

TITLE: Digital Accessibility Policy

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Policy Owner: Vice President of Digital Strategy, Data & Communications

I. POLICY

Cecil College is committed to providing equal access to its programs, services, activities, and information for individuals with disabilities. Consistent with the requirements of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and applicable federal and state accessibility standards, the College will ensure that its digital content and information and communication technologies (ITC) are accessible.

Digital content, websites, mobile applications, electronic documents, instructional materials, and other digital resources used to support or deliver the College's programs, services, activities, operations, or instruction shall be designed, developed, procured, and maintained in a manner that provides individuals with disabilities an opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as individuals without disabilities, in an equally effective and integrated manner.

To meet this obligation, the College will ensure that its web content, mobile applications, and other digital content and ICT conform to the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, or any successor accessibility standard adopted through federal regulation under Title II of the Americans with Disabilities Act.

The College will take reasonable steps to ensure accessibility through the adoption of accessibility standards, procurement requirements, training, monitoring, and remediation processes. When accessibility barriers are identified, the College will provide equally effective alternative access and will remediate inaccessible digital content and ITC within a reasonable timeframe consistent with applicable law.

The College will maintain processes through which individuals may report digital accessibility barriers and request accessible formats or accommodations. Such reports will be reviewed and addressed promptly to ensure continued access to College Programs.

II. DEFINITIONS

“Accessible means that individuals with disabilities are able to obtain the same information, engage in the same interactions, and enjoy the same services as individuals without disabilities in an equally effective and integrated manner.

“College Programs” means all programs, services, activities, and operations offered, sponsored, or conducted by the College, whether delivered in person, online, or through digital technologies. This includes, but is not limited to, academic instruction, courses, degree and certificate programs, student services, administrative services, public-facing information, events, employment-related activities, and other services provided to students, employees, or members of the public.

College Programs include activities and services delivered through websites, mobile applications, learning management systems, and other digital platforms operated by the College or by third-party providers acting on behalf of the College.

“Digital Content” means any information or communication created, posted, transmitted, distributed, or made available by the College in a digital format through websites, mobile applications, learning management systems, or other electronic technologies. Digital Content includes, but is not limited to, text, images, audio, video, documents, forms, web pages, applications, and multimedia resources used to support or deliver the College’s programs, services, activities, operations, or instruction.

Digital Content also includes digital instructional materials created or distributed for educational purposes, including course content, syllabi, presentations, readings, assignments, and other instructional resources provided to students through learning management systems or other digital platforms, whether hosted on College systems or on third-party platforms used on behalf of the College.

“Information and Communication Technology (ICT)” means any electronic or digital technology used to create, store, transmit, display, process, or manage information or communications. ICT includes, but is not limited to, websites, mobile applications, learning management systems, software applications, electronic documents, multimedia, digital course materials, telecommunications systems, and other technology used to deliver or support the College’s programs, services, activities, operations, or instruction.

ICT may include technologies developed, procured, maintained, or used by the College, including those provided through third-party vendors or service providers.

III. SCOPE

This policy applies to all College digital content and ITC used to create, publish, deliver, or maintain digital content supporting College Programs.

Covered technologies include, but are not limited to:

- College websites and web-based services
- Mobile applications operated by or on behalf of the College
- Learning management systems and instructional platforms
- Electronic documents and multimedia content
- Enterprise software systems and digital communications platforms
- Digital course materials and instructional resources
- Third-party platforms or services used to deliver College content or services

This policy applies to digital content and ITC created or distributed by College employees, departments, contractors, and third-party service providers acting on behalf of the College.

IV. PROCEDURE

A. Responsibilities

Ensuring digital accessibility is a shared responsibility across the College community.

1. The College President and Vice Presidents are responsible for supporting institutional compliance with applicable accessibility laws and ensuring appropriate resources, policies, and procedures are in place.
2. Information Technology Services is responsible for:
 - Implementing technical accessibility standards and tools
 - Reviewing vendor documentation describing accessibility features and limitations as part of the College's procurement process
 - Supporting accessibility testing and remediation efforts
 - Ensuring College-managed systems and infrastructure meet accessibility standards
 - Providing guidance and technical assistance to departments
3. Faculty and Instructional Staff are responsible for ensuring that digital instructional materials, course content, and learning resources they create or distribute are accessible to students with disabilities.
4. Content Owners and Departments that publish digital content on College websites or other platforms are responsible for ensuring that their content complies with accessibility standards and for addressing accessibility barriers identified in their materials.
5. Procurement procedures shall ensure that digital products, services, and technologies purchased or licensed by the College meet accessibility requirements consistent with this policy.

B. Implementation

The College will implement processes to promote and maintain accessibility across its digital environment, including:

- Adoption of accessibility standards for digital content and information and communication technologies
- Training for faculty, staff, and content creators
- Periodic review and evaluation of digital platforms and content
- Processes for reporting and resolving accessibility barriers
- Remediation of inaccessible digital content and ITC when barriers are identified

The College will work to ensure that its websites, mobile applications, and other digital resources conform to WCAG 2.1 Level AA or higher as required under Title II of the Americans with Disabilities Act and other applicable federal regulations.

Accessibility barriers reported by students, employees, or members of the public will be reviewed promptly, and the College will provide equally effective alternative access while remediation is underway.

C. Procurement

The College will consider accessibility as a core requirement when procuring digital products, services, and technologies.

