I. 5.1.2 Digital Accessibility

Chapter 5 - Information Technology	Original Effective Date: March 2022
Section: 5.1 Information Management & Services	Date Last Reviewed: August 2026
Responsible Entity: Vice President and Chief Information Officer	Date Last Revised: August 2026

II. Purpose

The purpose of this policy is to ensure all UT Health San Antonio digital platforms, digital content, and electronic and information resources (EIR) are accessible by employees, students, and members of the public and provide effective communication and optimal user experience for all users without barriers for individuals with disabilities.

UT Health San Antonio recognizes that conformance with digital accessibility standards supports equal opportunity and effective communication for all constituents, including those with disabilities.

III. Scope

This policy applies to all University faculty, staff, and students as well as any third-party vendors with whom UT Health San Antonio has contractual, licensing or other arrangements to provide digital content, applications, or other EIR.

IV. Policy

All EIR and digital content developed, procured, maintained, changed or used by UT Health San Antonio must meet standards for accessibility established by UT System policy, State law, federal statute and administrative rules, and any other relevant requirements from funding agencies.

In addition, all third-party EIR and digital content that is provided to users by the University either directly or through contractual, licensing, or other arrangements must also meet standards for accessibility established by UT System policy, State law, federal statute and administrative rules, and any other relevant requirements from funding agencies. A summary of key standards follows under Paragraph A.

A. Requirements

Title II Subpart H of the Americans with Disabilities Act of 1990, Section 504 Subpart I of the Rehabilitation Act of 1973, and the DIR Accessibility Rules all identify technical

standards by which accessibility can be measured for different types of EIR. Those categories and the respective standards that will apply at UT Health San Antonio are set out below.

1. Websites, web content, and web applications [28 CFR Part 35 Subpart H, 45 CFR Part 84 Subpart I, and 1 TAC 206.70]

   All websites, web content, and web applications that UT Health San Antonio provides or makes available, directly or through contractual, licensing, or other arrangements:

   a. Must conform with all Level A and Level AA success criteria of the Web Content Accessibility Guidelines (WCAG) version 2.1 [28 CFR 35.200(b)(1), 45 CFR 84.84(b)(1) and 1 TAC 206.70(a)]

   b. Must be tested using one or more accessibility validation methods, including but not limited to automated methods, manual methods, or assistive technologies, to confirm they meet or exceed the requirements of this policy [1 TAC 206.70(d)]

   c. Should support variations in internet connection speeds and emerging communications protocols and technologies [1 TAC 206.70(f)(1)]

   d. Should adapt content to end-user devices such as mobile phones, tablets, or other devices which are available to the general public [1 TAC 206.70(f)(2)]

   The standards for websites, web content and web applications apply to both public-facing and internal-facing content, including materials on the University's social media channels, on the University's intranet, and in the University's learning management system(s). The only exceptions to this section are those detailed in 28 CFR 35.201.

2. Mobile applications [28 CFR Part 35 Subpart H, 45 CFR Part 84 Subpart I, and 1 TAC 213.30]

   All mobile applications that UT Health San Antonio provides or makes available, directly or through contractual, licensing, or other arrangements shall conform with the following standards:

   a. All Level A and Level AA success criteria of the Web Content Accessibility Guidelines (WCAG) version 2.1 [28 CFR 35.200(b)(1), 45 CFR 84.84(b)(1), and 1 TAC 213.30(1)]

   b. Interoperability with Assistive Technology [1 TAC 213.30 (2) and 36 CFR Appendix-C-to-Part-1194 502]

   c. Applications [1 TAC 213.30 (3) and 36 CFR Appendix-C-to-Part-1194 503]

   d. Authoring Tools [1 TAC 213.30 (4) and 36 CFR Appendix-C-to-Part-1194 504]

3. Software Applications and Operating Systems [1 TAC 213.30]

   All software applications and operating systems EIR developed, procured, or changed by UT Health San Antonio shall comply with the following standards:

   a. All Level A and Level AA success criteria of the Web Content Accessibility Guidelines (WCAG) version 2.1 [1 TAC 213.30(1)]

b. Interoperability with Assistive Technology [1 TAC 213.30 (2) and 36 CFR Appendix-C-to-Part-1194 502]

c. Applications [1 TAC 213.30 (3) and 36 CFR Appendix-C-to-Part-1194 503]

d. Authoring Tools [1 TAC 213.30 (4) and 36 CFR Appendix-C-to-Part-1194 504]

4. Kiosks [45 CFR 84.83]

   All self-service kiosks will be implemented in a manner that does not discriminate against individuals with disabilities, and does not exclude them from participating in, nor deny them the benefits of the University's programs or activities.

5. Telecommunications Products [1 TAC 213.31]

   When purchasing telecommunication equipment or services, UT Health San Antonio shall contractually require the manufacturer of telecommunication equipment or provider of telecommunication services to ensure that the equipment or services are in compliance with 47 USC 255 and 36 CFR 1194.2, Appendix B [Appendix B to Part 1194, Title 36] when such products are readily available, or compliance is achievable.

