



Pima County Community College District Administrative Procedure

<i>AP Title:</i>	ADA & Equal Opportunity, Electronic Information Technology Accessibility Guidelines
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<i>Sponsoring Unit/Department:</i>	Office of the Provost
<i>Policy Title(s) & No(s):</i>	Diversity and Inclusion, BP 2.01
<i>Legal Reference:</i>	Title II and III of the Americans with Disabilities Act, 42 U.S.C. §12131 et seq., and its implementing regulation at 28 C.F.R. Part 35; §504 of the Rehabilitation Act, 29 U.S.C. §794, and its implementing regulation at 34 C.F.R. Part 104
<i>Cross Reference:</i>	Equal Employment Opportunity, ADA, Non-Discrimination and Anti- Harassment (including Sexual Harassment), BP 5.10

PURPOSE

The College is committed to supporting an electronic information technology (EIT) environment that is accessible to all, and in particular to individuals with disabilities. The purpose of this Administrative Procedure (AP) is to provide procedures for College administrators, instructors and staff to create, maintain and/or procure accessible EIT.

EIT is continually changing and compliance with this AP will be an ongoing process.

SECTION 1: Responsibility for Implementation and Coordination of this AP

The College ADA/504 Coordinator is responsible for implementing this AP, including answering questions or concerns regarding the rights and responsibilities described in this AP and developing and maintaining systems and working groups that facilitate and monitor compliance with this AP.

The ADA/504 Coordinator may be reached by email at 504-ADAHelp@pima.edu or by phone at 520-206-4868.

SECTION 2: Definitions

- 2.1 **Accessible** refers to the concept that individuals with disabilities have access to and use of EIT that is comparable to the access to and use of EIT by individuals without disabilities.
- 2.2 **Assistive/Access Technologies** are any item, piece of equipment, or system, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities. Examples include special input devices, screen-reading software, and screen magnifiers.
- 2.3 **Electronic Information Technology (EIT)** is any electronically delivered information or electronic system for interacting with individuals. It includes:
 - Web pages
 - Electronic instructional materials
 - Electronic documents
 - Video and audio materials
 - Software, hardware and operating systems
- 2.4 **Official College EIT** is any College administrative or instructional EIT used to deliver content or interact with individuals for administrative, instructional, or informational purposes.
- 2.5 **EIT Developer** is anyone who develops, maintains, or procures official college EIT, including, but not limited to:
 - Faculty
 - Staff

- Administrators
- Volunteers
- Vendors

2.6 **EIT Accessibility Standards** mean the standards set out in Section 5 of this AP and any associated Standard Operating Procedures (SOPS).

The following specific EIT terms are used in this AP:

New EIT is any official college EIT developed, created, or procured after the adoption of this AP.

Active EIT is any official college EIT that was developed, created, or procured prior to the date of the adoption of this AP and continues to be used after the adoption of this AP.

Inactive EIT is any official College EIT that was developed, created or procured prior to the adoption of this AP and not currently used for administrative, instructional, or informational purposes.

SECTION 3: Requirements

Unless an exception is granted pursuant to Section 4:

- 3.1 EIT Developers must make all new EIT comply with EIT Accessibility Standards as of the date of the adoption of this AP.
- 3.2 EIT Developers must either remove or make all active EIT comply with EIT Accessibility Standards within two (2) years of the adoption of this AP, except that EIT Developers must:
 - Make active EIT meet EIT Accessibility Standards at an earlier date when there is a significant alteration or update made to active EIT, such as the visual design of a web page or a major revision of the content of a web page, or
 - Make active EIT meet EIT Accessibility Standards or provide an equally effective alternative, if a qualified individual with a disability requests an accommodation regarding accessibility of the active EIT.
- 3.4 If a person has a need or reason to access Inactive EIT, EIT Developers must bring Inactive EIT into compliance with EIT Accessibility Standards upon

request within 21 days as part of an accommodation or provide an equally effective alternative for a qualified person with a disability.

