

# Accessible Technology Policy

## Civil Rights – ADA

### CWU Policy 402-02

**Effective:** February 20, 2019

**Policy Review Date:** YEAR

**Policy Executive:** Senior Vice President – Finance and Administration

**Responsible Office/Unit:** Human Resources

#### Policy Statement:

#### Applicability:

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#### Content:

Policy  
Appendix A – Accessible Technology Procedures

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- (1) Central Washington University provides equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. This policy extends to the university’s electronic and information technologies and applies to their procurement, development, implementation and ongoing maintenance.
- (2) Ensuring equal and effective electronic and information technology access is the responsibility of all university administrators, faculty, and staff.
- (3) This is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, Section 508 of the 1973 Rehabilitation Act as amended, and Title 18, Chapter 5, Part 603, and the State of Washington OCIO policy 188.

#### History:

*Responsibility: Business & Financial Affairs; Authority: Cabinet/UPAC; Reviewed/Endorsed by: Cabinet/UPAC; Review/Effective Date: 02/20/2019; Approved by: James L. Gaudino, President]*  
*Reformatted and Assigned new Policy Number - Previous Policy CWUP 2-35-045, June 2025*  
*Attached Procedure CWUR 3-45-025 as Appendix A, June 2025*

## Appendix A - Accessible Technology Procedures

(1) These procedures support CWU 402-02 Accessible Technology and are in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, Section 508 of the 1973 Rehabilitation Act as amended, and Title 18, Chapter 5, Part 603, and the State of Washington OCIO policy 188.

### (2) Purpose

- A. The purpose of these procedures is to provide processes by which university administrators, faculty, and staff will create, obtain and maintain all information technology in a manner that ensures that technology is accessible to individuals with disabilities.
  
- B. These procedures apply to the following areas:
  - 1. Web Accessibility
  - 2. Instructional Materials Accessibility
  - 3. Document Accessibility
  - 4. Electronic Media Accessibility
  - 5. Software, Hardware and Systems Accessibility
  - 6. Procurement
  
- C. The Director of Civil Rights Compliance is Central Washington University's (CWU) ADA/504 compliance officer. The ADA/504 compliance officer provides compliance oversight, advice and consultation regarding these procedures. Questions and/or specific concerns regarding requests and requirements relevant to these procedures should be directed to the ADA/504 compliance officer. A list of limited exceptions, approved by the Accessibility and Disability Action Planning Team (ADAPT), will be available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT)

### (3) Definitions

- A. "Accessible" means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.
  
- B. "Disability" means a physical or mental impairment that substantially limits one or more major life activities.

- C. "Information technology" includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information.
- D. "Equally effective" means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium.

#### **(4) Web Accessibility**

- A. Scope: These procedures apply to all outward facing university web pages, websites and web-based software used to conduct university business and activities including web resources used in courses.
- B. Standards: All outward facing web pages, websites and web-based software published, hosted or used (including remotely hosted sites and software) by the university will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 (<http://www.w3.org/TR/wcag2ict/>) published by the W3C. All pages will meet Level AA guidelines with limited exceptions approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT). All university websites, unless technically impossible, will link to [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT) which includes a statement of commitment to web accessibility.
- C. Responsibility
  - 1. All colleges, departments and programs:
    - a. Will comply with (3B) Standards when creating web pages, websites and utilizing web-based software.
    - b. Will ensure that web-based activities are hosted in accessible environments and that web-based content follows (3B) Standards.
  - 2. Public Affairs:
    - a. Will provide instruction and support for campus community members creating university websites and content so that individuals who author web content can be in compliance with these standards.
    - b. Will ensure that any Content Management System and other web production or web object creation software proposed and supported will be accessible and will produce accessible web content.
  - 3. Brooks Library:
    - a. Will maintain an accessible website and search engine that can search across all library collections, including, but not limited to e-journals, databases, and e-books.

- b. Will conduct monthly accessibility scans to ascertain whether any posted content on the library website is inaccessible. The library will notify content authors if corrections to pages are needed and of reasonable timelines for corrections to be made. The Library will note if corrective action has been taken during the next monthly scan.

4. ADAPT:

- a. Will compile and maintain data to track compliance with (3B) Standards and make recommendations for addressing problems.

5. Central Access:

- a. Will support colleges, departments and/or web-content owners, in the creation of accessible materials on a fee-for-service basis.

6. Disability Services:

- a. Will assist colleges, departments and/or web-content owners in the creation of accessible materials for students with disabilities. Disability Services is funded to support these services.

