



Applies to: All units, faculty, staff, student employees, and students

Responsible Office

Office of the Chief Information Officer

POLICY

Issued: 07/01/2003
Revised: 08/01/2021

The university is committed to diversity and fostering a campus culture of full inclusion of people with disabilities by ensuring that all university constituencies can access its digital information and digital services.

This policy establishes minimum standards for the accessibility of digital information and digital services, as well as the reporting requirements necessary to ensure compliance with the university’s obligations under applicable state and federal regulations.

Purpose of the Policy

To ensure equal access to **digital information** and **digital services** for all university constituencies (students, prospective students, faculty, staff, student employees, guests, visitors, and program participants with disabilities).

Definitions

Term	Definition
Accessible	Affording a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, the university still must ensure equal opportunity to the benefits and opportunities afforded by the technology and equal treatment in the use of such technology.
Archived	Digital information or digital services which are no longer actively linked to but are subject to records retention plans.
Digital information	Information and content delivered through the use of technology including, but not limited to, websites, electronic documents, audio, video, and computer and mobile applications.
Digital service	Includes, but is not limited to, platforms used to deliver digital information, such as websites, web applications, and mobile or computer applications used to deliver educational, administrative, or other services to the university community or general public.
Eligible person	A person with a disability who has standing to access the digital information or digital service owned by or managed on behalf of the university.
Exceptions	An established and approved process for providing substantially equivalent and effective access to digital information and services for similarly situated individuals with and without disabilities when compliance is not technically possible, requires extraordinary measures due to the nature of the digital information or service, or is available for a short duration to a population whose needs are known and accounted for.
Legacy	Digital information or digital services designed and implemented prior to August 1, 2018.
Minimum Digital Accessibility Standards (MDAS)	Ohio State’s standard for determining if digital information and digital services are accessible.
Unit	College or administrative unit.
Unit Leader	Head of college or administrative unit (e.g., dean, senior vice president, president, provost).



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Policy Details

I. Scope

- A. This policy covers all digital information and digital services (current, **legacy**, and **archived**) and provides requirements for accessibility effective August 1, 2018.
- B. All digital information and digital services acquired, developed, or delivered by any **unit** must be **accessible** and in compliance with the [Minimum Digital Accessibility Standards \(MDAS\)](#). Information on **exceptions** is provided in Procedure V.
- C. Legacy (including archived) digital information and digital services are subject to the applicable university web and digital accessibility standards in effect at the time of development and to this policy's specific provisions for legacy digital information and digital services. Legacy digital information and digital services must be made compliant with the [MDAS](#) when any substantial changes or upgrades occur.
- D. The following are not subject to this policy even when hosted on university resources:
 1. Digital information and digital services of a personal nature, and
 2. Student organization websites that do not conduct university business.

II. Administration

- A. The Digital Accessibility Center in the ADA Coordinator's office implements, reviews, and provides technical assistance regarding the [MDAS](#); consults with units; guides product evaluations as requested or necessary; processes exceptions; and resolves complaints under this policy.
- B. The Digital Accessibility Services Team in the Office of the Chief Information Officer (OCIO) assists with digital accessibility evaluations of software and digital content, training, writing remediation/accommodation plans, consulting with vendors/internal developers, and filing exceptions.
- C. Each unit with an IT security coordinator will designate an accessibility coordinator, and notify the Digital Accessibility Center of the appointment or any change in the designee. The accessibility coordinator, through a local structure, will implement the requirements of this policy. This structure must address the acquisition, development, and delivery of digital information and services in the following areas:
 1. Information technology (IT) and web support;
 2. Purchasing digital information and/or services;
 3. Business and transactional processes;
 4. Marketing, recruitment, and communications; and
 5. Delivery of content (including instructional content, policies, procedures, etc.).
- D. The accessibility coordinator must:
 1. Understand and ensure implementation of the Digital Accessibility policy, [MDAS](#), and available accessibility assessment tools within their unit;
 2. Obtain an exception when acquiring, developing, implementing, or delivering digital information or digital services that do not meet the [MDAS](#);
 3. Be aware of, complete, and appropriately disseminate training and technical assistance;
 4. Assist in evaluating digital information, services, and delivery; and
 5. Ensure response to users encountering accessibility barriers.

PROCEDURE

Issued: 07/01/2003

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I. General Accessibility

- A. Each unit must ensure all digital information and digital services are accessible and in compliance with the [MDAS](#) whether acquired, developed, or delivered.
- B. Each unit with an IT security coordinator must designate one or more accessibility coordinator(s) with responsibility for ensuring that the unit is in compliance with this policy, and must notify the Digital Accessibility Center whenever a change in designee occurs.



