accordance with, and as a supplement to, the CU Anschutz Policy on Digital Accessibility (to be published summer 2024) and [APS 6011: Digital Accessibility](https://www.cu.edu/ope/aps/6011).

## **Statement of Purpose**

CU Anschutz is committed to ensuring digital communications and information technology are accessible to everyone. It aligns with our value and commitment to be a leading university dedicated to fostering inclusivity and excellence.

It is everyone’s responsibility to ensure that content created is accessible. Each school, department and unit are responsible for making digital materials created or posted by their employees as compliant as possible. Content owners are responsible for ensuring compliance with campus accessibility standards. Numerous resources and training opportunities are available on the [CU Anschutz Digital Accessibility Webpage](https://www.cuanschutz.edu/accessibility/digital-accessibility).

## **Scope**

This document is designed to help ensure that all digital technology used by any university program, service or activity is meaningfully accessible to individuals with disabilities.

These Standards apply to all CU Anschutz schools, colleges, departments, centers, administrative units, offices, and authorized organizations, as well as the content created for these units in-house or by external entities. These Standards apply to all digital technology used to conduct university business. When student content is created in an academic context and shared for peer review, faculty must be prepared to provide accommodations.

## **Legal Background**

The Digital Accessibility Standards are intended to comply with the related requirements of the following civil rights laws, including, but not limited to:

* **The American with Disabilities Act (ADA)**The ADA is a civil rights law that prohibits discrimination against people with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. Universities are covered by this law. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
	+ - Title I of the ADA requires the university to provide qualified individuals with disabilities an equal opportunity to benefit from the full range of employment related opportunities available to others. It requires that employers make reasonable accommodations and reasonable modifications, unless doing so would result in undue hardship.
		- Title II of the ADA requires the university to provide people with disabilities an equal opportunity to benefit from all its programs, services, and activities. It provides that the university may be required to make reasonable accommodations and modifications to programs, services or activities unless the university demonstrates that the requested accommodation or modification would “fundamentally alter” such programs, services, or activities.
* **Section 504 of the Rehabilitation Act of 1973 (“Section 504”)**Section 504 is a federal law that protects the rights of individuals with disabilities in programs and activities that receive federal financial assistance from the U.S. Department of Education. Section 504 provides that qualified individuals with a disability shall not, solely by reason of their disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Standards are also informed by other laws that specifically address digital technology, including:

* **The Telecommunications Act of 1996**Section 255 of the Telecommunications Act of 1996 requires telecommunications products and services to be accessible to people with disabilities to the extent access is "readily achievable.” If manufacturers cannot make their products accessible, then they must design them to be compatible with adaptive equipment used by people with disabilities, where readily achievable.
* **The 21st Century Communication and Video Accessibility Act (CVAA)**Title I of the 21st Century Communication and Video Accessibility Act addresses communications access to make products and services using Broadband accessible to people with disabilities. Title II of the CVAA makes it easier for people with disabilities to view video programming on television and the Internet.
* **Colorado House Bill 21-1110**
Colorado House Bill 21-1110 makes it a civil rights violation for a government agency to exclude individuals with disabilities from receiving services or benefits because of a lack of accessibility. It requires all higher education institutions within the state to have digital accessibility policies and procedures in place by July 1, 2024. The rules apply to both public external-facing and internal-facing information and communication technology (“**ICT**”) that is procured, developed, maintained, or used by state and local government entities.

## **Accessibility Guidelines**

**Web Content Accessibility Guidelines (WCAG)**The campus uses the most recently adopted version of the [Web Content Accessibility Guidelines](https://www.w3.org/WAI/standards-guidelines/wcag/) (WCAG) 2.1 Level A/AA as a guideline for accessibility of digital content. WCAG is developed by W3C, an organization that maintains standards for creating content on the internet. W3C develops WCAG standards in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. The WCAG principles and guidelines explain how to make web content more accessible to people with disabilities. User experience should also inform evaluation and delivery of accessibility.

## **Notes to Assist in Comprehension of Campus Accessibility Standards**

### **Proactive Accessibility and Accommodation Requests**

CU Anschutz is legally, morally, and ethically required to afford all qualified individuals with equal access to programs, services, and activities, and effectively communicate with individuals with disabilities in a timely manner. Refer to the Digital Accessibility Campus Policy.

