1.0 BACKGROUND AND PURPOSE

The Colorado School of Mines (“Mines”) is committed to supporting an Electronic and Information Technology (EIT) environment that is Accessible. As part of this commitment, Mines seeks to deploy EIT that has been designed, developed, or procured to be Accessible, including to those who use Assistive Technologies.

Mines’ commitment to accessibility of EIT contributes to a rich and effective learning and working environment for members of our community and the general public, including Individuals with Disabilities and those with diverse learning needs. Access to information by all members of the Mines community is critical to their success as students, instructors, employees, and contributors.

Ensuring Equally Effective access is required by federal and state laws. Under these laws, Mines must make reasonable accommodations as appropriate to remove any barriers that may exist for an Individual with a Disability.

2.0 POLICY STATEMENTS

The procurement, development, implementation, distribution, and/or maintenance of Mines EIT must adhere to all procedures adopted and implemented regarding EIT accessibility, including but not limited to those outlined in Exhibit I.

Resources used to conduct administrative, academic, and business activities on behalf of Mines must adhere to all procedures adopted and implemented regarding EIT accessibility, including but not limited to those outlined in Exhibit I.

3.0 RESPONSIBILITIES

Ensuring Equally Effective accessibility to EIT is the responsibility of all Mines academic units, administrative units, student organizations, and business units.

The party responsible for the development, purchase, distribution and/or acquisition of information that will be shared through EIT is responsible for ensuring its content is considered Accessible under this policy. Website Owners are expected to follow web and digital accessibility guidelines located on the Mines Accessibility Resources Page.
Individuals requiring reasonable accommodations to access and use Mines EIT should notify the following areas:

- Students should contact Disability Support Services.
- Employees should contact the Office of Human Resources.

Once an individual has been determined to be an Individual with a Disability, Mines will engage in a good-faith, diligent, and timely effort to provide adjustments, modifications, or auxiliary aids and services that will allow the Individual with a Disability to access and use the desired content.

The EIT Accessibility Committee will offer training and educational resources to Mines community members, including faculty, web developers, and personnel involved with course delivery to ensure accessibility of newly created or substantially modified EIT.

4.0 COMPLIANCE/ENFORCEMENT

If the procedures set forth in Exhibit I are not adhered to, academic units, administrative units, student organizations, and business units may be responsible for any costs associated with remediating accessibility issues. The Mines Executive Team will make any determination on the extent of applicable unit's responsibility.

5.0 EXCLUSIONS/DISCLAIMER

This policy does not apply to non-Mines organizations or individuals acting in roles that are not associated with Mines (acting in their individual capacities), or are not under contract to deliver goods or services for Mines. Students, employees, and non-Mines organizations acting in their individual capacities, are encouraged to adopt Mines' policy and procedures for accessibility of EIT.

Systems/Software that has been exempted from the Technology-based Systems / Software Applications procedures discussed in section 2.3 of Exhibit I are not required to meet the accessibility requirements of this policy.

6.0 DEFINITIONS

**Accessible** refers to making EIT equally accessible to and independently usable by individuals with disabilities, so that they are able to acquire the same information, engage in the same interactions, and enjoy the same services as individuals without disabilities, with substantially equivalent ease of use, using reasonable accommodations when necessary. It does not mean that the means of access must be identical, but that an Equally Effective means of access is afforded.

**ADA Coordinator** means the person(s) designated to coordinate Mines’ compliance with Section 504 of the Rehabilitation Act of 1973 (“Section 504”)
Assistive Technologies are devices or methods that promote greater independence for individuals with disabilities, including, as defined by the Federal Technology Related Assistance to Individuals with Disabilities Act, devices “acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities.” Examples include, but are not limited to: special input devices (e.g., head or foot mouse, sip and puff switches, speech recognition), screen reading software, and screen magnifiers, text-to-speech and speech-to-text facilities, etc.

