

 UNIVERSITY OF DENVER	UNIVERSITY OF DENVER POLICY MANUAL DIGITAL ACCESSIBILITY	
<u>Responsible Department:</u> Information Technology <u>Recommended By:</u> Vice Chancellor IT/CIO Information Technology - Enterprise Application Services, Chief Risk and Compliance Officer <u>Approved By:</u> Chancellor	<u>Policy Number</u> IT 13.10.041	<u>Effective Date</u> 7/29/2026

I. INTRODUCTION

The University of Denver is committed to establishing and maintaining a digital environment that is accessible to all members of the University community and the general public and complies with applicable laws and regulations, including 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.

II. POLICY OVERVIEW

A. All University Technology and Content must meet the [University's Minimum Digital Accessibility Standards](#) (MDAS).

B. Exceptions.

1. This Policy provides a process for exceptions when compliance is not technically possible or may require extraordinary measures due to the nature of the Technology.
2. If an employee has an operational need for a Technology that does not conform to the MDAS, the employee must submit a request to IT for evaluation of the Technology and the employee's business requirements. This process applies to hardware, licensed applications, shareware, freeware, trial programs, and other software. IT will evaluate requests.

C. This Policy does not apply to:

1. Individual webpages published by students, employees, or non-University organizations that are not hosted by the University and on which University academic, student, or business activities are not conducted; provided, however, the University highly recommends compliance with accessibility guidelines for such webpages.
2. Single-instance, specialized software, or individual productivity software

- purchased with University funds for the individual employee's use and is not required for use by anyone other than the requestor.
3. Assistive technologies when required to present information in a specific way based on their intended use case.

III. PROCESS OVERVIEW

A. University Technology:

1. Any Technology utilized by the University must comply with the MDAS identified by the University's Office of Information Technology.
2. University employees may request that Technology be evaluated for accessibility by submitting an [online digital accessibility request](#).
3. Technologies existing prior to the Effective Date of this Policy are subject to the applicable University MDAS at the time of acquisition or development. Existing Technologies must be brought into compliance with the MDAS when any substantial changes or upgrades to such Technology occur.
4. Individuals acquiring any Technology for the University (whether purchasing or available for free) must:
 - a. complete a New Technology Review in accordance with University Policy IT 13.10.040 – *Technology Acquisition*; and
 - b. contractually require the supplier to meet the MDAS to the fullest extent possible.
5. Units may request an exception to this Policy for specific Technology which may be granted at the discretion of IT as stated in II.B.2.

B. University Content

1. Individuals who develop or share Content must make such Content accessible and confirm that such Content meets the MDAS.
2. Legacy Content (content existing prior to the Effective Date of this Policy) must meet the version of the technical guidelines in effect at the time that the Legacy Content was last revised unless the Legacy Content is necessary to provide access to University programs, services, or activities, or unless the University has received a request (to IT) to make the Legacy Content conform to the current MDAS. IT will prioritize such requests for timely remediation.

C. Training

Employees who acquire, develop, or deliver Technology or Content must complete periodic accessibility awareness training. IT will make available recommended Digital Accessibility Training Resources in the Digital Accessibility Training Resources section below.

D. Reporting Inaccessible Digital Content

Individuals who become aware of issues regarding digital accessibility should report those concerns using the [Inaccessible Digital Content Form](#).

IV. DEFINITIONS

- A. "Accessible"** "Accessible" means that individuals with disabilities can independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.
- B. "Content"** for purposes of this Policy means any information or communication accessed or displayed in a digital format or medium, as text, image, audio, or video, which is created, posted, distributed or published for University Business. Examples of Content include:
- Course materials posted and shared on learning management systems such as Canvas
 - Text, multimedia, and other content posted on public-facing and access-restricted University websites
 - Images, video, or other content posted on social media platforms
 - Documents shared internally via email or posted on University websites
- C. "Equally effective"** means: (1) the Technology communicates the same information with a comparable level of accuracy, or (2) that the result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestor.
- D. "Individuals with disabilities":** The Americans with Disabilities Act defines "individual with a disability" is someone who: (1) has a physical or mental impairment that substantially limits one or more major life activities, or (2) has a history or record of such an impairment (such as cancer that is in remission), or (3) is perceived by others as having such an impairment (such as a person who has scars from a severe burn).
- E. "Minimum Digital Accessibility Standards" or "MDAS"** means the minimum digital accessibility standards found on the University [Accessibility At DU](#) website.

F. "Student Organization" means any group at the University in which two or more of the members are Students, whether or not the group is established or recognized by the University, including, but is not limited to: varsity athletic or club sport teams, fraternities and sororities, Registered Student Organizations, student government, societies, associations, departmental student groups, and unchartered provisional chapters/interest groups.

G. "Technology" for purposes of this Policy means:

1. IT infrastructure related (e.g., IP, switches, routers, servers, etc.);
2. Mission critical IT applications or systems;
3. Networked printers, copiers and fax machines;
4. Data or physical security related (e.g., application access control software, etc.);
5. Life safety impacting (e.g., emergency notification, etc.);
6. Devices monitoring critical devices or infrastructure (e.g., fire detection monitoring, video cameras, etc.);
7. Building control systems (e.g., HVAC, door access card readers, elevator controls, etc.) to be connected to a University network;
8. Any hardware/equipment to be connected to/installed on a University wired or wireless network or computer system (e.g., cabling, access points, etc.) including, but not limited to general office products such as word processors;
9. Any software to be installed on University wired or wireless network or computer system, including, but not limited to, spreadsheets and presentation applications, as well as programs specific to a department or function (e.g., anti-malware, project management, productivity software);
10. Any software subscription or Software as a Service (SaaS)-based software; and
11. Consulting related to the categories noted above.

H. "University Business" means activities carried out under the auspices of the University of Denver, except for activities organized or conducted by students or Student Organizations.

V. RESOURCES

A. [Guidance on Web Accessibility and the ADA](#)

B. [Web Content Accessibility Guidelines](#) (WCAG) 2.1 Levels A and AA.

C. University of Denver Accessibility Council's [Foundational Accessibility Guidance](#)

D. [Accessibility at DU](#)

E. University [Policy IT 13.10.040 – Technology Acquisition](#).

F. University [Policy FINA 2.10.033 - Procurement](#)

VI. DIGITAL ACCESSIBILITY TRAINING RESOURCES

A. University of Denver Office of Teaching and Learning – [Instructional Accessibility Course Planning](#)

Revision Effective Date	Purpose
7/29/2026	<i>Original policy approved and added to the policy library</i>