POLICY CONCEPTS: INSTRUCTIONS AND GUIDELINES

All policy proposals – including new policy concepts, proposed revisions, or suggested repeals – must be submitted via the form on page 2 to the Office of the University Secretary with appropriate supporting information and documents. Completed submissions are forwarded to the University Senate (academic policies) or the President's Policy Advisory Council (PAC), which ensures proper routing through the policy-making process. (See UO Policy I.03.01 for more information.)

Please keep the following definition of a university policy in mind as you develop your concept:

A University Policy ("Policy") is a policy that (1) has broad application or impact throughout the University community, (2) must be implemented to ensure compliance with state or federal law, (3) is necessary to enhance the University's mission, to ensure institutional consistency and operational efficiency, or to mitigate institutional risks; or (4) is otherwise designated by the Board [of Trustees] or the President [of the University] as a University Policy.

A policy establishes rights, requirements or responsibilities. Excluded from this definition are things such as, but not limited to, implementation guides, operating guidelines, internal procedures, and similar management controls and tools.

To help facilitate as smooth a process as possible, please consider the following:

- 1. Consult as many stakeholders as possible *prior to submitting* your concept. A primary role for the PAC is to ensure that appropriate offices, departments or groups are consulted.
- 2. Run your concept by the Office of General Counsel (OGC) *prior to submission*. OGC review is a required step in policy-making.
- 3. Please use the proper template email uopolicy@uoregon.edu to obtain either (a) the new policy template (new proposals) or (b) the Word version of the existing policy in its proper template (for redlines/revisions).
- 4. A "redlined" version of your concept in Word is required for proposed revisions. This must be done using the appropriate Word version (see #3, above).
- 5. Include any appropriate related resources that will be useful to those reviewing the concept. Links are preferred, but supplemental documents are of course acceptable for items not online. Examples of such items include any associated procedures or unit level policies (even if in draft form), or other policies or procedures related to, overridden by, necessary as a result of, or otherwise affiliated with your concept;
- 6. Please submit all documents as individual files.
- 7. Someone from the responsible office or proposing unit will need to attend a PAC meeting to explain the concept and answer any questions.

Please email uopolicy@uoregon.edu if you have any questions. Thank you!

POLICY CONCEPT FORM

Name and UO Title/Affiliation:	Grey Pierce, Digital Accessibility Architect		
Policy Title & # (if applicable):	IV.06.08 Information and Communications Technology Accessibility		
Submitted on Behalf Of:	ADA Coordinator, PCS and IS		
Responsible Executive Officer:	Jamie Moffitt, Sr. Vice President for Finance and Administration and CFO		
SELECT ONE: ☐ New Policy ☒ Revision ☐ Repeal Click the box to select HAS THE OFFICE OF GENERAL COUNSEL REVIEWED THIS CONCEPT: ☒ Yes ☐ No If yes, which attorney(s): Jeslyn Everitt			
	er of any existing policies associated with this concept. tions Technology Accessibility Policy		

RELATED STATUTES, REGULATIONS, POLICIES, ETC.

List known statutes, regulations, policies (including unit level policies), or similar related to or impacted by the concept. Include hyperlinks where possible, excerpts when practical (e.g. a short statute), or attachments if necessary. Examples: statute that negates the need for or requires updates to an existing policy; unit level policy(ies) proposed for University-wide enactment; or existing policies used in a new, merged and updated policy.

- Americans with Disabilities Act of 1990, As Amended 2008, Title II
- Rehabilitation Act of 1973, Section 504
- Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities, 2024
- Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance, 2024

STATEMENT OF NEED

What does this concept accomplish and why is it necessary?

This policy was adopted in 2019 in response to an investigation by the U.S. Department of Education's Office for Civil Rights. It is central to the university's compliance with applicable federal laws regarding digital accessibility (Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act), including updated DOJ and HHS regulations that take effect in the spring of 2026. Small updates to the policy are proposed to align with 2024 Rulemaking and actual practice (i.e. having the President's designee oversee guidelines with input from the ICT access committee).

AFFECTED PARTIES

Who is impacted by this change, and how?

All those engaged with producing or using UO information and communication technologies.

CONSULTED STAKEHOLDERS

Which offices/departments have reviewed your concept and are they confirmed as supportive? (Please do <u>not</u> provide a list of every individual consulted. Remain focused on stakeholders (e.g. ASUO, Office of the Provost, Registrar, Title IX Coordinator, etc.).)

