

University of Maine System

ADMINISTRATIVE PRACTICE LETTER

SUBJECT: Information and Communications Technology Accessibility

I. Purpose and Scope	1
II. Authority	2
III. Overall Responsibility for ICT Accessibility:	2
IV. Summary of Duties, Responsibilities and Standards	2
V. Exemption Authority and Process	3
VI. Employee ICT Accessibility Training	3
VII. Standards (Requirements)	4
ICT Accessibility Technical Compliance Standards	4
Standards for the Acquisition of ICT tools or materials.	4
VIII. Responsibility for Website, Social Media and Other Digital Content and Functionality	5
IX. Examples of Information and Communication Technologies	5
X. ICT Accessibility Incident Response and Responsibilities	5
XI. Additional Information	5

I. Purpose and Scope

The University of Maine System is committed to providing equality of opportunity to persons with disabilities, including equal access to University programs, services and activities that are dependent upon, or involve the use of, Information and Communications Technology (ICT) and/or materials ([“examples” below](#)).

When we employ technology as part of a university activity, we introduce the possibility of excluding persons with disabilities when that technology, e.g., hardware, software, website, or an electronic document contains accessibility barriers.

This APL defines terms, roles, responsibilities, and business procedures necessary to ensure realization of equality of opportunities afforded through ICT as part of UMS programs, opportunities and activities. This APL is authorized under the [UMS Board of Trustees Policy Manual, Section 902-Information and Communications Technology Accessibility Policy](#).

Accessibility is a priority in the selection of ICT tools, services, software, etc. as well as in the design and implementation of University and 3rd-party materials that rely on ICT, such as (but not limited to) websites, social media posts, brochures and flyers, infographics, emails and other communications that use aural content and/or visual images and text graphics, (both print and digital), and course or program materials.

This APL is focused on business procedures, workflows and responsibilities and does not lay out specific technical procedures necessary to ensure accessibility of ICT resources. Such detailed technical documentation may be called for by this APL but being subject to frequent change they should be maintained separately.

II. Authority

Overall authority for the enforcement of this APL resides with the University of Maine System's Director of Equal Opportunity, in cooperation with the Chief Information Officer.

III. Overall Responsibility for ICT Accessibility:

Any member of the university community (faculty, staff or student) who acquires, incorporates, or produces Information and Communication Technologies (ICT) or materials, related to university programs, opportunities or activities, is responsible for ensuring that such technologies and/or materials are accessible to persons with disabilities, unless exempted under this letter.

IV. Summary of Duties, Responsibilities and Standards

1. It is the responsibility of each and every member of the university community to ensure that the ICT and digital materials they employ as part of, or in support of, university programs, opportunities and activities are fully accessible to persons with disabilities.
2. Each campus, and University Services will establish, and communicate (initially and annually thereafter) to its faculty, staff and students, procedures to ensure accessibility of campus ICT, including at a minimum: complaint reporting/resolution, acquisition, contract and procurement review and approval, web-content ownership, and digital course and other materials.
3. Each campus, and University Services, will assign responsibility, and allocate resources, for receiving, monitoring, and ensuring resolution of ICT accessibility incidents to at least one employee and will notify faculty, staff and students who this employee is and the employee's contact information.
4. All employees of the University of Maine System, and all its subsidiaries and other organizations under the Board of Trustees of the UMS, who select, create, edit, manage, publish, share and/or procure information and communications technologies, including

digital documents, will complete annual ICT accessibility awareness training. Such training will be delivered electronically where feasible.

5. This letter defines procedural and technical standards for ICT Accessibility with which all areas of the University are expected to comply.
6. When a required ICT cannot be made accessible, an exemption may be granted by the Equal Opportunity Office per Section V.

V. Exemption Authority and Process

Exemptions to this APL may be granted by the Equal Opportunity Office under the following circumstances.

1. As defined under applicable statute and regulation as determined by the Equal Opportunity Office. For example, if compliance would cause an “undue burden” or “fundamental alteration” of the program, activity or experience, an exemption may be warranted. These standards may change over time and the current legal standard will always apply.
2. Upon approval by the Equal Opportunity Office of an “Equally Effective Alternate Access Plan” (EEAAP) by the university sponsor.

Those seeking an exemption to this APL should contact the Equal Opportunity Office or the system IT Accessibility Coordinator for assistance.

VI. Employee ICT Accessibility Training

The University system will establish mandatory annual training, covering this letter, ICT accessibility awareness and basic digital accessibility techniques, for all university employees, including student employees, and employees of subsidiary and related organizations existing under the Board of Trustees of the UMS.

