Web Accessibility Standards

POLICY STATEMENT

Cornell University is committed to providing an environment in which all people have an equal opportunity to participate in the university’s programs, activities, and services. To support this environment, all new, newly added or redesigned university web content, web pages, web functionality, websites, and web applications must be made accessible to people with disabilities to the standard prescribed by the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, except where doing so would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

When fundamental alteration or undue burden applies, equally effective alternative means of access must be provided so that, to the maximum extent possible, individuals with disabilities receive the same benefits and services.

REASON FOR POLICY

Cornell recognizes that websites and web-based applications are often integral to the academic and administrative work of the university. The university strives to ensure that people with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any university programs, services, and activities delivered online, and that they receive effective communication of the university’s programs, services, and activities delivered online.

Additionally, the university strives to comply with federal and state laws and regulations requiring accessibility and equal access for individuals with disabilities, including the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, the New York State Human Rights Law, and Section 1557 of the Affordable Care Act.

ENTITIES AFFECTED BY THIS POLICY

☑ Ithaca-based locations
☑ Cornell Tech campus
☑ Weill Cornell Medicine campuses
POLICY 5.12

Web Accessibility Standards

WHO SHOULD READ THIS POLICY

– Anyone who is creating, editing, or placing content on a Cornell University website or web application
– Anyone purchasing web products and web services
– Unit heads

MOST CURRENT VERSION OF THIS POLICY

– www.dfa.cornell.edu/policy/policies/web-accessibility-standards
POLICY 5.12

Web Accessibility Standards

 CONTENTS

Policy Statement .................................................................................. 1
Reason for Policy .................................................................................. 1
Entities Affected by this Policy ................................................................. 1
Who Should Read this Policy ................................................................. 2
Most Current Version of this Policy ......................................................... 2
Related Resources .................................................................................. 4
Contacts ........................................................................................................ 5
Definitions ................................................................................................. 6
Responsibilities ......................................................................................... 7
Principles ................................................................................................. 9
  Introduction ............................................................................................... 9
  Scope of this Policy .................................................................................. 9
  Role of the EITA Coordinator ............................................................... 9
Procedures ............................................................................................... 10
  Required Website Footer Information ............................................... 10
  Web Accessibility Assistance Link ...................................................... 10
  Text in the Footer .................................................................................. 10
  Procuring Accessible IT ......................................................................... 10
  Addressing Concerns ........................................................................... 10
  Alternative Access .................................................................................. 10

University Policy Office

www.policy.cornell.edu
POLICY 5.12
Web Accessibility Standards

RELATED RESOURCES

External Documentation
- Americans with Disabilities Act of 1990
- Section 504 of the Rehabilitation Act of 1973
- Section 1557 of the Affordable Care Act
- WCAG 2.0 Level AA Guidelines published by the Web Accessibility Initiative of the World Wide Web Consortium

University Forms and Systems

<table>
<thead>
<tr>
<th>Ithaca-Based Locations</th>
<th>Weill Cornell Medicine Campuses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accessibility Information</td>
<td>Weill Accessibility Information (Login required)</td>
</tr>
<tr>
<td>Accessibility Resources</td>
<td>Weill's Siteimprove Resource (Login required)</td>
</tr>
<tr>
<td>Siteimprove</td>
<td></td>
</tr>
</tbody>
</table>
POLICY 5.12
Web Accessibility Standards

CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

<table>
<thead>
<tr>
<th>Subject</th>
<th>Contact</th>
<th>Telephone</th>
<th>Email/Web Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Clarification and Interpretation, Accommodation Requests (Ithaca Campus and Cornell Tech)</td>
<td>CIT - Electronic Information Technology Accessibility (EITA) Coordinator</td>
<td></td>
<td><a href="mailto:web-accessibility@cornell.edu">web-accessibility@cornell.edu</a></td>
</tr>
<tr>
<td>Policy Clarification and Interpretation, Accommodation Requests (WCM Campus)</td>
<td>Associate Director, IT Experience</td>
<td>(212) 746-6819</td>
<td><a href="mailto:accessibility@med.cornell.edu">accessibility@med.cornell.edu</a></td>
</tr>
<tr>
<td>Procurement Process Clarifications (Ithaca Campus and Cornell Tech)</td>
<td>Procurement and Payment Services</td>
<td>(607) 255-3804</td>
<td><a href="http://www.dfa.cornell.edu/procurement">www.dfa.cornell.edu/procurement</a></td>
</tr>
<tr>
<td>Procurement Process Clarifications (WCM Campus)</td>
<td>Weill Cornell Medicine Finance</td>
<td></td>
<td><a href="mailto:purchasing@med.cornell.edu">purchasing@med.cornell.edu</a></td>
</tr>
</tbody>
</table>
### POLICY 5.12

**Web Accessibility Standards**

### DEFINITIONS

These definitions apply to terms as they are used in this policy.

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Accessible</strong></td>
<td>When 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, within the same timeframes, and with substantially equivalent ease of use. If content and functionality cannot reasonably be made accessible through the website, equally effective alternate access must be provided in an expedient manner.</td>
</tr>
<tr>
<td><strong>University Web page, Website or Web Application</strong></td>
<td>Any web page, website, or web application created or procured by a unit for or in support of the activities carried out under the auspices of the university.</td>
</tr>
<tr>
<td><strong>Unit</strong></td>
<td>A college, department, program, office, research center, institute, laboratory, business service center, or other university unit.</td>
</tr>
<tr>
<td><strong>WCAG 2.0 Level AA</strong></td>
<td>The Web Content Accessibility Guidelines, version 2.0, Level AA, which is a standard promulgated by the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI).</td>
</tr>
<tr>
<td><strong>Web Content</strong></td>
<td>The information contained on a web page or presented through a web application, including text, images, PDFs, video, audio, and code or markup that defines structure, presentation, etc.</td>
</tr>
<tr>
<td><strong>Web Functionality</strong></td>
<td>An interactive part of a web page, website or web application. Including, but not limited to, maps, photo galleries, video galleries, online forms, etc.</td>
</tr>
</tbody>
</table>
## Responsibilities

The major responsibilities each party has in connection with this policy are as follows:

| **Cornell Information Technologies, Ithaca Campus, Cornell Tech, and WCM** | Provide documentation and resources to assist with web accessibility compliance. Identify both enterprise solution services and open-source services that enable the scanning of web pages for compliance with the standard set by this policy. Consult with units, as appropriate. Advise and support the EITA coordinator, as appropriate. |
| **Electronic Information Technology Accessibility (EITA) Coordinator** | Facilitate requests for accommodations and complaints of EITA violations. Coordinate a method to address modified compliance requests, as appropriate. Record any modified compliance requests and their outcomes. Provide guidance to offices and individuals. Consult with units and Procurement on web accessibility. Provide training and/or coordinate on web accessibility. Act as liaison for the IT Governance Committee. At least annually, perform a review of this policy and implement any necessary revisions. |
| **ITGC** | With advice from the EITA coordinator, address requests for modified compliance. |
| **Staff Member in College or Unit** | Ensure that all new Cornell University websites and web applications, including content or functionality added to existing Cornell University websites or web applications, are accessible to the standards set in this policy, and are monitored and maintained in an accessible state. |
| **Student Disability Services and the Department of Inclusion and Workforce Diversity** | Collaborate with the EITA coordinator to resolve complaints about web accessibility, including: Identification of effective alternatives and reasonable accommodations. Addressing modified compliance requests. |
| **Unit Head** | Assume responsibility for the web accessibility of all new, newly added, or redesigned university web content, web pages, web functionality, websites, and web applications within the unit. Understand web accessibility compliance requirements set by this policy. Identify a unit web accessibility liaison. |
| **Unit Web Accessibility Liaison** | Act as the unit point of contact for any web accessibility resources, concerns, or issues. Partner and share information as needed with the Cornell EITA Coordinator. Within the respective unit, ensure that all persons developing, designing, or creating Cornell University web content, web pages, web functionality, websites and/or web applications receive information on accessibility training and information on how to test and review their work. At least annually, review all respective unit websites with university-approved tools, and examine reports to ensure compliance with this policy. |
POLICY 5.12
Web Accessibility Standards

