



Northwestern
University

Approving University Official(s): Provost
Responsible Office: Office of Equity
Effective date: September 1, 2021
Next review date: August 31, 2022

Digital Accessibility Policy

I. Policy Statement

Northwestern University is committed to fostering a community of access, belonging and accountability. In accordance with this commitment, and with the knowledge that accessible digital content generally enhances usability for everyone, this Digital Accessibility Policy (hereafter “Policy”) is established to enable digital access and improve the user experience for individuals with disabilities. The University recognizes that websites and web-based applications are often integral to the academic and administrative work of the University. This Policy addresses the needs of individuals with disabilities who seek to use University Information and Communication Technologies (“ICT”) to participate in University programs and activities and/or conduct University Business.

Given that University Websites house the majority of the University’s public-, faculty-, staff-and student-facing Digital Content, the primary focus of this Policy is on University Websites. University Websites that are created or undergo substantial revisions after the effective date of the Policy are expected to conform to the Accessibility Standards with respect to their infrastructure and content. All Digital Content Owners must ensure that any new Digital Content for which they are responsible that is created, produced, or undergoes substantial revisions on or after the effective date conforms to the Accessibility Standards, absent an exception approved by the Office of Equity.

II. Purpose

The purpose of this policy is to conform with the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.

III. Audience

This policy applies to all Northwestern University faculty, staff and students engaged in the procurement, creation, production, or revision of Digital Content.

IV. Definitions

AccessibleNU: An office within the Division of Student Affairs that provides accommodations to students and key input to the Digital Accessibility Steering Committee (“DASC”) regarding students’ digital accessibility needs.

Accessibility Standards: The most updated version of The Worldwide Web Consortium's [Web Content Accessibility Guidelines](#) (“WCAG”).

Digital Accessibility Liaisons: Designated staff member(s) in a school, unit or department tasked with coordinating local digital accessibility efforts and reporting on progress to the DASC.

Digital Content: All electronic information procured, created, produced, or revised by a school, unit or department for University Business which includes, but is not limited to:

- Websites hosted on the University domain;
- Northwestern-created and third-party software, applications, domains and websites utilized by schools, units and departments;
- Official University social media accounts;
- Audiovisual materials, such as videos and podcasts; and
- Downloadable documents made available through University Websites and social media, including but not limited to PDFs, PowerPoints and Word documents.

Information and Communications Technologies: An umbrella term used to describe all information and communication technologies, and which includes but is not limited to the internet, wireless technologies, software, computers, social networking, video conferencing, and other media applications and services.

Digital Accessibility Steering Committee: A committee comprised of University stakeholders in the area of access and digital content, including representatives from Office of Equity, AccessibleNU, Office of Global Marketing and Communication, NUIT and the Office of General Counsel.

Digital Content Owner: An individual responsible for one or more area(s) of University Digital Content. Digital Content Owners have primary responsibility for: (1) ensuring that the Digital Content for which they are responsible conforms to this Policy; and (2) educating and training those who contribute to said Digital Content on the requirements of this Policy and the tools and methods for securing conformance with it.

Office of Equity (“OE”): An office within the Provost’s Office that serves as a University-wide resource on disability-related information, procedures and services for the University community, digital and otherwise; coordinates with the DASC to address digital accessibility concerns; and oversees the University’s disability accommodation process.

Procurement: The assessment and acquisition of digital products from Suppliers through Northwestern Procurement and Payment Services and directly by University departments or units.

Senior Leadership: Designated senior academic and administrative officials within the University who have the authority to take and/or direct the actions set forth in this Policy.

Supplier: Any third-party or vendor with which the University contracts to supply digital content and ICT.

University Business: Activities carried out under the auspices of Northwestern University and in furtherance of the University’s mission, exclusive of activities organized or conducted by students or student organizations.

University Website: Any public-facing, faculty-facing, staff-facing or student-facing website or web-based application that resides within a University-controlled domain and/or is used to conduct University Business by University faculty or staff.

V. Roles and Responsibilities

a. Senior Leadership

Senior Leadership (each unit's Dean, Vice President, Chair, Unit Leader and/or Director) is responsible for establishing mechanisms to ensure that Digital Content within their areas conform to this Policy by:

- Identifying Digital Accessibility Liaisons;
- Ensuring that Digital Content in their area has identified Digital Content Owners; and
- Ensuring that all University Websites in their area demonstrate a commitment to accessibility by including a link to this Policy.

b. Digital Content Owners

- Each unit's Dean, Vice President, Chair, Unit Leader and/or Director will designate Digital Content Owner(s) for the Digital Content that falls under their purview.
- Digital Content Owners are responsible for the accessibility of their sites and must hold content creators, developers and other necessary parties accountable for ensuring the site's accessibility.
- Digital Content Owners will coordinate with their Digital Accessibility Liaison(s) to oversee remediation processes and to identify any resource/training needs.