Vendors providing digital content and ITC must demonstrate conformance with accessibility standards consistent with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA or comparable accessibility standards recognized under federal law.

As part of the procurement process, vendors may be required to provide documentation describing accessibility features and limitations, such as a Voluntary Product Accessibility Template (VPAT) or equivalent accessibility conformance report. Vendors may also be required to provide accessibility remediation plans and timelines if accessibility barriers are identified.

When a product or service does not fully meet accessibility requirements, the College may require remediation commitments, accessibility roadmaps, or alternative access plans as a condition of procurement or continued use.

D. Exemptions

The College is committed to ensuring that digital content and ITC are accessible to individuals with disabilities. In limited circumstances, full conformance with accessibility

standards may not be immediately feasible due to technical limitations, legacy system constraints, or other factors.

In such cases, the College may determine that compliance with accessibility standards would result in an undue financial or administrative burden or would fundamentally alter the nature of a program, service, or activity.

Any determination of undue burden must be made by the appropriate Vice President(s) considering all resources available to the College for the funding and operation of the program or service. The determination must be documented in writing and must describe the reasons for the decision.

When full accessibility cannot be immediately achieved, the College will provide an equally effective alternative form of access to ensure that individuals with disabilities can obtain the same information, engage in the same interactions, and enjoy the same services in a timely and integrated manner.

The College will also take reasonable steps to remediate inaccessible digital content or technologies as soon as practicable.

E. Reporting

The College provides a process for students, employees, and members of the public to report digital accessibility barriers or request accessible formats of digital content and information and communication technologies.

Individuals who encounter inaccessible digital content or technologies are encouraged to notify the College so that the issue can be reviewed and addressed promptly.

Reports of accessibility barriers or requests for assistance may be submitted to the College through the designated reporting form published on the College's website.

Upon receiving a report, the College will:

- Review the reported accessibility issue
- Work with appropriate departments or content owners to evaluate the concern
- Provide accessible alternative access when necessary
- Remediate the inaccessible content or technology within a reasonable timeframe when feasible.

Students and visitors who are not satisfied with the College's response to a reported accessibility concern may file a formal grievance in accordance with the [College's ADA/Section 504 Grievance Procedure](#). Employees who are not satisfied with the College's

response to a reported accessibility concern shall follow the process for investigation of discrimination, harassment and retaliation in the College's [Non-Discrimination and Equal Employment Opportunity Policy](#).

F. Training

The College will provide training, resources, and guidance to help faculty, staff, and content creators understand their responsibilities under this policy and to support the creation of accessible digital content and information and communication technologies.

Training initiatives may include:

- Accessibility best practices for web and digital content and information and communication technologies
- Creation of accessible electronic documents and multimedia materials
- Accessibility considerations when developing instructional materials and course content
- Use of accessibility tools and evaluation methods
- Accessibility requirements for digital procurement and technology adoption

The College will encourage ongoing awareness and professional development related to digital accessibility to support compliance with applicable accessibility standards and to promote inclusive access to digital resources.

G. Monitoring, Evaluation, and Continuous Improvement

The College will implement processes to periodically review and evaluate the accessibility of its digital content and information and communication technologies.

Monitoring efforts may include:

- Accessibility testing of College websites and applications
- Review of electronic documents and digital course materials
- Evaluation of third-party technologies used to deliver College programs and services
- Identification and prioritization of remediation efforts for inaccessible content or systems

When accessibility barriers are identified, the College will work with appropriate departments to develop remediation plans and timelines consistent with applicable legal requirements.

The College will strive for continuous improvement in digital accessibility by incorporating accessibility considerations into technology planning, system development, and content creation practices.

V. Digital Accessibility Procurement Requirements

The IT Purchase Approval Process formally includes an accessibility review of all information technology products and services. This process aims to ensure that all products purchased for the college meet accessibility standards through several key components.

H. Requestor Responsibilities

Requestor Questionnaire: Upon receiving an IT Purchase Approval request, a questionnaire may be sent to gather essential details such as scope, user count, intended use, vendor contact, and justification.

I. Vendor Responsibilities

Vendor VPAT/ACR Requirement: Vendors will be formally required to submit a Voluntary Product Accessibility Template (VPAT) or an Accessibility Conformance Report (ACR). This involves initial requests for accessibility documentation, with a provision for Exemptions if needed.

Accessibility Roadmap: Vendors shall provide an intended outline for addressing accessibility gaps. This is mandatory if the VPAT shows barriers that are below the approval threshold and will include periodic check-ins with the vendor.

J. IT Responsibilities

Accessibility Risk Matrix: An internal risk matrix will assess risks related to non-compliant products, informed by VPAT reviews and vendor responses, in collaboration with relevant personnel.

IT Review: IT shall work with the Vendor to review accessibility documentation when appropriate. This includes essential checks for keyboard navigation, contrast, alt text, among other criteria.

Depending on the evaluation, there will be different levels of approval.

- Approval: Granted when all criteria are met.
- Conditional Approval: Used when a product has gaps, but a roadmap exists. These will require a annual review of the roadmap and risk assessment, and are tied to renewal periods.
- Exemption Required: Assigned when accessibility risk is too high or documentation is insufficient. In such cases, the requestor must provide a documented business justification by submitting the Request for Alternative Access Exemption Form, and the Vice President must grant formal approval before the product can proceed.