CORNELL UNIVERSITY POLICY LIBRARY



Web Accessibility Standards

POLICY 5.12

Volume: 5, Information Technology Chapter: 12, Web Accessibility Responsible Executive: Vice President for Information Technology and Chief Information Officer Responsible Office: Cornell Information Technologies Originally Issued: October 12, 2018 Last Full Review: May 2, 2019 Last Updated: April 11, 2023

POLICY STATEMENT

Cornell University is committed to providing an environment in which all people have an equal opportunity to participate in the university's programs, activities, and services. To support this environment, all new, newly added or redesigned university web content, web pages, web functionality, websites, and web applications must be made accessible to people with disabilities to the standard prescribed by the most recently published Web Content Accessibility Guidelines (WCAG), except where doing so would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

When fundamental alteration or undue burden applies, equally effective alternative means of access must be provided so that, to the maximum extent possible, individuals with disabilities receive the same benefits and services.

REASON FOR POLICY

Cornell recognizes that websites and web-based applications are often integral to the academic and administrative work of the university. The university strives to ensure that people with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any university programs, services, and activities delivered online; and that they receive effective communication of the university's programs, services, and activities delivered online.

Additionally, the university strives to comply with federal and state laws and regulations requiring accessibility and equal access for individuals with disabilities, including the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, the New York State Human Rights Law, and Section 1557 of the Affordable Care Act.

ENTITIES AFFECTED BY THIS POLICY

- \blacksquare Ithaca-based locations
- ☑ Cornell Tech campus
- ☑ Weill Cornell Medicine campuses

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WHO SHOULD READ THIS POLICY

- Anyone who is creating, editing, or placing content on a Cornell University website or web application
- Anyone purchasing web products and web services
- Unit heads

MOST CURRENT VERSION OF THIS POLICY

- https://policy.cornell.edu/policy-library/web-accessibility-standards

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RELATED RESOURCES

External Documentation

Americans with Disabilities Act of 1990

Section 504 of the Rehabilitation Act of 1973

Section 1557 of the Affordable Care Act

World Wide Web Consortium Accessibility Standards Overview

University Forms and Systems

Ithaca-Based Locations

 Weill Cornell Medicine Campuses

 Weill Accessibility Information (Login required)

Accessibility Information Accessibility Resources

<u>Siteimprove</u>

Weill Accessibility Information (Login required) Weill's Siteimprove Resource (Login required)

CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation, Accommodation Requests (Ithaca Campus and Cornell Tech)	Electronic Information Technology Accessibility (EITA) Manager		accessibility@cornell.edu
Policy Clarification and Interpretation, Accommodation Requests (Weill Cornell Medicine)	Associate Director, IT Experience	(212) 746-6819	accessibility@med.cornell.edu
Procurement Process Clarifications (Ithaca Campus and Cornell Tech)	Procurement and Payment Services	(607) 255-3804	www.dfa.cornell.edu/procurement
Procurement Process Clarifications (Weill Cornell Medicine)	Weill Cornell Medicine Finance		purchasing@med.cornell.edu

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DEFINITIONS

These definitions apply to terms as they are used in this policy.

Accessible	When 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, within the same timeframes, and with substantially equivalent ease of use. If content and functionality cannot reasonably be made accessible through the website, equally effective alternate access must be provided in an expedient manner.
University Web page, Website or Web Application	Web page, website, or web application created or procured by a unit for or in support of the activities carried out under the auspices of the university.
Unit	College, department, program, office, research center, institute, laboratory, business service center, or other university unit.
WCAG	Web Content Accessibility Guidelines, which are standards promulgated by the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI).
Web Content	Information contained on a web page or presented through a web application, including text, images, PDFs, video, audio, and code or markup that defines structure, presentation, etc.
Web Functionality	Interactive part of a web page, website, or web application. Including, but not limited to, maps, photo galleries, video galleries, online forms, etc.

RESPONSIBILITIES

The major responsibilities each party has in connection with this policy are:

Cornell Information Technologies, Ithaca Campus, Cornell Tech, and Weill Cornell Medicine	Provide documentation and resources to assist with web accessibility compliance.
	Identify both enterprise solution services and open-source services that enable the scanning of web pages for compliance with the standard set by this policy.
	Consult with units, as appropriate.
	Advise and support the Electronic Information Technology Accessibility Manager, as appropriate.
Electronic Information Technology Accessibility (EITA) Manager	Facilitate requests for accommodations and complaints of EITA violations.
	Coordinate a method to address modified compliance requests, as appropriate.
	Record any modified compliance requests and their outcomes.
	Provide guidance to offices and individuals.
	Consult with units and Procurement on web accessibility.
	Provide training and/or coordinate on web accessibility.
	Act as liaison for the IT Governance Council.

