Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

Responsible Office	Office of the Chief Information Officer

POLICY

Issued: 07/01/2003
Interim Revised: 08/01/2018
Revised: 07/31/2019 (minor revision)

The creation and dissemination of knowledge is fundamental to The Ohio State University's mission. In support of that mission, Ohio State is committed to diversity and fostering a campus culture of full inclusion of people with disabilities by ensuring that all university constituencies can access its digital information and digital services.

This policy establishes minimum standards for the accessibility of digital information and digital services, as well as the reporting requirements necessary to ensure compliance with the university's obligations under applicable state and federal regulations.

Purpose of the Policy

To ensure equal access to digital information and digital services for all university constituencies (students, prospective students, faculty, staff, student employees, guests, visitors, and program participants with disabilities).

Definitions

Term	Definition
Accessible	Affording a person with a disability 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 benefits and opportunities afforded by the technology and equal treatment in the use of such technology.
Archived	Digital information or digital services which are no longer actively linked to but are subject to records retention plans.
Digital information	Information and content delivered through the use of technology including, but not limited to, websites, electronic documents, audio, video, and computer and mobile applications.
Digital service	Includes, but is not limited to, websites, web applications, and mobile or computer applications used to deliver educational, administrative, or other services to the university community or general public.
Eligible person	A person with a disability who has standing to access the digital information or digital service owned by or managed on behalf of the university.
Exceptions	An established and approved process for providing substantially equivalent and effective access to digital information and services for similarly situated individuals with and without disabilities when compliance is not technically possible, requires extraordinary measures due to the nature of the digital information or service, or is available for a short duration to a population whose needs are known and accounted for.
Legacy	Digital information or digital services designed and implemented prior to August 1, 2018.
MDAS	Minimum Digital Accessibility Standards (Ohio State's standard for determining if digital information and digital services are accessible)

Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

Policy Details

I. Scope

    A. This policy covers all **digital information** and **digital services** (current, **legacy**, and **archived**) and provides requirements for accessibility effective August 1, 2018.

    B. All digital information and digital services acquired, developed, or delivered by any campus, college, or vice presidential (VP) unit must be **accessible** and in compliance with the Minimum Digital Accessibility Standards (**MDAS**). Information on **exceptions** is provided in Procedure V.

    C. Legacy (including archived) digital information and digital services are subject to the applicable university web and digital accessibility standards in effect at the time of development and to this policy's specific provisions for legacy digital information and digital services. Legacy digital information and digital services must be made compliant with the MDAS when any substantial changes or upgrades occur.

    D. The following are not subject to this policy even when hosted on university resources:

        1. Digital information and digital services of a personal nature, and

        2. Student organization websites that do not conduct university business.

II. Administration

    A. The ADA Coordinator's Office, in conjunction with the Digital Accessibility Center, consults with campuses, colleges, and VP units; processes exceptions; and resolves complaints under this policy.

    B. The Digital Accessibility Center implements, reviews, and provides technical assistance regarding the MDAS; guides product evaluations as requested or necessary; processes exceptions; and resolves complaints under this policy.

    C. The Digital Accessibility Services Team in the Office of the Chief Information Officer (OCIO) assists with digital accessibility evaluations of software and digital content, training, writing remediation/accommodation plans, consulting with vendors/internal developers, and filing exceptions.

    D. Each campus, college, and VP unit with an IT security coordinator will designate an accessibility coordinator, and notify the Digital Accessibility Center of the appointment or any change in the designee. The accessibility coordinator, through a local structure, will implement the requirements of this policy. This structure must address the acquisition, development, and delivery of digital information and services in the following areas:

        1. Information technology (IT) and web support;

        2. Purchasing digital information and/or services;

        3. Business and transactional processes;

        4. Marketing, recruitment, and communications; and

        5. Delivery of content (including instructional content, policies, procedures, etc.).

    E. The accessibility coordinator must:

        1. Understand and ensure implementation of the Digital Accessibility policy, MDAS, and available accessibility assessment tools within their campus, college, and VP unit;

        2. Inform or refer for an exception, as applicable, unit decisions related to acquisition, development, and delivery of digital information and services;

        3. Be aware of, complete, and appropriately disseminate training and technical assistance;

        4. Assist in evaluating digital information, services, and delivery; and

        5. Ensure response to users encountering accessibility barriers.

PROCEDURE

Issued: 07/01/2003
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I. General Accessibility

    A. Each campus, college, and VP unit must ensure all digital information and digital services are accessible and in compliance with the MDAS whether acquired, developed, or delivered.

Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

    B. Each campus, college, and VP unit with an IT security coordinator must designate one or more accessibility coordinator(s) with responsibility for ensuring that the campus, college, and VP unit is in compliance with this policy, and must notify the Digital Accessibility Center whenever a change in designee occurs.

    C. Accessibility coordinators must ensure that their respective campus, college, or VP unit's digital services clearly indicate a method of contact for **eligible persons** having difficulty accessing the digital information or digital service.