6. Video and Multimedia Products [1 TAC 213.32]

   All video and multimedia EIR developed, procured or changed by UT Health San Antonio shall comply with the standards referenced in Section 508 Appendix C [Appendix C to Part 1194, Title 36]. If the video or multimedia product also meets the definition of web content, it should also meet the corresponding standards in Section A1 above.

7. Hardware [1 TAC 213.33]

   All hardware EIR developed, procured, or changed by UT Health San Antonio shall comply with the following standards referenced in Section 508 Appendix C Chapter 4:

   a. General [36 CFR Appendix-C-to-Part-1194 401]

   b. Closed Functionality [36 CFR Appendix-C-to-Part-1194 402]

   c. Biometrics [36 CFR Appendix-C-to-Part-1194 403]

   d. Preservation of Information Provided for Accessibility [36 CFR Appendix-C-to-Part-1194 404]

   e. Privacy [36 CFR Appendix-C-to-Part-1194 405]

   f. Standard Connections [36 CFR Appendix-C-to-Part-1194 406]

   g. Operable Parts [36 CFR Appendix-C-to-Part-1194 407]

   h. Display Screens [36 CFR Appendix-C-to-Part-1194 408]

   i. Status Indicators [36 CFR Appendix-C-to-Part-1194 409]

   j. Color Coding [36 CFR Appendix-C-to-Part-1194 410]

   k. Audible Signals [36 CFR Appendix-C-to-Part-1194 411]

   l. ICT with Two-Way Communication [36 CFR Appendix-C-to-Part-1194 412]

m. Closed Caption Processing Technologies [36 CFR Appendix-C-to-Part-1194 413]

n. Audio Description Processing Technologies [36 CFR Appendix-C-to-Part-1194 414]

o. User Controls for Captions and Audio Descriptions [36 CFR Appendix-C-to-Part-1194 415]

When EIR hardware is located in maintenance or monitoring spaces, and where status indicators and operable parts are located in spaces that are frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment, such status indicators and operable parts shall not be required to conform to the requirements of this section.

8. Functional Performance Criteria for all EIR [1 TAC 213.35]

To the extent that any EIR developed, procured or changed by UT Health San Antonio does not comply with the requirements of 1 Texas Administrative Code 213.30 - 213.33 that are applicable to that EIR, the noncompliant features of that EIR shall conform to the standards referenced in Section 508 Appendix C, Chapter 3, 302 Functional Performance Criteria [36 CFR Appendix-C-to-Part-1194 Chapter 3].

9. Documentation and Support Services [1 TAC 213.36]

All documentation and services that support the use of EIR developed, procured, or changed by UT Health San Antonio shall comply with the following standards referenced in Section 508 Appendix C, Chapter 6:

a. Support Documentation [36 CFR Appendix-C-to-Part-1194 602]

b. Support Services [36 CFR Appendix-C-to-Part-1194 603]

B. Procurement or Development of accessible EIRs

1. Process Requirements

a. In all EIR procurements, UT Health San Antonio will follow the process and requirements described in the most recent revision of UT System OGC Bulletin 2006-1 [note: that link requires a UT login, as the material is for internal use only] and 1 TAC §213.38. Appendix A to this policy presents a flowchart summary of the procurement process of OGC Bulletin 2006-1; please refer to the Bulletin for full process details.

b. When developing EIRs, UT Health San Antonio will follow the process and requirements described in the most recent revision of UT System OGC Bulletin 2009-1 [note: that link requires a UT login, as the material is for internal use only]. Appendix B to this policy presents a flowchart summary of the procurement process of OGC Bulletin 2009-1; please refer to the Bulletin for full process details.

2. Fundamental Alteration or Undue Burden

In circumstances where a UT Health San Antonio department determines that conformance with the requirements of Section A above would fundamentally alter a University service, program, or activity, or would result in undue financial and administrative burdens, UT Health San Antonio has the burden of proving that compliance would result in such alteration or burden. In such circumstances, the department must document:

a. All available University resources that were considered to support accessibility conformance,

b. The specific effects that conformance would have on the University's expenses or operations, and

c. The actions the department will take to ensure that affected individuals are able to access the impacted programs and services to the maximum extent possible.

This departmental statement must be signed by the department head and reviewed every two years by the University's IT Accessibility Coordination Team.

3. Testing Requirements

a. Proactive accessibility testing of EIRs is important, not only to validate the documentation provided by a vendor or developer, but to ensure everyone in our University community continues to have equal access to the functionality and information they look to the University to provide.

b. At a minimum, to comply with 1 TAC 213.38(g), UT Health San Antonio will perform accessibility testing (or engage a third party to do so) for all EIR procurements or development projects for which costs exceed $500,000 and which meet one or more of the following conditions:

i. Requires one year or longer to reach operations status,

ii. Involves a collaboration between UT Health San Antonio and one or more additional institutions of higher education or state agencies, or

iii. Substantially alters work methods of UT Health San Antonio personnel or delivery of services to clients.

