Digital and Electronic Content Accessibility Policy (DRAFT)

1. Policy Summary
   In keeping with Molloy College’s commitment to a diverse and inclusive educational and work environment, Molloy College strives to make Molloy College’s Website and web-based applications accessible to all Users in the College’s programs and activities, including individuals with disabilities. This policy is in accordance with federal, state, local laws, regulations and policies requiring accessibility for individuals with disabilities, including Section 508 of the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act of 1990, as amended.

2. Policy Scope
   This policy establishes minimum standards for the accessibility of digital information and applies to all web-based content and functionality, whether developed, maintained, or offered by Molloy College or through a third party vendor or open source on the College’s behalf. This includes all members of the Molloy community (faculty, staff, administrators, and students) who create and modify content on the Molloy College Website(s), web-based applications, social media platforms or any digital learning management system.

3. Exceptions
   Limited exceptions may be granted by Disability Support Services/Success Through Expanded Education Program (DSS/STEEP) in specific instances where compliance with the most recent version of WCAG Level AA is not possible or would constitute Undue Hardship. However, these difficulties do not relieve College programs or activities from meeting applicable legal obligations to provide reasonable accommodations to Users in regard to access to the content and services provided on the Molloy College Websites. Managers of College programs and activities must be prepared to submit an accommodation plan detailing how they will convert this information to a suitable alternative format to individuals with a disability.

4. Policy
   Molloy College commits to ensuring equal access to all College programs, services and activities provided through electronic and information technology. All Personnel who are involved in the procurement, preparation and maintenance of the Molloy College Website and web-based applications shall adopt this goal, over time, with the assistance of campus resources dedicated to supporting web accessibility. The Molloy College Website and web-based applications must either conform to the most recent version of Web Content Accessibility Guidelines as published by the World Wide Web Consortium’s (W3C) Level AA, or, in cases of Undue Hardship, their content and functionality be made available to Users on request (such as
by a student request to the Office of Disability Support Services/Success Through Expanded Education Program (DSS/STEEP) in an equally effective and accessible alternative manner. This policy extends to the procurement, development, implementation, and ongoing maintenance of the College’s electronic and information technologies.

5. Definitions

**Molloy College Website**
Any website or web-based application within the Molloy College (molloy.edu) domain used in the programs or activities of the College.

**Accessible**
Refers to the concept that people with disabilities have independent and timely access to and use of a product or system, in some instances with the help of assistive technologies.

**Assistive Technologies**
Assistive technologies include adaptive hardware, software and devices that increase, maintain, or improve the functional capabilities of individuals with disabilities.

**Disability**
Disability means a physical or mental impairment that substantially limits one or more major life activities.

**Learning Management System (LMS)**
A learning management system (LMS) is a software application for the administration, documentation, tracking, reporting and delivery of educational courses, training programs, or learning and development programs. Molloy’s comprehensive learning platform, Canvas, is designed to support fully online or blended learning with features that enhance student learning and to connect digital tools for instructors and students to use in one place.

**Personnel**
Personnel refer to Molloy College staff, faculty, and students who manage the Molloy College Website and its web-based applications.

**Undue Hardship**
Undue hardship refers to situations where compliance is not technically feasible or may require extraordinary financial or administrative measures due to the nature of the information or the purpose of the Molloy College Website.

**Users**
Molloy website users are defined as current Molloy students and applicants for admission, Molloy staff and faculty, all those who visit the Molloy College Website and participants in the College’s programs and activities.

**Web-Based Application**
Computer programs that perform specific functions by using a web browser as their client. This includes, but is not limited to, large systems such as Customer Relationship Management systems (i.e., Element), student services websites (i.e., Jenzabar and Lion’s Den), message boards and contact forms.

6. Campus Resources

The following offices provide services to support users trying to access Molloy College’s digital resources, including guidance in web and course design.

Office of Strategic and Digital Communications
The Office of Strategic and Digital Communications (OSDC) provides guidance and support for Molloy College content creators to assist them in producing accessible materials. Services include content accessibility review and guidance regarding universal design and web standards compliance. The OSDC is also the campus resource that facilitates online accessibility for Users.

