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Owner **Madhavi Marasinghe: CIO**
Area **Information Technology**
References **SBHE Policy, Title IX, USC**

Digital Accessibility

POLICY STATEMENT

The University of North Dakota (UND/University) is committed to ensuring that all students, employees, and visitors have equal access to its programs, services, and activities, including those offered in digital environments.

Digital accessibility is a shared responsibility of all individuals who create, manage, procure, or use digital content and technology at UND. The University aligns its efforts with state and federal law and strives to meet the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards.

When digital content, applications, or services are not fully accessible, UND will provide reasonable accommodations or accessible alternatives to ensure equal opportunity, as applicable.

This policy applies to web applications, web content, mobile applications, and software.

Exemptions to the policy must be documented and approved per the Digital Accessibility Review Procedure (see Related Information)

REASON FOR POLICY

As digital technologies become essential to education, communication, administration, and public service, it is imperative that all digital content and tools are accessible to individuals with disabilities.

The University adopts this policy with a commitment to comply with North Dakota State Board of Higher Education policy 1203.1 and Federal and state laws, including the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act of 1990, as amended, and to further UND's mission and values.

SCOPE OF POLICY

- President
- Vice Presidents & Associate/Assistant Vice Presidents
- Deans, Directors & Department Heads
- Area Managers & Supervisors
- Faculty
- Staff
- Students

CONTACTS

Specific questions should be directed to the following:

Subject	Contact	Telephone	Department Email / Web Address
Policy Clarification	Chief Information Officer	701.777.5756	UND.cio@UND.edu CIO Website
	Civil Rights & Title IX (ADA Coordinator)	701.777.4171	UND.civilrights@UND.edu Civil Rights & Title IX Website
Americans with Disabilities Act	Civil Rights & Title IX (ADA Coordinator)	701.777.4171	UND.civilrights@UND.edu Civil Rights & Title IX Website
Classroom/Office Infrastructure	Facilities, Planning Design & Construction	701.777.2591	Planning, Design & Construction Website
Software Procurement	Procurement & Payment Services	701.777.2771	UND.pps@UND.edu Procurement & Payment Services Website
Report Assistive Technology Issues	University Information Technology (UIT)	701.777.2222	UND.techsupport@UND.edu University IT Website
Report or Complaint of Discrimination Based on Disability Status	Civil Rights & Title IX (ADA Coordinator)	701.777.4171	UND.civilrights@UND.edu Civil Rights & Title IX Website
Report or Complaint of Failure to Accommodate Employees or Public	Civil Rights & Title IX (ADA Coordinator)	701.777.4171	UND.civilrights@UND.edu Civil Rights & Title IX Website
Report or Complaint of Failure to Accommodate Students	Student Disability Resources &	701.777.3425	UND.sdr@UND.edu Student Disability

	Academic Support		Resources Website
Report Failure to Adequately Respond to Accessibility Concerns	Civil Rights & Title IX (ADA Coordinator)	701.777.4171	UND.civilrights@UND.edu Civil Rights & Title IX Website
Web Accessibility	Vice President for Marketing & Communications	701.777.2501	marketing@UND.edu Marketing & Communications Website

DEFINITIONS

Accessibility	The concept that all individuals are afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as others regardless of 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.
Archived Web Content	<p>Pursuant to 28 CFR Part 35, web content that:</p> <ol style="list-style-type: none"> 1. Was created before April 24, 2026, reproduces paper documents created before April 24, 2026, or reproduces the contents of other physical media created before April 24, 2026; 2. Is retained exclusively for reference, research, or recordkeeping; 3. Is not altered or updated after the date of archiving; and 4. Is organized and stored in a dedicated area or areas clearly identified as being archived. <p>Any documents available to students as part of course content on or after April 24, 2026, do not fall within this exception.</p>
Content Management System (CMS)	Software application used to store, edit and publish web pages via a series of managed templates.
Content Owner	Individual with primary responsibility for the web content or content within a mobile application.
Conventional Electronic Documents	Pursuant to 28 CFR Part 35, web content or content in mobile apps that is in the following electronic file formats: portable document formats (PDF), word processor file formats, presentation file formats, and spreadsheet file formats.
Digital Content	Any content that exists in the form of digital data. Also known as digital media, digital content is stored on digital or analog storage in specific formats. Forms of digital content include information that is digitally broadcast, streamed, or contained in computer files.

