Purpose:

This policy establishes standards for Electronic Information Technology (EIT) accessibility in compliance with applicable local, state and federal regulations and laws. The University of Florida is committed to providing equal access to its services, programs, and activities for all users. An accessible EIT environment enhances usability for everyone.

Scope:

This policy applies to all EIT acquired, developed, distributed, used, purchased or implemented by or for the University and used to provide University programs, services, or activities. This includes, but is not limited to, all EIT related to University business, academic and outreach, including web pages that represent the University, electronic documents and any multimedia created or obtained.

Policy:

The University adopts the World Wide Web Consortium’s standard: Web Content Accessibility Guidelines (WCAG) Version 2.0, AA conformance level as the minimum accessibility standard for all EIT, and Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT). In addition, all EIT shall comply with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), as amended, and Sections 504 and 508 of the 1973 Rehabilitation Act, as amended.
**Policy: EIT Accessibility**

**Definitions:**

**Accessible:** EIT that can be equally accessed and independently used by individuals with disabilities. Accessible EIT enables disabled individuals 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.

**Archived:** A web page or electronic resource that is no longer available online but is still subject to the applicable records retention requirement under University policy.

**Controlled Website:** Content that is not public-facing is termed “controlled” content, and encompasses content where authentication or authorization is required for access.

**Electronic information and technology (EIT):** EIT includes, but is not limited to, any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of electronic or digital data or information, such as: web sites, course and instructional materials (Word documents, PDF documents, Power Point presentations, video, podcasts, etc.), courseware, software, other classroom technologies, content management systems, search engines and databases, registration and grades, financial and human resource management systems, telecommunications, and emerging technologies.

**Electronic Information and Technology Coordinator:** The position responsible for EIT Accessibility coordination and compliance at the University of Florida.

**Employee:** Any person employed by the University, including (but not limited to) faculty, administrative professionals, state classified, student employees and temporary employees. Volunteers are not employees but are responsible to adhere to the University’s policies and procedures.

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

**“Public-facing” content:** Any content that is intended for access by the general public without restrictions.

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**Policy Number:** WEB-XX-nnn  
**Policy Family:** Web Services  
**Category:** Policy Category  
**Effective Date:** xx/xx/2017  
**Revised:** 6/1/2017
**Policy: EIT Accessibility**

**Redesigned Web Page:** A web page where 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.

**Software, Systems and Applications:** Examples of software, hardware and systems include, but are not limited to, learning and content management systems, library and email systems, and administrative management systems such as finance, registration and human resources, and all software, hardware and software services used for student services. Software includes freeware, shareware, desktop, enterprise, subscription and remotely-hosted options. Software that is accessed through a web-browser must also be accessible.

**Substantial Change:** Updates, design or architectural changes to a website that goes beyond simple text changes.

**University web page:** A web page created and published by the University in the scope of University-related business. It does not include web pages published by employees for personal purposes, and not published on University sites.

**University legacy web page:** A University web page created and published by the University prior to the effective date of the EIT Accessibility Policy.

**VPAT:** A Voluntary Product Accessibility Template published by the Information Technology Industry Council describing the accessibility of their products and services.


**Policy: EIT Accessibility**

**Standard: WCAG 2.0 AA**

https://www.w3.org/TR/WCAG20/

**WCAG 2.0 Summary Level A (Beginner)**

<table>
<thead>
<tr>
<th>Guideline</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1.1 – Non-text Content</td>
<td>Provide text alternatives for non-text content</td>
</tr>
<tr>
<td>1.2.1 – Audio-only and Video-only (Pre-recorded)</td>
<td>Provide an alternative to video-only and audio-only content</td>
</tr>
<tr>
<td>1.2.2 – Captions (Pre-recorded)</td>
<td>Provide captions for videos with audio</td>
</tr>
<tr>
<td>1.2.3 – Audio Description or Media Alternative (Pre-recorded)</td>
<td>Video with audio has a second alternative</td>
</tr>
<tr>
<td>1.3.1 – Info and Relationships</td>
<td>Logical Structure</td>
</tr>
<tr>
<td>1.3.2 – Meaningful Sequence</td>
<td>Present content in a meaningful order</td>
</tr>
<tr>
<td>1.3.3 – Sensory Characteristics</td>
<td>Use more than one sense for instructions</td>
</tr>
<tr>
<td>1.4.1 – Use of Color</td>
<td>Do not use presentation that relies solely on color</td>
</tr>
<tr>
<td>1.4.2 – Audio Control</td>
<td>Do not play audio automatically</td>
</tr>
<tr>
<td>2.1.1 – Keyboard</td>
<td>Accessible by keyboard only</td>
</tr>
<tr>
<td>2.1.2 – No Keyboard Trap</td>
<td>Do not trap keyboard only users</td>
</tr>
<tr>
<td>2.2.1 – Timing Adjustable</td>
<td>Time limits have user control</td>
</tr>
<tr>
<td>2.2.2 – Pause, Stop, Hide</td>
<td>Provide user control for moving content</td>
</tr>
<tr>
<td>2.3.1 – Three Flashes or Below</td>
<td>No content flashes more than three times per second</td>
</tr>
</tbody>
</table>
**Policy: EIT Accessibility**

