

# UNIVERSITY POLICY FOR GENERAL ADMINISTRATION

## UPGA - TBD

### DIGITAL ACCESSIBILITY POLICY

Number:	Name:
UPGA-TBD	DIGITAL ACCESSIBILITY POLICY
Purpose:	
The purpose of this policy is to: <ul style="list-style-type: none"><li>• Ensure that all students, faculty, staff, and visitors—regardless of ability—can access and benefit from the university’s digital offerings.</li><li>• Establish standards and responsibilities for achieving and maintaining compliance with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA.</li><li>• Promote identification and remediation of accessibility barriers in websites, mobile applications, instructional materials, and other digital resources.</li></ul>	
By adopting this policy, Marshall University seeks to create a digitally accessible campus that supports academic success, innovation, and full participation for all.	
Responsible Unit:	
Information Technology	
Approved by:	Approval Date:

#### 1. General

##### 1.1 Scope:

Marshall University is committed to fostering an equitable digital environment for all students, faculty, staff, and visitors. This Digital Accessibility Policy is established to ensure that the university’s digital content, services, and technologies are accessible to individuals with disabilities, in compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and the U.S. Department of Justice’s 2024 final rule under Title II of the ADA.

##### 1.2 Authority:

Marshall University Chief Information Officer, as defined by ADMIN-20 Approval of Board of Governors Rules, University Policies and Administrative Procedures.

##### 1.3 Controlling Over:

Marshall University digital accessibility, including websites, tools, and technologies that should be designed so that people with disabilities can have equal and equitable access to information resources.

#### 2. Digital Accessibility Policy

##### 2.1 Policy Statement:

Marshall University shall ensure that all digital content and services conform to WCAG 2.1 Level AA standards by the federal compliance deadline of April 24, 2027, for universities smaller than 50,000 in population.

## 2.2 Exceptions and Alternate Access

The university recognizes that in limited circumstances, full compliance may not be technically feasible. In such cases, exceptions may be granted only if:

1. The content falls under one of the five exceptions defined by the Department of Justice (refer to section 2.2.1).
2. An equally effective alternative access plan (EEAAP) is provided that ensures the same information, functionality, and timeliness.
3. Alternate access is not a substitute for accessibility and must be used only as a temporary or exceptional measure.

### 2.2.1 Exceptions as defined by the Department of Justice

#### 2.2.1.1 Archived Web Content

The following details the situations in which archived web content meet the exception, as defined by the DOJ.

- The content was created before the date the institution must comply with this rule, or reproduces paper documents or the contents of other physical media (audiotapes, film negatives, and CD-ROMs for example) that were created before the institution must comply with this rule, AND
- The content is kept only for reference, research, or recordkeeping, AND
- The content is kept in a specific area for archived content, AND
- The content has not changed since it was archived.

#### 2.2.1.2 Preexisting Conventional Web Documents

The following details the situations in which preexisting conventional web documents meet the exception, as defined by the DOJ.

- The documents are word processing, presentation, PDF, or spreadsheet files; AND
- They were available on the institution's website or mobile app before the date the institution must comply with this rule.
- Documents that are currently being used to participate in university services, programs, or activities do not fall under the exception even if the documents were posted before the date the government must comply with the rule.

#### 2.2.1.3 Content posted by a third party where the third party is not posting due to contractual, licensing, or other arrangements with a public entity.

The following details the situations in which third party content meets the exception, as defined by the DOJ.

- Content that is posted by third parties on a state or local government website or mobile app would not need to meet WCAG 2.1, Level AA.

#### 2.2.1.4 Individualized documents that are password-protected

For documents owned by an individual that are shared with a limited group of users, may meet the exception of digital accessibility. However, users should be mindful that tools are available to assist with making individual content accessible for sharing with users.

#### 2.2.1.5 Preexisting social media posts

Making outdated posts accessible may no longer be applicable because they were generally intended to provide updates about things happening at the time they were posted in the past. For these reasons, social media posts made by a state or local government before the date the state or local government must comply with this rule do not need to meet WCAG 2.1, Level AA.

### 2.3 Web and Mobile Applications

Web and mobile applications used by Marshall University will be assessed for WCAG 2.1 Level AA compliance during the technology purchasing review process starting January 1, 2026. The assessment process will be as follows:

- 1) MUIT will request VPAT documentation from the vendor during the technology review process, as detailed in ITP-1.
- 2) For vendors demonstrating conformance with WCAG 2.1, Level AA standards, the VPAT will be accepted with no further action needed.
- 3) For vendors that cannot demonstrate conformance with WCAG 2.1, Level AA standards, the sponsoring department/unit will be responsible for collaborating with the vendor to provide a one-year remediation plan for conformance from the vendor, as well as Equally Effective Alternative Access Plan (EEAAP) documentation. EEAAP documentation is available upon request from the Office of Accessibility and Accommodations.
- 4) MUIT will re-review all technology during the procurement technology review request process, as defined in ITP-1.

### 2.4 Website Content

The Marshall University website will be WCAG 2.1, Level AA compliant by April 24, 2027, unless the content meets an exception as defined in Section 2.2. The website will be reviewed semi-annually to ensure conformance to the standard.

### 2.5 Digital Content

Faculty and staff that share digital content with students, faculty, staff, and visitors are responsible for ensuring their content (including third-party content) meets WCAG 2.1, Level AA standards by April 24, 2027, unless the content meets an exception as defined in Section 2.2. More information can be found on Marshall Online's digital accessibility webpage:

<https://www.marshall.edu/online/digital-accessibility-and-universal-design-for->

learning/ More information can be found on Marshall Online's digital accessibility webpage: <https://www.marshall.edu/online/digital-accessibility-and-universal-design-for-learning/>

## 2.6 Requesting Assistance with Digital Content

For faculty, staff, students, or visitors requesting assistance or to report non-conformance of digital content or to request an Equally Effective Alternate Accessible Plan (EEAAP), a report must be submitted with the Office of Accessibility and Accommodations.