

<b>ADMINISTRATIVE DIVISION</b> Division of Information Technology	<b>POLICY NUMBER</b> IT 5.00
<b>POLICY TITLE</b> Digital Accessibility	
<b>SCOPE OF POLICY</b> USC System	<b>DATE OF REVISION</b> August 3, 2023
<b>RESPONSIBLE OFFICER</b> Vice President for Information Technology and Chief Information Officer	<b>ADMINISTRATIVE OFFICE</b> Information Technology

**PURPOSE**

The University of South Carolina Digital Accessibility Policy is set in place to ensure all digital content and technology owned and created by the University falls into compliance under the accepted standard for screen-based information and interactions, WCAG (Web Content Accessibility Guidelines) Level A and AA version 2.1, the most current version as of this document’s last revision.

**DEFINITIONS AND ACRONYMS**

**Assistive Technology:** Tools that help people with disabilities navigate and interact with digital products and digital content. These technologies include but are not limited to screen readers, keyboards, speech-to-text software, eye and head control technology, switches and prosthetics.

**Digital Accessibility:** The ability of digital products, services and tools (websites, applications, software, systems, social media, databases and all user-interfacing technology) to be accessed easily and efficiently by all users, including people with disabilities.

**Digital Content:** Any material—text, image, video, audio, document or otherwise—used for an interactive context, whether or not it was originally intended for that purpose.

**Digital Products, Services and Tools:** Any piece of technology that people interact with: websites, applications, software, intranets, systems, wearables, etc.

**Disability:** Disability is defined by the ADA as “a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.” The ADA does not specifically name all of the impairments that are covered.

**Screen Reader:** Software that reads screen-based interactive content aloud, helping people with disabilities (e.g., visual impairment, learning disorders) access and use digital products.

**Section 508:** A federal law mandating that all of the federal government’s digital products and technology must be accessible for those with disabilities. Section 508 is an amendment to the United States Rehabilitation Act of 1973.

**SiteImprove:** An online software service that regularly scans the USC website for multiple types of issues, including barriers to accessibility, providing a report of problems and where they occur.

**Temporary Injuries and Conditions:** Temporary injuries and conditions, also referred to at times as “temporary disabilities,” are impairments that substantially limit a person’s major daily life activities for a short period of time, rather than permanently.

**Testing, Automated:** Accessibility testing can be done by an automated program like SiteImprove. Both automated and manual accessibility testing are necessary for finding and remediating issues and ensuring digital content is in compliance with WCAG standards.

**Testing, Manual:** Manual testing is performed by an accessibility expert using assistive technology like keyboard controls or a screen reader to interact with a screen in-person. Both automated and manual accessibility testing are necessary for finding and remediating issues and ensuring digital content is in compliance with WCAG standards.

**Timely/Timeliness:** Timely or timeliness is defined as access in sufficient time for an individual with a disability to have an equal opportunity to obtain the same result, gain the same benefit or reach the same level of achievement as persons without disabilities.

**USC Sites:** Any website, web application or digital functionality housed within the University of South Carolina (~~sc.edu~~) domains (e.g., sc.edu, usca.edu, uscb.edu, uscupstate.edu)

**Users:** Anyone who needs to interact with the USC website or any digital products provided by USC. This list could include current and future USC students, USC faculty and staff, parents of USC students, community members, people at other universities and accessibility compliance officers.

**Usability:** The level of ease with which a person, with or without disability, can engage with a particular website, application or other digital product.

**VPAT (Voluntary Product Accessibility Template):** A document or web page, provided by the creator of a digital product or service, that outlines exactly how their offering is in compliance with Section 508 as well as any ways it is not in compliance with that standard. This is the widely accepted method for companies creating web and digital products to prove compliance with Section 508.

**WCAG (Web Content Accessibility Guidelines):** Web Content Accessibility Guidelines (WCAG) are part of a series of web accessibility guidelines published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). The W3C is an international community of member organizations which work together to develop web standards. WCAG has three levels of standards for digital accessibility but WCAG Level AA is the commonly recognized standard for compliance. WCAG Level A and AA version 2.1 is the most current standard as of this document’s last revision and the one referenced throughout this document.

