



Policy Title:
Electronic and Information Technology (EIT) Accessibility Policy

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Responsible Office:
[Office of Information Technology](#)

This policy item applies to:
Community Colleges
State-Operated Campuses
System Administration

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Summary

SUNY is the nation's largest comprehensive system of public higher education, comprised of a growing number of students, faculty and staff with disabilities that may impact the ways in which they access and successfully use electronic information. This growth comes at a time when essential information and services critical to student application and registration, academic course and program completion, employee hiring and evaluation, and more, are increasingly delivered via electronic means.

This document details the State University of New York's Electronic and Information Technology (EIT) Accessibility Policy, hereafter the SUNY EIT Policy, adopted by the SUNY Trustees in June 2019.

Policy

Pursuant to the Board of Trustees' Resolution No. 2019-50, the recommendations set forth in the Final Report and Recommendations of the Electronic and Information Technology Accessibility Committee (EIT Committee) comprise the SUNY EIT Accessibility Policy and apply to SUNY State-operated campuses, community colleges, and SUNY System Administration. The adopted recommendations are listed below (please see full report in the Appendix for additional detail):

1. SUNY's Electronic and Information Technology Accessibility policy ensures appropriate campus and system-level commitment to support equal and integrated access to all of its programs, services, and activities, particularly for individuals with disabilities, especially in the realm of electronic and information technologies.
 - a. EIT Accessibility must be recognized as the responsibility of all administrators, faculty, and staff.
 - b. System Administration and campuses shall develop, purchase, host, and/or acquire, to the extent feasible, web pages, websites, hardware and software products and services that are accessible to persons with

disabilities.

2. Each campus president and the Chancellor for System Administration shall designate an EIT Accessibility Officer no later than December 31, 2019. EIT Accessibility Officers will be responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY policy.
3. The EIT Accessibility Officer is responsible for assuring the collaborative development of an Accessibility Plan, consistent with local shared and faculty governance processes.
4. System Administration and all campuses shall develop an Accessibility Plan to promote ongoing, inclusive access for individuals with disabilities.
 - a. Each plan should serve as an accessibility action strategy that will be regularly evaluated, modified, and strengthened over time—in response to changing requirements, feedback and review of outcomes and effectiveness.
 - b. Minimum core elements of each Accessibility Plan should be as follows:
 1. Authority and Responsibility: An assignment of roles, authority, responsibility and accountability for achieving policy compliance.
 2. Awareness Raising: A campaign to communicate EIT accessibility across all campus divisions and departments.
 3. Design: A comprehensive approach to engrain accessibility into the creation of web and technology resources.
 4. Procurement: A procedure to include accessibility as a requirement within purchasing processes, including centralized and decentralized purchasing activities.
 5. Monitoring Compliance: A means for monitoring compliance with any standards listed in this document.
 6. Training: A method for training all University personnel who develop, select, purchase and maintain electronic and information technologies.
5. For purposes of consistency and risk management, the Standards delineated in Section C. of the Final Report and Recommendations of the EIT Committee will guide the framework of the EIT Accessibility Plans in order to sustain accessible electronic and information technology environments. System Administration and each campus will use these Standards as a baseline for EIT compliance and inclusion, and institutions are encouraged to exceed the required benchmarks outlined in the Standards below. These Standards address the following areas:
 - a. Websites and Software: Web Accessibility Standards (WAS);
 - b. Digital Content: Digital Content Accessibility Standards (DCAS);
 - c. Classroom Technology & Design: Classroom Accessibility Standards (CAS);
 - d. Libraries: Library Accessibility Guidelines (LAG); and
 - e. Procurement: Procurement Accessibility Conformance Standards (PACS).

Recognizing that technology and technical accessibility standards evolve, the Committee recommends designated EIT Accessibility Officers create communities of practice to propose necessary changes to the Standards over time.

6. System Administration and each campus will develop and adopt—via a consultative process that includes local faculty governance procedures—an EIT Accessibility Plan, to be developed no later than June 30, 2020, which includes, at a minimum, the key program elements described in item 4B above and detailed in the Final Report and Recommendations of the EIT Committee.
7. EIT Accessibility Plans shall be modified and updated over time in response to evolving technology and new requirements, user feedback, and the regular review of outcomes and effectiveness.
8. The University Provost and Chief Information Officer are jointly charged with identifying shared services or System-wide procurement opportunities in support of this work.
9. The University Provost will establish a short-term implementation committee to support campus and System Administration development and implementation of their respective Accessibility Plans and to develop a model for assessing and evaluating policy implementation.
10. Campus presidents will report annually to the Chancellor on their progress.

Definitions

The following definitions are excerpted from the final report of the EIT Committee:

Accessible: In the case of a program or activity, readily usable by a particular individual, with or without alternate formats; in the case of the web and electronic resources, accessible with or without the use of assistive technology.

Alternate Format: Refers to alternatives to standard print. Information presented in an accessible format (examples: electronic, audio, large print, or Braille).

Archived EIT: EIT containing core administrative or academic information, official records, and similar information that are no longer available to a wide audience, but are subject to record retention plans. Note that technology components such as software applications and hardware devices are not placed in an archive status.

Assistive Technology: Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.

Classroom Accessibility Standards: A summary listing of all pertinent building code and classroom technology system feature that should be included when constructing / renovating SUNY classrooms. These features draw heavily from the 2010 ADA building standards on federal and state property.

Digital Content Accessibility Standards: In addition to the accessibility standards codified in the Web Accessibility Standards (WAS), requirements and recommendations touch on documents, multimedia, and quality course-building that is inclusive of accessibility.

Electronic and information technologies (EIT): Information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. EIT includes, but is not limited to, information resources such as the internet and intranet websites, content delivered in digital form, search engines and databases, learning management systems, classroom technologies; web, computer, and mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

Equally Effective Alternate Access: The alternative format communicates the same information in as timely a fashion as does the original Web page. For interactive applications and hardware devices, “equally effective” means that the user action (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requester.

Exceptions: In certain cases, meeting the accessibility standards required by these guidelines may not be feasible due to an undue burden or doing so would result in a fundamental alteration. Such assertions may only be made by the president or designee who has budgetary authority after considering all resources available for use, and must be accompanied by written statement of the reasons why. These difficulties do not relieve University programs or services from meeting EIT accessibility obligations. Equally Effective Alternative Access must be provided upon request.

Existing EIT: Any EIT purchased or adopted prior to June 2018.

Legacy Content: Any digital content materials produced and published before January 2017.

Library Accessibility Standards: Accessibility best practices and guidance as it pertains to critical library functions including services, collections, physical and digital environments.

Procurement Accessibility Conformance Standards: Checklist for including accessibility as a requirement within the purchasing process for electronic information and technologies.

Web Accessibility Standards: Baseline requirements for compliance with the international web accessibility guidelines - Web Content Accessibility Guidelines (WCAG).

Other Related Information

There is no related information relevant to this policy.

Procedures

Please see the [Final Report and Recommendations of the Electronic and Information Technology \(EIT\) Accessibility Committee, May 2019](#)

Forms

There are no forms relevant to this policy.

Authority

There is no authority relevant to this policy.

History

SUNY Board of Trustees' Resolution, No. 2019-50.

Appendices

[Final Report and Recommendations of the Electronic and Information Technology \(EIT\) Accessibility Committee, May 2019](#)