Disability	A physical or mental impairment that substantially limits one or more major life activities; a record of such an impairment; or being regarded as having such an impairment.
Electronic Information Technology (EIT) Coordinator	Individual responsible for ensuring that UND's web and mobile app content is accessible to individuals with disabilities.
Equally Effective	For digital information, equally effective means that it communicates the same information with a comparable level of accuracy. 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.
Fundamental Alteration	A change that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered
Mobile Applications (Apps)	Software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.
Official University Social Media Accounts	Social media accounts that are approved and administered by UND in accordance with this policy. The accounts are used in an official capacity by a college, school, department, office, program or other unit of the University for purposes of representing the unit and/or University. University student club and organization social media accounts are not official University accounts.
Reasonable Accommodation	<p>A modification or adjustment to a process, task, policy, or environment that enables individuals with disabilities to have equal opportunity to access or participate in University programs, services, and activities, including work and academic programs (see 29 CFR 38.14 and 29 CFR 1630.2(o) in Related Information).</p> <p>The University is not required to provide a reasonable accommodation if it would result in undue hardship or burden or result in a fundamental alteration.</p>
Undue Hardship	<p>An action requiring significant difficulty or expense, when considered in light of the factors below:</p> <ul style="list-style-type: none"> • The nature and cost of the accommodation needed; • the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed; the effect on expenses and resources; or the impact otherwise of such accommodation upon the operation of the facility; • the overall financial resources of the employer; the number of employees; the number, type, and location of the employer's facilities; and • the type of operation or operations of the employer,

	including the composition, structure, and functions of the workforce; the geographic separateness, administrative, or fiscal relationship of the facility or facilities to the employer.
University Information Technology (UIT)	UND's technology support unit serving students, faculty, and staff. UIT works with all agencies on campus to provide technology tools for success both in and outside of the classroom.
Voluntary Product Accessibility Template (VPAT)	A free template that translates accessibility requirements and standards into actionable testing criteria for products and services. The template editions are WCAG, Revised 508, EN 301 549 and International, which includes all of the standards. A completed VPAT is called an Accessibility Conformance Report (ACR).
Web Application	An application that is accessed by users over a network such as the Internet or an intranet. The term may also mean a computer software application that is coded in a browser supported programming language (such as JavaScript, combined with HTML) and reliant on a common web browser to render the application executable.
Web Content	Pursuant to 28 CFR Part 35, information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content's structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents. In addition, within this policy web content also includes conventional electronic documents contained on websites; web applications, software, and SaaS; web content requiring a user-login to access, such as content within an LMS or ShareDrive; and all other digital content accessed via a web browser.
Web Content Accessibility Guidelines (WCAG)	A technical standard for web content accessibility, W3C recommendation June 05, 2018 (see Related Information).
WCAG Compliance	<p>Content fully supports all relevant WCAG 2.1 Level A and Level AA (WCAG 2.1 AA) success criteria. Content that is fully WCAG compliant should, in most cases, pass automated accessibility checkers and/or score at the highest level for automated accessibility scorers. However, automated testing is not sufficient to verify WCAG compliance.</p> <p>Pursuant to 28 CFR 35.205, content that does not fully support all relevant WCAG 2.1 AA success criteria will be deemed to be WCAG Compliant in the limited circumstance in which the University can demonstrate that the noncompliance has such a</p>

	<p>minimal impact on access that it would not affect the ability of individuals with disabilities to use the public entity's web content or mobile app to do any of the following in a manner that provides substantially equivalent timeliness, privacy, independence, and ease of use:</p> <ol style="list-style-type: none"> 1. Access the same information as individuals without disabilities; 2. Engage in the same interactions as individuals without disabilities; 3. Conduct the same transactions as individuals without disabilities; and 4. Otherwise participate in or benefit from the same services, programs, and activities as individuals without disabilities.
Website	A set of related web resources, generally organized under a particular domain name, generally "und.edu."
World Wide Web Consortium (W3C)	Group that develops protocols and guidelines on topics such as web accessibility, internationalization and web devices.

