Georgetown University Policy on Electronic and Information Technology Accessibility

Georgetown University is committed to fostering an inclusive academic and work environment for all individuals, including individuals with disabilities. Providing equitable and effective access to University services and information is a key component of that commitment. As such, all Electronic and Information Technology (“EIT”) used by the University must be accessible in accordance with relevant laws. Examples of EIT covered by this policy include web sites; electronic library and instructional materials, and electronic documents; video and audio; and software, hardware and systems. For the purposes of this Policy, “accessible” means a person with a disability is afforded equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person’s needs. All schools, departments, business units, and University-related entities are responsible for ensuring access to their EIT in accordance with this Policy. The University's EIT Accessibility Procedures and Guidelines, as may be amended from time to time, set forth standards and provide guidance and resources for Georgetown University community members to ensure compliance with this Policy.

Related Resources

- Georgetown University EIT Accessibility
- Procedures and Guidelines
  - Websites
  - Electronic Library and Instructional Materials, and Electronic Documents
  - Video and Audio
  - Software, Hardware, and Systems
  - EIT Procurement
- Frequently Asked Questions
- Georgetown's Accessibility Website
- Reporting Accessibility Problems
- Contact: webaccessibility@georgetown.edu / (202) 687-4949

Approved by the President's Executive Committee February 4, 2019
The University’s Policy on Electronic and Information Technology Accessibility establishes the expectation that "all electronic and information technology ("EIT") used by the University must be accessible. "Accessible" means a person with a disability is afforded equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person’s needs.

Electronic and information technologies and the ways that we use them are constantly evolving and accessibility standards and requirements may also change. These EIT Accessibility Procedures and Guidelines will be updated to reflect new developments, and are designed to support our community's efforts to make EIT accessible.

The EIT Accessibility Procedures and Guidelines reflect a prioritized approach to making content and information accessible based on factors including the importance of content or information, how frequently it is used, the costs associated with making it fully accessible, and the availability of alternative means of providing it to individuals with disabilities upon request in a timely way.

For purposes of the EIT Accessibility Procedures and Guidelines, the following definitions apply:

"Accessible" means that a person with a disability is afforded equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person’s needs.

"Disability" means a physical or mental impairment that substantially limits one or more major life activities.

"Electronic and Information Technology" or "EIT" includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion or duplication of data or information. EIT includes, but is not limited to, computer hardware and software, operating systems, web based information and applications, content delivered in digital form, electronic books and materials and reading systems, search engines and databases, learning management systems, classroom technology, video and multimedia, and telephones and telecommunications products.

"Legacy" websites or content means websites or content created before March 1, 2019.

**Specific Procedures and Guidelines**

I. Websites
II. Electronic Library and Instructional Materials, and Electronic Documents
III. Video and Audio
IV. Software, Hardware, and Systems
V. EIT Procurement

**Related Resources**

- [Policy on Electronic and Information Technology Accessibility](#)
- [Frequently Asked Questions](#)
I. Accessibility Procedures and Guidelines for Websites

All web pages, websites and web-based software produced or procured by the University and used to conduct University-related business must meet the standards outlined in Section I.A. This includes websites that use the content management system provided by University Information Services (UIS) as well as those that operate outside of the UIS content management system on different platforms. Personal web pages or websites published by students, employees or non-university organizations that are not used to conduct University-related business are outside the scope of the Policy and these Procedures, although members of the University Community should be cognizant of applicable standards and should make best efforts to create and maintain accessible web content.

A. Standards

All web pages should meet the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA guidelines, with the exception of audio/video content included in web sites, which should follow the Accessibility Procedures and Guidelines for Video and Audio. These WCAG guidelines were created by the World Wide Web Consortium (“W3C”) with the goal of making web content “perceivable, operable, understandable, and robust” for users with disabilities. For each guideline, there are basic (level A), and additional (levels AA and AAA) requirements, and web pages, websites and web-based software covered by the Policy shall at least meet all level A and AA requirements. In addition to serving as the relevant standards for technology accessibility compliance, these guidelines help improve websites for all users.

Training materials, checklists, and other helpful resources on WCAG 2.0 AA compliance can be found in the Tips and Resources section below and on Georgetown’s Accessibility Website.

