University of Pittsburgh
Electronic Information and Technology Accessibility Policy
Policy CS 26

Implementing Executive: Senior Vice Chancellor for Engagement
Responsible Unit: Office of Diversity and Inclusion
Category: Community Standard
Effective Date: March 4, 2020

I.   Purpose

The University of Pittsburgh is committed to providing equitable access to services and content available to the community. This Policy establishes the standards for the accessibility of electronic information and technology (EIT) necessary to meet this goal and comply with all applicable laws and regulations. This Policy also establishes the roles and responsibilities for implementing these requirements, as well as monitoring compliance.

II.   Scope

This Policy applies to all University EIT used to conduct University academic, research and business activities.

III.   Definitions

Accessible: Each person, regardless of ability status, is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services in an equally effective and equally integrated manner, with substantially equivalent ease of use. Although this might not result in identical ease of use, any person with a disability must be able to obtain information, to which they are otherwise permitted to access, in a timely manner as fully, equally, and independently as a person without a disability.

Accessibility standards: The required, minimum standards that all EIT must achieve to comply with Section IV. B. of this Policy.

Electronic information and technology (EIT): Includes, but is not limited to, any software (such as content and learning management systems, databases, instructional programs), hardware (such as computers, classroom technology, digital signs), or digital content (such as websites, course content, presentations, videos, newsletters, journal articles) used in the creation, conversion, or duplication of electronic or digital data or information.

New EIT: Any EIT that is acquired, purchased, or renewed after this Policy's effective date.

Fundamental EIT: Any EIT that is significant and used in the normal course of operations at the University to support teaching, research, or administrative functions, as determined by the relevant department (area) in partnership with the Office of Diversity and Inclusion (ODI).

Secondary EIT: Any EIT that was acquired, purchased, or renewed before this Policy's effective date and is not Fundamental EIT.

Universal Design: The design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. By considering the diverse needs and abilities of all throughout the design process, universal design creates products, services and environments that meet peoples' needs.

IV.   Policy

A. Statement of Commitment

The University is committed to providing equitable access to available services and content through accessibility techniques and Universal Design principles to enable all individuals to have access to EIT associated with University activities. Personnel employed by the University are responsible for complying with the requirements of this Policy when conducting any covered activity.

B. Standards

The University has adopted widely accepted international and national accessibility standards and guidelines in order to ensure compliance with federal laws and regulations, particularly Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. The required accessibility standards that all EIT must meet are:

- W3C WAI Web Content Accessibility Guidelines version 2.1 (or current version);
    - The University considers Level AA to be the necessary level of conformance.
- WCAG2ICT Guidance on Applying WCAG 2.1 to Non-Web Information and Communications Technologies (or current version); and
- Revised Section 508 of the Rehabilitation Act of 1973, as amended.

C. Implementation Priorities

The University recognizes the importance of full compliance. Below are the ordered priorities of the University to achieve compliance. The accompanying EIT Accessibility Procedure and ODI's Guidelines provide further details regarding how these priorities will be implemented, including associated timelines, and how compliance will be monitored, including the use of area-level implementation plans and annual reports.

1. New EIT: must be in compliance with applicable standards and guidelines described in this Policy, as of the date this Policy is adopted, or satisfy an exception.
2. Fundamental EIT: timelines for compliance will be outlined in the EIT Accessibility Guidelines provided by ODI.
3. Secondary EIT: timelines for compliance will be outlined in the EIT Accessibility Guidelines provided by ODI.

ODI will provide guidance to the community on education and implementation of the standards (as detailed in Section IV. B.), including the development of area-level implementation plans.

Where EIT cannot be brought into compliance, University schools, units, and departments (for purposes of this Policy, the term "area" will be used when referring to these entities) are responsible for providing equivalent access to the content.

All procurement or purchasing contracts for EIT must conform to these standards or satisfy an exception as described in Section IV. E.

D. Non-Compliance

Areas are responsible for meeting the requirements established in this Policy. Accordingly, at the discretion of the Senior Vice Chancellor for Engagement (SVC-E), or their designee(s), and after consultation with the involved areas in an effort to support compliance, some or all non-compliant portions of Web pages and resources may be removed or brought into compliance.

E. Exceptions

Exceptions to this Policy should be rare and demonstrable. The EIT Accessibility Procedure and the EIT Accessibility Guidelines provide further details regarding exceptions to this Policy.

V. Governance/Responsibilities

The University is committed to providing support and resources through such units as ODI, the Center for Teaching and Learning, and Pitt Information Technology (Pitt IT) to support University employees in creating and maintaining accessible EIT. Learn more here: https://www.diversity.pitt.edu/digital-accessibility. Additionally, the items below identify specific roles that are integral as the University strives to achieve EIT accessibility compliance.

A. **Senior Vice Chancellor for Engagement (SVC-E)** – oversight responsibility for the implementation and monitoring of this Policy, including ODI's administrative role in supporting University areas' EIT accessibility transitional plans.

B. **ODI** – responsible for implementing this Policy, including coordinating and reviewing the University's overall compliance program and plan relating to digital accessibility as well as providing implementation support and resources.

C. **University schools, departments, and/or units (i.e., area)** – designates a point person(s) who is responsible for monitoring compliance with this Policy and who will coordinate with ODI for implementation support.

D. **University employees (including faculty)** – works to achieve EIT accessibility best practices and, to the extent possible, full-EIT accessibility compliance with assistance and support from ODI, the Center for Teaching and Learning, Pitt IT, and University Communications where necessary.

VI.   Contact Information/Public Accessibility

This Policy is posted under Community Standards on the Office of Policy Development and Management's website.

Members of the University community are encouraged to contact ODI for assistance with understanding their obligations related to compliance.

VII. Appendix – Related Authorities and Policies

EIT Accessibility Guidelines

Procedure CS 26, Electronic Information Technology Accessibility

Revised Section 508 of the Rehabilitation Act of 1973

W3c WAI Web Content Accessibility Guidelines version 2.1

WCAG2ICT Guidance on Appling WCAG 2.1 to Non-Web Information and Communications Technologies