



University Policy: Digital Accessibility

Policy Category: Information Technology

Subject: This policy establishes digital accessibility guidelines for all online services, programs, and activities of American University.

Responsible Executive: Vice President & Chief Information Officer

Office Responsible for Review of this Policy: Office of Information Technology and University Communications and Marketing

Supplemental Documents:

Related University Policies: [Electronic Mass Communication Policy](#), [Responsible Use of University Websites and Content Management Systems](#), [Social Media Guidelines](#), [Captioning Policy](#)

I. SCOPE

This policy establishes standards for all online services, programs, and activities of American University. Online services, programs, and activities include, but are not limited to, information and communication technologies, webpages, web-based applications, online instructional content, services, and resources. American University's commitment to digital accessibility is grounded not only in our commitment to inclusive excellence, but also the knowledge that accessible content enhances usability for everyone.

The following do not fall under the scope of this policy:

- Individual webpages published by students, employees, or non-university organizations that are not hosted by the University and do not conduct University Business. However, compliance with accessibility guidelines is highly recommended.
- Single-instance, specialized software or individual productivity software purchased for individual use that is not required for use by anyone other than the requestor.

II. POLICY STATEMENT

American University is committed to providing a digital environment that is accessible to all, including individuals with disabilities. For the purposes of this policy, “accessible” means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.

American University's goal is to ensure that all digital content be compliant with the following Digital Accessibility Standards:

- [Web Content Accessibility Guidelines \(WCAG\) 2.0 AA](#) for institutional compliance
- [Web Content Accessibility Guidelines \(WCAG\) 2.1 Levels A and AA](#) for the Voluntary Product Accessibility Template required of prospective vendors
- [Section 508 of the Rehabilitation Act of 1973, as amended \(29 U.S.C. §794d\) for the University Library](#)

We strive to be compliant with:

- [Web Content Accessibility Guidelines \(WCAG\) 2.2](#)

This includes ensuring that all content is aligned with the Web Content Accessibility Guidelines core principles and success criteria. Information must be able to be perceived, interfaces must be operable, content needs to be understandable, and the content should be robust enough to work with various assistive technologies.

Given the dynamic nature of digital content and constantly expanding digital programs and services, compliance at American University involves ongoing review of policy implementation in accordance with current best practices for accessible digital content.

III. DEFINITIONS

Assistive Technologies: adaptive, rehabilitative devices that promote greater independence for individuals with disabilities but change how these individuals interact with technology. Examples include special input devices (e.g., head or foot mouse, puff-and-sip switches, speech recognition), screen-reading software, and screen magnifiers.

Digital Content: any type of media (e.g. video, audio, etc.) created, stored, and distributed in a digital format as part of the online services, programs or activities of the University, or as part of or in support of any other services, programs or activities (e.g., classroom instruction, athletics and other activities open to the general public or members of the campus community).

Digital Content Owner: a University employee, office, or unit responsible for the purchase, use, or maintenance of one or more area(s) of University Information and Communications Technology.

Reasonable Accommodation: Under both the Americans with Disabilities Act, as amended, and Section 504 of the 1973 Rehabilitation Act, a reasonable accommodation is a modification or adjustment to a course, program, service, or facility, which ensures that a qualified student or employee with a disability is not excluded, segregated, or otherwise treated differently. At American University the process to determine reasonable accommodations for students are provided by the Academic Support and Access Center, for employees by Human Resources, and for the general public by the ADA/504 Coordinator. The provision of individualized reasonable accommodations provided upon request is not a substitute for the University's responsibilities to ensure accessible digital content up front.

University Information and Communications Technology (UICT): an umbrella term used to describe all information and communications technologies purchased, developed, deployed, or used for University Business. Including, but not limited to, the internet, wireless technologies, web-based sites and applications, online instructional content, software, computers, video conferencing, mass communications tools, and other media applications and services.

University Business: services, programs, or activities carried out by American University faculty and staff (including part-time and temporary staff), or contracted on behalf of American University, in furtherance of the University's mission.

University Electronic Communication: includes email, social media, text and messaging services used to carry out University Business or related to the services, programs, or activities of American University.

University Website: Web pages, sites, or applications created or procured by a University department or unit for or in support of the services, programs, and activities of the University and hosted by American University

IV. POLICY

This policy applies to all University Information and Communications Technology (UICIT) that is acquired, distributed, purchased, developed, implemented, or substantially modified after the effective dates of this policy, by or for any American University department or unit and used to provide University programs, services, or activities.

Reasonable accommodations for individuals will continue to be handled case by case as described above.

A. Roles and Responsibilities

It is the responsibility of all members of our community – faculty, staff, students – to provide equal access to our employment and educational environment, including information and communications technology. Some members of the community serve in roles or offices with specific responsibilities to provide digital accessibility, as described here.

1. Digital Content Owner(s) will:
 - a) Adhere to the Digital Accessibility Standards outlined in this Policy.
 - b) Develop, purchase, and/or acquire hardware and software products that are accessible to people with disabilities.
 - c) Promote awareness of this Policy to all members of the University community, particularly those in roles that are responsible for creating, selecting, or maintaining electronic content and applications.
2. Office of Information Technology (OIT) will:
 - a) Provide documentation and resources to assist with digital accessibility compliance.
 - b) Employ services that enable the scanning of the University Website for compliance with the standards set by this policy.
 - c) Advise departments and units as necessary to support digital accessibility, including providing tools for testing Digital Content, and choosing vendors to assist with remediation.
 - d) Perform an annual review of this policy and implement any necessary revisions.
3. University Communications and Marketing (UCM) will