PRINCIPLES

UND is committed to ensuring that its digital environment is accessible to all individuals. Digital accessibility is a shared responsibility among those who create, maintain, procure, and assign digital content. While achieving full compliance with WCAG 2.1 AA is the University's goal, UND acknowledges that temporary challenges may exist. UND will, in good faith, prioritize accessibility improvements in areas with the highest impact on users and will continue to evaluate and enhance accessibility practices over time.

PROCEDURES

Technical Accessibility Standard

UND aims to fully support all WCAG 2.1 AA accessibility criteria and adopts this as the technical standard for the University. UND recognizes that achieving full WCAG compliance is a complex process and that immediate compliance may not be feasible in all cases. In those cases, UND will provide accessible alternatives and reasonable accommodations as needed while continuing to work on meeting the technical standard in a reasonable time-frame.

Web content includes, but is not limited to, online documents; web applications and software; log-in protected content; and all other content accessed via a web browser.

All digital content and technologies, including those exempt from WCAG 2.1 AA compliance, must not discriminate against individuals with disabilities. Content owners must make good faith efforts to make

such content and technologies accessible. Nothing prevents UND from providing access to content that exceeds WCAG 2.1 AA compliance.

Exceptions to Technical Accessibility Standard

While there are seven exceptions to WCAG 2.1 AA compliance, UND still has an obligation to provide reasonable disability-based accommodations. The exceptions are:

1. Archived web content (see [Definitions](#)), but not course documents used on or after April 24, 2026.
2. Preexisting conventional electronic documents from before April 24, 2026, unless still in use for UND services, programs, or activities. Course documents used on or after April 24, 2026, are not exempt.
3. Content posted by unrelated third parties, unless the third party is posting due to contractual, licensing, or other arrangements with the University.
4. Password-protected conventional electronic documents about a specific person (e.g., a PDF of a tuition bill).
5. Social media posts made before April 24, 2026.
6. Fundamental alteration: Cases where accessibility would change the content so much that it no longer serves its purpose. These exceptions must follow the Digital Accessibility Review Procedure (see [Related Information](#)).
7. Cases where making something accessible would create an undue financial or administrative burden for the University. These exceptions must follow the Digital Accessibility Review Procedure (see [Related Information](#)).

UND may also consider rare discretionary exemptions (See Digital Accessibility Review Procedure in [Related Information](#)).

Upon specific request, content exempted under 1-5 must be provided in an accessible format – usually within ten calendar days. The timeline may vary based on the information or service requested.

Conforming Alternative Version

If a digital item cannot be made directly accessible due to technical or legal limitations, UND may provide another version that is accessible. Use of this option, known as a conforming alternative version, must be approved through the Digital Accessibility Review Procedure (see [Related Information](#)).

Instructional Course Content

Applicability

This section covers course materials for all teaching formats: online, hybrid, and in-person. It includes, but is not limited to, materials hosted in the Learning Management System (LMS), syllabi, presentations, digital readings, multimedia, interactive assignments, and required third-party tools (see web content in [Definitions](#)).

Conformance Standard and Deadline

The standard for all course content used on or after April 24, 2026, is WCAG 2.1 AA. UND will focus on updating content for upcoming courses and those with accessibility requests. Periodic reviews of course content will be conducted in accordance with the Procedure on Academic Course Review.

Key Requirements for Instructional Content

While WCAG 2.1 AA provides comprehensive criteria, particular attention is directed to:

- **Text Alternatives:** Provide descriptive alternative text (alt text) for all informational images, graphs, and charts. Decorative images should be marked as decorative or "null."
- **Multimedia:** All pre-recorded videos and audio must have accurate, synchronized captions and transcripts. Videos with important visuals must also include audio descriptions.
- **Documents:** Digital documents like Word files, PowerPoints, and PDFs must use headings, lists, and table headers correctly. Ensure the reading order makes sense and color contrast is strong. Scanned documents must be searchable and readable by screen readers. Use tools such as Microsoft's Accessibility Checker and the Adobe Accessibility Checker to flag issues and suggest solutions, or training provided by TTaDA (see [Related Information](#)).
- **Keyboard Accessibility:** All interactive course features must work using just a keyboard.
- **Use of Color:** Color cannot be the only way to share important information or distinguish a visual element.