Office of Blended/Online Learning and Student Success
The Office of Blended/Online Learning and Student Success trains and assists faculty in making content and courses accessible to all students. Workshops, webinars, online courses (asynchronous and self-paced) and one-on-one consultations are available through this office.

Office of Disability Support Services/Success Through Expanded Education Program (DSS/STEEP)
DSS/STEEP is the campus office designated to work with Molloy students with disabilities. DSS/STEEP provides support services, accommodations, and programs to remove barriers to full participation of students with disabilities in the programs or activities of the College.

7. General Questions

For questions about this policy, its guidelines and procedures, please contact the Office of Strategic and Digital Communications at info@molloy.edu.

APPENDICES

Appendix A: Accessibility Guidelines

Molloy College has adopted the most recent version of WCAG Level AA as published by W3C as its goal for an accessible Molloy College Website. The guidelines and success criteria of WCAG are organized around the following four principles which lay the foundation for users with disabilities to access and use web content. For the Molloy College Website to be accessible under these principles, its content must be:

1. **Perceivable** – Information and user interface components must be presentable to users in ways they can perceive.

2. **Operable** – User interface components and navigation must be operable.
3. **Understandable** – Information and the operation of user interface must be understandable.

4. **Robust** – Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

**Appendix B: Implementation Guidelines**

1. All personnel responsible for existing Molloy College Websites must use good faith efforts, subject to the requirements and exceptions of the applicable laws, to bring each page that is part of the Molloy College Website into conformance with the most recent version of WCAG Level AA.

2. New Molloy College Website development and purchases, including development and purchases for major revisions and updates of existing websites, should conform to the most recent version of WCAG Level AA.

3. Vendors seeking to develop or provide websites or web-based applications for Molloy are to demonstrate that their products satisfy the most recent version of WCAG Level AA Criteria, unless undue burden or fundamental alteration can be demonstrated (see below). Accessibility language for Molloy’s web-based vendor contracts may be obtained from the Office of Compliance.

4. Each page of the Molloy College Website should contain Accessibility contact information for the site’s webmaster and/or the OSDC. The contact information may take a variety of forms, such as an email address or an accessible contact form on the site. The recommended location for this information is Molloy College Website’s “Contact” or “About Us” page. For information regarding classes/courses, please contact DSS/STEEP.

5. The OSDC will continue to test www.molloy.edu for accessibility.

6. DSS/STEEP will continue to seek input from Molloy students regarding accessibility issues.

**Appendix C: Implementation Assistance**

Guidelines, best practices and assistance for developing and implementing accessible website pages are available from the OSDC. If such assistance is needed, please email the OSDC at info@molloy.edu.

For training, resources, consultations or general assistance with web-enhanced, hybrid and/or online courses, please email the Office of Blended/Online Learning and Student Success at coursedesign@molloy.edu.
Services for students with disabilities are available through DSS/STEEP, and may be requested by emailing dss@molloy.edu.

Appendix D: Responding to Accessibility Issues (Procedures)

Recognizing the ongoing evolution of current web content and technologies, the designated content manager for a particular website, upon being made aware of an accessibility issue on that site, should proceed as follows:

- Acknowledge receipt of the issue in writing (via email) to the User raising the issue, with a copy to the OSDC.
- Open an accessibility case for recording the issue and resulting action taken.
- Verify that the issue is an authentic accessibility issue.
- Treat all issues as important. Address any time-sensitive need of the User promptly (generally within a period of no greater than two business days), unless technology or work involved requires more effort, in which case the User will be promptly notified in writing of expected delivery.

Upon receiving a report of an accessibility issue, the OSDC shall notify the site’s content manager as well as DSS/STEEP (for reports from students). If the OSDC determines that the information or service provided on the Molloy College Website cannot be made accessible, or that doing so would constitute an Undue Burden or fundamental alteration, DSS/STEEP or OSDC will engage in an interactive process with the User about alternative methods for providing the information or service and will provide an equally effective alternative format or service.