Electronic and Information Technology (EIT) includes any equipment or interconnected system or subsystem that is used in the creation, conversion, distribution, or duplication of electronic or digital data or information, such as: websites, course and instructional materials (Word documents, PDF documents, PowerPoint presentations, video, podcasts, etc.), coursework, software, other classroom technologies, content management systems, search engines and databases, student registration and information systems, financial and human resource management systems, telecommunications, and emerging technologies.

Equally Effective means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium. For interactive or service pages, equally effective means that the end result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestor.

Individual with a Disability/Individuals with Disabilities means a person(s) who has a physical, mental, or cognitive impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is regarded by others as having such an impairment.

Website Owner is an individual or group of individuals designated by a University unit who is responsible for webpage(s) within the mines.edu domain. Responsibility includes content and design aligned with WCAG Level AA guidelines and Mines approved themes.

7.0 RESOURCES

- Americans with Disabilities Act of 1990 (ADA)
- Amendments Act of 2008
- Sections 504 and 508 of the Rehabilitation Act of 1973
- C.R.S. §24-34-801, et seq.
Electronic and Information Technology Accessibility Policy

- Prohibiting Unlawful Discrimination Policy (https://www.mines.edu/policy-library/prohibiting-unlawful-discrimination-policy/)
- Americans with Disabilities Act (ADA) Request Procedures for Employees and Job Applicants
- ADA Coordinator: Ann Hix
- Disability Support Services (disabilitysupport@mines.edu)
- Web Content Accessibility Guidelines (WCAG) Review
- Mines Accessibility Page (https://www.mines.edu/accessibility)

**KEY WORDS**
Electronic Information Technology, accessibility, WCAG, assistive technology, W3C, disability.

8.0 HISTORY AND REVIEW CYCLE

The policy will be reviewed at least annually, or as needed, by the Responsible Administrative Unit.

Issued: March 10, 2021.
EXHIBIT I

1.0 PROCEDURES PURPOSE

Mines is committed to making EIT Accessible to the greatest extent that is reasonably practicable, by consistently improving accessibility through implementation of accessibility standards and assistive technology. As part of this commitment, Mines will review Electronic and Information Technology (EIT) inventory for accessibility, redesign or replace inaccessible products, and implement accessibility into our current and future purchases and design of all materials to be inclusive for people with all abilities.

These procedures establish guidance for making EIT Accessible and procurement requirements for EIT products and services.

2.0 PROCEDURES

Many software programs and electronic systems have tools and features already built in that can be easily utilized with no or a minimal amount of training, either self-guided or through training resources offered by Mines, to create Accessible content. All employees and students are encouraged to take the time to investigate and utilize such resources. Resources, accessibility training, and guidelines are provided online at: www.mines.edu/accessibility-resources/training.

2.1 Web Pages. Anyone responsible for online content, creating new and redesigned public-facing web pages under the mines.edu domain published on or after the effective date of this document will comply with the most current version of the Web Content Accessibility Guidelines (WCAG) AA Success Criteria. Controlled content and functionality on controlled content sites must be made available to users on request (such as by a student’s request to Disability Support Services, or an employee’s request to the ADA Coordinator) in an equally effective and accessible alternative manner.

A Mines web page is considered “redesigned” if significant alteration or update is made to the visual design of a page or a major revision of the content of a page takes place. All new and redesigned Mines web pages will meet the current version of WCAG Conformance Level AA with limited exceptions approved by the Marketing and Communications office and the Accessibility Technologist. For additional information on the exception process visit www.mines.edu/accessibility-resources/training.

2.2 Instructional Materials. All instructional materials created and hosted at Mines will comply with the most current version of the WCAG Success Criteria, in regard to text, audio, video, navigation, structure of pages, and color/contrast. Instructional materials are defined as documents, PDFs, spreadsheets,
presentations, video, audio, images, and web pages inside of the learning management system (Canvas) or other third-party platform used to host instructional materials.

The following minimum standards are required for the instructional materials identified above. All videos should include closed captions and text transcripts as well as use a video player that has control buttons that are accessible for screen readers. Images should be created using design guidelines, provide a short description/caption below the image, use alternative text, and provide extensive or long descriptions, if needed. Audio should include a text-based version with additional information (descriptions, explanations, or comments) and secondary audio information (e.g., music playing or person laughing). Documents, presentations, spreadsheets and PDFs should use heading styles and paragraph formatting, include alternative text for images, objects, or tables, use proper layout for tables, and use hyperlink text that is meaningful. All content built inside of Canvas should include each of the items above and adhere to web design best practices.