Responsibilities

- **Instructors and Faculty:** Responsible for making their course content accessible. This includes all materials they author, select, or require for their courses. Support units are not responsible for remediating or creating accessible course content on behalf of faculty and instructors.
- **All Instructional Content Creators:** Must ensure the content they create or edit meets the WCAG 2.1 standard.
- **Academic Departments:** Must promote this policy, support faculty, and ensure accessibility standards are met during curriculum development and the selection of department-wide instructional tools.

Third-Party Content and External Tools

UND must review all third-party tools used in teaching to ensure they meet WCAG 2.1 AA. (See [Procurement and Third-Party Content](#) below and Digital Accessibility Review Procedure in [Related Information](#)). Instructors or departments must provide (or have the third-party provide) required information (e.g., VPAT/ACR).

Archived Content

Old materials not in active use do not need updates. However, if reused, it must meet current standards.

Applications and Development

All UND systems – including software, platforms, databases, and enterprise systems – must follow digital accessibility best practices. Whether free, purchased, custom-built by a vendor, or built in-house, all technology must go through UND's review and approval process (non-standards software, services, and hardware). Administrators should plan for compliance, and developers must follow guidelines and consult UIT when needed.

Websites

All UND websites, unless exempt, must meet UND's commitment to WCAG 2.1 AA compliance. This includes:

- UND's official CMS sites,
- External sites hosted for UND,
- Course, individual, and research websites,
- Recognized student organization pages, and
- Any other web content managed by UND for the purpose of advancing the University's work or mission.

Content owners must make their webpages accessible. If a UND web page does not use a CMS template, content owners must also:

- Register all websites; (see [Forms](#))
- Test sites at least once a year or after major site changes occur; (see [Forms](#)) and
- Include current contact information or an accessible help link. Content owners are responsible for fixing any issues identified and should strive to remediate any issues within ten days or sooner.

UND's Website policy requires all official websites to use the approved CMS unless granted special approval by the vice president for marketing and communications. All UND employees and student leaders who manage web content must complete accessibility training. Those who repeatedly violate WCAG 2.1 AA standards may lose their privilege to manage web content (see Website policy in [Related Information](#)).

Social Media

All official UND social media posts made on or after April 24, 2026, must meet UND's commitment to WCAG 2.1 AA compliance. Content owners are responsible for making posts accessible. If an account has ongoing violations, additional training or account deactivation may follow.

Reporting and Responding to Accessibility Concerns

Anyone who has trouble using UND's digital content should submit a University Information Technology (UIT) support ticket (see [Related Information](#) or [Forms](#)). UND aims to correct the issue or offer an

alternative within ten days.

For archived administrative or academic information, official records, and similar information, UND must provide access upon request. The timeline depends on the size and nature of the request.

If the issue remains unresolved and prevents an individual with a disability from accessing UND's programs, activities, or services, they should contact (see [Contacts](#)).

- Students: Student Disability Resources & Academic Support
- Employees and the public: Civil Rights & Title IX/ADA Coordinator

Procurement and Third-Party Content

This policy does not apply to content posted by unrelated third parties unless UND has a contract or agreement with them. However, any third-party digital tools used in UND programs must meet accessibility standards.

Procured Content

All procured digital content, whether free or paid for, must pass an accessibility review as described in the Digital Accessibility Review Procedures (see [Related Information](#)). It is highly recommended that contracts and scopes of work include language requiring accessibility.

Vendors must provide an accessibility conformance report (ACR or VPAT) based on WCAG 2.1 AA standards (see [Forms](#)). All ACRs or other supporting evaluations must have been conducted or verified, at a minimum, within the past two years.

If the vendor is unable or unwilling to provide the specified accessibility information, the individual or department seeking to purchase or use the digital content must seek alternatives or request an exception (see Digital Accessibility Review Procedure in [Related Information](#)).