To provide access in an equally effective and inclusive manner with substantially equivalent ease of use, information and communication technology must be provided in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability. Due to this obligation, CU Anschutz strives to make its services and resources accessible proactively. This means creating and maintaining accessible information and communication technology, lessening, or preventing, the need for an individual with a disability to request accommodations.

### **Reporting Accessibility Barriers and Requesting Accommodations**

CU Anschutz is committed to equal, available, and reliable access to the campus’ services, digital content, and technologies. Students, faculty, and staff who face digital accessibility barriers or who need to request accommodations may do so on our [Campus Accessibility webpage](https://www.cuanschutz.edu/accessibility).

### **Campus Services and Offices**

#### **Digital Accessibility Website**

#### Resources and information – including websites, applications, and documents – are available to ensure that everyone can access and use university digital content and services on the [CU Anschutz Digital Accessibility website.](https://www.cuanschutz.edu/accessibility/digital-accessibility) For general inquiries on digital accessibility, please reach out to the CU Anschutz Digital Accessibility Committee at digitalaccessibility@cuanschutz.edu.

#### **Web Accessibility**For training and assistance on web accessibility, visit [CU Anschutz AtWeb website](https://www.ucdenver.edu/atweb/web-accessibility/accessibility-tools) or contact websitehelp@ucdenver.edu.

#### **Digital Communications Accessibility**For information and assistance regarding digital communications accessibility (i.e. email communications, social media, digital assets), visit the [Office of Communications website](https://www.cuanschutz.edu/offices/communications/brand/resources/digital-asset-accessibility) for guidelines.

#### **ADA Coordinator**The university promotes appropriate accommodations for faculty, staff, and campus visitors with disabilities. These accommodations are tailored to individual needs and provided on a case-by-case basis. Additional information can be found on the [Human Resources ADA Compliance webpage.](https://www.cuanschutz.edu/offices/human-resources/employee-relations-and-performance/ada-compliance)

#### **Office of Disability Access and Inclusion (ODAI)**ODAI provides accommodations and collaborates across campus partners on accessibility issues to support a growing and diverse student population with disabilities. Additional information can be found on the [ODAI website](https://www.cuanschutz.edu/offices/office-of-disability-access-and-inclusion/home-page).

#### **Campus Building and/or Campus Grounds**For physical ADA barriers in a campus building or on campus grounds, [contact Facilities Management](https://ucdenverdata.formstack.com/forms/report_accessibility_issue).

## **Campus Accessibility Standards**

### **Course Materials**

1. **Introduction**All course materials should be designed to be proactively accessible to as many students as possible.

Examples of digital components of a class that should be accessible include:
* Word docs, potentially including but not limited to, class syllabi
* PowerPoint presentations
* Google Apps (Docs, slides, etc.)
* External websites
* Digital textbooks
* PDFs, potentially including but not limited to, class syllabi
* Video content, in-video quizzing tools
* VoiceThread or other synchronous platforms
* Canvas or other learning management systems

Some training may be required to learn how to create certain accessible materials. Faculty and staff members will have access to resources to support them in creating accessible content. The practices outlined in the subsections below increase the likelihood that every student has an equitable opportunity in the course to succeed using their own abilities and learning preferences and will reduce the need for accommodations for individual students.

1. **Pre-Approved Course Accommodations**

It is the responsibility of faculty, instructional designers, and content creators to ensure course materials meet digital accessibility standards. The Office of Disability, Access, and Inclusion (ODAI) will support providing course content in an accessible format only to students with approved ODAI accommodations. If a student with an approved accommodation requests course content in an accessible format, they should receive access to that content in sufficient time to access the content for course requirements. For accommodation requests, students can initiate the process via the [ODAI website](https://www.cuanschutz.edu/offices/office-of-disability-access-and-inclusion/students/requesting-accommodations).

1. **Documents**

Students with disabilities should receive documents in an accessible format. Documents here include Microsoft Office files, Google Apps files, and PDFs. A document is generally considered accessible if a student can get to the content on the platform of their choosing and they can customize it to meet their specific disability-related needs. Students are responsible for developing the skills necessary to use accessible content.

Faculty and their departments are required to make course materials available in an accessible format in an on-going manner to all students, regardless of disability-related need. Accessible content gives many students a better learning experience by enabling them to search documents, read content on a variety of devices, and personalize documents with format changes such as font size and color.