D. Implementation Schedule Summary

1. ADAPT will identify a strategy to ensure that webpages that provide essential student functions are accessible.
2. The university website will contain a clear statement (or a link to a statement) describing the university's commitment to web accessibility and a method to report barriers and/or to receive an alternative equally effective accessible format. This statement will appear by default on all university, college, and department websites.
3. The Brooks Library implements a search engine that is accessible in accordance with WCAG 2.0 Level AA standard, which can search across all library collections, including, but not limited to, e-journals, databases, and e-books.
4. By January 31, 2021, all webpages published or hosted by the university, will be accessible according to (B) Standards (above).
5. Upon a specific request for access by an individual with a disability:
  - a. The owner will update web-content to be in compliance with (B) Standards (above), with limited exceptions approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT), or
  - b. Otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

## **(5) Instructional Materials Accessibility**

- A. Scope: These procedures apply to all electronic instructional materials (syllabi, textbooks, presentations, handouts, etc.). This includes electronic instructional materials delivered within the university's learning management system or in an alternate fashion (email, blogs, etc.) and electronic instructional activities (online collaborative writing, web conferencing, etc.). Electronic instructional materials include, but are not limited to, word processing documents, PDFs, presentations, publications and spreadsheets that are scanned, uploaded, posted, or otherwise published or distributed electronically. Documents will be made accessible when used.
  
- B. Standards: All electronic instructional materials, optional and required, will be equally effective for persons with disabilities as they are for persons without disabilities. Electronic instructional materials and electronic instructional activities will be made available in a timely manner. All electronic instructional materials and activities will meet all applicable standards and guidelines outlined in this policy.
  
- C. Responsibility
  - 1. All colleges, departments and programs:
    - a. Will ensure that instructional materials comply with (B) Standards (above).
    - b. Will ensure that college and/or department-owned classrooms provide accessible electronic instructional materials.
    - c. Will ensure that all college and/or department-owned computer labs provided for student use will have discipline-specific assistive technologies not limited to but including accessible computer stations, screen reading software, and screen magnification. (NOTE: Disability Services will provide an assistive software bundle installed in each computer lab. Colleges, department and programs are only responsible for discipline-specific technologies.)
  - 2. Faculty and instructional staff: Will create and present accessible electronic instructional materials and activities.
  - 3. Multimodal Learning:
    - a. Will provide instruction and support for faculty and instructional staff creating courses and instructional materials in the learning management system.
    - b. Will facilitate hosting of online activities in an accessible learning management system and related hosted systems (such as web conferencing, plagiarism detection, online testing, student engagement applications, and distance education).
  - 4. Information Services:

- a. Will use only accessible electronic instructional materials in IS-designed and IS-supported classrooms and computer labs.
  - b. Will ensure that all university-owned computer labs provided for student use will have at least one station with assistive technologies not limited to but including accessible computer stations, screen reading software, and screen magnification.
  - c. Will coordinate support for colleges, departments and programs needing assistance with accessibility in college and/or department-owned classrooms and college and/or department-owned computer labs.
- 5. Disability Services: Will assist colleges, and/or departments and/or web-content owners in the creation of accessible materials for students with disabilities. Disability Services is funded to support these services.
  - 6. ADAPT: Will compile and maintain data tracking compliance with the policy and procedures and make recommendations for addressing problems.

D. Implementation Schedule Summary:

- 1. Multimodal Learning implements tools (such as Blackboard Ally, Canvas Accessibility Checker, and UDOIT) and training to support faculty and instructional staff in creating accessible electronic instructional materials in the learning management system.
- 2. All faculty and instructional staff will create and present accessible electronic instructional materials in the learning management system.
- 3. Upon a specific request for access by an individual with a disability:
  - a. The owner will produce instructional materials in compliance with (B) Standards (above), with limited exceptions approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT), or
  - b. Otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

**(6) Document Accessibility**

- A. Scope: These procedures apply to university-produced and maintained or distributed electronic documents. Electronic documents include, but are not limited to, word processing documents, PDFs, presentations, publications and spreadsheets that are scanned, uploaded, posted, or otherwise published or distributed electronically. Documents will be made accessible when used.
- B. Standards:

1. Electronic documents will be accessible, including university policies, procedures, notifications and other documents. Electronic documents will be equally effective for persons with disabilities as they are for persons without disabilities.
2. Accessible electronic document types are listed at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT).
3. Electronic documents will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 (<http://www.w3.org/TR/wcag2ict/>) published by the W3C.

