



**Review of the Interim University of Maryland Web Accessibility Policy
(Senate Document #17-18-22)**

TO Wallace D. Loh | President

FROM Daniel Falvey | Chair, University Senate

I am pleased to forward the accompanying legislation for your consideration and approval. William Bowerman, Chair of the Information Technology Council, and Marcio Oliveira, Assistant Vice President for Academic Technology & Innovation, presented the Review of the Interim University of Maryland Web Accessibility Policy (Senate Document #17-18-22), which the University Senate approved at its meeting on April 4, 2018. Please inform the Senate of your decision and any administrative action related to your conclusion.

Approved:

Wallace D. Loh
President

Date:

April 5, 2018

Copies of this approval and the accompanying legislation will be forwarded to:

- Mary Ann Rankin**, Senior Vice President and Provost
- Reka Montfort**, Executive Secretary and Director, University Senate
- Michael Poterala**, Vice President and General Counsel
- Cynthia Hale**, Associate Vice President for Finance and Personnel
- John Bertot**, Associate Provost for Faculty Affairs
- Elizabeth Beise**, Associate Provost for Academic Planning & Programs
- Sylvia B. Andrews**, Academic Affairs
- William Bowerman**, Chair of the Information Technology Council
- Marcio Oliveira**, Assistant Vice President for Academic Technology & Innovation
- Jeffrey Hollingsworth**, Chief Information Officer for Division of Information Technology



Revision of the Interim University of Maryland Web Accessibility Policy

PRESENTED BY	William Bowerman, Chair, IT Council
REVIEW DATES	SEC – March 12, 2018 SENATE – April 4, 2018
VOTING METHOD	In a single vote
RELEVANT POLICY/DOCUMENT	VI-1.00(E) University of Maryland Web Accessibility Policy , approved on an interim basis on September 12, 2017
NECESSARY APPROVALS	Senate, President

ISSUE

The Senate Executive Committee (SEC) and Senate Chair Falvey charged the University Information Technology (IT) Council to review the University of Maryland Web Accessibility Policy, approved by the President on an interim basis in September 2017 (Appendix 1). Specifically, the IT Council was asked to:

1. Collect input from members of the campus community affected by the new interim policy, especially staff who support unit websites and work on issues of technology accessibility.
2. Consult with the Research Council on the potential impact of the policy on websites that report results from grant-funded research projects.
3. Consult with a representative of the Office of Faculty Affairs.
4. Review similar web accessibility policies at Big Ten and other peer institutions.
5. Consider whether the interim policy should be revised.
6. Identify the best approach for campus-wide implementation of the policy to meet the required deadline for compliance.
7. Consider how best to communicate available resources to campus units that need to evaluate and revise their websites.
8. Consult with the university's Office of General Counsel on any proposed recommendations.

RECOMMENDATIONS

1. The IT Council recommends a revision of the interim policy as indicated on the revised UMD Web Accessibility Policy document. The recommendations hope to address the collective concerns related to effectiveness, unintended effects, equity, implementation costs, feasibility, and acceptability of this policy.
 - a. Summary of the main recommendations and rationale:
 - i. Replace the terms “Websites” and “Webpages” currently used in the policy with the term “Web-based information.” This will expand the scope to Web pages, Web content (hypertext, videos, documents, images, audio files, etc.), Web-based applications, online instructional content, services, and resources, including those developed by, maintained by, or offered through third-party vendors or open sources.
 - ii. Include language that redefines the scope of this policy to only newly adopted or redesigned Web-based information and services. This will increase the feasibility and decrease the financial burden to revise legacy Web-based information.

- iii. Remove implementation deadlines from the policy to align with the practice in place at Big Ten peer institutions.
 - iv. Review the “exceptions” section of this policy to include clear criteria.
 - v. Review the contact information to update roles and responsibilities and add available resources on campus.
2. Publish a website (www.itaccessibility.umd.edu) to communicate available resources to the campus.

COMMITTEE WORK

Since October 20, 2017, assigned DIT personnel and the IT Council completed the following work:

1. Hosted several public sessions, discussed the existing interim policy in various meetings, and invited individuals to electronically collaborate on a shared policy feedback document. Appendix 2 includes a list of all meetings, events, and campus information about the policy. Specifically, feedback, questions, suggestions, and concerns were collected from the following groups:
 - a. Members of the campus community:
 - Academic IT Directors
 - President’s Commission on Disability Issues (PCDI)
 - UMD Webmasters Community
 - UMD Communication Officers
 - UMD IT Accessibility Committee
 - b. Stakeholders:
 - Office of Faculty Affairs
 - Research Council
 - University's Office of General Counsel
2. Evaluated and compiled all feedback, questions, suggestions, and concerns for each section of the policy (Appendix 3).
3. Consulted with a representative of the Office of Faculty Affairs and requested Faculty Affairs to provide feedback directly to the policy in an electronically shared policy feedback document. Records of meetings, feedback, and memo from Faculty Affairs are in Appendix 4.
4. Consulted with the Research Council and requested the council to provide feedback directly to the policy in an electronically shared policy feedback document. Records of meetings, feedback, and memo from the Research Council are in Appendix 5.
5. Reviewed existing similar web accessibility policies at Big Ten and other peer institutions (Appendix 6).
6. Completed review of Interim UMD Web Accessibility Policy.
7. The IT Council met on March 5, 2018 and unanimously approved the revisions to the Web Accessibility Policy.

