DIGITAL ACCESSIBILITY

Rationale/Purpose of the Policy

In support of its mission, UW–Madison is committed to diversity and fostering a culture of full inclusion of people with disabilities by providing digital resources and information technology that people with disabilities can fully, equally, and independently use.

This policy establishes shared definitions and practices, digital accessibility requirements and standards, and reporting requirements to ensure compliance with the university's obligations to nondiscrimination under applicable state and federal regulations.

This policy aligns with:

- UW–Madison's obligations under Section 504 of the Rehabilitation Act of 1973 [https://www2.ed.gov/policy/rights/reg/ocr/edlite-34cfr104.html] and the Americans with Disabilities Act of 1990 together with its 2008 Amendments [https://www.ada.gov/ada_intro.htm] ; and
- The Wisconsin State Legislature Statutes Chapter 36.12: Student Discrimination Prohibited [https://docs.legis.wisconsin.gov/statutes/statutes/36/12] and Chapter 111.322: Discriminatory Actions Prohibited [https://casetext.com/case/wisconsin-statutes/regulation-of-industry/chapter-111-employment-relations/subchapter-ii-fair-employment/section-111322-discriminatory-actions-prohibited]

Under this policy, UW–Madison strives to meet, to the fullest extent technically feasible, the Web Content Accessibility Guidelines [https://www.w3.org/TR/2008/REC-WCAG20-20081211/] as set forth under Section 508 of the Rehabilitation Act of 1973 [https://www.section508.gov/manage/laws-and-policies] , in alignment with the University of Wisconsin System Regent Policy Document 14-10 Nondiscrimination on Basis of Disability [https://www.wisconsin.edu/regents/policies/discrimination-prohibited/] and University of Wisconsin System Accessibility Statement. [https://www.wisconsin.edu/accessibility-statement/]

Compliance with this policy ensures UW–Madison provides an inclusive digital experience and can provide timely, reasonable accommodations as required under Section 504 of the Rehabilitation Act

and the Americans with Disabilities Act [https://www2.ed.gov/policy/rights/reg/ocr/edlite-34cfr104.html] ,
avoiding loss of federal funding or monetary damages to the university.

Definitions

Accessible	Affording a person with a disability the opportunity to independently acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an effective and integrated manner, with substantially equivalent ease of use. Although this might not result in identical ease of use compared to that of people without disabilities, it still ensures equal opportunity to the benefits afforded by the technology.
Digital resources and information technology	Information, content, and services used and delivered through the use of information and communications technology. Examples include websites, electronic documents, audio, video, web applications, mobile applications, and software, in addition to related, university-provided IT hardware and other IT devices that are a part of the user experience.

Scope

This policy includes, but is not limited to:

All schools, colleges, divisions, or units that design, create, develop, purchase, manage, administer, host, and/or support digital resources and information technology intended for human interaction or engagement for the purposes of teaching, learning, research, service, employment, administration or other university functions at UW–Madison. This includes digital resources and information technology hosted or provided by third parties.

Policy

I. UW–Madison will provide digital resources and information technology that are accessible to all, to the fullest extent technically feasible given an assessment of available resources, and subject to the Digital Accessibility Standards.

II. The Center for User Experience, under the authority and direction of the UW–Madison chief information officer and vice provost of information technology and the campus ADA coordinator,

working with key stakeholders and representatives across campus, is responsible for the collaborative development and maintenance of the standards, guidelines, and implementation in support of this policy.

    A. The Center for User Experience is responsible for providing training, guidance, resources, and consultation services to UW–Madison partners through the creation and management of the Digital Accessibility Liaisons Network to support policy implementation.

    B. Changes to the policy, standards, implementation plan, or procedures are maintained by the Center for User Experience Digital Accessibility Program in partnership with digital accessibility governance as detailed in the standards. Changes are made in accordance with IT policy review and revision procedures per UW–Madison Policy 510 [/library/UW-510] , Appendix F [https://kb.wisc.edu/itpolicy/it-policy-principles-and-procedures-appendices#appendix-f] .

    C. Changes impacting university schools, colleges, and divisions will be communicated through the Digital Accessibility Liaison Network.

III. Each UW–Madison school, college, or division will designate digital accessibility liaison(s), to serve as primary contact(s) as a part of the Digital Accessibility Liaisons Network, and will notify the campus ADA coordinator and the Center for User Experience of the appointment or any changes to the designee(s).

    A. Digital accessibility liaison(s) will partner with the Center for User Experience Digital Accessibility Program and be the primary point of contact for procurement, technical consultation, and policy compliance for that local unit.

