Policy title	Category
Digital Accessibility Policy	Administration Information Technology
Owner	**Approved by**
ITS	Ad Council

Purpose of this policy

The purpose of the Digital Accessibility Policy is to define the organization's accessibility requirements for the creation of "University Content", which it defines to mean "any information or communication accessed or displayed in a digital format or medium, as text, image, audio, or video," that is "created, posted, distributed or published for University Business." and to "University Information Technology": i.e., information technology that is "purchased, developed, deployed, or used for University Business and, in the case of web-based applications and websites, is hosted on a Nebraska Wesleyan University owned or -controlled domain." The Policy in turn defines "University Business" to include "activities carried out under the auspices of Nebraska Wesleyan University," except for "activities organized or conducted by students or student organizations."

Application of this policy

This policy applies to all Nebraska Wesleyan University Information Technology Services (ITS) standards and university technology assets. Any information not specifically identified as the property of other parties, that is transmitted or stored on Information Systems (including email, messages, and files), shall be considered the property of The University and to which this policy applies. However, this policy does not supersede the rights and ownership provisions outlined in the University's Intellectual Property Policy. In cases where information or materials qualify as intellectual property under that policy, such as faculty-created course materials, student works, or inventions, the ownership and usage rights shall be governed by the Intellectual Property Policy. All users (employees, contractors, vendors, or others) of Information Systems are responsible for adhering to both this policy and the Intellectual Property Policy.

Policy statement

Nebraska Wesleyan University is committed to ensuring that all digital content and technologies used for University Business are accessible to everyone, including individuals with disabilities. This policy establishes best practices and standards for accessibility across University Content and Information Technology.

All digital materials, whether text, image, audio, or video, created, posted, or distributed for University Business must meet accessibility standards. Likewise, all University Information Technology, purchased, developed, or used for university purposes, must comply with these requirements.

The University adopts the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA as its standard. These guidelines are based on four key principles:

- Perceivable – Content must be presented in ways users can perceive.
- Operable – Interfaces must be usable by all users.
- Understandable – Information and operations must be easy to comprehend.
- Robust – Content must be compatible with current and future technologies, including assistive tools.

Content Owners, designated individuals responsible for University websites or IT systems, are accountable for ensuring accessibility. If a site or system does not meet standards, the Digital Content Accessibility Committee (DCAC) may require a remediation plan. Any exceptions to this policy must be approved in writing by the Chief Information Officer (CIO), following the ITS-01: Policy Exception

Standard.

Digital Content Accessibility Committee
The Digital Content Accessibility Committee (DCAC) is convened by the Chief Information Officer and/or Director of Student Accessibility Services. In addition to preparing the prioritization plan, the DCAC is responsible for providing periodic review and revision of this Policy including making appropriate updates to the Policy's Standards definition as industry standards and practices evolve, with recommendations going to the Provost; working with Ad Council to promote general awareness of this Policy; assessing and reporting to the Provost the University's accessibility efforts as outlined in this Policy; and establishing a process and designating appropriate authorities to review and decide on requests for Policy exceptions.

Digital Accessibility Requirements

A Content Owner is the designated role or individual responsible for a University Website or IT system. Content Owners are responsible for the accessibility of their sites and must hold content creators, developers and other necessary parties accountable for ensuring the site's accessibility. Content Owners are determined by the applicable unit's Vice President , Dean, Chair and/or Director. Content Owners may not have the technical knowledge or expertise needed to ensure that their "owned" websites conform to the Policy. While a Content Owner is an individual person, this policy recommends that Content Owners be assigned based on their roles, as individuals tend to change roles at the University over time.

The "Standards" in the Policy are the Web Content Accessibility Guidelines, version 2.1, Level AA Conformance ("WCAG 2.1 AA"). These guidelines and success criteria are organized around the following four principles, which lay the foundation necessary for anyone to access and use web content. Anyone who wants to use the web must have content that is:

Perceivable - Information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented.

Operable - User interface components and navigation must be operable. This means that users must be able to operate the interface.

Understandable - Information and the operation of user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface.

Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content as technologies advance.

If any of these are not true, users with disabilities will not be able to use the Web.