The training will be delivered electronically and on-demand where feasible.

Optional role-based training modules specific to those who create course materials, created web-content, review web-content, manage websites, procure ICT and other emergent ICT accessibility issues will be made available by the University.

Training content is the responsibility of EO and US:IT with assistance from campus-based resources while UMS Academy is the primary mechanism for electronic training delivery.

VII. Standards (Requirements)

The following standards apply to all activities and procedures developed and implemented under this letter.

ICT Accessibility Technical Compliance Standards

As authorized under the UMS BOT ICT Accessibility Policy, the technical standards used by the University for assessing the accessibility of ICT tools and materials are:

1. Web Content Accessibility Guidelines 2.1 (WCAG v 2.1), level AA (includes level A)
2. PDF/UA-1 (ISO 14289-1) for PDF documents.
3. Web ARIA 1.1

The University Services: Digital Technology Accessibility Committee (DTAC), or its successor, will periodically review these standards, in coordination with General Counsel, and recommend changes to the CIO and EOO. Upon their approval, such changes will be incorporated into this letter. Such standards will at a minimum support compliance with US Federal and State law and regulations regarding ICT Accessibility and Equal Opportunity as determined by the General Counsel.

Standards for the Acquisition of ICT tools or materials.

Any person engaged in the purchase, or other acquisition, of a software application, digital material, website technology, 3rd-party website/content/functionality, plug-in, freeware, or other ICT resource, that will be used as part of a university program, opportunity or activity that is available to persons other than the acquirer, even if such use is not required, will collaborate with University Services Information Technology to identify and manage accessibility risks, and is also responsible for:

1. Identifying possible accessibility barriers during the acquisition
2. Verification of vendor claims of accessibility.
3. When barriers exist, developing and receiving approval for an Equally Effective Alternate Access Plan (see Exemptions), including specific action plans for providing equivalent opportunities, before introducing the resource to the University of Maine System community and/or the public.
4. Ensuring that these requirements have been met or exempted before executing contracts.

University Services:Information Technology and University Services:Strategic Procurement will collaborate to ensure that all purchases, including those utilizing a purchasing card, MaineStreet Marketplace, and formal procurement procedures support compliance with this APL. At the commencement of a procurement activity that could include an ICT Accessibility component,

Strategic Procurement will notify and consult with University Services Information Technology about accessibility compliance.

VIII. Responsibility for Website, Social Media and Other Digital Content and Functionality

1. Campuses have overall responsibility for the accessibility of all campus-related web content, including content posted on 3rd-party websites and social media platforms by university employees and contractors.
2. Individual employees and students are responsible for the accessibility of content they post on university and 3rd-party websites that are part of a university program or activity.
3. Each campus, and the University Services and Governance units are responsible for tracking ownership of, and therefore responsibility for, web content on university and university-contracted or promoted 3rd-party sites.
4. Campuses, University Services and Governance units are responsible for monitoring web content for accessibility and repairing accessibility errors, including paying their share of any costs to do so.

IX. Examples of Information and Communication Technologies

Examples of ICT and digital content covered under this APL include, but are not limited to: email, social media posts, promotional images, infographics, memes, PDFs, websites/content, electronic documents, streaming video and audio, course sites/content, software, marketing campaigns, assessments, evaluations and testing materials, computer hardware, kiosks, etc.

X. ICT Accessibility Incident Response and Responsibilities

1. Campuses, University Services and Governance units will each adopt and follow UMS EO-approved ICT accessibility incident response procedures.
2. All UMS websites, and web pages where technically feasible, will contain an accessibility incident contact.
3. Campuses, University Services and Governance units will maintain records, and report annually to UMS EO, the number and type of ICT accessibility incidents reported and resolved.

XI. Additional Information

For additional information, such as answers to frequently asked questions, best practices, tools, standards, etc., please visit:

- ITAccessibility.maine.edu
- [UMS Board of Trustees Policy Manual, Section 902-Information and Communications Technology Accessibility Policy](#) and [Terms & Definitions](#)
- [University of Maine System Human Resources/Equal Opportunity](#)

- [UMS Academy Accessibility Trainings](#) (you must first login via mycampus.maine.edu)
- [Equally Effective Alternate Access Plan \(EEAAP\)](#)
- [Maine CITE Coordinating Center's website for information about Assistive Technology and training resources](#)
- [WebAIM \(Web Accessibility In Mind\)](#) and [WebAIM Resources](#)

APPROVED BY THE CHIEF FINANCIAL OFFICER AND TREASURER ON 1/27/2020