Name	Office	Date
ICT Accessibility Committee	Information Services, University Communications, Accessible Education Center, Office for Equal Opportunity and Access, Teaching Engagement Program, UO Online, University Libraries, Purchasing and Contracting Services, Office of General Counsel, Office of the VP for Research and Innovation, Student Services and Enrollment Management	2025-06-03
Abhijit Pandit, Chief Information Officer	Information Services	2025-06-10
Grey L. Pierce, Digital Accessibility Architect	Information Services	2025-06-03

Information and Communications Technology Accessibility

Reason for Policy:

The University of Oregon is committed strives to ensure access, equity, and inclusion for information and communication technologies (ICT), e.g., including, but not limited to, information resources such as web pages, websites and databases; web- and computer-based applications allowing for interaction between software and users; services employing information technology and telecommunications equipment used to support its mission of exceptional teaching, research, and service as a comprehensive public university. As the university operates in an increasingly digital environment, equitable access for all is critical for our success. It is essential that accessibility be seamlessly integrated as the university acquires, creates, uses and publishes information and communication technologies. With these core institutional values, this policy and its accompanying procedures establish standards and expectations in alignment with nationally recognized best practices and applicable law, including Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as amended.

Entities Affected by this Policy:

All those engaged with producing or using UO communication and information technologies.

Responsible Office:

For questions about this policy, please contact Information Services at (541) 346-NETS (6387).CIO@uoregon.edu.

Website Address for this Policy:

https://policies.uoregon.edu/vol-4-finance-administration-infrastructur...

Enactment & Revision History:

09 July 2019 - Effective date

02 July 2019 - Approved as a new policy by the university president

Policy:

All University of Oregon web pages and other information and communication technologies (ICT) should be made accessible to the widest range of users, including those with disabilities, as described in more detail in the procedures accompanying this policy. 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. The person with a disability, and must be able to obtain the information as fully, equally and independently as a person without a disability. Unless an exemption is approved by the University President or their designee, all colleges, departments, offices and entities of the University will create, update, and disseminate ICT by making it consistent with the prevailing national access standards as set forth in the procedures that accompany this policy.

This is a rolling adoption, with certain ICT prioritized over others, and its schedule will be set forth separately in the procedures accompanying this policy.

The Chief Information Officer University President or their designee, will define and oversee an interdepartmental Information and Communication Technologies Access Committee (ICT Access Committee) to implement, maintain and enforce provide guidance on the implementation, maintenance and enforcement of procedures, procurement processes, and accessibility guidelines covering the University of Oregon digital environment to ensure that the university is fulfilling its commitment to accessibility for all and complying with applicable law. This digital environment includes, but is not limited to, web-based and native applications, media productions and presentations, and other emerging hard- and software technologies. Procedures, resources, and exemption criteria shall be reviewed and amendedrecommendations shall be made as necessary on an as-needed basis by the ICT Access Committee.

While the Chief Information OfficerPresident's designee, in consultation with the ICT Access Committee, is responsible for the creation and periodic revision of these evolving guidelines, it is incumbent upon those who create, procure, maintain, or are otherwise responsible for university ICT to ensure the accessibility of the technology and associated content. This obligation is ongoing and will require regular monitoring and evaluation as described in more detail in the procedures accompanying this policy.

The university will provide training opportunities and assistance, where appropriate.

Exemptions / Alternative Processes

Requests for exemptions from accessibility requirements must be approved by the University President or their designee(s), pursuant to the procedures accompanying this policy. Exemptions will be granted when action would result in a fundamental alteration in the nature of its program or activity or undue financial and administrative burdens, as determined by the University President or their designee(s), and must be accompanied by a written statement. The determination that an undue burden or fundamental alteration would result must be based on all resources available for use. If an action would result in a fundamental alteration or undue burden, the University of Oregon will pursue other appropriate options to provide individuals with disabilities the benefits and services of the program or activity in an equally effective and equally integrated manner, with substantially equivalent ease of use, as fully, equally and independently as individuals without disabilities.

Chapter/Volume:

Chapter 6: Information technology

Related Resources:

Information and Communications Technology Accessibility Procedures: https://is.uoregon.edu/ict-procedure

Original Source:

UO Policy Statement

Information and Communications Technology Accessibility

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