



XAVIER UNIVERSITY

Electronic and Information Technology Accessibility Policy

Effective:	4/30/2018
Last Updated:	N/A
Responsible University Office:	Office of the Provost and Chief Academic Officer
Responsible Executive:	VP, Provost and Chief Academic Officer
Scope:	Campus Community

A. REASON FOR POLICY

This policy supports Xavier University's existing policy on Access and Accommodations for Persons with Disabilities. The University is committed to promoting and providing an accessible, safe, open, environment conducive for living, learning and working for our students, prospective students, employees, guests and visitors with disabilities. The Americans with Disabilities Act of 1990 (ADA) and Americans With Disabilities Act Amendments of 2008 (Amendments Act) and Section 504 of the Rehabilitation Act of 1973 as Amended in 2008 (Section 504) and Amended in 1998 (Section 508) are federal laws applicable to private universities in the United States that set forth certain expectations and requirements for promoting accessibility to facilities, education, employment and experiences at the University.

While Section 504 prohibits discrimination on the basis of disability in programs, public and private, that receive federal financial assistance, Section 508 further requires that goods and services in Electronic or Information Technology (EIT) need to be fully accessible to persons with disabilities, particularly those with visual, hearing, or manual impairments or who otherwise require the use of assistive technology to access information.

Xavier University is committed to ensuring the accessibility of EIT used by students, prospective students, employees, guests and visitors with disabilities. The purpose of this Policy is to provide guidance to the University community about certain duties, rights, and responsibilities they may have in connection with ADA, the Amendments Act and Sections 504 and 508 in conjunction with EIT online accessibility standards.

Federal legislation requires the University to have clear and well communicated antidiscrimination policies as well as processes in place through students, prospective students, employees, guests and visitors may resolve grievances with the University.

B. POLICY:

Xavier University is committed to ensuring the web accessibility of (EIT) used by students, prospective students, employees, guests and visitors with disabilities, particularly those with visual, hearing or manual impairments or who otherwise require the use of assistive technology to access information, by adopting the web accessibility technical standards found in the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 level AA. WCAG 2.0 level AA is a widely accepted and commonly used standard for web content accessibility that meets the needs of all, including persons with disabilities.

Xavier will utilize EIT (developed or acquired) that is accessible for persons with disabilities. This includes, but is not limited to:

- Websites developed and operated by the University
- Purchased technology from third parties such as enterprise resource planning (ERP) systems and learning management systems (LMS).
- Electronic instructional content and materials.

All electronic systems and content purchased from third parties will require a voluntary product accessibility template (VPAT) to provide information on how the product or service conforms to Section 508 accessibility standards for electronic and information technology (EIT).

This policy will be reviewed annually and revised as necessary to take into account changes in applicable law, feedback from annual University department reviews and reports, guidance from the Chief Diversity and Inclusion Officer and the Provost and Chief Academic Officer.

C. DEFINITIONS

Websites developed and operated by the University

Any website or web-based application used by Xavier University in the programs or activities of the University.

Accessible

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 equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, it still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology.

W3C

World Wide Web Consortium. The main international standards group for website design.

WCAG

Web Content Accessibility Guidelines, version 1.0 published in 1999, version 2.0 published in 2008. WCAG is a working group of the W3C that focuses specifically on accessibility standards creation. WCAG is a widely accepted and commonly used standard.

D. PROCEDURES

This policy applies to all EIT that is acquired, developed, distributed, used, purchased or implemented by or for any Xavier University unit and used to provide university programs, services, or activities through websites or web-based applications.

I. Campus Resources

EIT Accessibility Subcommittee of the Xavier Technology Committee (XTC) will ensure that all University EIT is accessible for students, prospective students, employees, guests and visitors with disabilities and will:

- Work closely with the Office of Institutional Diversity and Inclusion, Disability Services, Information Technologies, Marketing and Communications, Academic Affairs, Student Affairs, and Human Resources, among other units, to ensure that EIT used at Xavier University is accessible for persons with disabilities.
- Establish standards, procedures, and guidelines for prioritizing and responding to EIT concerns, and work with university offices to ensure these procedures are put into place and are operating effectively.

