JACKSONVILLE STATE UNIVERSITY

Manual of Policies and Procedures

POLICY NO.: I.01.27   **DATE: March 2026**

REVISION/REVIEW DATES:

SUBJECT: Digital Accessibility Policy at Jacksonville State University

APPROVED: Dr. Don C. Killingsworth, Jr., President

PURPOSE

Jacksonville State University ("JSU" or "University") is committed to ensuring accessibility for people with disabilities. JSU continuously seeks to improve the user experience for faculty, staff, students, and guests and applies the relevant accessibility standards to meet this commitment. This policy is established to promote equal access to information technology and digital content for all users, including those with disabilities. This policy ensures that Jacksonville State University utilizes due diligence and best practices in the adherence of applicable federal and state policies related to digital accessibility.

POLICY

This policy applies to all digital content and platforms created or maintained by JSU, including but not limited to websites, web applications, electronic documents (including course syllabi, digital textbooks, required course readings and Open Educational Resources (OERs), and any other course materials used in the course), multimedia, and any other digital assets, including any applicable digital hardware interfaces to the extent required under applicable regulations.

In accordance with the U.S. Department of Justice's Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities, Final Rule, 28 C.F.F. part 35 (Apr. 24, 2024) (hereinafter "DOJ Final Rule"), Jacksonville State University is dedicated to making our digital resources accessible to individuals with disabilities. This includes adhering to the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards, as outlined in the DOJ Final Rule.

Definitions

- **Accessible:** An individual with a disability is "afforded equal opportunity to acquire the same information, engage in the same interactions, and enjoy the same services" at or through JSU "as an individual without a disability in an equally effective and equally integrated manner with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability" (OCR 11-11-6002; OCR 15-13-6001; and OCR 15-13-6002).
- **Technical Standard:** These are standards established by the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG). The DOJ Final Rule adopted WCAG Version 2.1, Levels A and AA as the technical standard for web content and mobile apps (28 C.F.R. § 35.200 (2024)).
- **Digital Content/Web Content:** The "information and sensory experience to be communicated to the user by means of a user agent (e.g., a web browser), including code or markup that defines the content's structure, presentation, and interactions. This includes text, images, sounds, videos, controls, animations, and conventional electronic documents." This also includes accessibility of "mobile apps that a public entity provides or makes available, directly or through contractual, licensing, or other arrangements" (28 C.F.R. § 35.202(a) (2024)).

- **Information Technology:** This is hardware and software that is developed, purchased, deployed, or otherwise used by the university. This also covers work provided by vendors to develop, manage, host, or provide goods and services; systems or services used or accessed by students, faculty, staff, applicants, or guests; and platforms with online components, mobile applications, and software-as-a-service.
- **Equally Effective Alternate Access Plan:** A document that outlines how JSU will provide equivalent access to information and services for people with disabilities when a particular technology is not fully accessible. It serves as a blueprint for addressing accessibility barriers, specifying what alternative measures will be taken, who is affected, and who is responsible for implementation.

Implementation

New Content or Technology: In accordance with the DOJ Final Rule, effective April 24, 2026, all digital content and information technology used to create, distribute, or publish content must conform to the standards. Compliance must be achieved and maintained in accordance with applicable regulations and standards no later than April 24, 2026. Applicable digital content and information technology that is newly purchased, developed, revised, or otherwise altered after the approval date of the policy must be made accessible to the Technical Standards as required under regulations except where limited exceptions exist or where a legitimate "fundamental alteration" or "undue burden" exists under applicable regulations. Personnel who are procuring digital content, course materials, and information technology are responsible for ensuring that publishers, providers, and vendors are aware of this policy and that JSU contracts with them in ways that hold them accountable to the Technical Standards. Procurement and JSU Information Technology ("IT") should support these efforts when involved in IT purchases. All applicable technology procurements must include a current VPAT/ACR (Voluntary Product Accessibility Template / Accessibility Conformance Report) and, where available, a vendor roadmap for accessibility improvements. IT and Procurement will apply a Risk Matrix (Low / Moderate / High) to the applicable procurements. Moderate and High-risk procurements require an Equally Effective Alternate Access Plans (EEAAP) before approval; High risk procurements may be denied.

All contracts involving digital materials, web applications, or websites shall include an IT Accessibility Rider with provisions for remediation timelines, remedies in case of vendor default, and cancellation rights. Library license agreements shall include language on accessibility for users with print disabilities.

Existing Content or Technology: Existing content and technology will likely fall under two primary categories – **Exempt and Non-Exempt.** There are five exemptions outlined by the DOJ Final Rule.

1. The first exemption is Archived Web Content: This includes archived web content that meets all four of the following points:
    a. It was created before the University's requirement to comply;
    b. It is kept for reference, record keeping, etc.;
    c. It is kept in a special area for archived content;
    d. and it has not been changed since it was archived.
2. The second exemption is Preexisting Conventional Electronic Documents: This includes preexisting electronic documents that are documents (word processing, presentation, spreadsheets, or PDF files), and those documents were available on the website or apps before the compliance date, unless that content is currently being used to apply, access, or participate in University, programs, services, or activities. In situations where the document is currently being used in that manner, the documents would not be exempt and must meet the Technical Standards.
3. The third exemption is Third Party Content: This is when the content was posted by a third party and that third-party is not posting due to contractual, licensing, or other arrangements.
4. The fourth exemption is Individualized Documents that are Password-Protected: This exception is for individualized documents that are password-protected. To qualify for this exemption, the document:
    a.   1) must be a word processing, presentation, PDF, or spreadsheet file;
    b. 2) is about a specific person, account, or property; and
    c. 3) is password-protected or otherwise secured.