Information on topics such as training and creating accessible documents is available on the [CU Anschutz Digital Accessibility Webpage.](https://www.cuanschutz.edu/accessibility/digital-accessibility/digital-accessibility-standards-and-resources)

1. **Other Digital Course Content**Digital content extends beyond documents to include any information, communication, or activity that takes place on a technology such as a computer or mobile device. This includes websites, digital publisher content, open educational resources, and software. This content might or might not be created by faculty or staff.

All forms of digital course content should be accessible to all students. However, it may not be feasible for faculty and staff to directly remediate digital content for accessibility if it was produced by a third party. This is not a reason in and of itself to not pursue accessibility, however, because the selection of this content in the course or program also comes with the responsibility to provide accessibility. Faculty and staff can and should advocate with the creators for the development and remediation of both accessible content and documentation to support faculty and students in using the product in an accessible way.If digital content is not accessible and cannot be made accessible within a reasonable timeframe to accommodate a student enrolled in a course with an approved accommodation, faculty must contact Office of Disability, Access, and Inclusion so that ODAI can work with the faculty member and the student to devise an alternative reasonable accommodation plan for the student. If a student with an accommodation has difficulty accessing course content and a barrier is not otherwise known to the faculty member or ODAI, it is the student’s responsibility to contact ODAI as soon as possible to communicate the issue.

### **Captioning**

1. **Introduction**

Individuals with hearing impairments and other disabilities may need captioning in order to access the audio component of video media. Faculty, staff, and students are required to caption all video content that they create as part of their role at the university. All captions should follow [FCC closed captioning rules](https://www.fcc.gov/consumers/guides/closed-captioning-television). Captions must be reviewed for accuracy. Audiovisual content should contain captioning and be hosted on platforms that support closed captioning. If audiovisual content is shown on a particular device managed by the University, the device should be able to display captions and captions should be turned on.

Captioning guides and resources, as well as a list of university captioning tools, are available on the [CU Anschutz Digital Accessibility webpage](https://www.cuanschutz.edu/accessibility/digital-accessibility/digital-accessibility-standards-and-resources).
2. **Course Accommodations**

Any video media used in a course must be captioned if a relevant disability accommodation request has been submitted by a student. The faculty member will need to plan ahead to ensure that any audio or video course materials used for the remainder of the semester are accessible to the student. The student does not need to request captioning for every individual piece of media that will be used; the request applies to all media that is course content.
3. **Pre-Recorded Content**

All public-facing pre-recorded video content representing the University or any of its departments or programs must be captioned. Non-captioned video that is in current use internally that is not public-facing should be made accessible as soon as practically feasible. The Office of Disability, Access, and Inclusion has a [resource guide](https://www.cuanschutz.edu/offices/office-of-disability-access-and-inclusion/faculty/teaching-resources) on creating a transcript file.
4. **Procurement**

All departments, programs, instructors, and employees are encouraged to purchase or create captioned versions of audiovisual media whenever possible.
5. **Digital Displays, i.e., Television Screens**

All public facing displays playing content with an audible component must have closed captioning enabled. If they do not have the capacity for closed captions, captions need to be embedded.
6. **Television Content**

Any broadcast or cable television content displayed on campus must have closed captioning and have it enabled.
7. **Departmental Content**

If departments are using televisions or digital screens to publicly display any materials, the audio content must have captions and the captioning must be enabled.

### **Audio Description**

1. **Introduction**

Audio description is an oral account of essential visual information for the sake of blind and low vision viewers of a video. Whereas captions need to accompany all audible video content, there is more nuance about when audio description is appropriate. It is possible to create videos in a way that minimizes the need for audio description. As a result, determining whether or not audio description is required for a particular video is a less straightforward process than it is with captioning. To learn more, reference the [UC Berkeley guide to audio description](https://webaccess.berkeley.edu/resources/tips/audio-description).
2. **Course Accommodations**

Any video media used for participation in a course should be audio described if a relevant disability accommodation request has been submitted by a student.
3. **Pre-Recorded Content**

All public-facing pre-recorded video content representing the University or any of its departments or programs should have audio description available (which can include sufficient description in the original audio of the video). If a separate audio description track is required, it is necessary to either have two versions of the video available, one with and one without audio description, or to use a player where the audio description can be toggled on and off. More information about audio description and media players is available at [Creating Accessible Videos](https://www.colorado.edu/digital-accessibility/resources/creating-accessible-videos).
4. **Live Content**

Any individual, department, or program associated with the University that is providing pre-planned live-streamed video content should be prepared to provide appropriate audio description upon request. Contact the ADA office if you receive a request for live audio description for an event.
5. **Procurement**

When purchasing audiovisual media, ask the vendor whether an audio-described version is available, if audio description is necessary.

