Approving University Officials): Provost
Responsible Office: Office of Civil Rights and Title IX Compliance
Effective date: September 1, 2026
Next review date: August 31, 2027

Digital Accessibility Policy

I. Policy Statement

Northwestern University is committed to fostering a community of access, belonging and accountability. In accordance with this commitment, and with the knowledge that accessible digital content generally enhances usability for everyone, this Digital Accessibility Policy (hereafter "Policy") is established to enable digital access and improve the user experience for individuals with disabilities. The University recognizes that digital content is often integral to the academic and administrative work and programmatic activities of the University. This Policy addresses the needs of individuals with disabilities who seek to use the University's digital content to participate in University programs and activities and/or conduct University Business.

All Digital Content Owners must ensure that any Digital Content for which they are responsible that is created, produced, or undergoes substantial revisions on or after the effective date conforms to the Accessibility Standards, absent the presence of an applicable exception.

II. Purpose

The purpose of this policy is to assist members of the NU community with conforming with 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. Audience

This policy applies to all Northwestern University faculty, staff and student workers engaged in the procurement, creation, production, or revision of Digital Content.

IV. Definitions

AccessibleNU: An office within the Division of Student Affairs that provides academic accommodations to students and key input to the Digital Accessibility Steering Committee ("DASC") regarding students' digital accessibility needs.

Accessibility Standards: This refers to The Worldwide Web Consortium's Web Content Accessibility Guidelines ("WCAG"). The University will comply with the WCAG level required by applicable regulations, although units within the University may choose to exceed that level. In the absence of applicable regulations, the University will aim to comply with the WCAG level currently required by the Department of Justice's Americans with Disabilities Act Title II Rule (as of the effective date of this Policy, WCAG2.1 AA).

Digital Accessibility Liaisons: Designated staff member(s) in a school, unit or department tasked with coordinating local digital accessibility efforts, often in partnership with the Digital Content Owner.

Digital Content: All electronic information procured, created, produced, or revised by a school, unit or department for University Business which includes, but is not limited to:

- Websites hosted on the University domain;
- Course sites
- Northwestern-created and third-party software, applications, mobile applications, domains and websites utilized by schools, units and departments;
- Official University social media accounts;
- Audiovisual materials, such as videos and podcasts; and
- Downloadable documents made available through University Websites, course sites, and social media, including but not limited to PDFs, PowerPoints and Word documents.

Digital Accessibility Steering Committee: A committee comprised of University stakeholders in the area of access and digital content, including representatives from Office of Civil Rights and Title IX Compliance ("OCR"), AccessibleNU, Office of Global Marketing and Communication, Northwestern IT, Human Resources and the Office of General Counsel.

Digital Content Owner: An individual responsible for University Digital Content (e.g. websites, software, Canvas sites, etc). Digital Content Owners have primary responsibility for: (1) ensuring that the Digital Content for which they are responsible conforms to this Policy; (2) educating and training Digital Content Creators who contribute to said Digital Content on the requirements of this Policy and the tools and methods for securing conformance with it; and (3) responding to known compliance deficiencies in a timely manner.

Digital Content Creator: Persons who create Digital Content for the University. This includes, but is not necessarily limited to: student workers (e.g. when updating websites or assisting instructors with class Canvas sites), faculty members, staff members, and contractors.

Office of Civil Rights and Title IX Compliance ("OCR"): An office within the President's Office that serves as a University-wide resource on disability-related information, procedures and services for the University community, digital and otherwise; coordinates with the DASC to address digital accessibility concerns; and oversees the University's Reasonable Accommodation Policy.

Procurement: The assessment and acquisition of digital products from Suppliers through Northwestern Procurement and Payment Services and directly by University departments or units.

Senior Leadership: Designated senior academic and administrative officials within the University who have the authority to take and/or direct the actions set forth in this Policy.

Supplier: Any third-party or vendor with which the University contracts to supply digital content.

Undue Hardship or Fundamental Alteration: Respectively, a change to the work environment that would impose significant operational difficulties and/or financial strain; and/or a change to an academic program, service, or activity that significantly changes the essential nature of the program, service, or activity. OCR, in partnership with DASC and key University partners as needed, makes the determination as to whether an Undue Hardship or Fundamental Alteration exists.

University Business: Activities carried out under the auspices of Northwestern University and in furtherance of the University's mission, exclusive of activities organized or conducted by students or student organizations.

V. Roles and Responsibilities

a. ***Senior Leadership.*** Senior Leadership (each unit's Dean, Vice President, Chair, Unit Leader and/or Director) is responsible for establishing mechanisms to ensure that Digital Content within their areas conform to this Policy by:
    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.
    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***
    i. Each unit's Dean, Vice President, Chair, Unit Leader and/or Director will designate Digital Content Owner(s) for the Digital Content that falls under their purview.
    ii. Digital Content Owners are responsible for the accessibility of the Digital Content under their purview and must hold Digital Content Creators, developers and other necessary parties accountable for ensuring the Digital Content's accessibility.
    iii. Digital Content Owners will coordinate with their Digital Content Creators and Digital Accessibility Liaison(s) 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.

c. ***The Digital Accessibility Steering Committee***
    i. The Digital Accessibility Steering Committee ("DASC") will support overall compliance of the University's Digital Content, and will consult with OCR as OCR reviews and makes determinations on EEAAPs known issues with digital accessibility compliance under this policy, including the applicability of the exceptions.
    ii. The DASC will consult with OCR to periodically review this Policy, its associated procedures, and the governance model and, as appropriate, recommend changes. The review will help ensure that the Policy continues to align with the University's mission, including its commitment to accessibility.

VI. Policy Implementation

a. General

- All Digital Content Owners will ensure that any Digital Content for which they are responsible conforms to the Accessibility Standards, absent an exception approved by OCR.
- Upon a request by an individual who is unable to access archived material, the relevant Digital Content Owner must either update the identified content to conform to the Accessibility Standards or make it available in an alternative format in a timely manner.
- If a Digital Content Owner believes that conformance with the Accessibility Standards would create an Undue Hardship or a Fundamental Alteration, the Digital Content Owner must reach out to OCR to discuss any such concern. OCR, in partnership with DASC and key University partners as needed, will assess and make a determination as to whether an Undue Hardship or Fundamental Alteration exists. If OCR determines that an Undue Hardship or Fundamental Alteration indeed exists, then OCR will work with the Digital Content Owner to identify alternative means of access.

b. Exceptions

These are the five situations in which the digital accessibility requirements of this policy do not apply. All conditions listed for a specific type of exception must be met in order for a given situation to qualify for the exception. Whether an exception applies is determined by OCR and/or its key partners. The five exceptions are:

1. **Archived web content.** This refers to web content that:
   a. Was created before the first effective date of this policy (September 1, 2021), reproduces paper documents created before September 1, 2021, or reproduces the contents of other physical media created before September 1, 2021;
   b. Is retained exclusively for reference, research, or recordkeeping;
   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: Courses sites that are not currently active may be considered archived web 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 exception applies.

2. **Preexisting conventional electronic documents.** Conventional electronic documents that are available as part of the University's web content or mobile

apps before September 1, 2021 unless such documents are currently used to apply for, gain access to, or participate in the University's services, programs, or activities (e.g. housing application forms).

3. **Content posted by a third party** – e.g. comments left on social media by third parties.
4. **Individualized, password-protected or otherwise secured conventional electronic documents.** This exception 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 exception does not apply to Canvas 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 exception include personal employee files of the kind typically held within HR (such as W-2 and I-9 forms), and personal information downloaded from password-protected University systems by students for their personal use.

5. **Preexisting social media posts.** University social media posts that were posted before September 1, 2021.

c. ***Procurement of digital content.*** Digital Content Owners shall purchase Digital Content that conforms with the Accessibility Standards. An equally effective alternative access plan ("EEAAP") must be developed when conformance with the Standards is not possible. Those responsible for procuring Digital Content for the University shall:
    i. Exercise due diligence in researching available information about a product's accessibility (e.g. examining the Accessibility Compliance Report ("ACR") and/or Voluntary Product Accessibility Template ("VPAT") provided for a given tool);
    ii. Endeavor that contracts with Suppliers include language holding the Suppliers accountable for conforming with the Accessibility Standards; and
    iii. Develop an EEAAP, when conformance with the Accessibility Standards is not possible.
        1. EEAAPs shall be promptly submitted to OCR.
        2. EEAAPs must include a detailed description as to why conformance with the Policy is not feasible or would cause undue hardship. EEAAPs should detail how information will be made

available to individuals with disabilities until conformance with the Accessibility Standards is achieved.

3. All EEAAPs will be reviewed by OCR in consultation with the DASC within 30 days. Documentation of EEAAPs and their disposition will be retained by OCR, which will undertake periodic review of the exemption process.

iv. If those responsible for procuring Digital Content are working with a vendor who will provide a custom build (new website, custom software, or Canvas tools/LTI integration), they should seek to:

1. Incorporate digital accessibility requirements into the RFP or work request;
2. Exercise due diligence in researching available information about a product's accessibility (e.g. examining the ACR and/or VPAT provided for a given tool);
3. Ensure that contracts with Suppliers include language holding the Suppliers accountable for conforming with the Accessibility Standards; and
4. Develop an EEAAP, when conformance with the Accessibility Standards is not possible.

VII. Reporting and Responding to Accessibility Issues

a. Reporting

University websites subject to this Policy should include a link to the "Report a Digital Accessibility Concern" form on the footer of each page, providing the primary means for users to submit requests or express concern about the accessibility of Digital Content. The "Report" form will link to the Digital Accessibility Policy page.

OCR will route submitted reports to the appropriate Digital Content Owner for follow up. Digital Content Owners are required to address any reported barriers to access promptly. If unable to do so, Digital Content Owners must refer the issue back to OCR. OCR will consult with DASC, Northwestern IT and/or any key partner to identify an appropriate accommodation, if applicable.

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 catalogued centrally.

b. Remediation

OCR, in partnership with the DASC, may require a Digital Content Owner to establish a plan to remediate those portions of Digital Content under their purview that do not conform to the Accessibility Standards. This may include Digital Content that would otherwise not be required to conform, such as a site created or revised prior to the effective date of this Policy.

c. Consequences of Violating this Policy

OCR is charged with responding to complaints regarding Digital Content that does not conform to the Accessibility Standards. Absent an applicable exception, OCR will require that non-conforming portions of Digital Content be brought into conformance by designated staff or suppliers, and the expense of that work may be charged to the Digital Content Owner that is responsible for ensuring the accessibility of that content. If non-conforming Digital Content remains out of compliance after repeated attempts by OCR to communicate with the Digital Content Owners, then, as a measure of last resort, OCR may refer the issue to Northwestern IT to take down the noncompliant Digital Content and/or the appropriate office overseeing the Digital Content Owner for corrective action.

VIII. Related Information

• Related Policies:

- Reasonable Accommodation Policy
- Policy on Discrimination, Harassment and Sexual Misconduct

IX. Contacts

The following individuals can address questions regarding this Policy:
Laura Conway, Director of ADA Compliance and ADA Coordinator, Office of Civil Rights and Title IX Compliance: laura.conway@northwestern.edu

X. History

Policy Approval Date: September 1, 2026
Policy Effective Date: September 1, 2027

XI. Policy URL:

https://www.northwestern.edu/accessibility/digital-accessibility/policies-standards/