

Policy:	Web Accessibility Policy	Policy No.:	IT9002
Authority:	SUNY Broome Community College Board of Trustees		
Policy Owner:	President	Responsible Party:	<i>VP Academic Affairs</i>
Approved:	August 19, 2021		
Revised:	(DATE)		

Purpose

The purpose of this policy is to establish accessibility requirements for web-based information and applications developed, procured, maintained, or used for all SUNY Broome Community College web-based content and college webpages, in order to ensure equal, effective, and inclusive access. Universally accessible digital content enhances usability and improves the user experience for all individuals, with or without disabilities. Inaccessible web-based content creates barriers for individuals with disabilities that include, but are not limited to, auditory, cognitive, physical, sensory, neurological, and visual impairments, or those who are experiencing situational barriers which impede access.

Statement of the Policy

SUNY Broome Community College is committed to ensuring equal access to information presented online. The college is also committed to ensuring that all individuals have an equal opportunity to participate in the programs, services, and activities at the college, which are accomplished through web content, web-based applications, and websites. As part of this commitment, the college will ensure its website(s) and web content are universally accessible. This policy applies to all web-based content and functionality, whether developed, maintained, or offered by the college, or through a third-party vendor or open source on the college's behalf.

After the effective date of this policy, all new and redesigned digital content created and produced on the college website, including web pages and apps, will conform to Level AA of the Web Content Accessibility Guidelines (WCAG), a universally acceptable level of accessibility, with technical requirements developed by the World Wide Web Consortium's Web Accessibility Initiative (WAI), except where doing so would not be technically feasible or would impose a fundamental alteration or undue burden, as established through the exceptions procedures established at the college.

Where conformance is not technically feasible, content creators should consider how to make the content available in accessible alternative formats. Web editors reserve the right to require the content creator to remediate inaccessible content, or may deny publication of materials which are deemed inaccessible to users and which do not comply with the most current WCAG AA Standards.

The college shall engage in regular review of the accessibility of its website(s), web content, and web-based applications, including those within the Learning Management System, through manual accessibility checks as well as through the use of automated accessibility tools and maintain a publicly available reporting mechanism for issues related to web accessibility, which will be addressed in a timely manner.

Related Policies (by number)-Electronic and Information Technology (EIT) Accessibility Policy

To whom it applies (title or department)

This policy applies to SUNY Broome websites and digital content created by the college and its employees or affiliates for publication on the college website or its web-based applications. The Office of Marketing and Communications is responsible for ensuring the SUNY Broome website is accessible. Any individual who creates text content, documents, files, or visual imagery they intend to have published on the SUNY Broome website or shared on any SUNY Broome affiliate social media channels are responsible for making their content web accessible, per the college's accessibility standards. Faculty and staff utilizing websites, web content, and web-based applications, including third-party applications, for the use of instruction, or the offering of programs and services, are responsible for ensuring content and web-based applications or platforms are accessible to users.

General Guidelines

SUNY Broome Community College will follow the [SUNY Electronic and Information Technology \(EIT\) Accessibility Policy](#) and the Standards, which includes those pertaining to Web Accessibility, as outlined within the [SUNY EIT Accessibility Committee Final Report and Recommendations](#).

All content created for publication on the college website, college affiliated social media sites, and on web-based applications must follow the Web Content Accessibility Guidelines (WCAG) (Level AA Conformance) [<https://www.w3.org/WAI/WCAG2AA-Conformance>] which covers a wide range of guidelines to make web content more accessible to users in general, including those with disabilities, including, but not limited to, blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity, or a combination.

To ensure consistent user experience, which provides for accessibility for all users, SUNY Broome web pages will be designed with consistent layouts and content structure. Main content and menus should be on the same location on all pages to create a consistent user experience across the college website. This applies to all non-academic and academic websites and webpages.

All instructional materials used on college websites or applications used in course instruction must be made accessible and follow requirements as outlined within this policy. Information technology products purchased or required by students to access

programs, services, or activities must be accessible and undergo an electronic and information technology (EIT) accessibility review following established college procurement policies and procedures, including a review of the vendor's Voluntary Product Accessibility Template (VPAT). EIT utilized within the LMS or required for student access to programs or courses is required to be accessible. In instances in which it is not technically feasible to ensure accessibility or in which case it presents an undue financial hardship, must follow the procurement exception request process.

