

**Policy Title:** Web Accessibility Policy  
**Applicability:** Campus-Wide  
**Oversight:** Associate VP for Information Technology, Chief Information Officer  
**Effective Date:** November 17, 2017

## **I. POLICY STATEMENT**

Providence College is committed to taking reasonable measures to support the accessibility of its digital resources, including its websites, to students, employees and/or the general public in accordance with Section 504 of the Rehabilitation Act of 1973 (Section 504).<sup>1</sup> This Web Accessibility Policy provides information and guidelines regarding the College's efforts to make its websites accessible; appoints a Website Accessibility Coordinator to oversee those efforts; and outlines the process by which individuals may seek assistance with or file complaints related to website accessibility issues.

## **II. DEFINITIONS**

- A. **Website** refers to the collection of pages that the College or College units make available online through the World Wide Web for purposes of conducting official College business that do not require authentication (user identification and password).
- B. **Section 504 of the Rehabilitation Act of 1973, a civil rights law, states that:** “No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”
- C. **Title III of the Americans with Disabilities Act** states no individual may be discriminated against, based on disability, with regards to the full and equal enjoyment of the goods, services, facilities, or accommodations of any place of public accommodation by any person who owns, leases, or operates a place of public accommodation.
- D. **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 main international standards organization for the Internet. They are a set of guidelines that specify how to make content accessible, primarily for people with disabilities. The current version, WCAG 2.0, was published in December of 2008 and became an ISO standard, ISO/IEC 40500:2012 in October of 2012.  
<https://www.w3.org/TR/WCAG20/>

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<sup>1</sup> Consistent with the College's Anti-Harassment and Discrimination Policy, this Policy supports the College's efforts to comply with applicable disability laws, including the Americans with Disabilities Act (ADA) of 1990 as amended, and Section 504.

### **III. POLICY**

The College is committed to ensuring that its websites are accessible to students, prospective students, employees and visitors with disabilities. In meeting its nondiscrimination obligations under Section 504 of the Rehabilitation Act of 1973 and Title III of the Americans with Disabilities Act, the College has developed this Policy to help ensure that individuals with disabilities are able to obtain information and perform online tasks through the use of the College's websites.

This policy does not apply to unofficial websites published by a student or College employee or by any organization not sponsored, owned, or controlled by the College.

#### *A. Website Accessibility Coordinator*

The College has designated a Website Accessibility Coordinator within Information Technology to oversee the implementation of this Policy. The Website Accessibility Coordinator's contact information is provided below.

In addition to overseeing the implementation of this Policy and the College's web accessibility efforts, the Website Accessibility Coordinator will maintain resources, including training resources, to assist individuals in complying with this policy when creating, revising, or managing web content.

#### *B. Website Accessibility Guidelines*

##### New or Revised Content

The College is committed to ensuring College web pages created or revised after the effective date of this Policy are compliant with the World Wide Web Consortium's Web Content Accessibility Guidelines, or WCAG 2.0. Web content creators and approvers are responsible for ensuring that new and revised content complies with the WCAG 2.0, Level AA Standards, and its successive revisions.

##### Legacy Content

Legacy content is web content that was developed prior to the effective date of this Policy. The College assesses legacy web content on a periodic basis to determine compliance with the WCAG 2.0 Standards. The College modifies legacy web content on a prioritized basis, with priority given to web pages with the most traffic or webpages with content that is most critical to students, faculty, and staff.

Individuals can request that legacy web content be made available when content is inaccessible using the grievance procedure outlined below. Priority will be given to individualized requests to make web content accessible.

## Exceptions

In certain circumstances, exceptions to this Policy may be granted. This Policy does not require adherence to the WCAG 2.0 Standards when compliance is not possible or would constitute an undue administrative or financial burden or result in a fundamental alteration. The College will make determinations on the applicability of these exceptions on a case by case basis. Individual content creators or approvers may request exceptions to this Policy by contacting the Website Accessibility Coordinator and exceptions may be granted or denied at the discretion of the Coordinator, who will consult with other College officials as necessary.

## **IV. REPORTING ACCESS BARRIERS AND FILING COMPLAINTS**

Individuals who experience a barrier, should contact the Website Accessibility Coordinator. Current students who encounter a barrier related to College web content also may contact the Disability Support Services within the Office of Academic Services to coordinate technical assistance and/or individual accommodations. Other individuals who experience a barrier related to College web content should contact the Website Accessibility Coordinator.

Complaints regarding Website Accessibility can be filed by contacting the Website Accessibility Coordinator or by completing the form available at the following link:  
<https://providence.tfaforms.net/235>

The Website Accessibility Coordinator will review a submitted form, or other information provided by a complainant. The Website Accessibility Coordinator (or designee) will assess the complaint and the web content issue. The Website Accessibility Coordinator (or designee) will determine a means to resolve the accessibility issue in a timely manner, in most cases within 15 business days of receiving the complaint. The resolution will be communicated in writing to the complainant. If the resolution is not satisfactory to the complainant, a grievance may be filed in accordance with established grievance procedures available at the following links.  
<https://academic-services.providence.edu/services/grievance-procedure/>

## **V. THIRD-PARTY VENDOR AGREEMENTS AND CONTRACTS**

College employees or units who hire third-party vendors to provide website services are to use vendors with a proven commitment to website accessibility. Third-party websites are external websites that are not hosted on Providence College servers, nor hosted on servers funded by Providence College. If a vendor is unable or unwilling to provide written assurance that its services will be accessible to individuals with disabilities, the hiring employee or unit must consult with the Website Accessibility Coordinator regarding alternative solutions and approval. The College's contract review process includes an analysis of accessibility issues.

## **VI. TRAINING AND RESOURCES**

### **A. Training**

The Website Accessibility Coordinator (and/or designee) will work within IT and with other College units as necessary to provide and publicize resources, including training, in support of web accessibility. The Website Accessibility Coordinator (and/or designee) will oversee mandatory, periodic training on website accessibility for all developers and content creators and approvers for the College's website. To request additional or customized individual or department training regarding Website Accessibility, contact the Website Accessibility Coordinator.

### **B. Resources**

Website Accessibility Coordinator  
Matthew Bevilacqua  
Web Application Developer  
Information Technology  
Providence College  
(401)865-1766  
mbevilac@providence.edu

ADA/504 Coordinator for Students  
Jonathan Gomes  
Assistant Director of Tutoring & Disability Services  
Office of Academic Support Services  
(401) 865-2470  
jgomes@providence.edu  
<https://academic-services.providence.edu/services/grievance-procedure/>

ADA/504 Coordinator for Students  
Dr. James F. Campbell  
Assistant VP for Student Development and Compliance  
(401) 865-2676  
James.campbell@providence.edu  
<https://academic-services.providence.edu/services/grievance-procedure/>

ADA/504 Coordinator for Employees  
Kathy Alvino  
Associate VP for Human Resources  
(401) 865-2430  
kalvino@providence.edu  
<https://human-resources.providence.edu/policies/>