- 3.5 All College websites must indicate in plain text a method of contact for users who have trouble accessing content within the site. Suggested language includes the following:

If you have trouble accessing this page and/or need to request an alternate format, contact the College's ADA/504 Coordinator at 504-ADAHelp@pima.edu or by phone at 520-206-4868.

The ADA/504 Coordinator, or designee, will respond to any request for an alternate format in a timely manner.

- 3.6 The ADA/504 Coordinator is responsible for implementing this AP with respect to (a) providing students working in campus labs or on publically accessed campus computers with Assistive/Access Technologies and (b) providing College employees, including student employees, with Assistive/Access Technologies.
- 3.7 The College will develop processes for the purchase of only accessible EIT. It is recommended that EIT Developers include the following language in RFPs, purchase orders and contracts for EIT:

In providing any electronic information technology equipment and/or software to the College ("EIT"), Vendor shall provide access to EIT to individuals with disabilities, in compliance with College policies/administrative procedures and federal and state laws and regulations including but not limited to Section 504 of the Rehabilitation Act and Title II and III of the Americans with Disabilities Act and applicable regulations. Vendor shall also comply with the Web Content Accessibility Guidelines ("WCAG") 2.0 Level AA guidelines.

SECTION 4: Resolving Accessibility Issues — Exceptions to Requirements

- 4.1 The ADA/504 Coordinator is responsible for resolving issues regarding the accessibility of Official College EIT.
- 4.2 Any person experiencing accessibility issues with Official College EIT should notify the ADA/504 Coordinator.

- 4.3 If an EIT Developer becomes aware of an accessibility issue relating to any Official College EIT, he or she will immediately notify the ADA/504 Coordinator. EIT Developers will work with the ADA/504 Coordinator to address the accessibility issue in an effective and timely manner.
- 4.4 In resolving accessibility issues, the ADA/504 Coordinator may grant EIT Developers exceptions to the Accessibility Standards set out in Section 5 or other requirements of this AP in situations where he or she determines that modifying the particular EIT would create an undue burden or would result in a fundamental alteration of the service, program, or activity.
- Any decision of the ADA/504 Coordinator to grant an exception to the Accessibility Standards or other requirements of this AP shall be in writing detailing the reasons for the exception and shall also be approved in writing by, the Provost or designee who has knowledge of the College’s resources and has budgetary authority. The ADA/504 Coordinator shall also consult with the College’s Legal Counsel, before granting any exception.
 - If an exception to the Accessibility Standards is granted, an EIT Developer must provide alternate access to the content or service that does not result in an undue burden or fundamental alteration, but ensures that, to the maximum extent possible, individuals with disabilities receive the same benefits or services as their non-disabled peers.

SECTION 5: EIT Accessibility Standards

The development, maintenance and procurement of Official College EIT will conform to the accessibility standards specified in the accessibility standards set out below as appropriately tailored to the specific circumstances of the College. Accessibility Standards may be further described, detailed or added in Standard Operation Procedures (“SOPs”).

The standards set out in this section are minimum standards. Nothing in this section is intended to prevent the use of standards for a particular EIT that results in greater access to and use of EIT by individuals with disabilities.

Level AA guidelines outlined in the Web Content Accessibility Guidelines (“WCAG”) set out in WCAG 2.0 (<https://www.w3.org/WAI/intro/wcag.php>)

Web Accessibility Initiative Accessible Rich Internet Applications Suite (“WAI-ARIA”) 1.0 for web content Described and Captioned Media Program

(DCMP) Captioning Key, sponsored by the National Association of the Deaf and the US Department of Education
(http://www.captioningkey.org/quality_captioning.html)

Federal Communication Commission captioning quality standards for synchronicity, completeness, and placement.
(https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-12A1.pdf)

US Access Board's Guide 508 Standards - Software Applications and Operating Systems, Section 508 1194.21. 1194.22. found at
(<https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/guide-to-the-section-508-standards>).