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- C. Accessibility coordinators must ensure that their respective unit's digital services clearly indicate a method of contact for **eligible persons** having difficulty accessing the digital information or digital services.
 - 1. Suggested language: "If you have a disability and experience difficulty accessing this content, contact [insert name of responsible individual/position] at [contact information]."
 - 2. The contact information must be an email, electronic form, and/or phone number that puts the user in contact with the unit individual responsible for the digital information or digital service who must respond within one business day.

- II. Training
 - A. Accessibility coordinators must complete annual training coordinated by the ADA Coordinator's office and the Digital Accessibility Services Team.
 - B. Accessibility coordinators will facilitate, in collaboration with the Digital Accessibility Services Team and the Digital Accessibility Center, training their unit's faculty, staff, and student employees who acquire, develop, or deliver digital information or digital services.

- III. Reporting
 - A. By the third Friday in January of each year, each accessibility coordinator must submit to the ADA Coordinator's office for review and approval an Annual Digital Accessibility Report and Plan for their unit that must include:
 - 1. A description of local controls for the acquisition, development, and delivery of digital information and digital services;
 - 2. An evaluation of the current accessibility of their digital information and digital services; and
 - 3. A description of the processes for:
 - a. Equally effective alternative access,
 - b. Removing identified barriers,
 - c. Current training, and
 - d. Training proposed for the upcoming year.
 - B. The ADA Coordinator's office will review and approve all such plans and work with the Digital Accessibility Services Team and unit to remedy any deficiencies.

- IV. Responding to Accessibility Requests
 - A. When an eligible person or a representative of an eligible person contacts a unit to express difficulty accessing digital information or digital services, the owning unit must respond to the individual within one business day and elevate a description of the response to the accessibility coordinator and the Digital Accessibility Center.
 - B. When current and legacy digital information and digital services are specifically requested to be made accessible by or on the behalf of an eligible person, the owning unit must make the digital information or digital service accessible or provide an equally effective alternative within 10 business days.
 - 1. For digital information, equally effective means that it communicates the same information with a comparable level of accuracy.
 - 2. For digital services, 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.
 - C. Legacy digital information or digital services that are specifically requested to be made accessible by or on the behalf of an eligible person must be updated to be in compliance with the [MDAS](#) or the digital information or digital service must otherwise be made available within 10 business days.
 - D. Archived digital information or digital services do not have to be converted to meet the [MDAS](#) unless specifically requested by or on the behalf of an eligible person. When requested, digital information in archive status must be provided in an effective accessible format in a timely manner. Timeliness is generally within 10 business days, but the unit may consider the context, type, and volume of information or service requested.
 - E. Upon specific request for access by or on the behalf of an eligible person, digital information in legacy or archive status containing administrative or academic information, official records, and similar information must be prioritized and made available promptly and in a format that provides effective access.



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V. Exceptions

- A. When compliance is not technically possible or may require extraordinary measures due to the nature of the digital information or digital service, units may request an exception.
- B. Exceptions to this policy may be granted by the ADA Coordinator's Office, in consultation with the Digital Accessibility Center, **unit leader**, and/or the relevant academic oversight group (e.g., unit curriculum committee, Institutional Review Board (IRB), University Senate) when appropriate.
 - 1. Requests for such exceptions must be made within the ADA Exception Tracking System using the [Accommodation-Based Exception Request Form](#).
 - 2. Units must have an exception approved before implementing or delivering digital information or digital services that do not meet the [MDAS](#).
 - 3. Requests for such exceptions should be initiated as soon as product information, design plans, evaluations, or user feedback indicates a significant conflict with the [MDAS](#). This may be at any point in the digital information's or digital services' life cycle, including prior to, during, or after acquisition, development, or delivery.

VI. Complaints

- A. If an eligible person or a representative of an eligible person is dissatisfied with any unit's response to an accessibility request or other performance under this policy, they may file a complaint with the Director of the Digital Accessibility Center (accessibility@osu.edu; 614-292-1760; 260 Younkin Success Center, 1640 Neil Ave, Columbus, OH 43201) or with the ADA Coordinator and 504 Compliance Officer (ADA-OSU@osu.edu; 614-292-6207; 260 Younkin Success Center, 1640 Neil Ave, Columbus, OH 43201). If such a complaint is received by any unit, the complaint must be forwarded to the Digital Accessibility Center using the [Digital Accessibility Complaint Form](#) within one business day.
 - 1. Within two business days of receiving a complaint, the Digital Accessibility Center or the ADA Coordinator's office will notify the eligible person or their representative that their complaint has been received and answer any questions about the complaint process.
 - 2. Within 10 business days of receiving a complaint, the Digital Accessibility Center will:
 - a. Conduct, or cause to be conducted, an evaluation of the digital information, digital service, or any alternatives provided by the unit in question; or
 - b. Notify the eligible person or their representative of the need for additional time to conduct an evaluation.
- B. Once the evaluation has been completed, in consultation with the Digital Accessibility Center, the ADA Coordinator will determine what action, if any, is needed.
- C. The Digital Accessibility Center or the ADA Coordinator will inform the individual of the outcome of their complaint and the unit of any actions they must take to comply with this policy.

