

Procedure Title: Electronic Information Technology Accessibility

Impact: Employees, Affiliates

Responsibility: Chief Information Officer

Effective Date: 11/20/2019

Revised Date:

Reviewed Date:

Relates to Policy(s): 3.08.09

Legal Citation(s): Americans with Disabilities Act of 1990 (ADA), Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, Revised 508 Standards 21st Century Communications, and Video Accessibility Act of 2010

The purpose of this procedure is to provide processes by which college administrators, faculty, and staff will create, obtain and maintain all Electronic and Information Technology (EIT) for public and limited-use resources.

This procedure applies to the following areas:

- Web Accessibility
- Instructional Materials Accessibility
- Document Accessibility
- Electronic Media Accessibility
- Software, Hardware and Systems Accessibility
- Procurement

I. EMPLOYEE RESPONSIBILITIES

- A. Comply with and test for accessibility standards when creating public EIT resources.
- B. Ensure media utilized for limited-use resources meets accessibility standards whenever possible.
- C. Ensure they host online activities in accessible environments and that online content follows accessibility standards whenever possible.
- D. Initiate procurement for EIT resources through the Information Technology (IT) department.
- E. Direct questions regarding accessible content to the IT Accessibility Coordinator.

II. EXCLUSIONS AND EXEMPTIONS

- A. EIT resources that are classified as limited-use in nature do not need to meet accessibility standards, unless a reasonable accommodation request is made by someone who should have equitable access to those resources. Accommodation requests in this case shall follow the North Idaho College policy and procedure 5.13: Accommodations for students and employees with disabilities.
- B. Public EIT resources without an accessible alternative will require a Provisional Use Waiver to be submitted to the EIT Committee for review, approval by the College CIO, and reported quarterly to the President's Cabinet.

III. VENDOR AGREEMENTS

- A. Employees shall purchase public facing resources from vendors who show that, in good faith, they are working towards complying with accessibility standards, as appropriate for the products or services they provide, unless an extraordinary circumstance exists. Any current agreements already in existence with the College prior to the effective date of this procedure are considered to be exempt from this policy and procedure.
- B. Accessibility Conformance Reports based upon the current Voluntary Product Accessibility Template (VPAT) will be required from vendors, unless an exemption is granted through a Provisional Use Waiver.

IV. ENFORCEMENT

- A. Regarding employees and other affiliates, the consequences of policy violation will be commensurate with the severity and frequency of the offense and may include termination of employment or contract.
- B. Violations of this policy will be addressed in accordance with appropriate NIC policies and procedures, as issued and enforced by the appropriate authorities.
- C. Consequences of policy violation may include, but are not necessarily limited to, the following:
 - a. Notification: alerting a user to what appears to be an inadvertent violation of this policy in order to educate the user to avoid subsequent violations.
 - b. Warning: alerting a user to the violation, with the understanding that any additional violation will result in a greater penalty.
 - c. Loss of system privileges: limitation or removal of system privileges, either permanently or for a specified period of time.

V. APPEAL

For employees, appeal of actions taken which result in an unresolved dispute will be handled via the Grievance Policy and Procedure.

VI. MAINTENANCE

This procedure will be reviewed by NIC's Chief Information Officer (CIO), IT Department, EIT Committee, and the IT Policy and Planning Council every three years or as deemed appropriate based on changes in technology or regulatory requirements.