B. Responsibilities

1. All Websites – All schools, departments, business units, and University-related entities with a website included in the scope of these Procedures shall appoint a person who will be responsible for the accessibility of each (or all) of their websites (a “Web Accessibility Manager”), and shall do the following:
   a. Register each website and its Web Accessibility Manager with UIS (for tracking, monitoring, and accessibility checker software coverage).
   b. Include on all covered websites a clearly visible link in the page footer to Georgetown’s Accessibility Website.
   c. Ensure that all individuals who publish content (“content publishers”) on covered websites attend required web accessibility training provided by UIS.
   d. Ensure all new content developed after March 1, 2019 is WCAG 2.0 AA compliant.
   e. Develop and enact a prioritized plan for updating all legacy content to be accessible within a
reasonable time frame. Priority should be given to publicly facing content and websites with high traffic and/or with content important for individuals with disabilities.

f. Use the UIS-provided accessibility checker software to monitor content and template errors that may preclude accessibility. Use reports created by the UIS-provided accessibility checker software to identify any errors and fix any such errors at least monthly.

g. Track any reports or complaints received about accessibility problems and ensure that accessibility issues are addressed promptly and remediated or that an equivalent alternative is provided.

h. Using methods suggested by UIS, conduct an annual review of site accessibility to ensure WCAG 2.0 AA compliance. This review should be reported to UIS on a form provided and should include the status of the plan for updating legacy content and the progress made, a list of reports or complaints received and descriptions of their resolution, and a certification of WCAG 2.0 AA compliance.

2. Websites using the UIS Web Content Management System (CMS) – The UIS web content management system (CMS) is a standardized web template (currently on Drupal) that UIS provides and maintains for University websites. For websites in the UIS web CMS, UIS will have responsibility for ensuring WCAG 2.0 AA compliance of website templates, while Web Accessibility Managers will have responsibility for ensuring that web content is compliant, as set forth in Section I.B.1.

3. Websites outside of the UIS Web Content Management System (CMS) – For University websites that do not use a UIS-provided and maintained template (those outside of the UIS web CMS, which is currently Drupal), the following requirements apply in addition to those set forth in Section I.B.1.:

   a. Web Accessibility Managers are responsible for ensuring that any new website template (as well as the content on the site) is WCAG 2.0 AA compliant prior to publication. This should be confirmed by performing appropriate testing internally or by contracting out testing work to a qualified vendor, and documentation must be provided to UIS.

   b. Web Accessibility Managers must provide specialized accessibility training that is appropriate to the website template in use to all content publishers and provide documentation of such training to UIS.

   c. If an outside vendor shares responsibility for making the website compliant, the Web Accessibility Manager should provide UIS with a clear description of how responsibilities are shared, and the annual review (see Section I.B.1.h.) should examine and report on the outside vendor’s effectiveness.

C. Tips and Resources

- **Contact - UIS Web Services Team**
  - Email: webaccessibility@georgetown.edu
  - Phone: (202) 687-4949

- **More information:**
  - [Georgetown’s Accessibility Website](#)
    Your one stop shop for all things accessibility at Georgetown
  - [How People with Disabilities Use the Web](#)
    A description of Accessibility Principles that explains “How People With Disabilities Use the
II. Accessibility Procedures and Guidelines for Electronic Library and Instructional Materials, and Electronic Documents

As the University increasingly relies upon technology to enhance learning, it is critical that instructional information and materials are accessible to students and others with disabilities. Similarly, electronic documents that are posted or delivered through a webpage or other means for purposes other than instruction should also be accessible.

"Accessible" means that a person with a disability is afforded equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person’s needs.

"Electronic Library and Instructional Materials" is a broad term that includes all library materials and materials used for classroom or other instruction (syllabi, textbooks, handouts, assignments, presentations, etc.) that are provided through electronic media, whether delivered face to face in a classroom or through the University's Canvas or Blackboard learning management systems (LMS), or through other means, such as email, blogs, or video or audio recordings. It also includes other instructional activities that utilize technology, such as online collaborative interaction and web conferencing.

"Electronic Documents" include, but are not limited to, PDFs, word processing documents, presentations, publications, and spreadsheets, created or used in University programs, events or activities for academic, administrative, informational, promotional or other purposes, and which do not fall under the definition of "Electronic Library and Instructional Materials."

A. Standards

1. **Electronic Library and Instructional Materials** must be made accessible to students with disabilities upon request and in accordance with the procedures of campus disability services offices.

2. **Electronic Documents** that are created after March 1, 2019 and are made available to the public
should be accessible by default. For Electronic Documents that were created prior to March 1, 2019 and are made available to the public, the University departments or community member responsible for that content should take a prioritized approach to making such content accessible within a reasonable timeframe, considering the age and importance of content, how widely available and trafficked it is, how frequently it is used, whether it exists in other formats that are accessible, and whether, in consideration of these and other factors, it is more appropriate to make accessible versions of the content available only upon request.