- a) Ensure that new UCIT being acquired by the university related to marketing and communications functions be vetted and meet relevant Digital Accessibility Standards.
 - b) Annually review existing digital products, in collaboration with OIT, for compliance with appropriate Digital Accessibility Standards.
 - c) Advise departments and units as necessary to support digital accessibility.
 - d) Promote awareness of the policy and provide training for Digital Content Owners and Publishing Leads.
4. Procurement & Contracts will
- a) Ensure contracts and procurement agreements adhere to the Digital Accessibility Standards outlined in this Policy.
 - b) Ensure Voluntary Product Accessibility Template be submitted by vendors and reviewed by appropriate staff prior to completed agreement.
5. Digital Content Owners and Publishing Leads will
- a) Ensure that the University Website meets relevant Digital Accessibility Standards and is monitored and maintained in an accessible state, including appropriate testing, including usability testing as needed, and remediation.
 - b) Implement recommendations or advisories issued by OIT or UCM to bring UCIT into conformity with Digital Accessibility Standards.
6. Third-party contractors hired to implement or service UICT will be held to the same responsibilities as the department or unit they report to.

B. University Information and Communications Technology

1. University Website
- a) All content published on the University Website for internal and public audiences, including content externally hosted on behalf of the University, will maintain accessibility standards as outlined in the Policy Statement.
 - b) All new and redesigned web-based applications must comply with relevant Digital Accessibility Standards. In addition, existing web-based applications will be reviewed and updated to comply with these standards before renewal or on a case-by-case basis.
2. University Digital Content
- a) Any type of media (e.g. video, audio, etc.) created, stored, and distributed in a digital format as part of the online services, programs, or activities of the University, or that is used as part of or to support any other programs, services, or activities of the University, should conform to the AU Digital Media Guidelines. These guidelines are developed and maintained by UCM and may be updated as technology and other resources evolve. University Digital Content should conform to the guidelines in place on the date of publication, though UCM may request updates as needed.
3. Non-web software
- a) Software and services that are not web-based should conform to the above

Digital Accessibility Standards to the extent such guidelines may usefully be applied to improve the accessibility of these resources.

4. University Electronic Communication
 - a) American University recognizes that email is an essential communication tool, and we strive to make all email communications accessible. All email communications sent by or on behalf of the University must be formatted to be accessible to screen readers and other assistive technologies. This includes providing alternative text or image descriptions for images and ensuring that all hyperlinks are descriptive.
 - b) All new and redesigned social media posts and accounts carrying out University Business must conform to relevant Digital Accessibility Standards.
 - c) Individuals utilizing electronic communication on behalf of the University are expected to apply the following techniques to promote accessibility: using plain language (avoid acronyms or jargon); including subtitles, captioning, or transcripts; using alternative text and image descriptions to describe images, graphics, or charts; opting for camel case with hashtags; using descriptive links. Additional guidance on accessible content can be found in the AU Digital Media Guidelines.
 - d) The use of social media for University Business also requires adherence to techniques that promote accessibility in meaningful ways on each platform. Digital Content Owners and Publishing Leads should seek guidance from UCM for best practices on approved platforms.

C. Reporting, Remediation, and Exceptions

1. Concerns regarding accessibility of University Information and Communications Technology (UICT) should be reported to digitalaccessibility@american.edu. The Digital Accessibility Program Manager (“Program Manager”) or designee will receive reports and coordinate the resolution process.

The Program Manager may engage OIT leadership and/or members of a digital accessibility community of practice in determining whether remediation or an exception is appropriate. The Program Manager will document the decision and communicate it to the appropriate Digital Content Owner or Web Content Coordinator for resolution.

Nothing in this Policy is intended to supersede the University’s formal policies and procedures for filing complaints about accessibility and/or disability discrimination under applicable local and federal laws.

2. Remediation: The Program Manager will establish a plan to remediate those portions of UICT that do not conform to the relevant Digital Accessibility Standards, including a timeline for completion. The unit responsible for the creation and maintenance of UICT is responsible for the remediation.

Currently, overlays and remediation options utilizing Artificial Intelligence are not considered acceptable alternatives.

If remediation is not possible, the Program Manager will refer the report to be

reviewed as an exception and refer impacted parties to the relevant Reasonable Accommodation process.

3. Exceptions to this policy may be granted in certain limited and narrowly tailored circumstances. To be considered for an exception the request must meet one of the following criteria:
 - a) Not technically possible: When full compliance with relevant accessibility standards is not technically possible.
 - b) Fundamental alterations: When bringing the content, product, or service into compliance would fundamentally alter the program or service.
 - c) Not commercially available: An accessible product which meets business requirements is not commercially available.
 - d) Digital Content under the control of third parties. The University must make its best efforts to ensure that all new software, systems, programs, tools, and Digital Content is accessible, or that the University has a license to make it accessible.
 - e) Undue burden: When providing an accessible digital product or service would result in an undue financial or administrative burden. Requirements for demonstrating undue burden are taken within the context of the University as a whole, thus making this criterion extremely difficult to meet.

4. Requests for exceptions

Exceptions to this policy may be granted in certain limited circumstances and must meet one of the criteria listed above in IV.C.3. a-e above. Additional exceptions may be identified by the University.

Units seeking an exception to this policy must submit a written request to digitalaccessibility@american.edu stating the specific exception criteria and providing any supporting documentation. Decisions will be made by the Vice President and Chief Information Officer and Vice President of Communication or designee(s).

When an exception is granted, it may be reevaluated based on material changes to feasibility, availability, or other relevant factors, or upon request. Requests for reevaluation of an exception will be accepted once annually, unless the supporting documentation for the reevaluation request indicates that there has been a material change in the rationale used in granting the original exception. In those limited circumstances, the reevaluation of the exception may occur on an as-needed basis.

V. EFFECTIVE DATE AND REVISIONS:

This Policy is effective February 25, 2026.