ALTERNATIVE

The current interim policy would remain official policy.

RISKS

The non-approval of this policy may result in civil penalties and damages and/or have a significant adverse impact on UMD’s mission, finances, or reputation.

FINANCIAL IMPLICATIONS

All recommended changes to the language of the policy aim to minimize the financial burden of all units, as they will have to identify financial resources to evaluate and/or revise their current and future Web-based information.



Revision of the Interim University of Maryland Web Accessibility Policy

2017-2018 COMMITTEE MEMBERS

William Bowerman (Chair)

Professor, College of Agriculture and Natural Resources

Willie Brown

Director, University Human Resources

Helene Cohen

Executive Director, Office of Innovations and Partnerships

Michel Cukier

Associate Professor, A. James Clark School of Engineering

Ann Holmes

Assistant Dean, College of Behavioral and Social Sciences

Richard King

Associate Professor, School of Music

Hannah Ogden

College of Computer, Mathematical and Natural Sciences

Adam Porter

Professor, College of Computer, Mathematical and Natural Sciences

Derek Richardson

Professor, College of Computer, Mathematical and Natural Sciences

Andrew Smith

College of Computer, Mathematical and Natural Sciences

Ben Wallberg

Manager, University Libraries

Gregorio Zimmerman

Undergraduate, A. James Clark School of Engineering

Jeffrey Hollingsworth (Ex Officio)

Interim CIO, Division of Information Technology

Axel Persaud (Ex Officio)

Interim Executive Director, Division of Information Technology

Marcio A. Oliveira (Ex Officio)

Assistant Vice President, Division of Information Technology

Gerry Sneeringer (Ex Officio)

Information Technology Security Officer, Division of Information Technology

Submitted: March 5, 2018

BACKGROUND

The Senate Executive Committee (SEC) and Senate Chair Falvey charged the University Information Technology (IT) Council to review the University of Maryland Web Accessibility Policy, approved by the President on an Interim basis on September 2017 (Appendix 1). Specifically, the IT Council was asked to:

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APPENDICES

Appendix 1 – Charge

Appendix 2 – List of Feedback Sessions

Appendix 3 – Stakeholder Feedback By Policy Section

Appendix 4 – Consultation & Feedback from the Office of Faculty Affairs

Appendix 5 – Consultation & Feedback from the Research Council

Appendix 6 – Review of Big Ten & Peer Institution Policies

Revised University of Maryland Web Accessibility Policy
new text in blue ([example](#)), removed text in red/strikeout (~~example~~)



VI-1.00(E) UNIVERSITY OF MARYLAND WEB ACCESSIBILITY POLICY
([Approved by the President on an Interim Basis September 12, 2017](#))
(Revisions approved by the IT Council on March 5, 2018)

I. POLICY

The University of Maryland is committed to creating and maintaining a welcoming and inclusive educational and working environment for people of all abilities and to ensuring equal access to information and services for all its constituencies. Web-based information and services delivery are the primary means by which the campus community and its visitors communicate and conduct business.

This policy sets minimum standards for the accessibility of all university ~~Web pages~~ [Web-based information](#) used to conduct university business and academic activities to ensure compliance with applicable state and federal regulations. ~~specifically, Sections 504 and 508 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990.~~

~~A. Applicability~~

~~This policy applies to all university Web pages used to conduct university business or academic activities. This policy does not apply to Web pages published by students, employees, or non-university organizations that are hosted by the university but are not used to conduct university business or academic activities.~~

II. DEFINITIONS

~~“University Web pages” are web pages used~~ **“Web-based information”** includes Web pages, Web content (hypertext, videos, documents, images, audio files, etc.), Web-based applications, online instructional content, services, and resources, including those developed by, maintained by, or offered through third-party vendors or open sources. ~~used to conduct university business and academic activities for all university constituencies. and that students, employees, or visitors must access in order to effectively participate in a program, service, or activity offered by the university. All Web pages published or hosted by units or programs reporting to the President or a Vice President are presumed to be included.~~

“**University business and academic activities**” refer to those activities that students, faculty, staff and/or visitors must perform in order to effectively participate in a program, service, or activity offered by the university.

“**Legacy Web-based information**” is any Web-based information or service created, adopted, or modified before the establishment of this policy.