Exclusions

Archived web content is not required to meet accessibility standards outlined in this policy, but the college is required to provide an accessible version of archived web content should there be a specific request for access by any individual with a disability, within 10 calendar days. Where it is not technically possible to make the content available, a suitable alternative should be agreed upon with the individual. The department or person(s) responsible for the creation of the content is responsible for making the requested content accessible. In instances in which it is not technically possible to make content accessible or in which compliance constitutes undue administrative or financial burdens, or require fundamental alterations, an exception may be requested through the Dean of Students, who serves as the ADA and Section 504 Compliance Officer.

This policy does not apply to individual webpages published by students, employees, or affiliates that are not hosted by the college; individuals and organizations responsible for these web pages are encouraged to follow the college's accessibility standards.

Procurement

This policy applies to all web content developed by or for SUNY Broome Community College and should be referenced within any contract of services of work for web content, websites, services, or applications. All such contracts must include a statement indicating conformance to the college's web accessibility policy and conformance to WCAG AA standards. Any technology procured from a third-party to be utilized on the college website or on its web-based applications must adhere to the college's web accessibility policies, including adherence to the WCAG AA guidelines and SUNY policy.

Accessibility requirements will be incorporated into all purchasing and procurement processes, including those related to the procurement of online or web-based content and software, including web properties maintained by a third party on behalf of the college. Any hardware, software, programs or other electronic and information technology (EIT) procured from vendors for use by college employees or students to access programs, services, or activities of the college, or which are used for public consumption, must be accessible, or provide equally effective alternate access if accessibility is deemed by the college's procurement EIT accessibility processes to not be feasible. EIT purchases must follow college procurement policies and procedures including an accessibility review, which includes a review of the Voluntary Product Accessibility Template (VPAT). The VPAT must contain sufficient detail to demonstrate

how the product meets accessibility requirements and/or in instances in which it does not, disclosure about accessibility limitations, and steps to remediate accessibility issues.

Compliance

MarCom is responsible for maintaining SUNY Broome's website accessibility as well as fielding, documenting, and taking corrective action on all reported web accessibility concerns. Content produced by MarCom for the website, including but not limited to text, documents, layouts and imagery, will be created in accordance with SUNY Broome's accessibility policies. Content produced for the college website outside of MarCom for college website publication, will be reviewed for accessibility by MarCom staff, who will provide guidance on the creation of accessible content. It is the responsibility of content creators to ensure content is accessible; inaccessible content will not be published on the college website and existing content found to be inaccessible will be removed.

The Dean of Students at SUNY Broome is the ADA & Section 504 Compliance Officer and is responsible for handling accessibility exception requests with regard to unresolved complaints, or when accessibility issues are not resolved within an appropriate time frame.

All college employees share a responsibility to ensure the SUNY Broome website is accessible and are encouraged to utilize the [Web Accessibility Reporting Form](#) if inaccessible content is found.

Course instructional content delivered via the Learning Management System including content developed by SUNY Broome faculty, staff, or third-party vendors must be accessible to its users. College policies and procedures for course accessibility utilizing the LMS will be followed; faculty are responsible for ensuring accessibility of their courses. Third party content utilized within the LMS will be reviewed following college procurement accessibility review processes, with inaccessible material requiring the development of an equally effective alternative access plan. Exception requests in the instance in which it is technically not feasible or presents an undue burden to the college, the college's procurement exception request process will be followed.

In compliance with [SUNY EIT Policy](#), the Electronic Information Technology Officer at the college is responsible for oversight of the college's EIT Accessibility plan and to ensure the development of and continued review and revision of the plan, including web accessibility guidelines, based on changing requirements, evolving technology, feedback and review of outcomes.

Definitions

Accessible: In the case of a program or activity, readily usable by a particular individual, with or without alternate formats; in the case of the web and electronic resources, accessible with or without the use of assistive technology.

Alternate formats: Refers to alternatives to standard print. Information presented in an accessible format (e.g., electronic, audio, large print, Braille).

Content Creators: Any individuals who create text content, documents, files, or visual imagery that they intend to have published on the SUNY Broome website or shared on any SUNY Broome-affiliated social media channels are responsible for making their content web accessible per SUNY Broome’s accessibility standards.

Equally Effective Alternate Access: The alternative format communicates the same information in as timely a fashion as does the original Web page. For interactive applications and hardware devices, “equally effective” means that the user action (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the user.

Web Accessibility Standards: Baseline requirements for compliance with the international web accessibility guidelines (Web Content Accessibility Guidelines-WCAG).

Action <i>(Created, Reviewed, Retired)</i>	Date	Initials	Position Title
<i>Created</i>	04/29/2021	KM	<i>Dean Institutional Effectiveness</i>