RESPONSIBILITIES

| University Procurement | Include the appropriate university web accessibility standards and requirements in procurement agreements. |
POLICY 5.12
Web Accessibility Standards

PRINCIPLES

Introduction
Cornell University is dedicated to providing an inclusive environment for individuals with disabilities. In keeping with this principle, Cornell has adopted the WCAG 2.0 Level AA standards for all new, newly added, or redesigned university web content, web pages, web functionality, websites, and web applications (see Related Resources). Furthermore, the university will strive to purchase only those web products and services that operate in accordance with the WCAG 2.0 Level AA standard. Individuals seeking assistance or having difficulty with website accessibility should contact the EITA coordinator for assistance.

Scope of this Policy
All new, newly added or redesigned university web content, web pages, web functionality, websites and web applications published or procured by any unit are covered by this policy.

Role of the EITA Coordinator
The Electronic Information Technology Accessibility (EITA) coordinator has the authority to report any EITA issue to the IT Governance Committee, for reasons related to this policy, when necessary.

Additional responsibilities include, but are not limited to, the following:

- Developing and implementing outreach and training on principles, tools, and techniques for members of the university community who maintain websites and web applications or use the web to deliver instructional materials.
- Being actively involved in the procurement process for websites and web applications, to help ensure that accessibility requirements are made part of contractual agreements and contractors fulfill their obligations to deliver accessible websites and web applications.
- Leading accessibility reviews of key institutional websites and web applications.
- Developing and maintaining a web accessibility website or a robust resource section under the Cornell accessibility website.
- Organizing and responding to requests for assistance from site users to make website or web application content accessible.
- Facilitating review of modified compliance requests.
POLICY 5.12

Web Accessibility Standards

PROCEDURES

Required Website Footer Information

Each university website and web application, including legacy pages, must provide a user-friendly way for individuals to request assistance with accessibility issues. Examples of acceptable footer language are below.

Web Accessibility Assistance Link

This is a link in the footer that goes to a page on their website explaining who to contact (the email address) and possibly the full text:

Cornell University is committed to making its websites accessible to everyone, including individuals with disabilities. To report a problem or to request an accommodation to access online materials, information, resources, and/or services, please contact web-accessibility@cornell.edu. In your message, include the website address or URL and the specific problems you have encountered. You will receive a reply as soon as possible.

Text in the Footer

If you have a disability and are having trouble accessing information on this website or need materials in an alternate format, contact web-accessibility@cornell.edu for assistance.

Procuring Accessible IT

The university strives to ensure that university web pages, web content, web functionality, websites, and web applications purchased by, or used at the university are accessible to all faculty, students, and staff members, including those with disabilities. To reach this goal, those responsible for making decisions about which products or services to procure must consider accessibility as one of the criteria for acquisition. This is especially critical for enterprise-level web applications and other key websites that affect a large number of students, faculty, or staff members. For more information contact Procurement Services.

Addressing Concerns

Direct any concerns regarding accessibility of university web pages, websites, or web applications to the EITA coordinator for prompt resolution.

Alternative Access

If you believe compliance with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens due to the nature of the information and/or the intent of the web page, you may submit a written request for consideration to the EITA coordinator, who will, in consultation with the IT Governance Committee, work with you to address your concerns. Requests for consideration must be as narrowly tailored as possible, be based on
PROCEDURES, continued

issues other than cost alone, and must include information regarding equally effective alternative means of access that would be provided so that, to the maximum extent possible, individuals with disabilities receive the benefits and services being provided.