#### C. Responsibility

1. All colleges, departments and programs/university employees: Will follow (B) Standards (above) when creating and using electronic documents.
2. Multimodal Learning: Will provide instruction and support for faculty and instructional staff creating courses and instructional materials.
3. Brooks Library: Will implement procedures for ensuring that materials digitized or hosted by the library for research purposes are accessible to individuals with disabilities.
4. ADAPT: Will compile and maintain data tracking compliance with the policy and procedures and make recommendations for addressing problems.
5. Central Access: Will support colleges and/or departments in the creation of accessible materials on a fee-for-service basis.
6. Disability Services: Will assist colleges and/or departments in the creation of accessible materials for students with disabilities. Disability Services is funded to support these services.

#### D. Implementation Plan Summary

1. By January 31, 2020, all newly-created and/or disseminated documents (including PDF, Word, Excel and PowerPoint files) will be accessible.
2. Disability Services will work with colleges and/or departments to identify resources for producing accessible scientific and mathematical documents.
3. By June 30, 2019: University Relations will identify and develop strategies for the integration of epub/edupub processes, or accessible PDFs will be provided as an alternative.
4. Upon a specific request for access by an individual with a disability:
  - a. The owner will update documents to be in compliance with (B) Standards (above), with limited exceptions approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT), or

- b. Otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

## **(7) Electronic Media Accessibility**

- A. Scope: All multi-media resources (audio and video) used in university programs and activities will be accessible. This includes, but is not limited to, media that is instructional, informational, and promotional.
- B. Standards: Video resources will be captioned; audio resources will be transcribed.
- C. Responsibility
  - 1. All colleges, departments, programs, faculty, instructional staff, and employees:
    - a. Will purchase and produce only accessible multi-media.
    - b. Will purchase only captioned versions of video resources whenever possible.
    - c. Will ensure that all other media that will be used on the web or in instruction is captioned.
    - d. Will purchase only transcribed audio resources whenever possible.
    - e. Will update any non-transcribed audio and any non-captioned video that is in current use.
    - f. Will use only transcribed audio and captioned video, made available in a timely manner to all students.
  - 2. Brooks Library:
    - a. Will maintain a library of transcribed audio and captioned video resources that are available for faculty, staff, and student use.
    - b. Will assist faculty in identifying copyrighted or open education media resources that are captioned prior to acquisition.
  - 3. Multimodal Learning:
    - a. Will provide instruction and support for faculty and instructional staff creating transcribed audio and captioned video for use in the learning management system.
    - b. Will incorporate captioning and media accessibility information into training videos and recordings.

- c. Will coordinate campus-wide captioning and transcribing solutions.
  - d. Will disseminate information to the university community about protocols related to accessible multi-media including a list of approved vendors to perform captioning.
4. Information Services:
- a. Will ensure all classroom and presentation equipment is caption-compatible and the default on all projectors, monitors, digital signage, etc.
  - b. Will provide instruction on media accessibility and how to show captioned media in classrooms.
  - c. Will incorporate information about accessibility into faculty training on AV equipment.
5. University Relations: Will produce new communications and promotional materials that are captioned or transcribed.
6. Disability Services: Will assist colleges and/or departments in the creation of accessible multi-media materials for students with disabilities. Disability Services is funded to support these services.

#### D. Implementation Schedule Summary

1. Multimodal Learning implements tools (such as machine-captioning for lecture capture and streaming media) and training to support faculty and instructional staff in creating transcribed audio and captioned video for use in the learning management system.
2. By January 31, 2021, all faculty and instructional staff will create and present transcribed audio and captioned video for use in the learning management system. Machine-captioning instructions and support will be provided by Multimodal Learning; faculty will be responsible for ensuring the accuracy of machine-captioning.
3. By September 25, 2019: Students with disabilities may request one-time recordings, created or used during a single course, and in use only during that quarter, be captioned after the fact. Disability Services is funded to support these services.
4. By January 2020: All videos (professionally or internally produced) shared on university websites or video storage sites (such as YouTube and Vimeo, etc.) will be captioned.
5. By January 2021: The university, through ADAPT, assess audio description availability and create a plan toward audio description standards for use at CWU.
6. Upon a specific request for access by an individual with a disability:

- a. The owner will update electronic media to be in compliance with (B) Standards (above), with limited exceptions approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT), or
- b. Otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

