A. INTRODUCTION

The University of Colorado Denver and Anschutz Medical Campuses strive to ensure that people of all abilities have access to the same services and content available to people without disabilities, including services and content made available through the use of information technology. In accordance with Administrative Policy Statement (APS) 6011, Digital Accessibility, “…each campus Chancellor, or designee, shall be responsible for providing digital accessibility standards and establishing appropriate
compliance and governance structures.” This policy establishes those responsibilities, standards, compliance, and governance structures as required by APS 6011.

B. POLICY STATEMENT

The Office of Information Technology (OIT) services and applications that are procured, developed, maintained, and used by the CU Denver and CU Anschutz faculty, staff, and students should provide similar functionality, experience, and information access to individuals of all abilities. Examples of technology covered by this policy include websites, software systems, electronic documents, learning management system, videos, and hardware equipment.

Accessibility is the responsibility of all members of the CU Denver and CU Anschutz community. In accordance with APS 6011, section II.D, if you create (or are responsible for) websites, software, videos, or electronic documents and instructional content; or if you procure technology that others will use, it is your responsibility to ensure these technologies and content are accessible to all users. To that end, the key areas surrounding accessibility are as follows:

1. Campus Standards:

   Any and all information and technology—including, but not limited to, computers and ancillary equipment, instructional materials (including online course content, which must strive to be universally designed and inclusive), software, videos, apps, multimedia, telecommunications, or web-based content or products—developed, procured, maintained, or used in carrying out university activities must be compliant with Sections 504 and 508 of the Rehabilitation Act of 1973, as amended; the Americans with Disabilities Act of 1990, as amended; Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, developed by the World Wide Web Consortium (W3C); other related local, state, and federal laws; and other related university policies. Per APS 6011, at a minimum, these university standards apply to the following:

   - Course Syllabi, textbooks and other course materials
   - Websites and applications (compliant with WCAG 2.1 level)
   - Closed-captioning and audio description of audio-visual materials
   - Digital Signage
   - Procuring goods and services

2. Process for overcoming known accessibility barriers:

   If you experience a barrier, and/or learn about a barrier that affects your or someone else’s ability to access CU Denver | CU Anschutz websites, videos, online forms, or other digital content, technologies and/or services, please send
a detailed message to the OIT Service Desk - help@ucdenver.edu or call 303.724.HELP (4357).

Faculty and staff responsible for the information or technology must undertake reasonable efforts to make it accessible in a timely manner upon becoming aware of non-compliance applicable to federal or state law, as well as the CU Denver [CU Anschutz campus administrative policy 3054, Nondiscrimination Policy. If the information or technology is required for coursework or for essential job functions, a timely review by the Access and Usability Manager (AUM) will determine if appropriate alternatives are available and can be implemented. If the alternatives cannot be implemented in a timely manner, the AUM will consider requiring the removal of access to the information or technology.

Access and Usability Manager (AUM): The AUM for the Office of Information Technology, serving both CU Denver and CU Anschutz, acts as a central resource for leadership, services, and programs related to the Americans with Disabilities Act (ADA) and Title II, sections 504 and 508 of the Rehabilitation Act and relevant standards and university policies. Currently, the AUM serves as an advocate and liaison for diversity and inclusion within the Office of Information Technology. In addition, the AUM is the primary manager for training and coaching around inclusive course design practices, client engagement, and strategic planning.

3. Campus Governance:

Following are the governance structures responsible for ensuring digital accessibility transparency and risk mitigation. The Access and Usability Manager (AUM) either resides on a particular group/committee, as indicated, or has access to the committees if needed.

- **Digital Accessibility Working Group.** This is a system-level group charged to examine the accessibility efforts each campus currently has underway. In examining these efforts, the working group will make recommendations to the IT Governance Cabinet around resources needed to fill any gaps and/or areas that will need expanding and additional collaborating with the four campuses within the CU System to maintain a superior level of accessibility at the University of Colorado. The AUM is a member and the campus representative to this group.

- **Information Technology (IT) Cabinet:** While not a member of this cabinet, the AUM will liaise with the campus Chief Information Officer as necessary to be aware of and resolve digital accessibility initiatives/issues. The IT Cabinet provides executive-level strategy and direction for university-wide technology.
IT Governance Committee. This is a system-level group consisting of
campus Chief Financial Officer and Chief Information Officers. They are
responsible for establishing who is empowered to evaluate, prioritize,
select, and fund competing IT investment options as well as oversee the
implementation of solutions and measure benefits. The AUM is a member
and the campus representative to this committee.

The person/team responsible for the information or technology must undertake
reasonable efforts to make it accessible in a timely manner upon becoming
aware of non-compliance applicable to federal or state law, as well as the CU
Denver | CU Anschutz campus administrative policy 3054, Nondiscrimination
Policy. If the information or technology is required for coursework or for
essential job functions, a timely review by the access and usability manager will
determine if appropriate alternatives are available and can be implemented. If
the alternatives cannot be implemented in a timely manner, the access and
usability manager will consider requiring the removal of access to the
information or technology.

4. Procuring Goods and Services:

Faculty and Staff Persons who use, create, purchase, or maintain information or
communication technology (ICT) for university programs, services, and
activities in the scope of their employment are responsible for making decisions
about which products, services and technologies to procure. Responsible for
making it accessible should strongly consider accessibility in accordance with
campus standards defined in section B.1 of this policy, as one of the criteria for
acquisition. This will ensure that products, services and technologies developed
at, purchased by, or used at the university are accessible to all faculty, students,
and staff, including those with disabilities. This is especially critical for
enterprise-level systems and other technologies that affect a large number of
students, faculty, and/or staff. Faculty and Staff should consult with the campus
Access and Usability Manager (OIT) help@ucdenver.edu or 303.724.HELP
(4357) for information regarding responsibilities and advice on best practices.

C. ANNUAL REPORTING

In accordance with APS 6011, the CU Denver | CU Anschutz Chief Information Officer
will provide an annual digital accessibility status to the CU IT Governance committee.
At a minimum, this status should note changes to standards, barriers to compliance to
standards, and identified accessibility barriers for broadly used systems.

Notes

1. Dates of official enactment and amendments:
   July 1, 2018: Adopted/Approved by the Chief Information Officer
   January 30, 2019: Amended
2. History:

January 29, 2019: Modified to reflect a Campus-wide effort to recast and revitalize various Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university. Amended to ensure compliance with APS 6011, Digital Accessibility.

3. Initial Policy Effective Date: July 1, 2018

4. Cross References/Appendix:

- University of Colorado Administrative Policy Statement 6011, Digital Accessibility
- Campus Administrative Policy 3054, Nondiscrimination Policy
- Rehabilitation Act of 1973, sections 504, 508
- Americans with Disabilities Act of 1990
- Web Content Accessibility Guidelines (2.1), Level AA
- University of Colorado Digital Accessibility Program
- CU IT Governance Committee
- Digital Accessibility Program (CU Boulder?)