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Responsibilities, continued

	At least annually, perform a review of this policy and implement any necessary revisions.
Information Technology Governance Council (ITGC)	With advice from the EITA manager, address requests for modified compliance.
Staff Member in College or Unit	Ensure that all new university websites and web applications, including content or functionality added to existing university websites or web applications, are accessible to the standards set in this policy, and are monitored and maintained in an accessible state.
Student Disability Services and the Department of Inclusion and Workforce Diversity	Collaborate with the EITA manager to resolve complaints about web accessibility, including:
	Identification of effective alternatives and reasonable accommodations. Addressing modified compliance requests.
Unit Head	Assume responsibility for the web accessibility of all new, newly added, or redesigned university web content, web pages, web functionality, websites, and web applications within the unit.
	Understand web accessibility compliance requirements set by this policy.
	Identify a unit web accessibility liaison.
Unit Web Accessibility Liaison	Act as the unit point of contact for any web accessibility resources, concerns, or issues.
	Partner and share information as needed with the EITA manager.
	Within the respective unit, ensure that all persons developing, designing, or creating university web content, web pages, web functionality, websites, and/or web applications receive information on accessibility training and information on how to test and review their work.
	At least annually, review all respective unit websites with university- approved tools, and examine reports to ensure compliance with this policy.
University Procurement	Include the appropriate university web accessibility standards and requirements in procurement agreements.

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PRINCIPLES

Introduction	Cornell University is dedicated to providing an inclusive environment for individuals with disabilities. In keeping with this principle, Cornell has committed to adopt the most recently published Web Content Accessibility Guidelines (WCAG). standards for all new, newly added, or redesigned university web content, web pages, web functionality, websites, and web applications (see Related Resources). Furthermore, the university will strive to purchase only those web products and services that operate in accordance with the most recently published WCAG standards. Individuals seeking assistance or having difficulty with website accessibility should contact the Electronic Information Technology Accessibility (EITA) manager for assistance.	
Scope of This Policy	All new, newly added or redesigned university web content, web pages, web functionality, websites, and web applications published or procured by any unit are covered by this policy.	
Role of the EITA Manager	The Electronic Information Technology Accessibility (EITA) manager has the authority to report any EITA issue to the IT Governance Council, for reasons related to this policy, when necessary. Additional responsibilities include, but are not limited to:	
	• Developing and implementing outreach and training on principles, tools, and techniques for members of the university community who maintain websites and web applications or use the web to deliver instructional materials.	
	• Being actively involved in the procurement process for websites and web applications, to help ensure that accessibility requirements are made part of contractual agreements and contractors fulfill their obligations to deliver accessible websites and web applications.	
	 Leading accessibility reviews of key institutional websites and web applications. 	
	• Developing and maintaining a web accessibility website or a robust resource section under the Cornell accessibility website.	
	• Organizing and responding to requests for assistance from site users to make website or web application content accessible.	
	• Facilitating review of modified compliance requests.	

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PROCEDURES

Required WebsiteEach university website and web application, including legacy pages, must provide a
user-friendly way for individuals to request assistance with accessibility issues.
Examples of acceptable footer language are below.

Web Accessibility Assistance Link

This is a link in the footer that goes to a page on the website explaining who to contact (the email address) and possibly the full text:

Cornell University is committed to making its websites accessible to everyone, including individuals with disabilities. To report a problem or to request an accommodation to access online materials, information, resources, and/or services, please contact web-accessibility@cornell.edu. In your message, include the website address or URL and the specific problems you have encountered. You will receive a reply as soon as possible.

Text in the Footer

If you have a disability and are having trouble accessing information on this website or need materials in an alternate format, contact web-accessibility@cornell.edu for assistance.

Procuring AccessibleThe university strives to ensure that university web pages, web content, webInformationThe university strives, and web applications purchased by or used at the university
are accessible to all faculty, students, and staff members, including those with
disabilities. To reach this goal, those responsible for making decisions about which
products or services to procure must consider accessibility as one of the criteria for
acquisition. This is especially critical for enterprise-level web applications and other
key websites that affect a large number of students, faculty, patients, or staff
members. For more information contact Procurement and Payment Services.

- Addressing Concerns Concerns regarding accessibility of university web pages, websites, or web applications can be directed to the Electronic Information Technology Accessibility (EITA) manager for prompt resolution.
- Alternative Access If compliance with Web Content Accessibility Guidelines (WCAG) would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens due to the nature of the information and/or the intent of the web page, a written request for consideration can be submitted to the Electronic Information Technology Accessibility (EITA) Manager, who will, in

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PROCEDURES, continued

consultation with the IT Governance Council, work to address the concerns. Requests for consideration must be as narrowly tailored as possible, be based on issues other than cost alone, and must include information regarding equally effective alternative means of access that would be provided so that, to the maximum extent possible, individuals with disabilities receive the benefits and services being provided.

Training

Courses on web accessibility and other resources can be found in <u>CULearn</u> and/or under the <u>IT@Cornell website</u>.