

# Standard Practice Guide Policies

## Electronic and Information Technology Accessibility

601.20

**Applies to:** All Units, Faculty and Staff

### I. OVERVIEW

To enable full and equitable participation for **individuals with disabilities**, the University of Michigan (“U-M”) is committed to creating and maintaining **electronic and information technology (“EIT”)** that strives to be comprehensively accessible. In addition to any legal or regulatory obligations, this policy is an important part of U-M’s commitment to diversity, equity, and inclusion in that accessible design benefits the entire university community, including individuals with a variety of identities. Further, this policy is intended to set forth a framework that units, faculty, staff, and **users** can use to establish, maintain, and improve accessible EIT at U-M.

### II. SCOPE AND APPLICABILITY

This policy applies to all units, faculty, and staff. This policy exists to support and accommodate individuals with any type of disability, and it applies to EIT.

### III. DEFINITIONS

- A. Electronic and information technology: At U-M, Electronic and Information Technology (EIT), typically includes, but is not limited to: websites, web-based applications, desktop or mobile applications, document authoring applications (e.g., Microsoft Word or Email Marketing/Distribution tools), documents, and digital textbooks. Questions about the intended scope of this policy should be directed to the Equity, Civil Rights, & Title IX Office (“ECRT”).
- B. Individuals with disabilities: An individual with a disability is defined by the Americans with Disabilities Act (ADA) as a person who has a physical or mental 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.

C. Users: An individual who interacts with an Electronic and Information Technology resource created, maintained, procured, or provided for usage by U-M. A user might be a student, a faculty member, a staff member, or a member of the public.

#### IV. POLICY

EIT should provide equal access and be as effective, available, and usable for individuals with disabilities as for those who do not have disabilities.

##### A. PROCUREMENT OF ELECTRONIC AND INFORMATION TECHNOLOGY

This section provides a framework for purchasing or obtaining accessible EIT from suppliers that are external to U-M.

1. U-M Procurement Services (<http://procurement.umich.edu/>) incorporates standard accessibility specifications and requirements (“Accessibility Specs” (<https://accessibility.umich.edu/policy/accessibility-specs>)) into competitive bid solicitation (also known as “RFx”) and sole-source solicitation documentation for any purchases of EIT. The Accessibility Specs are intended to support and supplement this policy. ECRT will plan to review and update the Accessibility Specs periodically with Procurement Services to maintain their currency, clarity, and utility.
2. All acquisition of EIT, including through the Procurement Office, whether new or renewed, involving EIT require suppliers to meet and maintain the applicable specifications set forth in the Accessibility Specs.
3. Products and services that do not meet the Accessibility Specs may be considered for procurement, in consultation with ECRT or designees, so long as a clear plan with objectives and timelines for meeting the applicable Accessibility Specs (<https://accessibility.umich.edu/policy/accessibility-specs>) requirements is incorporated into the procurement agreement.
4. Internal U-M entities may seek an exception to the requirements of this policy through an ECRT-managed exception process. Approval of an exception will ordinarily be contingent on identification of acceptable alternatives to the required standards that still allow for comparable and reasonable accessibility.

##### B. INTERNALLY-DEVELOPED OR MAINTAINED ELECTRONIC AND INFORMATION TECHNOLOGY

This section provides guidance for developing or customizing accessible EIT that is or will be developed, maintained, modified, or adapted by internal U-M entities.

1. All internally-developed or maintained EIT should comply with and be kept current with this policy and the Technical Accessibility Guidelines (“Technical Guidelines” (<https://accessibility.umich.edu/policy/technical-accessibility->

guidelines”). The Technical Guidelines (<https://accessibility.umich.edu/policy/technical-accessibility-guidelines>) support and supplement this policy. The Technical Guidelines (<https://accessibility.umich.edu/policy/technical-accessibility-guidelines>) describe how to design or develop EIT to be accessible to individuals with disabilities.

2. U-M units responsible for existing EIT must bring the EIT into compliance with the Technical Guidelines (<https://accessibility.umich.edu/policy/technical-accessibility-guidelines>), in collaboration with other U-M units (e.g., U-M Procurement Services (<http://procurement.umich.edu/>), ECRT (<https://oie.umich.edu/>), U-M Information and Technology Services (<https://its.umich.edu/>), and Health Information & Technology Services (<https://hits.medicine.umich.edu/>)). This remediation effort should continue until the Technical Guidelines (<https://accessibility.umich.edu/policy/technical-accessibility-guidelines>) are met and sustained.
3. U-M units are responsible for maintaining the accessibility, usability, and equity of their EIT over time, in collaboration with other U-M units (e.g., U-M Procurement Services (<http://procurement.umich.edu/>), ECRT (<https://oie.umich.edu/>), U-M Information and Technology Services (<https://its.umich.edu/>), and Health Information & Technology Services (<https://hits.medicine.umich.edu/>)).