Responsibilities

Position or Office	Responsibilities
Accessibility coordinators	<ol style="list-style-type: none"> 1. Implement the requirements of this policy, MDAS, and available accessibility assessment tools within their unit. 2. Develop a local structure addressing the acquisition, development, implementation, and delivery of digital information and services as specified in this policy. 3. Obtain an exception when acquiring, developing, implementing, or delivering digital information or digital services that do not meet the MDAS. 4. Assist in evaluating digital information, services, and delivery; and be aware of, complete, and appropriately disseminate training and technical assistance. 5. Ensure their unit's digital services indicate a method of contact for difficulty in accessing digital information or digital services. 6. Submit an Annual Digital Accessibility Report and Plan by the third Friday in January to the ADA Coordinator's Office for review and approval. 7. Complete annual digital accessibility training. 8. Facilitate training their unit's faculty, staff, and student employees who acquire, develop, or deliver digital information or services.



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Position or Office	Responsibilities
ADA Coordinator's office	<ol style="list-style-type: none"> 1. Grant exceptions to the policy when appropriate, in consultation with the Digital Accessibility Center, unit leader, and/or the appropriate academic oversight group. 2. Take and resolve complaints as set forth in the policy. 3. Coordinate annual digital accessibility training for accessibility coordinators. 4. Review and approve Annual Digital Accessibility Reports and Plans and work with Digital Accessibility Services Team and unit to remedy any deficiencies.
Digital Accessibility Center	<ol style="list-style-type: none"> 1. Implement, review, and provide technical assistance to units regarding MDAS and resolve complaints under this policy. 2. Guide product evaluations as requested or necessary. 3. Collaborate with Digital Accessibility Services Team on unit training facilitated by accessibility coordinators as set forth in the policy. 4. Process exception requests, in consultation with the ADA Coordinator's office. 5. Consult with ADA Coordinator's Office on exceptions to this policy. 6. Take and resolve complaints as set forth in the policy. 7. Evaluate digital information or digital services when complaints are received.
Digital Accessibility Services Team within OCIO	<ol style="list-style-type: none"> 1. Assist with digital accessibility evaluations of software and digital content, training, writing remediation/accommodation plans, consulting with vendors/internal developers, and filing exceptions. 2. Coordinate annual digital accessibility training for accessibility coordinators. 3. Collaborate with Digital Accessibility Center on unit training facilitated by accessibility coordinators as outlined in the policy. 4. Work with ADA Coordinator's Office and unit to remedy any Annual Digital Accessibility Report and Plan deficiencies.
Unit	<ol style="list-style-type: none"> 1. Ensure all digital information and digital services are accessible and in compliance with the MDAS whether acquired, developed, or delivered. 2. Ensure legacy digital information and digital services are made compliant with the MDAS when any substantial changes or upgrades occur. 3. Respond to individuals who express difficulty accessing digital information or digital services and elevate a description of the response to the accessibility coordinator and the Digital Accessibility Center. 4. Make accessible or provide an equally effective alternative when information and digital services are requested as set forth in the policy. 5. If applicable, request exceptions to this policy using the Accommodation-Based Exception Request Form. 6. Forward any complaint received to the Digital Accessibility Center using the Digital Accessibility Complaint Form within one business day of receipt.
Unit with an IT security coordinator	Designate an accessibility coordinator, and notify the Digital Accessibility Center of the appointment or any change in the designee.

Resources

Accommodation-Based Exception Request Form, accessibility.osu.edu/exceptions
 Digital Accessibility Complaint Form, accessibility.osu.edu/complaints
 List of Accessibility Coordinators, accessibility.osu.edu/coordinators
 Minimum Digital Accessibility Standards (MDAS), accessibility.osu.edu/standards
 Digital Accessibility Services, das.osu.edu

Contacts

Subject	Office	Telephone	E-mail/URL
Policy interpretation and complaints	ADA Coordinator's office, Office of Institutional Equity	614-292-6207 TTY614-688-8605	ada-osu@osu.edu ada.osu.edu
Digital accessibility training, technical assistance, and complaints	Digital Accessibility Center	614-292-1760	accessibility@osu.edu accessibility.osu.edu
Digital Accessibility Services	Office of the Chief Information Officer	n/a	das@osu.edu



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History

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