Digital Accessibility Policy

Purpose

The University of Georgia ("UGA") is committed to ensuring that digital content and technology related to its programs, services, and activities, directly or through contractual, licensing, or other arrangements, will be accessible to all individuals in accordance with the Americans with Disabilities Act ("ADA"). Pursuant to the federal implementing regulations, all digital content and services must conform to these standards. Digital accessibility under the rules means designing web content and mobile applications to provide equal access, regardless of ability or circumstance. At its core, it is about removing barriers so that individuals do not face unnecessary obstacles when engaging with our resources.

This Policy sets forth provisions for UGA's compliance with relevant state and federal law and regulations and details UGA's commitment to digital and electronic accessibility. This Policy also provides guidance to the UGA community about their responsibilities regarding technology and digital accessibility.

Definitions

"University Business" includes activities carried out by UGA faculty and staff in furtherance of UGA's mission of teaching, research, and service.

"Digital Content" consists of any information or communication accessed or displayed in a digital format or medium, such as text, image, audio, or video developed, procured, posted, published, maintained, distributed, or used for University Business. This includes, but is not limited to instructional systems, online instructional lessons, web-based services, software applications, electronic documents, hardware systems, telecommunication products, video and multimedia products, and online events.

"Information Technology" includes software; server-based, personal computer, mobile device, and web-based applications and websites; website hosting and design services; development, hosting, maintenance, and archiving services; cloud-based applications and information processing or storage services; digital hardware interfaces; kiosks; and digital database configurations and interfaces purchased, developed, deployed, or used for University Business and, in the case of web-based applications and websites, hosted on a UGA-owned or –controlled domain.

"Senior Leadership" includes the University's President, Provost, Senior Vice President, Vice Presidents, Deans, Department Chairs, and Directors of University and School Centers or their designees.

"Standards" are The World Wide Web Consortium's Web Content Accessibility Guidelines version 2.1, Level AA Conformance (WCAG 2.1 Level AA) for websites and web-based applications and services. Software and services that are not web-based should conform to

WCAG 2.1 Level AA to the extent such guidelines may usefully be applied to improve the accessibility of these resources.

"Voluntary Product Accessibility Template" or "VPAT" is a standardized template report that allows vendors to document how their digital products comply with the Standards for digital accessibility.

Applicability

This Policy applies to:

- all University of Georgia departments and units, including all programs and activities carried out by UGA faculty and staff in furtherance of UGA's mission of teaching, research, and service.
- Digital Content and Information Technology in all programs, services, and activities UGA provides or makes available directly or through contractual, licensing, or other arrangements.
- vendors who develop or provide Information Technology for University Business.

Legal Standard/Timeline

All parties responsible for developing, procuring, posting, publishing, maintaining, distributing, or using Digital Content and Information Technology shall strive to be in compliance with WCAG 2.1 AA no later than April 24, 2026.

Information Technology and Digital Content

By April 24, 2026, all new Digital Content and Information Technology will be required to meet WCAG 2.1 AA. Digital Content and Information Technology that does not comply with this rule may only be used when it is not possible to make web content directly accessible due to technical or legal limitations.

The Accessibility Steering Committee will establish and recommend to Senior Leadership a prioritization plan for improving the accessibility of existing Information Technology, including websites and web-based applications and the existing Digital Content hosted, published, or communicated on those platforms. Priority will be given to Information Technology and Digital Content that deliver essential functions or information and are widely and consistently used by UGA faculty, staff, and students. In the case of public-facing websites, priority will be given to sites that are among the most highly trafficked and to those that contain core institutional information.

Exceptions Under the Law

In limited situations, some forms of Digital Content are not required to meet WCAG 2.1, Level AA. These exceptions include:

- 1. Archived web content where all of the following criteria are met:
 - a. The content was created or reproduces paper documents or the contents of other physical media created before April 24, 2026,
 - b. The content is kept only for reference, research or recordkeeping,
 - c. The content is kept in a special area for archived content, and
 - d. The content has not been changed since it was archived.
- 2. Preexisting Digital Content in the form of conventional electronic documents where all of the following criteria are met:
 - a. The Digital Content is word processing, presentation, PDF, or spreadsheet files; and
 - b. The files were available on a UGA website or mobile app before April 24, 2026.
- 3. Content posted by a third party where the third party is not posting due to contractual, licensing, or other arrangements with UGA.
- 4. Individualized documents that are password-protected where all of the following criteria are met:
 - a. The documents are word processing, presentation, PDF, or spreadsheet files,
 - b. The documents are about a specific person, property, or account, and
 - c. The documents are password-protected or otherwise secured.
- 5. Preexisting social media posts made before April 24, 2026.