C. Implementation and maintenance

1. Digital Accessibility Officer (EIR Accessibility Coordinator)

a. As directed by OGC Bulletin 2006-1, OGC Bulletin 2009-1, UTS 150, and 1 TAC §213.41(d), UT Health San Antonio shall designate a Digital Accessibility Officer (DAO, a/k/a EIR Accessibility Coordinator) who shall be organizationally placed to facilitate institution-wide EIR accessibility compliance and practices in support of this Policy. This designation will be kept updated with the Texas Department of Information Resources as described on the Department's website. UT Health San Antonio will inform the DIR within 30 days whenever its Coordinator position is vacant, or a new/replacement Coordinator is designated.

b. The Coordinator is responsible for:

i. developing, supporting, and maintaining UT Health San Antonio's EIR accessibility policies.

ii. providing assistance to offices at UT Health San Antonio with understanding, implementation and conformance with the DIR Accessibility Rules and other accessibility practices.

iii. ensuring required compliance by UT Health San Antonio with all DIR standard operating procedures or corrective action plans.

iv. coordinating the completion of required DIR EIR accessibility surveys and reports regarding progress and compliance with the DIR Accessibility Rules on behalf of the University

v. coordinating with UT system and EIR Accessibility Coordinators at other UT Institutions to ensure consistent implementation of EIR Accessibility compliance efforts at UT Health San Antonio.

2. Accessibility Compliance Plan

a. UT Health San Antonio will establish, approve and publish an Accessibility Compliance Plan to achieve compliance with the DIR Accessibility Rules, including progress measurement toward meeting established goals.

b. UT Health San Antonio will provide training to appropriate staff members to conform with the DIR Accessibility Rules and ensure the University's EIRs are as accessible as possible to all users. Additionally, the University will consider including accessibility criteria in job descriptions for any positions in which EIR Accessibility may be applicable.

c. UT Health San Antonio will establish an IT Accessibility Coordination Team (ITACT). UT Health San Antonio will provide the ITACT with the authority and resources necessary for the ITACT to develop and implement policies, procedures, and reporting necessary to implement the EIR Accessibility Compliance Plan at UT Health San Antonio. UT Health San Antonio's ITACT must include at a minimum the University's Digital Accessibility Officer (EIR Accessibility Coordinator), as well as representatives from University IT and the Institutional Compliance and Privacy Office.

d. UT Health San Antonio's ITACT will design and implement a process by which each UT Health San Antonio organizational unit will collect and provide the ITACT with written reports identifying the EIRs for which the unit is responsible and that are subject to the DIR Accessibility Rules.

e. UT Health San Antonio's ITACT will work with each organizational unit to identify EIRs out of compliance with the DIR Accessibility Rules and develop Corrective Action Plans (CAPs) to remediate non-compliant issues. Each unit is responsible for implementing its CAP and reporting completion to the ITACT.

f. The University's Digital Accessibility Officer (EIR Accessibility Coordinator) will report to the Institutional Compliance and Privacy Office twice a year regarding the status of the ITACT's efforts to implement the EIR Accessibility Compliance Plan.

V. Definitions

When used in this document, the following words have the meaning set forth below unless a different meaning is required by context.

Accessible - describes an electronic and information resource that can be used in a variety of ways and (the use of which) does not depend on a single sense or ability [1 TAC 213.1(2)].

Electronic and information resources (EIRs) –Texas code generally uses the term to refer to information technology (IT) including any equipment or interconnected system or subsystem of equipment used to create, convert, duplicate, store or deliver data or information. It includes telecommunication products (such as telephones), information kiosks and transaction machines, web sites, multimedia and office equipment such as copiers and fax machines.

The term does not include equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission or reception of data or information. For example, thermostats or temperature control devices and medical equipment that contain information technology that is integral to its operation, are not information technology.

If the embedded information technology has an externally available web or computer interface, that interface is considered EIR [1 TAC 213.1(9)].

Web content - the information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content's structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents. [28 CFR 35.104]

VI. Related References

28 CFR Part 35 Subpart H "Nondiscrimination on the Basis of Disability in State and Local Government Services – Web and Mobile Accessibility"

45 CFR Part 84 Subpart I "Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance – Web, Mobile and Kiosk Accessibility"

Texas Government Code, Chapter 2054, Subchapter M, "Access to Electronic and Information Resources by Individuals with Disabilities."

Texas Administrative Code, Rule §206.70, "Institution of Higher Education Websites: Accessibility."

Texas Administrative Code, Chapter 213, Subchapter C, "Accessibility Standards for Institutions of Higher Education."

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UT System policy UTS 150, "Access by Persons with Disabilities to Electronic and Information Resources Procured or Developed by The University of Texas System Administration and The University of Texas System Institutions."
UT System OGC Bulletin 2006-1, "Access by Persons with Disabilities to Electronic and Information Resources Procured by The University of Texas System Administration and The University of Texas System Institutions."
UT System OGC Bulletin 2009-1, "Access by Persons with Disabilities to Electronic and Information Resources Developed by The University of Texas System Administration and The University of Texas System Institutions."

VII. Review and Approval History

The approving authority of this policy is the University Executive Committee.

Effective Date	Action Taken	Approved By	Approval Date
03/2022	Policy Origination	Executive Committee	2/2022
08/2026	Policy Revision	Executive Committee	08/2026