The Web Accessibility Coordinator will serve on the EIT Accessibility Subcommittee as the point-of-contact for EIT concerns relative to accessibility, and oversee the handling and timely resolutions of such requests to ensure compliance with state and federal regulations. The Web Accessibility Coordinator's contact information is web_accessibility@xavier.edu.

II. Training

Training will be provided at least annually for any employees (e.g., administrators, faculty, staff, students) responsible for creating or distributing information with online content. Training will include but is not limited to, training on the EIT Accessibility Policy and their roles and responsibilities to ensure that web design, documents, and multimedia content are accessible. The training will be facilitated, in whole or in part, by an individual with sufficient knowledge, skill, and experience to understand and employ the technical standard(s) adopted by the University.

III. Accessibility Audit

An accessibility audit to be completed at regular intervals under the direction of the Web Accessibility Coordinator, during which information provided by the University through its online content is measured against the Web Content Accessibility Guidelines (WCAG) 2.0 level AA adopted in this EIT Policy. All problems identified through the Audit will be documented, evaluated, and if necessary, remediated within a reasonable period of time.

IV. Complaints and Grievances

- The University website will indicate in plain text a method of contact for users having trouble accessing content within the site (e.g. web_accessibility@xavier.edu)

- Students, prospective students, employees, guests, and visitors may report violations of the technical standard(s) used by the University or file a complaint by following the procedure listed in the Access and Accommodations for Persons with Disabilities Policy and/or contact the Web Accessibility Coordinator at web_accessibility@xavier.edu with any accessibility concerns.

E. EXHIBITS (if applicable)

N/A

F. Related University Policies and Procedures

- **Access and Accommodations For Persons with Disabilities Policy**
The University is committed to promoting and providing an accessible, safe, open, environment conducive for living, learning and working for our students, faculty, staff and guests. The Americans with Disabilities Act of 1990 (ADA) and Americans With Disabilities Act Amendments of 2008 (Amendments Act) and Section 504 of the Rehabilitation Act of 1973 as Amended in 2008 (Section 504) are federal laws applicable to private universities in the United States that set forth certain expectations and requirements for promoting accessibility to facilities, education, employment and experiences at the University.
- Xavier University Office of Human Resources assists employees with accommodation requests.
<https://www.xavier.edu/hr/documents/2AmericanswithDisabilitiesActACT.pdf>
- **Xavier University Harassment Position Statement on Harassment** Xavier is committed to eliminating barriers that impede learning and research development and to establishing and maintaining diverse human relationships essential to living harmoniously in a global society. Xavier is creating and implementing educational and development initiatives through the discovery and transmission of knowledge in order to establish and maintain diverse human relationships essential to living harmoniously in a global society. Therefore, it is essential that members of the University Community function effectively and justly when exposed to ideas, beliefs, values, personal characteristics, and cultures different from their own. Incidents of harassment jeopardize the proper functioning of the Xavier Community and therefore the University takes all claims of harassment seriously.
- **Xavier University Harassment Code and Accountability Procedures (“HCAP”)** governs Harassment.
<http://www.xavier.edu/titleix/HarassmentCodeandAccountabilityProcedures.pdf>
- **Xavier University Equal Employment Opportunity Statement (“EEO”)** 6 Xavier University is committed to providing equal employment opportunity for all employees and applicants in compliance with applicable laws. No personnel decisions concerning any term or condition of employment shall be unlawfully based upon race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, veteran status, disability and any other protected class protected by law.
<http://www.xavier.edu/hr/documents/official-policies-proceduresmanual/2.03%20Equal%20Employment%20Opportunity.pdf>

- Xavier University Office of Disability Services (“Disability Services”) Assists students with academic accommodations. <http://www.xavier.edu/lac/Services-Provided.cfm>

G. HISTORY

This policy supports Xavier’s existing policy on Access and Accommodations for Persons with Disabilities. This policy ensures the accessibility of electronic and information technology (EIT) used by students, prospective students, employees, guests and visitors with disabilities.