## **POLICY STATEMENT**

- A. This is a system-wide policy, affecting all campuses. Campus-specific procedures will be directed by each campus' Chief Information Officer or senior technology director. See the University digital accessibility website at [sc.edu/accessibility](http://sc.edu/accessibility) for more information about campus-specific procedures as they are developed.
- B. This policy applies to all digital content and technology distributed by the University of South Carolina, including but not limited to: websites, documents, videos, audio files, social media posts, digital educational materials, applications, digital signs, third-party tools and databases.
- C. All digital content and technology created and/or owned by the University must meet the accepted standard for screen-based information and interactions, WCAG (Web Content Accessibility Guidelines) Level A and AA version 2.1, the most current version as of this document's last revision.
- D. All third-party digital products and services used by the University of South Carolina must conform to WCAG Level A and AA version 2.1.
- E. Any contract, obligation or agreement which requires the University to purchase, acquire or otherwise accept a digital product or service shall contain a provision indicating that the vendor or provider of the product or service certifies its compliance with WCAG Level A and AA version 2.1 via a VPAT document. The vendor or provider must also agree in the contract, obligation or agreement to hold the university harmless for any claims, damages, expenses, fines, costs, attorney's fees and any other liability resulting from the university's acceptance and/or use of the product or service.
- F. If time is needed to find an accessible solution or to bring third-party content into compliance, the unit that owns the product or service must provide equally effective alternative access to the content until the third-party product or service can fully comply with this policy. A conscious effort must be shown to replace all interim fixes with long-term accessibility-compliant solutions, and a solution must be reached within 6 months.
- G. The Vice President for Information Technology and Chief Information Officer has final responsibility for digital content accessibility compliance for the University of South Carolina system.

## **PROCEDURES**

Campus-specific procedures will be directed by each campus' Chief Information Officer or senior technology director. See the University digital accessibility website at [sc.edu/accessibility](http://sc.edu/accessibility) for more information about campus-specific procedures as they are developed. The following procedures are specific to USC Columbia.

- A. The Division of IT will appoint accessibility liaisons for USC Columbia representing a variety of divisions and colleges who will be available to assist with digital compliance questions and concerns.
- B. The Chief Information Officer at USC Columbia will appoint a Director of Digital Accessibility and convene a Digital Accessibility Committee.
- C. The Digital Accessibility Committee serves as a support mechanism for the university community, for those who own and create digital content as well as those interacting with digital content. When necessary, the Digital Accessibility Committee will also serve a policy enforcement role.
- D. The Digital Accessibility Committee includes the following members:
  - 1. Chief Information Officer, who will advise the Committee
  - 2. Director of Digital Accessibility, who will lead the Committee and coordinate regular meetings
  - 3. Two representatives from the web team in the Office of Communications and Public Affairs
  - 4. One representative from the Student Disability Resource Center
  - 5. Digital platform owners, as topics in front of the Committee relate to their efforts
  - 6. Appointed accessibility liaisons, who may attend optionally or when a topic in front of the Committee relates to their efforts
- E. The Digital Accessibility Committee will be responsible for the following:
  - 1. Meet regularly to review, discuss and delegate any digital accessibility issues, and to discuss accessibility efforts and progress.
  - 2. Along with the Director of Digital Accessibility, assess and respond to issues related to digital accessibility at the university.
  - 3. Ensure from a high level that all digital products conform to this policy and WCAG Level A and AA version 2.1.
  - 4. Alert fellow committee members of any potential or known accessibility issues with upcoming digital initiatives at the university.
  - 5. Advocate for accessibility across the university, fostering an inclusive culture and promoting accessibility awareness.

6. Organize regular educational opportunities surrounding digital accessibility for the University community.
  7. Author, maintain and enforce accessibility policies and procedures.
  8. Support the Director of Digital Accessibility in responding to escalated questions or concerns regarding digital accessibility.
  9. Review results of digital content audits conducted by the Director of Digital Accessibility and address any concerns that arise.
  10. Assist the Director of Digital Accessibility in determining the course of action for units or individuals continually in non-compliance with WCAG Level A and AA version 2.1.
  11. Identify digital accessibility training needs and helping to evolve training content over time.
  12. Plan and promote communications campaigns regarding the importance of digital accessibility, in collaboration with communications offices across campus.
  13. Recommend updates to the accessibility section of sc.edu.
  14. Contribute to ongoing accessibility documentation and a yearly digital accessibility progress report.
- F. Any USC employee or vendor creating, editing, managing or purchasing digital content or technology is responsible for ensuring that content adheres to WCAG Level A and AA version 2.1. As such, this policy outlines clear responsibilities for each of the roles involved in creating and distributing digital content at the university:
1. Chief Information Officer for Columbia Main Campus. The Chief Information Officer for the University's main Columbia campus has final responsibility for digital product accessibility compliance at the University of South Carolina. Responsibilities include:
    - a. Advise the Accessibility Committee.
    - b. Report efforts, complaints and remediations to leadership and interested parties.
    - c. Ensure that other roles are meeting expectations and accessibility standards.
    - d. Help to create a culture of accessibility at USC.
  2. Director of Digital Accessibility. The Chief Information Officer will appoint a Director of Digital Accessibility within the Division of Information Technology, to report directly to the Chief Information Officer. Responsibilities include:

