

ELECTRONIC AND INFORMATION TECHNOLOGY ACCESSIBILITY

I. Policy Statement:

The College of Southern Maryland (CSM) is committed to ensuring individuals with disabilities have equal access to all programs, activities and services provided through information technology. Information technology is increasingly the medium in which college programs and services are delivered. As a result, it is necessary for accessibility considerations to be in the forefront as we design, acquire, or use new information technology. However, due to the number of individuals and departments involved in the acquisition and the use of information technology, the institution will have difficulty ensuring access for individuals with disabilities as required by federal laws without a college wide policy and standards.

Therefore, the procurement, development, maintenance, and/or implementation of electronic or information technology will conform to the accessibility standards specified in the Americans with Disabilities Act of 1990 (ADA), the Amendments Act of 2008 (ADAAA), Section 504 and 508 of the Rehabilitation Act of 1973, and Web Content Accessibility Guidelines (WCAG), of the college. This include purchases of third-party products with digital content, all hardware, software, programs, or other information technology procured to support access to the college programs, services, and activities. Compliance with this policy is the responsibility of all administrators, staff, faculty, and departments. Departments, auxiliary services, and administrative entities that do not comply with the standards will be responsible for any cost associated with remediating accessibility issues.

When compliance is not technically possible, would require a Fundamental Alteration, or would result in undue Financial burden, exceptions to the policy may be granted by an appropriate official after consultation with the EIT Coordinator. Whenever an exception is granted, a plan must be developed to provide equally effective alternate access to the information or service of the technology.

This policy will form the basis of an accessibility implementation plan and accessibility guidelines that will define what accessibility means in varying circumstances, such as website accessibility, accessibility for software and hardware, accessibility of college equipment. etc. The plan will also reference timelines for deploying accessible technology, instructional materials, procurement, web pages, learning management systems, library systems, and other electronic information technology. The college has adopted the current Web Content Accessibility Guidelines WCAG 2.1 standards and will strive to attain as much Level AA conformance developed by the W3C as possible. The standards are designed to

evolve and change, as regulatory requirements change, newer technologies are introduced, and user needs change.

II. Scope:

This policy applies to all College of Southern Maryland electronic and information technology resources and services provided, maintained, distributed and/or purchased by the College of Southern Maryland for use by students, faculty, staff, administrators and visitors, including those with disabilities.

III. Definitions:

Accessible – when a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.

Accessible Format - the structure and composition of digital documents and applications that are readable and usable by people with disabilities, using assistive technologies, and/or special configurations for user agents. These may include but are not limited to large print; recorded audio and DAISY format; HTML, MathML, and other digital formats; video captioning; and Braille.

Equally Effective Alternative Access (EEAP)- Equally Effective Alternate Access to electronic and information technology is based on (1) timeliness of delivery, (2) accuracy of translation, and (3) delivery in a manner and medium appropriate to the disability of the person. Such alternate(s), to be equally effective, are not required to produce the identical result or level of achievement for disabled or non-disabled persons, but must afford disabled persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.

Electronic and Information Technology (EIT) – Electronic and Information technology includes e-learning and any information, equipment, or interconnected system that is used in the creation, conversion or conveying of electronic information. Electronic Technology includes but is not limited to equipment, hardware, computers, software, firmware and similar procedures, systems, ancillary technologies, technologies which cause content to be active in any way, services (including support services) and related resources. Information activities include, but are not limited to, the creation, translation, duplication, serving, acquisition, manipulation, storage, management, movement, control, display, switching, interchange, transmission, or reception of data or information. Information activities include delayed presentation activities such as information servers and messaging systems as well as

synchronous, real-time communication activities. Any form of Information includes, but is not limited to, voice, graphics, text, dynamic content, and data structures of all types whether they are in electronic, visual, auditory, optical or any other form.

Section 508 (of Rehabilitation Act of 1973) Standards-a comprehensive set of general, technical, and functional standards that apply to federal agencies to make their electronic and information technology accessible to individuals with disabilities. An accessible information technology system is one that can be operated in a variety of ways and does not rely on a single sense or ability of the user.

Timely and Timeliness - enough time for the person with the disability to have access and an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as persons without disabilities.

Web Content Accessibility Guidelines (WCAG) 2.1 AA - defines how to make web content more accessible to people with disabilities. Accessibility impact a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.

Fundamental Alteration: A change to a program or service may constitute a fundamental alteration if it alters the essential purpose of the program or service or any of its components. In situations where a fundamental alteration can be documented, equally effective alternate access must still be provided.

Undue Financial and Administrative Burdens: Undue financial and administrative burdens are created when a proposed course of action causes significant difficulty or expense. Because the college must consider all available resources when deciding whether there are undue financial and administrative burdens, the ability to establish undue financial and administrative burdens is difficult and rare and must be sufficiently documented. Even in situations where undue financial and administrative burdens can be documented, equally effective alternate access must still be provided.

IV. Compliance and Implementation:

The college will appoint an EIT Coordinator who will oversee the college's accessibility program and coordinate the dissemination and training on this policy, an implementation plan, and accessibility guidelines. The EIT Coordinator will be assisted by the ADA/Section 504 Committee.

The EIT Coordinator, with the cooperation of all vice presidents and the Chief Information Officer (CIO), will ensure that the personnel responsible for electronic and information

technology, procurement, programs, and services provided by the college will possess the necessary technical knowledge related to accessibility standards. Updates and training will be communicated when changes in the policy occur.

Procurement will facilitate compliance with the guidelines for electronic and information technology purchases, license upgrades, as well as the acquisition of all technology with a user interface.

Web Team and Content Managers will ensure accessibility of campus websites including the intranet, web applications and web content, as documented in the college guidelines and plans for accessible technology.

Faculty will ensure accessibility of instructional materials to allow for equally effective access for all faculty and students, as documented in the college guidelines and plans for accessible technology.

Distance Learning and Faculty Development (DLF) will ensure accessibility of instructional materials including Learning Management Systems (LMS) and provide or coordinate training to faculty to allow for equal and effective access for all faculty and students with disabilities.

Human Resources Department (HRD), Vice Presidents and Directors will provide oversight of training of all staff and ensure compliance with federal and state laws, regulations, and this EIT policy and accompanying plans and procedures.

V. Grievance Procedures:

Individuals who believe they have been discriminated against on the basis of his/her disability alleging inaccessibility of information technology in a college program or activity should follow the [Grievance Procedure for the College of Southern Maryland](#) or visit the link at <https://www.csmd.edu/about/policies/ada-grievance-procedures/>

Individuals who are unable to access electronic information related to programs, services or activities offered or sponsored by the college should contact the EIT Coordinator or complete the Accessibility Feedback Form located on the CSMD.edu website.

For more information contact: EIT/ADA Coordinator/Director Disability Support Services, at (301) 934-7614.