    B. Digital accessibility liaison(s) working in partnership with the Center for User Experience will provide consultation on implementation guidance for their local units.

IV. Digital resources and information technology are subject to the applicable university accessibility policies in effect at the time of development or procurement. Digital resources and information technology developed or procured prior to the effective date of this, and other applicable university accessibility policies, will be made compliant with current policy, to the fullest extent technically feasible given an assessment of available resources, when changes or upgrades occur within the university's control, or if a request for accessibility or reasonable accommodation is submitted following the policy effective date.

V. Compliance with this policy is designed, in part, to ensure the university complies with legal and regulatory requirements.

    A. When compliance with this policy is not possible or would require extraordinary measures to meet the policy standards, this may require consultation with the Center for User

Experience and the campus ADA coordinator to determine equally effective alternative access.

B. While timely accommodation(s) must be provided when an accessibility barrier cannot readily be addressed, solely providing accommodations does not meet the requirements of this policy subject to the Digital Accessibility Standards.

C. Complaints regarding accessibility of university digital resources and information technology that are not in compliance with this policy must be directed to the campus ADA coordinator through the UW–Madison Office of Compliance. Timely response and ongoing communication with the complainant are essential, including offering reasonable accommodations while the barrier is worked on.

D. Digital resources and information technology in noncompliance of this policy will be referred to the UW–Madison chief information officer and vice provost of information technology to develop a plan for remediation in cooperation with campus divisional leadership.

Related UW-Madison Policies

UW-510 IT Policy Principles and Procedures [/library/UW-510]

Employment:

- UW-142 Academic Staff Disability Accommodation [/library/UW-142]
- UW-143 Reassignment as an Accommodation Policy and Procedures [/library/UW-143]
- UW-144 Classified Staff Disability Accommodation [/library/UW-144]
- UW-149 Faculty Reasonable Accommodation Policy and Procedures [/library/UW-149]

Faculty Legislation and Guidance Documents:

- UW-855 Access for Students with Disabilities [/library/UW-855]

Related UW–Madison Documents, Web Pages, or Other Resources

IT Policy KnowledgeBase [https://kb.wisc.edu/itpolicy/]

Previous Web Accessibility Policy [/attachments/UW-519/WebAccessibilityPolicyWatermark.pdf]

UW–Madison – Digital Accessibility Policy Implementation Plan (DAP) [https://kb.wisc.edu/itpolicy/116210]

UW–Madison – Digital Accessibility Standards (DAS) [https://kb.wisc.edu/itpolicy/116214]

External References

Americans with Disabilities Act of 1990 together with its 2008 Amendments [https://www.ada.gov/ada_intro.htm]

Section 504 of the Rehabilitation Act of 1973 [https://www2.ed.gov/policy/rights/reg/ocr/edlite-34cfr104.html]

Section 508 of the Rehabilitation Act of 1973 [https://www.section508.gov/manage/laws-and-policies]

University of Wisconsin System Accessibility Statement [https://www.wisconsin.edu/accessibility-statement/]

University of Wisconsin System Regent Policy Document 14-10 Nondiscrimination on Basis of Disability [https://www.wisconsin.edu/regents/policies/discrimination-prohibited/] [https://www.wisconsin.edu/accessibility-statement/]

Web Content Accessibility Guidelines [https://www.w3.org/TR/2008/REC-WCAG20-20081211/]

Wis. Stat. Chapter 36.12: Student Discrimination Prohibited [https://docs.legis.wisconsin.gov/statutes/statutes/36/12]

Wis. Stat. [https://docs.legis.wisconsin.gov/statutes/statutes/36/12] Chapter 111.322: Discriminatory Actions Prohibited [https://casetext.com/case/wisconsin-statutes/regulation-of-industry/chapter-111-employment-relations/subchapter-ii-fair-employment/section-111322-discriminatory-actions-prohibited]

Policy Administration

Approval Authority

Chief Information Officer & Vice Provost for Information Technology

Policy Manager

Chief Information Officer & Vice Provost for Information Technology

Policy Contact

IT Policy Writer and Analyst, Office of CyberSecurity; IT Policy Website Link [https://it.wisc.edu/it-community/governance/information-technology-committee-itc/it-policies/] -- Sara Tate-Pederson, itpolicy@cio.wisc.edu, (608) 263-5370

ADA Coordinator -- Ruben Mota, ruben.mota@wisc.edu, (608) 265-4508

Policy History

Effective Date	7-1-2023
Date Issued	2-17-2022
Revised Dates	09-23-2013, 08-25-2016, 02-23-2022
Reviewed Dates	08/01/2018