

**Policy Title:** Web Accessibility Policy  
**Applicability:** Campus-Wide  
**Oversight:** Senior Associate VP for Information Technology,  
Chief Information Officer  
**Effective Date:** November 17, 2017  
**Administrative Revisions:** May 1, 2024

## **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) and Title III of the Americans with Disabilities Act.<sup>1</sup> This Web Accessibility Policy provides information and guidelines regarding the College's efforts to make its websites accessible; appoints a Web 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. **Web/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 2.2, was published in October of 2023.

<https://www.w3.org/TR/WCAG22/>

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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. Web Accessibility Coordinator*

The College has designated a Web Accessibility Coordinator within Information Technology to oversee the implementation of this Policy. The Web 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 Web Accessibility Coordinator will maintain resources, including training resources, to assist individuals in complying with this policy when creating, revising, or managing web content.

#### *B. Web 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. Web content creators and approvers are responsible for ensuring that new and revised content complies with the current version of the WCAG 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 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 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 Web 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 Web Accessibility Coordinator. Current students who encounter a barrier related to College web content also may contact Accessibility Services within the Student Success Center to coordinate technical assistance and/or individual accommodations. Other individuals who experience a barrier related to College web content should contact the Web Accessibility Coordinator.

Complaints regarding website accessibility can be filed by contacting the Web Accessibility Coordinator or by completing the form available at the following link:

<https://providence.tfaforms.net/235>

The Web Accessibility Coordinator will review a submitted form, or other information provided by a complainant. The Web Accessibility Coordinator (or designee) will assess the complaint and the web content issue. The Web 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 <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 Web 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 Web 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 Web 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 web accessibility, contact the Web Accessibility Coordinator.

### B. Resources

#### **ADA/504 Coordinator:**

Mirlen Mal

Senior Associate VP for Human Resources

(401) 865-2430

[mmal@providence.edu](mailto:mmal@providence.edu)

<https://human-resources.providence.edu/policies/>

**Inquiries regarding ADA/Section 504 issues for students may also be directed to:**

Jonathan Gomes

Assistant Dean / Director of Accessibility Services

Student Success Center

(401) 865-2470

[jgomes3@providence.edu](mailto:jgomes3@providence.edu)

#### **Web Accessibility Coordinator:**

Kerri Hicks

Assistant Director for Web Development & Web Accessibility

Information Technology, Web Services

Providence College

(401) 865-1766

[khicks3@providence.edu](mailto:khicks3@providence.edu)