## **(8) Software, Hardware and Systems Accessibility**

- A. Scope: Software, hardware and systems will be accessible and will produce accessible products. Accessible, in this context, means compatible with assistive technology. Software that is accessed through a web-browser will also be accessible and is discussed under Section 1 of these procedures.
- B. Standards: All software, hardware and systems purchased by the university will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 (<http://www.w3.org/TR/wcag2ict/>) published by the W3C. Limited exceptions will be approved by ADAPT and available at [www.cwu.edu/ADAPT](http://www.cwu.edu/ADAPT).
- C. Responsibilities
  - 1. All colleges, departments and programs/university employees:
    - a. Will ensure that their software, hardware, local interfaces, modifications and electronic systems are accessible, except when it would fundamentally alter a program or when it is not technically feasible to do so and in such case the process will require the university to provide accessible alternate ITs.
    - b. Will ensure that applications developed on campus (web, desktop, etc.) are accessible according to principles of WCAG 2.0, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments).
  - 2. Information Services:
    - a. Will ensure that assistive technologies are available to students working in university-owned labs or on publically-accessed university computers.
    - b. Will ensure that assistive technologies are available in a timely manner for campus employees including student employees.
  - 3. ADAPT: Will coordinate campus processes for ensuring university software, hardware and system accessibility.
  - 4. Disability Services: Will ensure that assistive technologies are available in a timely manner for students with disabilities. Disability Services is funded to support these services.

D. Software Implementation Schedule Summary:

1. After October 2018, the university will purchase only accessible ITs, except when it would fundamentally alter a program or when it is not technically feasible to do so and in such case the process will require the university to provide accessible alternate ITs.
2. Reading systems and software that are used for textbook delivery will meet these guidelines: <http://www.daisy.org/accessibility-screening-methodology-guidelines-and-checklist.html>.

**(9) Procurement**

A. Scope: This process applies to all university purchases of Information Technology software, hardware and services.

B. Standards: Purchase orders and contracts for EIT must include the following clauses:

1. “No University funds may be expended for the purchase of information technology equipment and software for use by University employees, program participants, or members of the public unless it provides visually or hearing impaired individuals with access, including interactive use of the equipment and services, that is equivalent to that provided to individuals who are not visually or hearing impaired. (18-5-603, MCA.) Contractor warrants that such information technology equipment and software it provides the University will provide equal and effective access to all individuals in accordance with federal and state laws and regulations, including, but not limited to the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and Section 508 of the 1973 Rehabilitation Act.”
2. “Vendor warrants that the products or services to be provided under this agreement comply with the accessibility requirements of section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794d), and its implementing regulations set forth in 36 C.F.R. 1194.1 through 41 and the World Wide Web Consortium (W3C) Web Content Accessibility Guideline 2.0. Vendor agrees to promptly respond to and resolve any complaint regarding accessibility of its products or services provided to the agency under this agreement when brought to its attention. Vendor further agrees to indemnify and hold harmless the {agency} for any claim arising out of its failure to comply with the aforesaid requirements. Failure to comply with these requirements shall constitute a material breach and be grounds for termination of this agreement.”

C. Responsibility

1. All colleges, departments and programs/university employees: Will purchase or otherwise acquire accessible information technology, in accordance with these procedures.
2. ADAPT:

- a. Will serve as a resource for IT purchases and other acquisitions for compliance with accessibility requirements.
- b. Will provide written justification for all provisional use waivers and post such waivers on the accessibility website. Will provide requests for exceptions for public vetting and will include the written comments in its decision-making.

### 3. Implementation Schedule Summary

- a. The university will develop and institute procedures that require the university to purchase or recommend that will provide the same programs, benefits, and services as they do to individuals without disabilities, except when it would fundamentally alter a program or when it is not technically feasible to do so, in which case the procedures will require the university to provide accessible alternate ITs.’
- b. The university will develop a strategy for review of academic and other hardware with the intent that only hardware with accessible options should be selected for use in academic courses and campus activities including such things as door swipes and educational technology.
- c. The university will implement as part of its request for proposal process a requirement that bidders meet the accessibility standards of WCAG 2.0 Level AA for web-based technology and Section 508 of the Rehabilitation Act and the Americans with Disabilities Act for other information technology; and requiring or encouraging, at the university’s discretion, as part of any contract with its vendors, provisions in which the vendor warrants that any technology provided complies with these standards and any applicable current federal and state disability laws.