       1. Suggested language: "If you have a disability and experience difficulty accessing this content, contact [insert name of responsible individual/position] at [contact information]."

       2. The contact information must be an email, electronic form, and/or phone number that puts the user in contact with the campus, college, or VP unit individual responsible for the digital information or digital service who must respond <u>within one business day</u>.

II. Training

    A. Accessibility coordinators must complete annual training coordinated by the ADA Coordinator's Office and the Digital Accessibility Services Team.

    B. Accessibility coordinators will facilitate, in collaboration with the Digital Accessibility Services Team and the Digital Accessibility Center, training their campus, college, and VP unit faculty, staff, and student employees who acquire, develop, or deliver digital information or digital services.

III. Reporting

    A. By the third Friday in January of each year, each accessibility coordinator must submit to the ADA Coordinator's Office for review and approval an Annual Digital Accessibility Report and Plan for their campus, college, or VP unit that must include:

       1. A description of local controls for the acquisition, development, and delivery of digital information and digital services;

       2. An evaluation of the current accessibility of their digital information and digital services;

       3. A description of the processes for:

          a. Equally effective alternative access,

          b. Removing identified barriers,

          c. Current training, and

          d. Training proposed for the upcoming year.

    B. The ADA Coordinator's Office will review and approve all such plans and work with the Digital Accessibility Services Team and campus, college, or VP unit to remedy any deficiencies.

IV. Responding to Accessibility Requests

    A. When an eligible person or a representative of an eligible person contacts a campus, college, or VP unit to express difficulty accessing digital information or digital services, the campus, college, or VP unit must respond to the individual <u>within one business day</u> and elevate a description of the response to the accessibility coordinator and the Digital Accessibility Center.

    B. Current and legacy digital information and digital services that are specifically requested to be made accessible by or on the behalf of an eligible person must be made accessible or an equally effective alternative must be provided <u>within 10 business days</u>.

       1. For digital information, equally effective means that it communicates the same information with a comparable level of accuracy.

       2. For digital services, equally effective means that the end result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestor.

    C. Legacy digital information or digital services that are specifically requested to be made accessible by or on the behalf of an eligible person must be updated to be in compliance with the MDAS or the digital information or digital service must otherwise be made available <u>within 10 business days</u>.

    D. Archived digital information or digital services do not have to be converted to meet the MDAS unless specifically requested by or on the behalf of an eligible person. When requested, digital information in archive status must be provided in an effective accessible format in a timely manner. Timeliness is generally within 10 business days, but the campus, college, or VP unit may consider the context, type, and volume of information or service requested.

Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

    E.   Upon specific request for access by or on the behalf of an eligible person, digital information in legacy or archive status containing administrative or academic information, official records, and similar information must be prioritized and made available promptly and in a format that provides effective access.

V.   Exceptions

    A.   When compliance is not technically possible or may require extraordinary measures due to the nature of the digital information or digital service, campuses, colleges, and VP units may request an exception.

    B.   Exceptions to this policy may be granted by the ADA Coordinator's Office, in consultation with the Digital Accessibility Center, Dean or VP of the requesting unit, and/or the relevant academic oversight group (e.g. unit curriculum committee, IRB, Faculty Senate) when appropriate.

        1.   Requests for such exceptions must be made within the ADA Exception Tracking System using the [Accommodation-Based Exception Request Form](#).

        2.   Requests for such exceptions should be initiated as soon as product information, design plans, evaluations, or user feedback indicates a significant conflict with the [MDAS](#). This may be at any point in the digital information's or digital services' life cycle, including prior to, during, or after acquisition, development, or delivery.

        3.   Campuses, colleges, and VP units must have an exception before acquiring, developing, or delivering digital information or digital services that do not meet the [MDAS](#).

VI.   Complaints

    A.   If an eligible person or a representative of an eligible person is dissatisfied with any campus, college, or VP unit's response to an accessibility request or other performance under this policy, they may file a complaint with the Director of the Digital Accessibility Center (accessibility@osu.edu; 614-292-1760; 1800 Cannon Drive, Room 950, Columbus, OH 43210) or with the ADA Coordinator & 504 Compliance Officer (ADA-OSU@osu.edu; 614-292-6207; 21 E. 11th Avenue, Columbus, OH 43201). If such a complaint is received by any campus, college, or VP unit, the complaint must be forwarded to the Digital Accessibility Center using the [Digital Accessibility Complaint Form](#) within one business day.

        1.   Within two business days of receiving a complaint, the Digital Accessibility Center or the ADA Coordinator's Office will notify the eligible person or their representative that their complaint has been received and answer any questions about the complaint process.

        2.   Within 10 business days of receiving a complaint, the Digital Accessibility Center will:

            a.   Conduct, or cause to be conducted, an evaluation of the digital information, digital service, or any alternatives provided by the campus, college, or VP unit in question; or

            b.   Notify the eligible person or their representative of the need for additional time to conduct an evaluation.