3. **Electronic Documents** created after March 1, 2019 that are restricted and **not publicly available** (e.g., only those with a GU NetID can access the material), should be made accessible upon request and in accordance with the procedures of campus disability services offices.

**B. Tips and Resources**

- **Electronic Library and Instructional Materials**: It is helpful, and most efficient, to consider accessibility needs and requirements when creating instructional materials. Faculty should make efforts to create documents and course materials that are accessible from the outset rather than having to modify or convert materials after the fact or upon request. Anticipating the ways that students or others with disabilities may access materials (e.g., with screen readers, etc.) is important.

Additional resources can be found in the [I. Accessibility Procedures and Guidelines for Websites](#) and [III. Accessibility Procedures and Guidelines for Video and Audio](#) sections.

The following resources are also available:

- The **Academic Resource Center** (for Main Campus, School of Medicine, and School of Continuing Studies) can provide advice and assistance relating to the needs of disabled students, and should be consulted whenever a student requests an accommodation for a disability. The **Office of Disability Services** (for the Law Center) provides similar services for the Law Center. The **Office of Academic Services** provides these services at Georgetown University in Qatar.

- The **Center for New Designs in Learning and Scholarship (CNDLS)** provides support and assistance with pedagogical technologies and course design.

- The **Canvas** learning management system provides a lot of information on how to make course content accessible.

- The **Blackboard** learning management system also provides information about accessibility.

- **Electronic Documents**: The following resources are available to assist with making electronic documents accessible.

  - Contact - UIS Web Services Team
    - Email: webaccessibility@georgetown.edu
    - Phone: (202) 687-4949

  - **WC3 Information on WCAG 2.0 application to electronic documents**

  - More information:
    - **UIS resource on PDF accessibility**
    - Adobe PDF accessibility
    - Microsoft Office document accessibility
III. Accessibility Procedures and Guidelines for Video and Audio

Videos and audio recordings are used for classroom instruction, employee training, broadcasting events, and other purposes. Videos and audio should be produced and delivered in ways that are accessible. The primary techniques for providing accessibility are video captioning and audio transcription, but special considerations such as audio descriptions of visual content and accessibility of simulcast or live-streamed events are also important.

A. Standards

1. All video and audio used as Instructional Materials must be made accessible to students with disabilities upon request and in accordance with the II. Accessibility Procedures and Guidelines for Electronic Library and Instructional Materials, and Electronic Documents and the procedures of campus disability services offices.

2. Pre-recorded video and audio content created after March 1, 2019 and are made available to the public should be accessible by default.

3. Pre-recorded video and audio content created after March 1, 2019 that is restricted and not publicly available (e.g., only those with a GU NetID can access the material), should be made accessible upon request and in accordance with the procedures of campus disability services offices.

4. Pre-recorded video and audio created prior to March 1, 2019 should generally be made accessible. University departments and community members should take a prioritized approach to such content, considering the age and importance of content, how widely available and trafficked it is, how frequently it is used, whether it exists in other formats that are accessible, and whether, in consideration of these and other factors, it is more appropriate to make accessible versions of the content available only upon request.

5. Live/Streaming Video and Audio: When planning events that will be live streamed or broadcast online, all schools, departments, business units, and University-related entities are expected to take accessibility into consideration. Events that are expected to draw a large online audience (more than 200 unique online viewers/listeners anticipated) or be of significant public interest should be made accessible by default by providing live captioning. For all other events, a notice must be provided to attendees – in promotional materials and during the event – that informs individuals how to request live captioning in advance, and how to obtain an accessible recording or transcript after the event.

6. In certain circumstances, more complex accommodations such as narrated audio descriptions of video content, may be appropriate for individuals with disabilities. This accommodation should be made upon request of the individual, consistent with University policies and procedures.
While video hosts like YouTube do offer automated caption services, it is the responsibility of the video producer to confirm that captions are accurate.

**B. Tips and Resources**

- **Contact:** Office of Strategic Communications:
  - email - creativeservices@georgetown.edu

- **More information:**
  - UIS video accessibility documentation
  - YouTube captioning instruction
  - Vimeo captioning instructions
  - Facebook captioning instructions

- **Training resources:**
  - YouTube captioning video
  - Another YouTube captioning video
  - Udemy video captioning training class (costs)

**IV. Accessibility Procedures and Guidelines for Software, Hardware, and Systems**

The University purchases and uses software, hardware, and systems to serve applicants, students, employees, alumni, and others and to discharge important operational functions. This includes learning and content management systems, library and email systems, and administrative management systems such as finance, registration, human resources, advancement, and other software and hardware used for student and other services. It also includes software that is freeware, shareware, desktop, enterprise, subscription, and cloud or remotely-hosted. To allow individuals with disabilities to participate fully in the learning, scholarship, service, and other work of the University, it is vital that the software, hardware, and systems the University uses be compatible with assistive technologies used by those with disabilities.