Even when Digital Content is not required to meet WCAG 2.1, Level AA, UGA must still provide individuals with disabilities with effective communication, reasonable modifications, and an equal opportunity to participate in or benefit from their services, programs, and activities.

When compliance is not technically feasible or would require extraordinary measures due to the nature or purpose of the Information Technology, a request for exception can be made via the Digital Accessibility Exception Request Form. This request must include information on how the department will make the Information Technology available for individuals in an equally effective manner. Insufficient funds of a particular department will not be considered as a valid qualification for exception, except in rare circumstances and as approved by the Accessibility Steering Committee.

The Accessibility Steering Committee will review exception requests and make recommendations to the Vice President for Information Technology, who will decide whether to approve an exception.

Procurement

UGA departments or units purchasing or procuring Information Technology are responsible for ensuring that suppliers seeking to develop or provide Information Technology for University Business are aware of this Policy and that contracts with such vendors fully hold them accountable to the Standards. UGA Procurement and others charged with supporting Information Technology procurement efforts should support these efforts when involved in IT purchases.

UGA units or departments that purchase or procure Information Technology are responsible for testing all purchased Information Technology against the Voluntary Product Accessibility Template to determine compliance with the Standards.

Resources

Resources for complying with this Policy will be regularly posted and updated on the Digital Accessibility Services Hub (DASH) website. These resources will include technical support for instructors and content creators, training opportunities, and remediation consultation support.

Monitoring and Promoting Compliance

1. Accessibility Steering Committee

The Accessibility Steering Committee ("ASC") shall be appointed by the President and/or Provost. In addition to preparing the prioritization plan described above, the ASC is responsible for (1) providing periodic review and revision of this Policy, including making appropriate updates to the Policy's Standards definition as industry standards and practices evolve, with recommendations going to the President and/or Provost; (2) working with Senior Leadership to promote general awareness of this Policy; (3) assessing and reporting to the President and/or Provost the University's accessibility efforts as outlined in this Policy; and (4) establishing a process and working with appropriate authorities in Senior Leadership to review and decide on requests for Policy exceptions.

2. Digital Accessibility Services

The Digital Accessibility Services team ("DAS") within EITS is responsible for supporting Senior Leadership across the University in creating and sustaining a culture of commitment at UGA. DAS provides training, guidance, and information on accessibility standards and best practices and works with University Information Technology purchasers and providers and their technical partners to advise or augment their efforts toward adopting the Standards. Guided by ASC priorities, DAS tracks and supports remediation efforts throughout UGA.

3. Digital Accessibility Liaisons

Digital Accessibility Liaisons ("DAL") are appointed by Senior Leadership. DAL coordinate local accessibility efforts and report on progress to the ASC and DAS.

Complaint Process

If you encounter inaccessible Digital Content or Information Technology, please let us know. The "Report a Barrier" Form can be used to notify DAS and the UGA Equal Opportunity Office ("EOO") of non-compliant content. DAS and EOO will work together to resolve any complaints of non-compliant content.

Upon a specific request by an individual who is unable to access specific Digital Content due to non-conformance to the Standards, either the requested content must be updated to conform to the Standards, or the requested content must be made available in an alternative format in a timely manner. The unit responsible for the creation and maintenance of Digital Content is responsible for making it accessible or providing an accessible alternative.

Adopted

University Cabinet October 1, 2025

Policy Owner

Responsible University Senior Administrator: Vice President for Information Technology

Policy Owners: Office of Information Security and Equal Opportunity Office

Policy Contact: Chief Information Security Officer

Phone Number: 706-542-3106 Email: infosec@uga.edu

Website: https://uga.teamdynamix.com/TDClient/3190/eitsclientportal/Requests/ServiceDet?ID=

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