Under the Policy, the DCAC may require a Content Owner to establish a plan to improve some or all non-conforming portions of an existing University Digital Content. This may include websites and their content that would not otherwise be required to conform, such as a site created or revised prior to December 1, 2019, or access-restricted content created prior to June 1, 2023. In prioritizing websites for remediation, the DCAC will consider several factors, including:

How essential the website or its content is to university functions (i.e., is it functional or informational?);

- Whether the Content Owner is already planning a redesign;
- Target audience (i.e., is the website directed to internal or external users?); and
- Size of audience.

Remediation Process

The DCAC will refer identified sites to the Director of Student Accessibility for further evaluation. The Director of Student Accessibility will in turn contact each applicable Content Owner to provide information about their site and identify resources available to support remediation. The Director of Student Accessibility may assist Content Owners in prioritizing what to improve and how to approach the work, such as through incremental updates made by existing staff, through contracted work, and/or through platform migration. Content Owners must provide an evaluation report to the DCAC enumerating efforts and periodically demonstrating progress.

Reporting and Responding to Accessibility Issues

The Policy expects University Websites to indicate their commitment to accessibility by including a link to the Nebraska Wesleyan University Digital Accessibility Policy from each web page. (This can be accomplished most effectively by including the link in a footer or other web element that replicates across all pages of the site.) The "Report a Web Accessibility Concern" form is linked from the Policy page, providing the primary means for users to submit requests or express concern about a particular University Website .

The Digital Content Accessibility Committee will triage requests submitted via this form and route them to the relevant Content Owner for follow-up. Content Owners who learn of a user accessibility issue through other channels also should submit the issue using the "Report a Web Accessibility Concern" form so that all such concerns can be cataloged centrally. Content Owners should ensure that prompt

efforts are undertaken to address any reported barriers to access. If Content Owners are unable to address the issue promptly, the Content Owner should contact the Office of Student Accessibility Services to discuss options for an exception.

Procurement Considerations

University personnel purchasing or procuring University Information Technology are responsible for ensuring that suppliers seeking to develop or provide University IT are aware of this policy and that contracts with such vendors hold them accountable to the standards to the fullest extent possible. University IT software and systems will be purchased through the ITS department and must be approved by the Vice President of Finance and Administration. ITS will document preferred vendors and negotiate contracts of purchasing with vendors.

Application and Enforcement

This Policy applies to all employees and students of the University. Failure to comply with University IT policies may result in sanctions related to an individual's use of IT resources.

Inappropriate behavior in the use of computers will be addressed through university policies and related procedures regarding students, faculty, and staff. The offenses mentioned in this policy range from relatively minor to extremely serious, though even a minor offense may lead to more significant consequences if it is repeated or malicious. Certain offenses may also be subject to prosecution under federal, state, or local laws.

The University considers the intent, severity, and history of any incident when determining an appropriate response. Sanctions for offenses will utilize procedures outlined in the Student Code of Conduct, Human Resources policies, or the Faculty Handbook.

Restrictions of Privileges During Investigations
During the course of an investigation of alleged inappropriate or unauthorized use, and after assessing the possible risk to the university or its computing resources, it may be necessary to temporarily suspend a user's network or computing privileges. This is a precautionary measure and does not imply wrongdoing by the individual involved. For example, if a computer account has been used to launch an attack on another system, that account will be rendered inactive until the investigation is complete. This is a necessary action taken to prevent further misuse and does not presume that the account holder initiated the misuse.

Unsubstantiated reports of abuse will not result in the suspension of accounts or network access unless sufficient evidence is provided to show that inappropriate activity occurred. For example, if someone reports that their computer was "attacked" by a Nebraska Wesleyan system, the burden will be upon the complainant to provide sufficient data logs or other evidence to show that the incident did, indeed at least appear to be an attack.

Review and Update

This Policy shall be reviewed and amended by the University's Chief Information Officer and the Digital Content Accessibility Committee at increments no longer than every three (3) years or may be updated periodically for accuracy and clarity based on changes in technology or regulatory requirements.

The NWU Administrative Council approved this policy to be implemented on July 1, 2025. All topics or questions addressed in this policy that occur on or after this date will be subject to this policy and corresponding procedures. This policy supersedes and takes precedence over any prior IT policy or related procedures.

Last revised date
July 1, 2025