c. The Digital Accessibility Steering Committee

- The Digital Accessibility Steering Committee will establish and recommend to Senior Leadership a prioritization schedule for remediating accessibility issues with certain existing University Digital Content, with a particular focus on University Websites.
- The DASC will consult with OE as OE reviews and makes determinations on requests for exceptions to the application of this Policy.
- The DASC will consult with OE to periodically review this Policy, its associated procedures, and the governance model and, as appropriate, recommend changes. The review will help ensure that the Policy continues to align with the University's mission, including its commitment to accessibility.

d. Digital Accessibility Liaisons

- Each unit's Dean, Vice President, Chair, Unit Leader and/or Director will coordinate with the DASC to designate a Digital Accessibility Liaison ("DAL").
- DALs are responsible for coordinating local digital accessibility efforts and reporting on progress to the DASC.

VI. Policy Implementation

- All Digital Content Owners will ensure that any Digital Content for which they are responsible that is created, produced, or substantially revised on or after the effective date of this Policy conforms to the Accessibility Standards, absent an exception approved by OE.
- Upon a request by an individual who is unable to access content on a University Website, either the identified content must be updated to conform to the Accessibility Standards or it must be made available in an alternative format in a timely manner. The relevant Digital Content Owner shall be responsible for making it accessible or providing the alternative.
- Where conformance with the Accessibility Standards would create an undue hardship or result in a fundamental alteration of the Digital Content, a Digital Content Owner must request a temporary exception to the Policy from OE. Exception requests must include a detailed description as to why conformance with the Policy is not feasible or would cause undue hardship. Digital Content Owners requesting an exception will be required to submit an equally effective alternative access plan detailing how information will be made available to individuals with disabilities until conformance with the Accessibility Standards is achieved. All exception requests will be reviewed by OE in consultation with the DASC within 30 days. Documentation of exception requests and their disposition will be retained by OE, which will undertake periodic review of the exceptions process.
- Those responsible for procuring Digital Content for the University, including for public, faculty-, staff- and student-facing University Websites, shall seek to ensure that contracts with Suppliers include language holding the Suppliers accountable for conforming with the Accessibility Standards. Those procuring Digital Content will exercise due diligence to include such provisions in contracts with Suppliers, and, when conformance with the Accessibility Standards is not possible, develop an equally effective alternative access plan, which shall be promptly submitted to OE.

VII. Reporting and Responding to Accessibility Issues

a. Reporting

University Websites subject to this Policy must include a link to the “Report a Web Accessibility Concern” form on the footer of each page, providing the primary means for users to submit requests or express concern about a particular University Website. The “Report” form will link to the Digital Accessibility Policy page.

Submitted reports will be triaged by OE and routed to the appropriate Digital Content Owner and Digital Accessibility Liaison for follow up. Digital Content Owners are required to address any reported barriers to access promptly. If unable to do so, the issue will be referred back to OE. OE will consult with NUIT as to any and all actions taken, and coordinate with NUIT to identify an appropriate accommodation, if applicable.

Should a Digital Content Owner become aware of a user accessibility issue through any other channel, the Digital Content Owner must submit the issue using the “Report a Web Accessibility Concern” form so that all such concerns can be catalogued centrally.

b. Remediation

OE, in partnership with the DASC, may require a Digital Content Owner in cooperation with a DAL to establish a plan to remediate those portions of an existing University Website that do not conform to the Accessibility Standards. This may include websites that would otherwise not be required to conform, such as a site created or revised prior to the effective date of this policy.

c. Consequences of Violating this Policy

OE is charged with responding to complaints regarding University Websites that do not conform to the Accessibility Standards, as well as complaints involving other forms of University Digital Content. Absent an applicable exception, OE will require that non-conforming portions of a University Website or inaccessible Digital Content be brought into conformance by designated staff or suppliers, and the expense of that work may be charged to the school, unit or department that is responsible for ensuring the accessibility of that content. If a non-conforming Website remains out of compliance after repeated attempts by OE to communicate with the Digital Content Owners, then, as a measure of last resort, OE after consultation and approval from appropriate stakeholders, will request that NUIT remove the non-conforming University Website from the Northwestern domain registry until it can be brought into conformance.

VIII. Related Information

- Related Policies:
 - [Reasonable Accommodation Policy](#)
 - [AccessibleNU– Guidance on Student Accommodations](#)
 - [Policy on Institutional Equity](#)
- Frequently Asked Questions
- Additional Guidance

IX. Contacts

The following individuals can address questions regarding this Policy:

- Laura Conway, ADA Coordinator, Office of Equity: laura.conway@northwestern.edu

History

Policy Approval Date: April 14, 2021

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Policy URL:

<http://policies.northwestern.edu/docs/digital-accessibility-policy-final.pdf>