    B.   Once the evaluation has been completed, in consultation with the Digital Accessibility Center, the ADA Coordinator will determine what action, if any, is needed.

    C.   The Digital Accessibility Center or the ADA Coordinator will inform the individual of the outcome of their complaint and the campus, college, or VP unit of any actions they must take to comply with this policy.

Responsibilities

Position or Office	Responsibilities
Accessibility Coordinators	1. Implement the requirements of this policy for their respective campus, college, or VP unit. 2. Develop and implement a local structure addressing the acquisition, development, and delivery of digital information and services as specified in this policy. 3. Ensure that faculty, staff, and student employees who acquire, develop, and deliver digital information and services comply with this policy (see responsibilities below). 4. Ensure their campus, college, or VP unit's digital services indicate a method of contact for difficulty in accessing digital information or digital services. 5. Submit an Annual Digital Accessibility Report and Plan by the third Friday in January to the ADA Coordinator's Office for review and approval. 6. Complete annual digital accessibility training. 7. Facilitate training their campus, college, or VP unit faculty, staff, and student employees who acquire, develop, and deliver digital information and services.

Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

Position or Office	Responsibilities
ADA Coordinator's Office	1. Provide guidance to campuses, colleges, and VP units. 2. Track accessibility coordinator(s) for each campus, college, and VP unit. 3. Grant exceptions to the policy as appropriate, in consultation with the Digital Accessibility Center, Dean or VP of the requesting unit, and/or the appropriate academic oversight group. 4. Take and resolve complaints about the policy, in consultation with the Digital Accessibility Center. 5. Coordinate annual digital accessibility training. 6. Review and approve each campus, college, or VP unit's Annual Digital Accessibility Report and Plan or assist in remedying any deficiencies.
Digital Accessibility Center	1. Implement, review, and provide technical assistance to campuses, colleges, and VP units on MDAS and compliance with this policy. 2. Guide product evaluations as requested or necessary. 3. Consult with the ADA Coordinator's Office on exception requests. 4. Take and resolve complaints about the policy, in consultation with the ADA Coordinator's Office. 5. Evaluate digital information or digital services when complaints are received.
Digital Accessibility Services Team within OCIO	1. Partner with the ADA Coordinator's Office to determine training content, provide delivery of content, and track training completion institutionally. 2. Assist with digital accessibility evaluations of software and digital content, writing remediation/accommodation plans, and filing of exceptions for campuses, colleges, and VP units. 3. Consult with vendors and internal developers to ensure the assessment tool is meeting the needs of the university. 4. Effectively communicate accessibility requirements to campuses, colleges, and VP units, ensuring all units are informed.
Campus, college, VP unit	1. Designate one or more accessibility coordinator(s), and notify the ADA Coordinator's Office who is responsible or if changes in designation occur. 2. Ensure all digital information and digital services are accessible and in compliance with the MDAS whether acquired, developed, or delivered. 3. Respond within one business day to individuals who express difficulty accessing digital information or digital services and elevate a description of the response to the accessibility coordinator and the Digital Accessibility Center. 4. Make accessible or provide an equally effective alternative within 10 business days of a specific request. Make legacy and archived digital information and digital services accessible according to the procedures specified. 5. If applicable, request exceptions to this policy using the Accommodation-Based Exception Request Form. 6. Forward any complaint received to the Digital Accessibility Center using the Digital Accessibility Complaint Form within one business day of receipt. 7. Comply with any actions as determined necessary (as a result of a complaint) by the ADA Coordinator or Digital Accessibility Center.
Faculty, staff, and student employees who acquire, develop, and/or deliver digital information and services	1. Understand and implement the MDAS and available accessibility assessment tools. 2. Inform and approve, as applicable, unit decisions related to acquisition, development, and delivery of digital information and services. 3. Be aware of, complete, and appropriately disseminate training and technical assistance. 4. Assist in evaluating digital information, services, and delivery. 5. Respond to users encountering accessibility barriers. 6. Make digital information available in accessible formats.

Resources

Accommodation-Based Exception Request Form, accessibility.osu.edu/exceptions
Annual Digital Accessibility Report and Plan, accessibility.osu.edu/plan
Digital Accessibility Complaint Form, accessibility.osu.edu/complaints
Frequently Asked Questions, accessibility.osu.edu/faq
List of Accessibility Coordinators, accessibility.osu.edu/coordinators
Minimum Digital Accessibility Standards (MDAS), accessibility.osu.edu/standards

Applies to: Campuses, colleges, VP units, faculty, staff, student employees, and students.

Contacts

Subject	Office	Telephone	E-mail/URL
Policy interpretation and complaints	ADA Coordinator's Office, Office of University Compliance and Integrity	614-292-6207 TTY614-688-8605	ada-osu@osu.edu ada.osu.edu
Digital accessibility training, technical assistance, and complaints	Digital Accessibility Center	614-292-1760	accessibility@osu.edu accessibility.osu.edu
Digital Accessibility Services Team	Office of the Chief Information Officer	n/a	das@osu.edu

History

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