### **C. ADAPTIVE TECHNOLOGY**

This section covers adaptive or assistive technologies, which are objects, systems, strategies, and tools that are intended to facilitate a user’s ability to access EIT or content presented on EIT.

1. U-M will support contemporary delivery methods for appropriate assistive or adaptive technology. When feasible with available resources, U-M will also provide support to deliver adaptive technology to individual users.
2. U-M currently maintains an adaptive technology computing site (<https://its.umich.edu/computing/accessible-computing/atcs/about>) that assists and supports students with temporary or permanent disabilities. The site provides student accommodations that are impractical in fully public locations and gives members of the U-M community the opportunity to work privately with professional staff who can provide guidance with using adaptive technology. There are also assistive technology consultation services available to faculty, staff, and students.

### **V. OVERSIGHT, ENFORCEMENT, AND EXCEPTIONS**

The Executive Director of ECRT and the Vice President for Information Technology and Chief Information Officer (“VPIT-CIO”) are jointly responsible for the implementation and monitoring of this policy. The Executive Director of ECRT is responsible for enforcement of this policy. Consistent with this policy and other related U-M policies, deans, department heads, and directors are also responsible for ensuring implementation of this policy’s provisions by their units, in collaboration with other U-M units (e.g., U-M Procurement Services (<http://procurement.umich.edu/>), ECRT (<https://oie.umich.edu/>), U-M Information and Technology Services (<https://its.umich.edu/>), and Health Information & Technology Services (<https://hits.medicine.umich.edu/>)).

ECRT will provide education, technical assistance, guidance, and other resolution strategies to support units, faculty, staff, and other U-M community members in meeting their shared responsibility to develop, procure, and provide accessible EIT.

The Executive Director of ECRT evaluates requests for exceptions to this policy on a case-by-case basis, in consultation with other offices as needed (e.g., VPIT-CIO).

ECRT will provide regular, periodic updates to the executive officers on the status of EIT accessibility at the university.

## VI. REPORTING AN ACCESSIBILITY ISSUE

Questions, concerns, and complaints regarding the accessibility of EIT should be shared directly with ECRT. ECRT is responsible for implementation and enforcement of this policy, including providing guidance, educational outreach, investigating complaints of non-compliance with this policy, and other actions.

### Notes

This SPG is new as of the date issued. It codifies U-M’s commitment to creating and maintaining electronic and information technology (“EIT”) that strives to be comprehensively accessible.

**SPG Number:**

601.20

**Applies To:**

All Units, Faculty and Staff

**Date Issued:**

June 20, 2022

**Owner:**

Office of the Provost and Executive Vice President for Academic Affairs, Office of the Vice President for Information Technology and Chief Information Officer

**Next Review Date:**

June 20, 2027

**Primary Contact:**

Equity, Civil Rights, & Title IX Office (ECRT)

**Related Policies:**

[Discrimination and Harassment \(/policy/201.89-1\)](#)

[EEO Affirmative Action Policy for Individuals with Disabilities \(/policy/201.84\)](#)

[Non-Discrimination \(/policy/201.35\)](#)

[Responsible Use of Information Resources \(/policy/601.07\)](#)

**Related Links:**

[U-M Procurement Services \(http://procurement.umich.edu/\)](http://procurement.umich.edu/)

[U-M Information and Technology Services \(https://its.umich.edu/\)](https://its.umich.edu/)

[Health Information & Technology Services \(https://hits.medicine.umich.edu/\)](https://hits.medicine.umich.edu/)

[Adaptive Technology Computing Site \(https://its.umich.edu/computing/accessible-computing/atcs/about\)](https://its.umich.edu/computing/accessible-computing/atcs/about)

[Equity, Civil Rights and Title IX Office \(ECRT\) \(https://oie.umich.edu/\)](https://oie.umich.edu/)

[Technical Accessibility Guidelines \(“Technical Guidelines”\) \(https://accessibility.umich.edu/policy/technical-accessibility-guidelines\)](https://accessibility.umich.edu/policy/technical-accessibility-guidelines)

[Request Help with EIT Accessibility](#)

[\(https://teamdynamix.umich.edu/TDClient/30/Portal/Requests/TicketRequests/NewForm?](https://teamdynamix.umich.edu/TDClient/30/Portal/Requests/TicketRequests/NewForm?)

[ID=YILIsUWthww\\_&RequestorType=Service\)](#)

[Accessibility Specifications \(https://accessibility.umich.edu/policy/accessibility-specs\)](https://accessibility.umich.edu/policy/accessibility-specs)

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