

MMC's Policy on Information Technology Accessibility

Part I: Introduction

MMC is committed to maintaining a diverse and inclusive academic community, where all students are given the opportunity to have a transformative learning experience. Providing equality of opportunity to persons with disabilities, including equal access to College programs, services, and activities provided through electronic or information technology (EIT), is essential to fulfilling this commitment.

As a basis for achieving this commitment, this Policy establishes minimum standards and expectations for the design, acquisition, and use of information technology. This Policy must be compliant with [Sections 504 and 508 of the Rehabilitation Act of 1973](#), the [Americans with Disability Act of 1990](#), as amended, and other federal, state, local and College policies.

The College's Policy regarding these standards will be introduced in phases. The first phase includes website and web-based content accessibility. The second phase of this Policy will include, at a minimum, electronic documents and multimedia disseminated on a webpage that have been created or obtained after the effective date of this Policy, hardware and software in use at the College, and the procurement of these IT products.

This Policy is a living document that will change over time as EIT changes. Ample opportunities for education and communication will occur whenever changes to this Policy take place.

Part II: Policy Statement

MMC commits to ensuring equal access to all College programs, services, and activities provided through electronic and information technology. Unless an exemption applies and according to the applicability and timeline specifications below, all College divisions, departments, and offices shall:

1. Use College web page designs that are consistent with the World Wide Web Consortium's ([W3C](#)) [Web Content Accessibility Guidelines 2.0](#) (WCAG) Level AA conformance level.
2. Disseminate electronic documents and multimedia on web pages that are consistent with this Policy.

Applicability:

This Policy applies to all EIT that is acquired, developed, distributed, used, purchased, or implemented by or for any MMC division, department, or office and used to provide College programs, services, or activities through websites or web-based applications, including:

- Official web pages and associated web-based applications (see Web Page Requirements & Time Frames below)
 - Webpages created prior to the effective date of this Policy are considered "legacy" pages. Accordingly, the applicable timeframes are specified below under "Exemptions" for web page requirements.
- Electronic Documents
 - Any documents created or obtained and disseminated after the effective date of this Policy.
- Multimedia
 - Any multimedia created or obtained and disseminated after the effective date of this Policy.

- Equipment
 - Office equipment, as defined in Part III, purchased after the effective date of this Policy.

Web Page Requirements & Time Frames:

- All new and revised web pages, website templates, and website themes published on or after the effective date of this Policy must comply with WCAG 2.0 Level AA.
- All new and revised webpages must indicate in plain text a method for users having trouble accessing the site to report the inaccessibility. This could be in the form of contact information on the bottom of every MMC page.
- When contacted and offered technical assistance, divisions, department, and offices with identified high-priority legacy pages must comply with this Policy and make their web pages consistent with WCAG 2.0 Level AA. Divisions, departments, and offices will be notified if their legacy pages have been deemed high priority and will be provided technical assistance, as needed. High priority pages will be identified by:
 - The top 20% of web pages most frequently visited.
 - Pages required for participation, funding, disability-related services and other key pages needed by people with disabilities not already in the top 20%.
 - Other pages determined to be of the most importance in providing College services online (i.e. core institutional information).

Exemptions:

Archived Web pages do not have to comply with WCAG 2.0 Level AA unless specifically requested by an individual with a disability. Units with legacy pages not deemed high priority also do not have to comply with WCAG 2.0 Level AA, but are encouraged to identify and improve the accessibility of their pages.

Undue burden and non-availability may qualify as an exemption from this where compliance is not technically possible, or is unreasonably expensive or difficult, in that it may require extraordinary measures due to the nature of the IT or the intent of a web page.

The conclusion of undue burden or non-availability is an institutional decision to be made by the EIT Committee in consultation with the affected unit and others with relevant perspective or expertise.

Part III: Definitions

Accessibility: Means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with a substantially equivalent ease of use.

Electronic and Information Technology (EIT): Includes e-learning and information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to internet and intranet websites, content delivered in digital form, electronic books, and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems (“clickers”), and office equipment such as classroom podiums, copiers, and fax machines. It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement,

control, display, switching, interchange, transmission, or reception of data or information. This term includes telecommunications products (such as telephones), information kiosks, Automated Teller Machines (ATMs), transaction machines, computers, ancillary equipment, software, firmware and similar procedures, services, (including support services), and related resources.

Archived Web Pages: Inactive web pages that may be searchable, but are otherwise hidden from view and are no longer linked anywhere on the College's website.

Legacy Web Pages: Active Web pages that were created before the effective Policy date.

Part IV: Compliance

The College is committed to monitoring the maintenance related to keeping the website accessible for persons with disabilities. MMC's accessibility standards are designed to evolve and change, as newer technologies are introduced and user needs change. At the same time, the standards maintain a consistent framework for accessibility training and support services. All MMC employees who are responsible for electronic and information technology produced, maintained, distributed, purchased and/or used by the MMC community will possess the required technical knowledge related to accessibility standards for individuals with disabilities.

Part V: Third Party Applications

In order for any third-party applications to be included on the website, they are expected to comply with the same website accessibility guidelines followed by the College.

Part VI: Contact

Michael S. Johnson, Assistive Technology Specialist
mjohnson@mmm.edu 212-774-0782

Name: Michael S. Johnson Date: 10/1/2018

Effective Date:

This Policy will take effect six months after its approval.

Effective: 4/1/2018

Date of Approval and Last Date Updated:

Approved: 10/1/2018

Updated: