

DRAFT:

January 21, 2009

Web Accessibility

Volume: 5, Information
Technologies

Responsible Executives: Vice
President for Information
Technologies/Vice President for
Communications

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POLICY STATEMENT

All Web pages within the Cornell University Web space, subject to exceptions enumerated in this policy, must be made accessible to the widest range of users, including those with the more common sensory, motor and cognitive disabilities, by adopting as a minimum all requirements of Section 508 of the Rehabilitation Act of 1973.

REASON FOR POLICY

Cornell University strives to attract the highest caliber of faculty, staff, and students. In addition, the university recognizes that the future will bring trends toward more accessible Web space design, to better serve Web users with and without disabilities. These factors, coupled with the university's overall commitment to a diverse and inclusive educational and work environment that anticipates a changing technological and regulatory environment, merit a comprehensive university policy on Web accessibility.

ENTITIES AFFECTED BY THIS POLICY

- All units of the university

WHO SHOULD READ THIS POLICY

- All members of the university community

WEB SITE ADDRESS FOR THIS POLICY

- This policy: www.policy.cornell.edu/

- University Policy Office: www.policy.cornell.edu

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RELATED DOCUMENTS

University Policies and Documents	Other Documents
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University Policy 6.13, Disability Accommodation Process

Rehabilitation Act of 1973 (Pub. L. 93-112)
Americans with Disabilities Act

[Open Doors, Open Hearts, and Open Minds: Cornell's
Statement on Diversity and Inclusiveness](#)

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CONTACTS

Ithaca Camps Contacts

Subject	Contact	Telephone	E-mail/Web Address
Policy Clarification	Director of IT Policy	(607) 254-3584	IT-policies@cornell.edu
	Director of Web Communications	(607) 255-1290	univcomm.cornell.edu/webcommunications

Weill Cornell Medical College Contacts

Subject	Contact	Telephone	E-mail/Web Address
Policy Clarification	PLEASE COMPLETE	(212) xxx-xxxx (212) xxx-xxxx	PLEASE COMPLETE

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DEFINITIONS

These definitions apply to terms as they are used in this policy.

Archival Web Site	A web site that is (a) intended to represent a historical snapshot of a course, research project, or other Web information, and (b) not used to gather or disseminate information about any current course, currently active research project, or current administrative function of the university.
Assistive Technologies	Adaptive, rehabilitative devices, whether acquired commercially or off the shelf, modified, or customized, that promote greater independence for individuals with disabilities by changing how these individuals interact with technology. Assistive technologies include special input devices, such as a head or foot mouse, and screen-reading software, which can read aloud for the user the details of material displayed on a monitor.
Central Administrative Unit	A unit that serves the entire university community in an administrative role.
Cornell Web Space	The entire collection of Web sites whose purpose for existence can be legitimately connected with Cornell University activities, including academic, research, and outreach activities. A Web site may reside on a non-Cornell Web server, or may not have a cornell.edu domain name, but may still be considered part of the Cornell Web space.
Official Web Site	A web site that has been created or sponsored by the university, its schools, departments, units, or other administrative offices and that is used in the process of conducting official University business. In addition, Web applications—both those developed in-house and those purchased from outside vendors—are considered official.
Section 508 Standards for Accessibility	Web design standards established through federal law and regulation under the Rehabilitation Act of 1973. See the “ <i>Web Accessibility Standards</i> ” Section of this document for a detailed list of those standards.
Unit	A college, department, program, research center, business service center, office, or other operating unit.
Unofficial Web Site	A site published by an individual such as a student or a university employee, or by a non-university organization, which is hosted on university servers but does not conduct university business. These include: <ul style="list-style-type: none">• Student, faculty, and staff personal pages• Pages created by students to fulfill academic requirements that do not fall within one or more of the categories of “official websites”• Sites that reside on Cornell University servers that do not conduct university business, e.g., mirror sites• Pages hosted on ResNet servers that do not fall within the official Web site categories listed above• Alumni Class and Organization Pages• Student organization pages, including pages for all recognized Greek chapters• Affiliate Web pages
Web Accessibility	The practice of making web pages more accessible to a wide range of users by applying specific design standards and programming that

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DEFINITIONS, continued

	offers alternative forms of access and that enables assistive technologies to function effectively.
Web Application	Any software that delivers dynamically generated content intended to be rendered in a web browser.
Web Page	A (web) document rendered by a markup language, (e.g., xhtml, html), independent of its transmission protocol (e.g., http) and user agent (browser/reader).
Web Site	Any collection of Web pages residing under a single domain and whose content is centered around a single organizational unit or workgroup, a university course, a research or business activity, or an area of academic content.
Web Site Redesign	Any phase during the development or maintenance of a Web site in which significant alteration or update is made to the visual design, institutional branding, information architecture, or technical functionality of the site. Minor content updates are not considered Web site redesign projects.

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RESPONSIBILITIES

Unit Head	When possible, provide necessary support within the unit for compliance with this policy.
Cornell Information Technologies (CIT)	Provide education, training, and support resources to university community members on compliance with this policy
Office of Web Communications (OWC)	Provide education, training, leadership, guidance, and support resources to university community members on compliance with this policy
Procurers of Web Development Software	Consider Web accessibility issues when purchasing software or licenses.
Web Developer (or anyone responsible for the creation, review, or update of a Web page)	Design or revise web sites in accordance with this policy.

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PRINCIPLES

Overview

The federal government requires its agencies to comply with the Rehabilitation Act of 1973, 29 U.S.C. 794d, Section 508, subpart B 1194.22 "Web-based intranet and internet information and applications" ("Section 508"). The law does not require compliance because Cornell University is a private entity. Nonetheless, Cornell aspires to make its Web pages as accessible as is practicable in keeping with its founding, and enduring, philosophy of accessibility in its many forms. Toward that end, this policy sets Web accessibility standards for Web sites in the Cornell University Web space.

Currently, the two most widely accepted standards for Web accessibility are the aforementioned Section 508 and the Web Content Accessibility Guidelines (WCAG) of the World Wide Web Consortium (W3C). Cornell has chosen Section 508 standards because they may well represent the standards that Cornell may be expected to adopt if compliance branches out to private educational institutions.

This policy divides the Cornell University web space into sectors for the purpose of creating zones of compliance, exceptions, and timelines for implementation.

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PROCEDURES

Official Cornell Web Space to Which Web Accessibility Requirements Will Apply

The following areas of Cornell Web space are required to adopt Section 508 standards:

Administrative

- *Central Administrative Units* – www.cornell.edu and central administrative unit sites
- *Academic Units* – college and department sites constructed for public information and university business functions

Academic

- *Teaching* – Course sites; Course collaboration tools; Pages created by students to fulfill academic requirements which also fall within one or more of the official categories listed here
- *Research* – Research results presented to the public on line; human participant sites created for the purpose of conducting research by collecting data (please note the exemptions, listed below, for research collaboration sites and for sites created to conduct research or experiments in developing or utilizing new technologies and applications for the Web.)
- *Outreach* – Outreach program sites not designed for collaboration

Cornell Web Space to Which Web Accessibility Requirements Will NOT Apply

The following areas of Cornell Web space are not required to adopt Section 508 standards:

1. Unofficial Web sites (see the “*Definitions*” Section of this document)
2. Vendor-obtained web applications for which no accessible functionally equivalent alternative exists
3. Inter-institution archives, databases, and collections.
 - ◆ **Note:** If these sites or Web pages fulfill any university purpose other than the conduct of research (example: also serve as a course Web page), then alternate accessible sites or Web pages must be provided.
4. Sites and Web pages created to conduct research or experiments in developing or utilizing new technologies and applications for the Web
5. Sites and Web pages created to experiment with new workflow processes that involve Web tools

◆ **Note: There may be additional exceptions, as noted in Section 508.**

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PROCEDURES, continued

- ◆ **Note:** Once a tool moves beyond an experiment and becomes an accepted part of a workflow process, that tool must comply with this policy.
- 6. Whole-course capture sites (automated videotaping or audio recording of every class session)
- 7. Any site intended for use by fewer than 25 people
- 8. Archival sites
- 9. Undue burden: compliance with this proposed policy would interfere significantly with the site owner's teaching, research or public service mission
 - ◆ **Note:** Site owners are asked to make a good faith effort at evaluating whether a site qualifies for an undue burden; no documentation is necessary.

WEB ACCESSIBILITY REQUIREMENTS

For non-exempted Cornell Web space, the following will be required of Web developers. This list is taken *verbatim* from the Section 508 provisions, which can be found at www.section508.gov/Web.

- a. A text equivalent for every non-text element shall be provided (examples: via "alt," "longdesc," or in-element content).
- b. Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- c. Web pages shall be designed so that all information conveyed with color is also available without color. For example, from context or markup.
- d. Documents shall be organized so they are readable without requiring an associated style sheet.
- e. Redundant text links shall be provided for each active region of a server-side image map.
- f. Client-side image maps shall be provided instead of server-side image maps, except where the regions cannot be defined with an available geometric shape.
- g. Row and column headers shall be identified for data tables.
- h. Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- i. Frames shall be titled with text that facilitates frame identification and navigation.
- j. Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- k. A text-only page, with equivalent information or functionality, shall be provided to make a Web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- l. When pages utilize scripting languages to display content or create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.
- m. When a Web page requires that an applet, plug-in, or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).
- n. Online forms shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
- o. A method shall be provided that permits users to skip repetitive navigation links.
- p. When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

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	WEB ACCESSIBILITY REQUIREMENTS, continued
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Notes:

1. Section 508 includes the following provision: "A text-only page, with equivalent information or functionality, may be provided to make a Web site comply [with Section 508 requirements], when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes." In short, providing a fully accessible, text-only alternative with equivalent information or functionality will satisfy accessibility requirements under this proposed policy.
2. This proposed policy does not cover the accessibility of sites outside Cornell University to which a Cornell University page might be linked. Sites outside the Cornell Web space containing required content for courses should be reviewed for accessibility before making the course assignments, and faculty will advise students of available accommodation for any inaccessible content assigned. In the case of equivalent content being available from multiple sources, faculty will give preference to the accessible alternative.

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TIMING FOR ADOPTION OF STANDARDS

Overview

Web accessibility standards should be adopted as soon as practicable within the normal parameters of university operations. Risks that attach to a failure to adopt include potential future legal liabilities, impediments to forming effective collaboration with academic and non-academic partners (examples: research, government, corporate, and community), barriers in communication to external audiences (examples: prospective students, media, and the academic community), and dilution of the university's outreach mission.

Timeline for Implementing Web Accessibility Standards

Implementation Deadline	Web Page(s) or Site(s) to Comply
Within one year of promulgation	All new and redesigned ¹ Web sites published by any university college, department, or program
Within two years of promulgation	All official administrative and academic instructional Web sites
Within three years of promulgation	All academic research and outreach Web sites
Within three years of promulgation	All large-scale Web applications developed completely within the university, by any university college, department, program, or unit All licensed or open source Web applications not purchased by Cornell but in use within the Cornell Web space
Within three years of promulgation, or upon the next renewal of contract with the vendor	All Web applications purchased from an external vendor ² or obtained under contract with other institutions
Within five years of promulgation	All official Web sites (subject to exceptions)

¹ As noted in the "Definitions" Section of this document, above, Web site redesign refers to any phase during the development or maintenance of a Web site in which significant alteration or update is made to the visual design, institutional branding, information architecture, or technical functionality of the site. Minor content updates are not considered Web site redesign projects.

² If the vendor does not offer a compliant product, all market alternatives must be explored.

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