“**Web pages**” includes both Web pages and websites used to conduct university business and academic activities. ~~including their design and any Web-delivered content or service.~~

III. REQUIREMENTS

- A. All Web-based information newly adopted or redesigned by any university administrative, academic, or programmatic unit on or after the establishment of this policy must be in compliance with the World Wide Web Consortium’s [Web Content Accessibility Guidelines \(WCAG\) Version 2.0 AA conformance level](#). ~~All University Web pages must conform to the Web Consortium Accessibility Guidelines (WCAG) 2.0 level AA and the requirements set forth in this policy.~~
- B. ~~Within 90 days of the effective date of this policy:~~ Each university administrative, academic, and programmatic unit must establish priorities and timetables for [updating its legacy Web-based information](#).
- C. All university Web pages (newly designed, or legacy), must ~~should~~ contain the words “Web Accessibility” in the footer or any visible location and link to a common institutional Web page (<https://www.umd.edu/web-accessibility>) that contains the following statement: “*The University of Maryland is committed to equal access to Web content. If you need to request Web content in an alternative format or have comments or suggestions on accessibility, contact itaccessibility@umd.edu. For more information about accessibility at UMD, visit the UMD Accessibility Hub.*”
- ~~C. All University Web pages must be compliant on or before December 31, 2020.~~
- D. The unit that owns and controls the [Web-based information](#) is responsible for [any remediation](#), for responding to requests to make content accessible, for replacing or modifying the original content, or for providing an equally effective alternative that communicates the same information and provides equivalent functions in a timely fashion (ideally within 10 business days).

IV. EXCEPTIONS

~~If achieving compliance with standards set forth by the Web Consortium Accessibility~~

~~Guideline (WCAG) 2.0 Level AA is not possible by the deadline, an Accessibility Exception Request must be submitted. Exceptions will be granted through the Division of Information Technology (DIT). An approved exception request is not an exemption from making a Web page accessible. It documents a temporary delay in compliance that will be accomplished through remediation or discontinuation of use due to end of life.~~

- A. Any university administrative, academic, or programmatic unit may request an exception to the requirements of this policy on the basis that compliance with the World Wide Web Consortium's standard: (a) would result in a fundamental alteration to the content or functionality of any Web-based information, (b) would result in an undue burden (including financial or administrative burden), and/or (c) is not technically feasible.
- B. Units seeking an exception must submit an exception form found at <https://itaccessibility.umd.edu/> explaining in detail why the policy exception is being sought and how, if the requested exception is granted, the unit will provide equally effective alternative access and ensure, to the maximum extent possible, that individuals with disabilities will receive the same benefits or services as their nondisabled peers.

~~V. REMEDIATION~~

~~Remediation is the responsibility of the university administrative, academic, or programmatic unit that owns and controls the Web page and its content.~~

V. REVIEW

The Division of Information Technology (DIT) IT Accessibility Specialist (or designee) in collaboration with the ~~IT Accessibility Committee managed by DIT~~ may American with Disabilities Act (ADA) Coordinator will initiate a review and necessary revisions of this policy and its associated standards ~~on a periodic basis~~ as needed.

VI. RESPONSIBILITIES

A. Division of Information Technology (DIT)

1. Provides documentation and resources about Web accessibility.
2. Provides campus-wide solutions ~~that enable the scanning of~~ to audit Web-based information for compliance with the standards of this policy.
3. Works with the ADA coordinator to initiate a review and necessary revisions of this policy and its associated standards as needed.
4. Consults with ~~ADS~~ the ADA Coordinator on complaints, equally effective alternatives, and exceptions to the required compliance.
5. Receives requests for exceptions and collaborates with the ADA Coordinator to

evaluate and make decisions on requests for exceptions to this policy.

6. Grants exceptions to this policy.

B. ~~Accessibility and Disability Service (ADS) ADA Coordinator:~~

1. Works with the DIT IT Accessibility Specialist (or designee) to initiate a review and necessary revisions of this policy and its associated standards as needed.
2. ~~ADS~~ Collaborates with DIT to resolve complaints for Web accessibility and assesses equally effective alternatives. ~~and grants exceptions to required compliance.~~
3. Advises the DIT IT Accessibility Specialist (or designee) on requests for exceptions to the policy.

C. ~~DIT Accessibility Committee~~

- ~~1. Reviews the policy in collaboration with DIT, ADS the ADA Coordinator, and other offices, as appropriate.~~
- ~~2. Reviews Accessibility Exception Requests and makes recommendations to DIT.~~

C. University Relations

~~University Relations~~ Provides standards and guidelines for Web ~~sites~~ pages to the university.

D. University Administrative, Academic, and Programmatic Units

1. ~~These units will~~ Comply with the requirements of this policy.
2. Remediate complaints about Web-based information in order to meet the requirements of this policy.
3. Purchase and produce Web-based services, and resources that meets the requirements of this policy.

VII. CONTACTS

A. Policy and Complaints

DIT IT Accessibility Office | itaccessibility@umd.edu

B. Web Accessibility Testing, Training, Resources, and Technical Assistance

DIT IT Accessibility Office | itaccessibility@umd.edu | <https://itaccessibility.umd.edu/>

C. ADA Coordinator

dissup@umd.edu | 301.314.7682 | TTY/TDD: 301.314.7682

~~IT accessibility office~~
~~itaccessibility@umd.edu~~