Requesting Exemptions

Exemptions to this policy must be submitted for review in accordance with the Digital Accessibility Review Procedure (see [Related Information](#)).

RESPONSIBILITIES

ADA Coordinator	<ul style="list-style-type: none">• Receive and resolve employee and visitor reports of failure to provide reasonable accommodations
Campus Accessibility Working Group	<ul style="list-style-type: none">• Annually review accessibility of digital and web content and make recommendations for any necessary changes
Chief Information Officer	<ul style="list-style-type: none">• Clarify policy and procedure

Content Creators/Owners	<ul style="list-style-type: none"> • Create, use, post, or otherwise distribute accessible digital content
Division of Marketing & Communications	<ul style="list-style-type: none"> • Ensure web content in the University provided CMS complies with federal requirements by providing accessibility training, monitoring CMS publishing workflow and using software to monitor accessibility issues
Electronic Information Technology Coordinator	<ul style="list-style-type: none"> • Provide executive oversight of compliance with policy • Review and approve or deny exemption requests
Faculty	<ul style="list-style-type: none"> • Create, use, select, or otherwise provide accessible course content
Student Disability Resources & Academic Support	<ul style="list-style-type: none"> • Engage in an interactive process with students to determine eligibility and barriers • Approve or deny reasonable accommodation requests
Teaching Transformation and Development Academy	<ul style="list-style-type: none"> • Provide training and resources for faculty and staff on making content accessible • Work with academic technology vendors to ensure software and systems meet accessibility requirements • Collaborate with Student Disability Resources & Academic Support, UIT, and vendors as needed to create accessible content • Work with faculty on best practices in making content accessible
University Information Technology	<ul style="list-style-type: none"> • Route the help ticket to the appropriate office • Review non-standard software requests to ensure security features are built in

RELATED INFORMATION

- [29 CFR 38.14 - Reasonable Accommodations and Reasonable Modifications for Individuals with Disabilities](#)
- [29 CFR 1630.2\(o\) - Definitions: Reasonable Accommodation](#)
- [Adobe Accessibility Checker](#)
- [Americans with Disabilities Act of 1990 \(42 USC §§ 1201 et seq.\)](#)
- [ADA Information & Technical Assistance](#)

- [Microsoft Accessibility Checker](#)
- [Microsoft Accessibility Training Essentials](#)
- [Office for Civil Rights, Digital Accessibility Video Series](#)
- [SBHE Policy 1203.1 - Digital Accessibility](#)
- [Section 504 of the Rehabilitation Act of 1973 \(29 USC §§ 701 et seq.\)](#)
- [Section 508 of the Rehabilitation Act of 1973 \(29 USC §798\)](#)
- [TTaDA: Creating Accessible Content](#)
- [UIT Tech Support](#)
- [UND Policy - Student Educational Disability Accommodations](#)
- [UND Policy - University Website](#)
- [UND Policy - Workplace Disability Accommodations](#)
- UND Procedures - Digital Accessibility Review (pending development/implementation)
- [UND Web Content Standards](#)
- [UND Web Policy and Guidelines](#)
- [Voluntary Product Accessibility Template \(VPAT\)](#)
- [Web Content Accessibility Guidelines \(WCAG\)](#)

FORMS

- [Discrimination and Harassment Report Form \(to report failure to accommodate\)](#)
- [Exemption Request for VPAT](#)
- [UIT Support Ticket](#)
- [VPAT 2.5 WCAG](#) (note: vendors are welcome, but not required, to complete AAA and 2.2 criteria)

APPENDICES

There are no appendices associated with this policy.

Approval Signatures

Step Description	Approver	Date
Campus Comment	Jennifer Rogers: Director of University Policy	Pending
Staff Senate/University Senate Review	Beth Valentine: Staff Senate PAG Liaison	11/2025

Executive Council (1st Reading)	Jennifer Rogers: Director of University Policy	10/2025
Policy Advisory Group	Jennifer Rogers: Director of University Policy	08/2025
Policy Office	Jennifer Rogers: Director of University Policy	08/2025
Policy Owner	Madhavi Marasinghe: CIO	08/2025

COPY