### **Digital Signs**

1. **Introduction**

Digital signs are electronic displays that communicate visual and/or audible content.

1. **Limitations to Accessibility**The content in digital signs must be as accessible as reasonably possible. However, digital signs are limited in the degree to which they can be made accessible to all people, so any content in a digital sign should first be made available on a fully accessible digital platform such as a departmental website or web-based calendar. Digital signs should only be used as a supplementary way of communicating information.

The content of digital signs for use in any public CU Anschutz program, service or activity must be as accessible as the constraints of the device allows, according to the guidelines of the most recently adopted/published WCAG 2.1 level AA standards.
2. **Guidelines**Minimum accessibility requirements for digital signs are:
	* 1. Captions should accompany any audio content.
		2. Visual format should follow the most recently adopted/published [WCAG guidelines for distinguishable color](https://www.w3.org/WAI/WCAG21/quickref/#distinguishable) and [accessibility best practices for text readability](https://webaim.org/techniques/fonts). CU Anschutz [branding colors and branding fonts](https://www.cuanschutz.edu/offices/communications/brand/colors-and-fonts) should only be used in combinations that have sufficient color contrast. For more support/guides, see our [CU Anschutz AtWeb page on Accessibility tools](https://www.ucdenver.edu/atweb/web-accessibility/accessibility-tools).
		3. Follow the most recent WCAG standards with respect to [animation and flicker rates](https://www.w3.org/TR/WCAG21/#seizures-and-physical-reactions).
		4. Follow ADA requirements around sign placement as indicated on the [Facilities Management Campus Planning Resources page](https://www.cuanschutz.edu/docs/librariesprovider260/design-and-construction/guidelines-and-standards/division-10/101400---signage.pdf?sfvrsn=8a74b9b9_2).

Additional resources are listed on the [OIT Digital Signage services webpage](https://www.cuanschutz.edu/offices/office-of-information-technology/tools-services/detail-page/digital-signage).

### **Websites**

1. **Introduction**Departments and units, including all faculty and staff, are responsible for ensuring websites related to their programs and/or services are accessible.
2. **Guidelines**As noted in Section E, the campus uses the most recently adopted/published version of the [Web Content Accessibility Guidelines (WCAG) 2.1 Level A/AA](https://www.w3.org/WAI/standards-guidelines/wcag/new-in-21/) as a guideline for accessibility for all information and communication technology (ICT), recognizing that replicable user experience is an important part of determining whether digital content is accessible.

Members of the university community can access resources on creating accessible websites on the [OIT Web Accessibility site](https://www.ucdenver.edu/atweb/web-accessibility). For hands-on web accessibility support, web creators can email websitehelp@ucdenver.edu.

### **Procurement**

1. **Introduction**Any ICT good or service procured for use in a CU Anschutz program, service, or activity should be as accessible as possible.
2. **Guidelines**

Guidelines and process for procurement of services to ensure compliance with campus digital accessibility standards are explained on the [CU Anschutz Digital Accessibility Webpage – Procuring Accessible IT](https://www.cuanschutz.edu/accessibility/digital-accessibility/digital-accessibility-standards-and-resources#procurement). These standards are in accordance with the [State of Colorado Office of Information Technology Standard Operating Guide for Procuring Accessible Technology](https://oit.colorado.gov/standards-policies-guides/guide-to-accessible-web-services/procurement-toolkit/standard-operating).

### **Digital Communications**

1. **Introduction**Individual schools, departments, and units are responsible for ensuring that all of their digital assets and digital communications used to market their programs and/or services are accessible. These types of communications and assets include items such as email marketing templates, social media posts, and all other digital imagery.
2. **Guidelines**

The campus uses the most recently adopted/published version of the [Web Content Accessibility Guidelines (WCAG) 2.1 Level A/AA](https://www.w3.org/WAI/standards-guidelines/wcag/new-in-21/) as a guideline for accessibility for all digital communications. Members of the university community can access guidelines on how to create accessible digital assets and communications by visiting the [Office of Communications website](https://www.cuanschutz.edu/offices/communications/brand/resources/digital-asset-accessibility).