**A. Standards**

1. All software, hardware, and systems purchased or used by the University and its schools, departments, and units should:
   - be compatible with assistive technology where possible;
   - produce accessible outputs; and
   - should be available for use by those with disabilities through assistive technologies or other appropriate means in a timely manner.

2. To meet these requirements, UIS and technology officers in University units should ensure that software, hardware and local interfaces and modifications to electronic systems are accessible, and that applications developed for use on campus are accessible.
3. New software, hardware, and systems should meet the requirements detailed in the V. Accessibility Procedures and Guidelines for EIT Procurement.

B. Tips and Resources

- Contact - UIS Web Services Team
  - Email: webaccessibility@georgetown.edu
  - Phone: (202) 687-4949
- More Information:
  - Additional resources can be found in the I. Websites, II. Electronic Library and Instructional Materials, and Electronic Documents, and III. Video and Audio procedures.

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V. Accessibility Procedures and Guidelines for EIT Procurement

Responsibility for ensuring that EIT used at the University is accessible for those with disabilities falls not only on the University, but also on the vendors from which the University purchases EIT.

A. Standards

It is important that those who purchase EIT for the University or using University funds, ensure this by 1) discussing accessibility requirements with vendors; 2) verifying vendor information; and 3) including appropriate language in purchase orders and contracts.

1. Discuss accessibility requirements with vendors

Bidders and vendors shall be required to demonstrate that EIT provided to Georgetown University meets the accessibility standards set out in these procedures. For example, web sites must meet the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA guidelines. Vendors may do so by providing or completing any of the following:

- An independent third party evaluation from a reputable accessibility consultant
- A Voluntary Product Accessibility Template (VPAT). If a VPAT is used, it must use the VPAT 2.0 template or higher, which is based on WCAG 2.0 Level AA. The VPAT template is available from the Information Technology Industry Council.
- Other accepted verification methods that have been approved in advance by UIS. For website contracts, this can include passing a browser plugin check and the UIS manual checklist.

2. Verify vendor information

Vendors should provide detailed information about the accessibility of their product or services using one or more of the three methods listed in the preceding section but it is the responsibility of the Georgetown department purchasing the EIT to verify the vendor information in consultation with Sourcing & Procurement Services, UIS, or other UIS-approved staff with expertise in EIT accessibility. In cases where software configuration or development impacts accessibility, the Georgetown department will be responsible for verifying the accessibility of the final product.

3. Include accessibility assurances in contracts
All transactions for the procurement of EIT using University funds (including sponsored research funds) must be documented with a written and signed contract or purchase order, which must contain the following clause and any additional language to ensure accessibility according to relevant standards:

[Contractor] acknowledges and warrants that its Programs and Services during the Term of this Agreement shall provide equal and effective access to all individuals in accordance with federal and state laws and regulations, including, but not limited to the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act of 1973. Any website or application functionality and content provided by [Contractor] shall meet the accessibility standards of the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA for web-based technology.

[Contractor] agrees to promptly respond to, resolve and remediate any complaint regarding accessibility of its products or services in a timely manner and provide an updated version to Georgetown at no cost. [Contractor] further agrees to indemnify and hold harmless Georgetown from any claims arising out of its failure to comply with the requirements of this section. Failure to comply with these requirements shall constitute a material breach of this Agreement and shall be grounds for termination of this Agreement by Georgetown.

B. Exceptions to EIT Procurement Procedures and Guidelines

The University recognizes that in certain limited circumstances, full conformance with accessibility standards may not be feasible, e.g., due to the nature or purpose of the EIT, the lack of accessible solutions available on the market, or unreasonably burdensome administrative or financial cost necessary to make the resource(s) accessible. In such circumstances, the University may permit exceptions to these Accessibility Procedures and Guidelines for EIT Procurement. Such exceptions must be appropriately justified and approved by both the head of the relevant school, department or business unit (at the Dean or Vice President level), as well as the CIO or the CIO’s designee. Exception request forms may be obtained from the UIS Web Services Team.

C. Tips and Resources

- Contact - UIS Web Services Team
  - Email: webaccessibility@georgetown.edu
  - Phone: (202) 687-4949

- More Information:
  - Federal Government’s Vendor Accessibility Resource Center
  - Additional resources can be found in the I. Websites, II. Electronic Library and Instructional Materials, and Electronic Documents, III. Video and Audio, and IV. Software, Hardware, and Systems procedures.

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