2.4.1 – Bypass Blocks  
Provide a ‘Skip to Content’ link

2.4.2 – Page Titled  
Use helpful and clear page titles

2.4.3 – Focus Order  
Logical order

2.4.4 – Link Purpose (In Context)  
Every link’s purpose is clear from its context

3.1.1 – Language of Page  
Page has a language assigned

3.2.1 – On Focus  
Elements do not change when they receive focus

3.2.2 – On Input  
Elements do not change when they receive input

3.3.1 – Error Identification  
Clearly identify input errors

3.3.2 – Labels or Instructions  
Label elements and give instructions

4.1.1 – Parsing  
No major code errors

4.1.2 – Name, Role, Value  
Build all elements for accessibility

**WCAG 2.0 Summary Level AA (Intermediate)**

<table>
<thead>
<tr>
<th>Guideline</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2.4 – Captions (Live)</td>
<td>Live videos have captions</td>
</tr>
<tr>
<td>1.2.5 – Audio Description (Pre-recorded)</td>
<td>Users have access to audio description for video content</td>
</tr>
<tr>
<td>1.4.3 – Contrast (Minimum)</td>
<td>Contrast Ratio b</td>
</tr>
<tr>
<td>1.4.4 – Resize Text</td>
<td>Text can be resized to 200% without loss of content or function</td>
</tr>
<tr>
<td>1.4.5 – Images of Text</td>
<td>Do not use images of text</td>
</tr>
</tbody>
</table>
### Policy: EIT Accessibility

- **2.4.5 – Multiple Waves**: Offer several ways to find pages
- **2.4.6 – Headings and Labels**: Use clear headings and labels
- **2.4.7 – Focus Visible**: Ensure keyboard focus is visible and clear
- **3.1.2 – Language of Parts**: Tell users when the language on a page to changes
- **3.2.3 – Consistent Navigation**: Use menus consistently
- **3.2.4 – Consistent Identification**: Use icons and buttons consistently
- **3.3.3 – Error Suggestion**: Suggest fixes when users make errors
- **3.3.4 – Error Preventions (Legal, Financial, Data)**: Reduce the risk of input errors for sensitive data
Guidelines:

Web Pages and Applications

All public facing University web pages and applications shall comply with standards by the following dates:

- All University websites created or substantially updated after November 1, 2017 shall be compliant when created or updated.
- All University websites in existence prior to November 1, 2017 shall be compliant by November 1, 2019.
- Each University, college, department, program, or unit must establish a timetable for updating non-compliant pages.
- All archived web pages must be clearly marked as archived and include accessible instructions on how users can request an accessible version of its content. The content must be made available in an equally effective accessible format in a timely manner to any individual requesting access. The unit responsible for the creation and maintenance of the information on the web page is responsible for fulfilling the accommodation request.

Controlled Web Pages and Applications

All controlled University web pages and applications, which require login credentials to view, published or hosted by the University shall be compliant by the following dates:

- All controlled University websites created or substantially updated after November 1, 2017.
- All controlled University websites in existence before November 1, 2017 shall be compliant by November 1, 2020.
Business Processes, Software and Applications

All business processes, software and applications created or obtained shall comply with the standard or have as high level of compliance as feasible. All current systems shall be evaluated for compliance. If a system is not compliant, a strategic plan for achieving compliance within 5 years of the effective date of the EIT Accessibility Policy will be delivered to the Chief Information Officer and EIT Accessibility Officer no later than November 1, 2018. Yearly updates of the report and progress will also be delivered to the Chief Information Officer and EIT Accessibility Officer each November until compliant.

Instructional Materials

All EIT instructional materials shall be compliant to the standard. Instructional materials include, but are not limited to, syllabi, textbooks, presentations, handouts, electronic instructional materials delivered within the University’s learning management system, face-to-face classes, or an alternate method, and electronic instructional activities such as online collaborative writing, web conferencing, and other similar activities.

Procurement

The University’s procurement and documentation processes shall include an accessibility evaluation of any and all EIT. Prospective vendors will be required to submit the Voluntary Product Accessibility Template (VPAT) published by the Information Technology Industry Council, and such accessibility will be taken into consideration in making procurement decisions. All University contracts to procure EIT or EIT related services will contain appropriate provisions, as prescribed by the Office of the General Counsel, concerning product, service or program accessibility and compliance with applicable federal and state laws and regulations.

New EIT must be accessible upon acquisition or implementation to the greatest extent practicable. When it is technically unfeasible to do so, procedures must require the University to provide accessible alternate EITs.

The University’s procurement and documentation processes must also contain language
Policy: EIT Accessibility

requiring bidders meet the accessibility standards set forth in this policy and include a provision in which the vendor warrants or represents that all technology provided complies with these standards and any other applicable federal or state regulations and laws pertaining to EIT accessibility.

Undue Burden and Non-availability:

The following circumstances may qualify as exemptions from this policy:

Where compliance may require extraordinary measures due to the nature and the intent of the EIT, a request for exemption must be made. Lack of sufficient funding for any particular unit, department or college of the University would not be, by itself, a sufficient qualification for an exemption.

Units seeking an exemption from this policy must submit a written request to the EIT Accessibility Officer detailing why compliance is not feasible without extraordinary measures and how the unit will make EIT available to all individuals in an equally effective manner.