- a. Oversee and supervise all accessibility efforts at USC.
  - b. Ensure university digital products and services comply with WCAG Level A and AA version 2.1.
  - c. Monitor high-traffic sites and templates on an ongoing basis.
  - d. Along with the Digital Accessibility Committee, create digital accessibility training materials and implement a training plan to educate those creating, managing, and purchasing digital content and technology at the university.
  - e. Lead the Digital Accessibility Committee. The Director of Digital Accessibility will coordinate monthly meetings and delegate any tasks that arise to members within and outside of the Committee.
  - f. Audit the university's digital products regularly, reporting issues to be corrected to the appropriate parties and issuing regular reports to the Chief Information Officer and Digital Accessibility Committee.
  - g. Coordinate with the Procurement team to set and enforce review and testing standards for third-party products and services. Work with Procurement to ensure any vendor or provider of a digital product or service certifies its compliance with WCAG Level A and AA version 2.1 via a VPAT document.
  - h. Work with the Division of IT to arrange regular audits of new projects.
  - i. Work with the Division of IT to train IT teams to comply with digital accessibility standards.
  - j. Respond to any accessibility complaints and delegate remediation tasks to the appropriate parties.
  - k. Test each new digital initiative (new home page design, special landing pages, virtual tours, etc.) for accessibility compliance before launch.
  - l. Escalate accessibility issues with any units or individuals that are consistently negligent in remediating barriers to digital accessibility.
  - m. Suggest and oversee implementation of new initiatives and projects to help continually improve digital accessibility at the university.
3. Office of Communications and Public Affairs Web Team. As the overseeing unit for sc.edu website efforts, the web team in the Office of Communications and Public Affairs will have responsibilities in accessibility efforts. Responsibilities include:

- a. Ensure, alongside the Director of Digital Accessibility and the Digital Accessibility Committee, that accessibility is part of the process for creating new websites and digital content university-wide.
  - b. Assist the Director of Digital Accessibility in monitoring high-traffic sites and templates on an ongoing basis.
  - c. Submit each new digital strategy initiative created by the web team in the Office of Communications and Public Affairs (new home page design, special landing pages, virtual tours, etc.) to the Director of Digital Accessibility for accessibility compliance testing before launch.
  - d. Keep at least one developer on staff who understands digital accessibility and the requirements of WCAG Level A and AA version 2.1.
  - e. Contribute to the Digital Accessibility Committee by sending representatives to attend monthly meetings and helping to resolve any issues that arise in audits.
  - f. Give regular reports to the Accessibility Committee and Chief Information Officer regarding upcoming initiatives of note, accessibility issues encountered and remediation efforts.
  - g. Work closely with the Director of Digital Accessibility, especially on large digital initiatives that may require special attention for accessibility compliance.
4. Student Disability Resource Center. As the overseeing unit for inclusivity and accessibility at the USC, the Student Disability Resource Center will have responsibilities associated with this policy. Responsibilities include:
- a. Provide a representative to attend and contribute to Digital Accessibility Committee meetings.
  - b. Give feedback regarding all accessibility policies, initiatives, campaigns and large-scale efforts.
  - c. Identify resources for user research and accessibility testing, as needed.
5. Accessibility Liaisons. Accessibility liaisons are appointed by the Digital Accessibility Committee to ensure digital initiatives comply with accessibility guidelines. They will represent a multitude of divisions and colleges and are available to help with questions or concerns from those creating, managing or purchasing digital content, products and services. Responsibilities include:
- a. Oversee accessibility efforts of those creating content and who own digital products and services, alongside site managers, the Digital Accessibility Committee and the

