

## ADMINISTRATIVE POLICY

### DIGITAL ACCESSIBILITY

*This policy pertains to employees and students.*

It is the intent of Fox Valley Technical College to comply with all applicable provisions of the following federal and state laws that prohibit discrimination on the basis of a disability and require equal access to programs, services and activities.

This includes compliance with:

- **Title II of the Americans with Disabilities Act (ADA)**, which prohibits discrimination by public institutions and requires digital content and technology systems to be accessible.
- **Section 504 of the Rehabilitation Act of 1973**, which ensures that individuals with disabilities are not excluded from or denied access to any program or activity receiving federal financial assistance.
- **Section 508 of the Rehabilitation Act of 1973**, in alignment with federal accessibility requirements, the College strives to ensure that electronic and information technology (EIT) developed, procured, maintained, or used is accessible to individuals with disabilities. While Section 508 of the Rehabilitation Act of 1973 applies specifically to federal agencies, the College adheres to these standards when required by federal contracts, grants, or other funding agreements that include accessibility provisions.

In accordance with the 2024 updates to Title II, Fox Valley Technical College will implement digital accessibility standards consistent with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, or latest available standard, as required.

This policy applies to all areas of the College, including contractors, who create, use, manage, or support digital content or tools, systems, or technologies for teaching, learning, service, work, administration, or other College business.

- I. **Policy Oversight** The Chief Information Officer and Digital Accessibility Coordinator are responsible for the oversight and implementation of this policy. A Digital Accessibility Compliance Workgroup, chaired by the Digital Accessibility Coordinator, will monitor compliance and recommend updates to the policy.
- II. **Enforcement and Compliance** All College divisions and departments must comply with this policy. Non-compliance will be addressed by the Digital Accessibility Compliance Workgroup.
- III. **Training and Support** All employees must complete required digital accessibility training. Additional resources are available on the Digital Accessibility Hub.

#### IV. Definitions

1. **Digital Accessibility (DA):** The practice of designing digital content, tools, and technology to be perceivable, operable, understandable, and robust for people of all abilities, including those with disabilities.
2. **Assistive Technology (AT):** Technology - hardware or software – used by individuals with disabilities to interact with digital content and systems. Examples include screen readers, speech-to-text programs, Braille displays, magnification tools, and alternative input devices.
3. **Digital Content:** Any information or media – such as documents, websites, videos, images, forms, and applications – created, shared, or stored digitally and accessed through websites, learning management systems (LMS), applications, or third-party platforms hosting content that is used in official college programs or services.
4. **Systems:** Digital platforms, applications, websites, portals, and technology environments – whether developed in-house or provided by third parties – that the College uses to deliver programs, services, or activities. This includes LMS, internal software, user interfaces, and any required or integrated third-party tools essential for students, staff, or public access and participation.
5. **Alternative Access Plan (AAP):** When full compliance with accessibility standards is not possible, the College will provide individuals with disabilities an alternative means of access to digital content, technology or services. This approach is intended to ensure that individuals with disabilities can benefit from the same services, programs, or activities, that is:
  - Comparable in purpose and experience to what is provided to others;
  - Timely, so that access is not reasonably delayed;
  - Effective, meaning the alternative enables meaningful engagement or participation.
  - Does not alter fundamental competencies or create an undue burden.
6. **“The Standards” Web Content Accessibility Guidelines (WCAG)** are a set of internationally recognized technical standards for digital accessibility. WCAG 2.1 Level AA is the minimum accepted standard ensuring digital content and systems are perceivable, operable, understandable and robust. This standard shall be reviewed on an annual basis by the Committee to determine if it remains the proper minimum standard. In the event the standard is changed, notice will be provided to the College, and this policy will be updated.
7. **Universal Design for Learning (UDL):** A framework that guides proactive design of digital content and educational resources to support diverse learning needs and accessibility from the outset.

8. **Supplier:** Any third party with which the college contracts to supply information technology products, software, or services for the delivery of services, content or technology.
9. **College Website:** Any public-facing website or web-based application within an FVTC-controlled domain used to conduct College Business by faculty and staff.
10. **College Business:** Any official activities, programs, communications, or services conducted by college employees on behalf of the college. This does not include personal activities or events conducted solely by a student without college sponsorship.

## V. **Applicability**

The following are included within the scope of accessibility compliance.

### **Digital Content**

Examples of digital content include, but are not limited to:

- Websites and webpages
- Documents (PDFs, Microsoft Word, PowerPoint, Excel, Google Docs/Sheets/Slides)
- Videos and video-based content
- Audio files and podcasts
- Images and graphics
- Social media posts
- Email communications
- Digital forms and surveys
- Digital signage and display screens
- Interactive content (e.g., simulations, games, assessments)
- E-books and digital textbooks
- Learning materials and training content
- Content hosted on third-party platforms that are used in official college programs or services

### **Systems**

Examples of systems covered by this policy include, but are not limited to:

- Websites and web-based portals
- Learning Management Systems (LMS)
- Mobile applications (college-developed or procured)
- Software applications (desktop, web-based, or mobile)
- Internally developed platforms
- Third-party tools integrated into instruction or college services

- Online registration, advising, and scheduling systems
- Student information systems and financial aid platforms
- Assessment and testing platforms
- Vendor-hosted platforms used for academic, administrative, or public-facing services

VI. **Evaluation:** Digital content and systems will be evaluated to determine compliance with the highest available standard wherever possible as part of the College’s accessibility review process.

VII. **Procurement:** All digital platforms and systems must include a current Voluntary Product Accessibility Template (VPAT) or Accessibility Conformance Report (ACR) documenting conformance with WCAG 2.1 Level AA or higher. Departments are responsible for obtaining this documentation from the vendor.

If conformance with WCAG 2.1 Level AA cannot be demonstrated, the vendor must provide a written plan or roadmap outlining how and when accessibility issues will be addressed.

VIII. **Complaints:** Complaints related to digital accessibility will follow the College complaints process.

IX. **Accessibility Statement:** The College will publish an accessibility statement on all public-facing websites outlining its commitment to digital accessibility.

Related Policy: Students with Disabilities

*Adopted: 10/16/2025*

*Reviewed: XX/XX/XXXX*

*Revised: XX/XX/XXXX*