

COLORADO STATE UNIVERSITY
ACCESSIBILITY OF ELECTRONIC INFORMATION TECHNOLOGY STANDARDS

DEFINITIONS USED IN THIS STANDARD

Information Communications Technology (ICT) is used in this standard interchangeably with **Electronic Information and Technologies (EIT)** in the [Accessibility of Electronic Information and Technologies policy](#).

University Website Standards

All university web developers and content editors creating university web pages published on or after the effective date of this policy will refer to the most current published version of the [Web Content Accessibility Guidelines \(WCAG\) AA Success Criteria](#). Developers should strive to apply all aspects of WCAG.

A university web page is considered “redesigned” if significant alteration or update is made to the design of a page or a major revision of the content of a page takes place. All new and redesigned university web pages will meet WCAG 2.2 Level AA guidelines with limited exceptions. Evaluations may be requested through the Accessibility by Design website.

Archived web pages do not have to be converted to the WCAG standard unless specifically requested by an Individual With a Disability who would otherwise be allowed access or when the web page is republished.

University departments and employees must be prepared to provide content and/or services in an Equally Effective alternative format as required.

University Application Standards

Software or electronic systems that Colorado State University requires students or employees to use in completing university business must be accessible or have a roadmap for being made accessible, whether purchased or home-grown (e.g., RamWeb, admissions applications, testing, exam proctoring, purchasing, human resources, trainings, professional development, etc.).

The accessibility of a product will be assessed in the same process outlined for Procurement in this policy.

Requisition of non-compliant Information Communications Technology (ICT)

In limited circumstances, the University may procure ICT that does not fully conform with the accessibility standards required by Colorado law. Before submitting a request for the purchase of non-compliant ICT, the requesting department must first demonstrate it undertook good-faith efforts to meet the accessibility requirements established by the law.

Minimum Required Good Faith Efforts for “Best Meets” considerations:

If the requisition is a Documented Quote/Request for Proposal (DQ/RFP), in addition to the accessibility language already included, the DQ/RFP should request a VPAT/HECVAT/HECVAT Lite

from each of the responsive vendors. If none of the responsive vendors meet the accessibility standards, then “best meets” considerations may be applied.

If the requisition is under our DQ/RFP thresholds, then the requesting department must request the VPAT/HECVAT/HECVAT Lite from the selected vendor and [review the accessibility compliance report](#). If it is determined the selected product does not meet accessibility standards, departments must seek out two additional vendors for similar products and request a VPAT/HECVAT/HECVAT Lite for review. If none of the available vendors meet accessibility standards, then “best meets” considerations may be applied.

If the requisition is a sole source, in addition to sole source justification, a VPAT/HECVAT/HECVAT Lite should still be requested and reviewed by the requesting department. However, approved sole source requisitions may always apply “best meets” considerations.

“Best Meets” Considerations:

Non-compliant ICT under consideration must be one that “best meets” the technical standards established by 8 CCR 1501-11 and the University’s unique business needs. Evaluation of non-compliant ICT should consider factors such as audience needs, capacity, reliability, interoperability, organizational needs, privacy, and security. “Best Meets” considerations may not be applied as a first resort. Submission of “Best Meets” documentation does not guarantee approval of the requisition. Any decision to move forward with the acquisition of non-compliant ICT shall be at the discretion of the Procurement Director in consultation with the Office of the General Counsel (as needed).

Documentation must be submitted by the requesting department providing justification for how the selected non-compliant ICT best meets the technical standards and business needs of the University. Submitted documentation should provide enough information to justify the purchase of noncompliant ICT in light of the identified accessibility barriers. Additionally, all identified accessibility barriers should be documented and addressed via an Alternate Access Plan. All “Best Meets” documentation must be in place prior to final approval of the requisition.

Exemption Requests:

Exemptions from the above process may be considered at the discretion of the Procurement Director in consultation with the Office of the General Counsel (as needed) on a case-by-case basis. Individuals requesting an exemption must provide sufficient justification for the requested exemption. The information provided must answer, at a minimum, the following questions:

- What is the intended purpose of the ICT (e.g., specialized research, teaching, day-to-day admin work);
- Who will be using or interacting with the ICT (i.e., public invitees, students, employees);
- How many individuals will use or interact the ICT on a regular basis;
- How long with the ICT be in use (i.e., long-term/recurring v short-term/one-time acquisition);
- Why is the exemption necessary (note: urgency due to a lack of time will not, on its own, justify the need for an exemption);
- Where other solutions considered? Why or why not; and
- What plans are in place to remove or reduce accessibility barriers.

Academic Content Standards

Academic Content includes course and instructional materials such as PDF files, Word documents, PowerPoint slides, videos, podcasts, etc., uploaded into a Learning Management System. Instructors should also consider the accessibility of any e-textbooks, adaptive courseware, apps, etc., or other software or hardware that they require students to use in their courses.

Academic Content should be accessible by design. Any inaccessible Academic Content must be made accessible, or an Equally Effective manner of access provided, upon request by an Individual With a Disability who needs to access the content as determined through the Student Disability Center or Office of Equal Opportunity.

Legacy Academic Content

Existing inaccessible content that is most actively used in courses or university processes should be prioritized to meet the university's Accessibility of Electronic Information Technology policy and these standards, as well as content needed immediately for an accommodation.

New & Redesigned Academic Content

All University employees should incorporate the "Emerging" level of the [Steps to Inclusive Content](#) identified on the Accessibility by Design website when creating or redesigning Academic Content for active use.

If there is a need to make new and redesigned content accessible or to be provided in a timely manner in an equally accessible format, students should contact the Student Disability Center and all others should contact the Office of Equal Opportunity.

Video Requirements

Short videos intended for websites or software systems should have accurate captions.

Videos with significant visual elements may warrant description, either through an attached transcript or audio description.

Academic Videos

Academic Content videos will be captioned in a tiered approach:

1. Auto-captions should be enabled on all videos in platforms where the feature is available, for a base level of accessibility. Information regarding capabilities of various video hosting platforms is available on the Accessibility by Design website.
2. In courses where captions or audio description are needed for a specific accommodation, the SDC will coordinate the process of acquiring accurate captions or audio description.

Live Events

Auto-captions should be made available for live events that are being provided through digital means. Additional sign language interpretation may also be necessary in some cases.

REFERENCES

- [Accessibility by Design website](#)

- Code of Colorado Regulations: [Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11](#)
- Colorado Governor's Office of Information Technology, [Accessibilty Solution Evaluation: Reviewing the Accessibility Compliance Report](#)
- Web Accessibility Initiative, [Web Content Accessibilty Guidelines \(WCAG\) 2.2 international standard](#)

UPDATED

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