- Director of Digital Accessibility, answering any questions or concerns or directing them to the appropriate party.
- b. Serve as the main point of communication between the Director of Digital Accessibility and those creating digital content, interacting with the Accessibility Committee and the web team in the Office of Communications and Public Affairs as required.
  - c. Complete accessibility liaison training.
  - d. Assist with reporting accessibility issues to the appropriate parties for remediation.
  - e. Assist the Director of Digital Accessibility in overseeing remediation progress where issues are identified.
  - f. Assist with documenting any units or individuals who consistently have accessibility issues and recommend them for further training, if needed.
6. Site Managers. Serve as the day-to-day digital accessibility gatekeepers for the site or sites they manage. Site managers have the final responsibility for approving content for digital accessibility compliance and ensuring everything published to their site or sites follows WCAG Level A and AA version 2.1. Responsibilities include:
- a. Receive and delegate any remediation tasks from the Director of Digital Accessibility, members of the Digital Accessibility Committee or an accessibility liaison.
  - b. Review work done by others working on sites to ensure accessibility compliance. Help those creating content for publication on the site to find an accessible solution if their work violates accessibility standards.
  - c. Complete digital accessibility training.
  - d. Alert the web team in the Office of Communications and Public Affairs aware before making large-scale changes or building a new digital product or service of any kind.
7. Content Creators. Any USC employee creating documents, videos, audio files, images and content of any kind that may end up in a digital context is responsible for ensuring that content adheres to WCAG Level A and AA version 2.1. Responsibilities include:
- a. Respond to requests from the site manager to change content that is not in compliance with WCAG Level A and AA version 2.1.
  - b. Review all updates and new content for accessibility compliance before publishing or sending content for publish.



- c. Check that each new PDF, Word document and other file types including any videos or audio complies with digital accessibility standards before uploading and publishing to the site.
  - d. Write careful, clear alt text for any and all images to be used online.
  - e. Ensure heading hierarchy is correct, dividing content into semantically correct headings, H1 through H5.
  - f. Propose changes to requests that will negatively impact accessibility compliance.
  - g. Complete digital accessibility training.
8. Division of IT. The Division of IT will make digital accessibility a part of all technology and digital content projects. Responsibilities include:
- a. Work closely with the Director of Digital Accessibility and the Digital Accessibility Committee to help ensure all digital content is created or purchased in compliance with this policy and WCAG Level A and AA version 2.1.
  - b. Complete digital accessibility training.
  - c. Contribute to testing of digital products and services for accessibility compliance before and after launch.
  - d. Correct any accessibility issues found in testing conducted by the Division of IT or by the Director of Digital Accessibility.
9. Procurement. Any and all third-party digital products and services the university purchases must comply with this policy and WCAG Level A and AA version 2.1. Responsibilities include:
- a. Help vet new digital products and services, working with the Director of Digital Accessibility to ensure potential new third-party products comply with WCAG Level A and AA version 2.1 and that the third-party organization has a VPAT document proving that compliance.
  - b. Assist with coordinating replacement or remediation of current third-party digital products and services that are not compliant.
  - c. Complete digital accessibility training.
  - d. Alert the Director of Digital Accessibility once a new product or service is selected and implemented.

10. Digital Platform Owners. Those deciding to initiate a new digital product or service must make digital accessibility part of the plan for creating or purchasing that new technology. Responsibilities include:

- a. Document how accessibility will be addressed as part of the plan for building or procuring the new digital product or service.
- b. Work with procurement to ensure third-party products to be purchased comply with this policy and WCAG Level A and AA version 2.1.
- c. Work with the Division of IT to ensure third-party products to be created by the university comply with this policy and WCAG Level A and AA version 2.1.

G. The Division of IT will provide required digital accessibility training for anyone creating, editing, managing or purchasing digital content, products and services at the university.

H. The Director of Digital Accessibility and the Digital Accessibility Committee will monitor digital content and technology to ensure compliance with WCAG standards, identifying areas that require remediation.

**RELATED UNIVERSITY, STATE AND FEDERAL POLICIES**

[CR 1.00 Policy Against Discrimination, Harassment & Sexual Misconduct](#)

[STAF 6.00 Disability Discrimination](#)

[STAF 6.24 Student Non-Discrimination and Non Harassment](#)

[Americans with Disabilities Act](#)

[Rehabilitation Act of 1973](#)

[South Carolina Human Affairs Law](#)

[Web Content Accessibility Guidelines \(WCAG\) AA](#)

**HISTORY OF REVISIONS**

<b>DATE OF REVISION</b>	<b>REASON FOR REVISION</b>
July 15, 2020	New policy approval
August 3, 2023	Non-Substantive revisions to reflect current organization structure, policy titles and URLs.