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| Responsible Office   | Disability Support Services                           | Adoption Date | 02/25/2026 |
| Responsible Official | University Director of<br>Disability Support Services | Last Revision | 02/25/2026 |

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## **DIGITAL ACCESSIBILITY POLICY**

### **I. POLICY STATEMENT**

Fairleigh Dickinson University is committed to fostering an environment in which all students can be successful. In accordance with this commitment, this Digital Accessibility Policy (“Policy”) is established to enable digital access and improve the user experience for individuals with disabilities. This Policy addresses the needs of individuals with disabilities who seek to use any University digital content to participate in University classes, programs, activities and/or conduct University business.

### **II. PURPOSE OF POLICY**

The purpose of this Policy is to assist members of the FDU community to meet the legal requirements of the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.

### **III. SCOPE OF POLICY**

Fairleigh Dickinson University requires all faculty, staff, students, and contracted third-party suppliers involved in the procurement, creation, production, or revision of Digital Content to adhere to this Policy.

### **IV. DEFINITIONS**

**Archived Content:** Digital Content which is not actively being used and not intended to be used in the future. Short-term inactivity does not imply that Digital Content qualifies to be archived, rather, there should be no expectation of future use before classifying such content as Archived. Archived Content is not required to meet current WACG 2.1 AA compliance. See Section V.B.i for further information on what content may be considered Archived Content.

**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.

**Blackboard:** The online Learning Management System (LMS) currently used by FDU for academic instruction and the housing of course Digital Content.

**Digital Accessibility Steering Committee:** Chaired by the University Director of Disability Support Services, this cross-functional committee is charged with ensuring this Policy remains current with all future regulatory requirements and that the FDU community remains aware of all Policy requirements through regular communication.

**Digital Content:** Any material—text, image, video, audio, form, document or otherwise—used for an interactive context, whether or not it was originally intended for that purpose. This includes but is not limited to: content posted on the FDU website and contracted third-party websites; course content posted on Blackboard; email sent within the FDU email system; social media content posted on an official FDU social media account; content within mobile applications; and content within internal digital platforms.

**Digital Content Creator:** Any individual who creates Digital Content for the University. This includes but is not limited to: student workers (e.g., when updating websites, posting social media content on University accounts, or assisting instructors with class Blackboard sites), faculty members, staff members, contractors, and contracted third-party vendors.

**Digital Content Owner:** Any individual who manages or supervises a department or unit which creates Digital Content.

**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 WCAG as well as any way it is not in compliance with that standard.

**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. As of the adoption date of this Policy, the current standard is WCAG 2.1 AA. WCAG has three levels of standards for digital accessibility, but WCAG Level AA is the commonly recognized standard for compliance.

## **V. POLICY STATEMENT**

### **A. Requirements**

All new or redesigned University websites and digital resources posted by a Digital Content Creator shall be in compliance with the most recent version of or successor standards to the WACG 2.1 Level AA (“Policy Standards”), as published by the Web Accessibility Initiative of the World Wide Web Consortium. Legacy web pages and

digital resources shall be updated to comply with the Policy Standards according to priorities set by the Senior Leader, as defined in Section VI.A., responsible for the web page or digital resource in collaboration with the Digital Accessibility Steering Committee.

A variety of evaluation methods shall be used to test and maintain the accessibility of web pages and digital resources, including automated and manual testing, user testing (including the use of assistive technology), and expert evaluation.

## **B. Exemptions**

There are four cases in which Digital Content is exempted from the Policy Standards. All conditions for each type of exemption must be met in order for the Digital Content to qualify.

- i. Archived content. This refers to web content that:
  - a. Was created before the issuance of this Policy, reproduces paper documents created before the issuance of this Policy, or reproduces the contents of other physical media created before the adoption of this Policy;
  - b. Is retained exclusively for reference, research, or recordkeeping purposes. It is not used for current, active, or public/University community communication (e.g., it is not a current, essential document, form, or policy);
  - c. Is not altered or updated after the date of archiving; and
  - d. Is organized and stored in a dedicated area or areas clearly identified as being archived.

*Note: Course sites that are not currently active may be considered Archived Content if they meet the above criteria. Any previously inactive course site that is reactivated after this Policy's effective date must comply with this Policy unless an exemption applies.*

- ii. Content posted by a third party – e.g., comments left on social media by third parties.
- iii. Individualized, password-protected or otherwise secured conventional electronic documents. This exemption applies only to conventional electronic documents that are:
  - a. About a specific individual, their property, or their account; and
  - b. Password-protected or otherwise secured.

*Note: This exemption does not apply to Blackboard sites or any software/website utilized for sharing course materials in the regular course of educational programs. Some examples of documents that may fall under this exemption include personal employee files of the kind typically held within HR (e.g., W-2 and I-9 forms), and personal information downloaded from password-protected University systems by students for their personal use.*

- iv. Preexisting social media posts. University social media posts that were posted before the adoption of this Policy.

### **C. Procurement**

Any contract, obligation or agreement which requires the University to license, purchase, or otherwise accept a product or service with Digital Content shall contain a provision indicating that the vendor or provider of the product or service certifies its compliance with WCAG level 2.1 AA or higher via a VPAT document. Any exceptions must be approved by the General Counsel.

## **VI. ROLES AND RESPONSIBILITIES**

### **A. Senior Leaders**

Senior Leaders (Senior Vice President, Vice President, General Counsel, Dean, or their designee) are responsible for:

- i. Ensuring that Digital Content in their area has identified Digital Content Owners;
- ii. Charging Digital Content Owners to (1) identify Digital Content Creators, (2) promote the necessary training and education for Digital Content Creators; and (3) respond to compliance deficiencies in a timely manner; and
- iii. Ensuring that all Digital Content (websites, documents, course sites, etc.) in their area demonstrates a commitment to accessibility by including a link to this Policy.

### **B. Digital Content Owners**

Digital Content Owners are responsible for the accessibility of the Digital Content under their purview and must take reasonable measures to ensure Digital Content Creators, developers and other necessary parties accomplish this goal. Digital Content Owners will coordinate with their Digital Content Creators and appropriate members of the Digital Accessibility Steering Committee to: (1) oversee remediation processes; (2) identify any resource/training needs; and (3) create a plan for regular auditing of their Digital Content's compliance with this policy and reporting of audit results to the Digital Accessibility Steering Committee.

## **VII. REPORTING AND RESPONDING TO ACCESSIBILITY ISSUES**

### **A. Reporting**

University websites, including contracted third-party websites are subject to this Policy and should prominently display a link to the Accessibility page or directly to the "Report a Digital Accessibility Concern" form, providing the primary means for users to submit requests or express concerns about the accessibility of Digital Content. All instructional modules within Blackboard, also being subject to this Policy, should include this link on their main page. The reporting form will reside on the Digital Accessibility Policy page.

Should a Digital Content Owner become aware of a user accessibility issue through any other channel, the Digital Content Owner must submit the issue using the “Report a Digital Accessibility Concern” form so that all such concerns can be tracked centrally.

## **B. Remediation**

Report form submissions will be routed to the appropriate Digital Content Owner for follow up. Digital Content Owners are required to address any reported barriers to access promptly.

If remediation measures are not taken in a timely manner, the Senior Leader who oversees the Digital Content Owner shall be contacted to ensure that remediation is completed. As a last resort, if the remediation has not been completed, the non-compliant Digital Content may be taken down until corrective action is taken.