5. The fifth and final exemption is Preexisting Social Media Posts: The fifth exemption is for pre-existing social media posts created before the date the University must comply with the Technical Standards found in the DOJ Final Rule.

Content that does not fall under an allowable exemption is considered non-exempt and must be remediated to be compliant with the Technical Standards. Remediation should begin on all applicable content following the implementation of this policy and be compliant by April 25, 2026, except where a legitimate "fundamental alteration" or "undue burden" exists under applicable regulations.

JSU will classify information technology as: Active, Legacy, or Archived.

- Active IT: in current use or ≥5 accesses/year; must be remediated as a priority.
- Legacy IT: older systems still accessible but with limited use; remediated upon request or before upgrade/replacement.
- Archived IT: maintained only for recordkeeping; made accessible on request.

Equally Effective Alternate Access Plans (EEAAP): When IT cannot be made accessible without undue burden, the department must develop an EEAAP documenting how individuals with disabilities will be provided with timely, equally effective access. EEAAPs must be submitted to the Digital Accessibility Steering Committee and retained for compliance review.

Undue Burdens or Fundamental Alterations: If there is a belief that compliance would result in a fundamental alteration or an undue financial or administrative burden, the President of the University or their designee evaluates the claim. The President's decision must consider all resources available for use in the funding and operation of the service, activity, or program and must be documented in a written statement that outlines the reasons for that conclusion.

At that time, the university shall take "any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity to the maximum extent possible" ([28 C.F.R. § 35.150(a)(3) (2024)](#)).

Responsibilities

- **Senior Administration**: Promotes awareness of this policy, assigns responsibility to ensure accessibility of content and IT within their divisions, and provides resources and support to ensure compliance.
- **Digital Accessibility Steering Committee:** Advises senior leadership, publishes accessibility reports, establishes and monitors milestones, and reviews EEAAPs.
- **Accessibility Liaisons**: Each college and cabinet level division shall designate an Accessibility Liaison to coordinate local accessibility testing, training, remediation, and reporting. Liaisons serve as primary contact with the Digital Accessibility Steering Committee.
- **Faculty, Staff, Course Designers, and Content Creators**: Responsible for producing accessible digital content, adhering to the Technical Standards, and utilizing accessibility best practices in their work. This includes but is not limited to the following: social media posts, images and graphics, flyers, video and audio content for courses, email content, and electronic documents. The unit or department responsible for the creation and maintenance of the specific content is responsible for making it accessible as required under the defined Technical Standards.
- **Office of Information Technology**: Implements accessibility features, conducts automated scans, and coordinates technical support.
- **Disability Resources:** Serves as a resource to University efforts in ensuring accessible, inclusive, and welcoming environments for individuals with disabilities while supporting and complying with applicable federal and state regulations. Disability Resources serves as a resource for disability-related information, technical assistance, training, consultation, and services university-wide.

- **Marketing Services / Web Services:** Provides resources for creating accessible marketing materials and website content, providing technical assistance, training, and consultation services related to their areas of expertise. Ensures all institutional sites include a public accessibility statement and a "report a barrier" link. Online@JSU supports faculty by offering training and resources designed to enhance proficiency in utilizing Canvas and Canvas Studio to develop accessible course materials such as Canvas Pages, Assignments, Discussions, and instructional videos within Canvas Studio.

Monitoring and Compliance

JSU monitors compliance with this policy through regular audits and assessments of digital content and platforms. Compliance is monitored through a tiered review process:

- Automated Testing: Weekly automated scans of JSU's web domains and applicable University approved LMS.
- Targeted Sampling: Items not covered through automated testing are sampled for manual review and testing.
- Quarterly Reviews: Cabinet level divisions receive quarterly accessibility score reports from their assigned accessibility liaisons. Any site scoring below 80% automated conformance requires a remediation plan and manual testing.
- Annual Accessibility Report: The Digital Accessibility Steering Committee compiles results, identifies high-risk systems, and publishes a summary report to senior administration.

Non-compliance will be addressed promptly. Divisions failing to remediate after notification may have digital content unpublished until accessible, and persistent failures may be escalated to the supervising dean, vice provost, or vice president.

Accessibility Statement and Barrier Reporting

All official JSU websites, web applications, and mobile applications must include a link in the footer to a standardized Accessibility Statement. This statement must at a minimum:

1. Affirm JSU's commitment to digital accessibility.
2. Provide a "Report a Barrier" link to report barriers.
3. Specify expected response timelines.

Training

JSU requires mandatory digital accessibility training for:

- All new faculty, staff, and student workers who create or manage digital content (as part of onboarding).
- Periodic refresher training for faculty, staff, procurement personnel, and IT staff responsible for creating and managing digital content.
- The university will maintain a central training portal with updated materials, including Technical Standards updates, best practices, and tutorials.

Review and Revision

This policy will be reviewed every five years by the Digital Accessibility Steering Committee. Revisions will be approved by the responsible party outlined below. The University reserves the right to modify the policy unilaterally at any time. This policy does not create or intend to create any contractual or legal obligation on the University's part or any contractual or legal right of any member of the public or the University's community.

Conclusion

JSU is committed to providing accessible digital resources and ensuring equal access to information and services for all individuals, including those with disabilities. By adhering to this policy and the latest guidance from the DOJ Final Rule, we uphold our commitment to inclusivity and accessibility.

RESPONSIBILITY

The Vice President for Information Technology has responsibility for this policy.

EVALUATION

The policy will be evaluated at least every five (5) years by the Digital Accessibility Steering Committee and the Vice President for Information Technology.