All instructional materials should also be tested using built in accessibility checkers in Microsoft, Adobe, and Canvas to identify and fix any out of compliance items. Web pages and other online elements should also be checked using the WebAim Wave accessibility tool, aXe developer tools, or similar tools.

Instructional materials developed through the online course development process will be provided additional resources (e.g., video/audio captioning, instructional design support, multimedia creation) to ensure online courses are accessible and designed using Universal Design principles.

2.3 Technology-based Systems / Software Applications. Mines adheres to Section 508 of the Rehabilitation Act of 1973, Scope 1194.21, applicable to Software Applications and Operating Systems. The provision addresses program features that must be contained for the product to meet standards. To meet the standards, the software must have accessibility built in or be compatible with assistive technologies. For example, this prohibits “mouse-only” functions for all actions that can be identified or labeled with text. In this case, keyboard access to a programs’ controls and features must be provided. Therefore, if a computer is running software that is possible to add assistive technology, the software must comply with this section. All Technology-based Systems and Software Applications will comply with areas listed in Section 508 of the Rehabilitation Act of 1973, Scope 1194.21 unless a Mines entity or unit seeks approval and submits a written request for an exemption from this policy detailing why compliance is not feasible without extraordinary measures, such as unique software with no other comparable alternatives. The Mines entity or unit must review the software’s VPAT and research other/future software of the same nature that will meet the same intention and function and also meets accessibility requirements.
2.4 **Promoting Awareness of Accessibility.** Mines Accessibility Committee will provide the Mines community with resources and links to sources detailing how to provide electronic information in accessible formats and how to evaluate or test the accessibility of EIT. The EIT Accessibility Checklist will be shared with the Mines community to provide essential items and resources to ensure a minimal level of accessibility is being met for students, faculty, and staff.

The Mines Accessibility Page provides guidance regarding software acquisition, curriculum, public facing communications, web development, and courses. The Mines Accessibility Page will also include accessible online and in-person resources including but not limited to tutorials on creating and implementing accessible websites, audio and video content, electronic documents, classroom technologies, and software and hardware technologies.

2.5 **Support for Reasonable Accommodations.** Mines employees needing to request accommodations should follow the Americans with Disabilities Act (ADA) Request Procedures for Employees and Job Applicants (https://www.mines.edu/policy-library/ada-requests-for-employees-and-job-applicants/).

Mines students needing to request accommodations should follow the DSS Procedures: https://www.mines.edu/disability-support-services/aim-portal-new-students/.

For any other accommodation requests not related to current students or for existing employees or job applicants, complete the web form on the Mines Accessibility Page (https://www.mines.edu/accessibility/).

3.0 **PROCUREMENT REQUIREMENTS**

Accessibility will be included as a requirement throughout the procurement process. Prospective vendors will submit a completed voluntary product accessibility template (VPAT) or a statement describing the accessibility of their products and services. Such accessibility will be taken into consideration in making all procurement decisions. Beyond reviewing the VPAT or accessibility statement from the software company, Mines Accessibility Technologist will conduct a manual audit and review of the software using Assistive Technologies including but not limited to screen readers, keyboard-only navigation, web-based accessibility tools, and color contrast analyzers to verify the product’s accessibility and document inaccessible aspects of the product in an accessibility report. All Mines contracts for EIT will contain appropriate provisions concerning accessibility, as prescribed by Procurement and Contracting and the Office of General Counsel. Software Procurement Process

4.0 **EIT ACCESSIBILITY COMMITTEE**
The Mines Accessibility Committee provides oversight, support, and recommendations to the President of Colorado School of Mines to create an Information Technology (IT) environment that is accessible to all, especially in its commitment to individuals with disabilities. The EIT Accessibility Committee Charter can be found on the Mines Accessibility page.