



## Executive Memorandum No. 47

### Information and Communication Technology Accessibility Policy

#### 1. Policy Scope

This policy applies to all Information and Communication Technology (“ICT”), Web Content, and Mobile Applications (“apps”) procured, developed, maintained, or used by or for the University of Nebraska (“University”) to support teaching, working, learning, research, and to provide University programs, services, activities, or communications.

#### 2. Reason for Policy

In alignment with Board of Regents Policy 3.1.2 and in compliance with federal and state laws—including the Americans with Disabilities Act of 1990 (ADA), the ADA Amendments Act of 2008, Section 504 and Section 508 of the Rehabilitation Act of 1973, and Nebraska Revised Statutes §86-516(6)—the University of Nebraska is committed to ensuring that all students, employees, and members of the public have equitable access to the University’s Web Content, Mobile Applications, and ICT resources. Accessibility is critical to fulfilling the University’s academic, research, service, and employment missions.

#### 3. Definitions

- a. **Information and Communication Technology (ICT)** is defined as information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include, but are not limited to: computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; Web sites; videos; and, electronic documents. [Revised 508 Standards, 36 C.F.R. § 1194 (2018)]
- b. **Mobile Applications (“apps”)** means software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.

- c. **Web Content** means the information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content's structure, presentation and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents.

#### **4. Policy Statement**

The University is committed to providing ICT, Web Content, and Mobile Applications in an accessible manner for persons with disabilities. ICT, Web Content, and Mobile Applications procured, developed, maintained, or used by the University shall conform to accessibility requirements prescribed in federal and state laws including Revised 508 Standards, 36 C.F.R. § 1194 (2018), as amended by the Nebraska Information Technology Commission, the Web Content Accessibility Guidelines (WCAG version updated to 2.1); and 28 CFR Part 35 Subpart H—Web and Mobile Accessibility.

#### **5. Web Content and Mobile Applications**

On April 24, 2024, the Federal Register published the Department of Justice's final rule updating its regulations for Title II of the Americans with Disabilities Act (ADA). The final rule has specific requirements about how to ensure that Web Content and Mobile Applications ("apps") are accessible to people with disabilities.

In accordance with these updated regulations, Web Content and Mobile Applications utilized by the University in its programs, services, activities, or communications shall conform with the Web Content Accessibility Guidelines (WCAG version updated to 2.1 AA Standard) as soon as practical, and no later than April 24, 2026.

This includes, but is not limited to, digital instructional materials (e.g., lecture slides, recorded classes, and electronic resources delivered through platforms such as Canvas); official University websites, which provide centralized access to academic or employment information, course catalogs, and program details; office and productivity software; administrative systems, including ticketing platforms, online registration portals, employee information systems and application systems for student admissions, housing, and employment; and library services, such as online catalogs, electronic books, academic databases; digital communications, including official University social media channels and multimedia elements, combining audio, video, and text-based content, along with accessibility features such as video captions, audio description for visual content, and alternative text for images, ensuring access for all users

#### **6. Procurement Considerations**

University employees who procure, develop, maintain, or use ICT, Web Content, and/or Mobile Applications for University related purposes must consider accessibility as one of the criteria when evaluating the selection and potential utilization of ICT, Web Content, and/or Mobile Applications.

The University shall incorporate standard accessibility specifications and requirements into its procurement contracts, purchase order terms and conditions, competitive bid solicitation documentation, and sole-source documentation, for any proposed purchase or acquisition of ICT, Web Content, and/or Mobile Applications. The standard accessibility specifications and requirements shall include the obligation for vendors to remediate noncompliance when identified. In addition, the University shall establish procedures to verify vendor accessibility claims, including requesting and evaluating Voluntary Product Accessibility Templates (VPATs), Higher Education Community Vendor Assessment Tool (HECVAT) or equivalent documentation.

Preference should be given to vendors whose ICT, Web Content, and/or Mobile Application products demonstrate compliance with accessibility requirements.

## **7. Requests for Exemptions**

Exemptions to this policy may be permitted when full compliance would impose an “undue burden” or when an accessible format constitutes a fundamental alteration to the nature of the program, service, or activity. In all cases, the individual or unit requesting an exemption will be required to document and obtain written approval(s) for the exemption from the cognizant ADA/504 Coordinator

The ADA/504 Coordinator may grant exemptions to this policy in consultation with the requestor and other relevant parties when appropriate. The granting of an exemption does not eliminate the requirement to ensure individuals with disabilities receive the benefits or services the University is providing to the maximum extent possible.

## **8. Responsibility, Enforcement, & Assistance**

Compliance with this policy is the responsibility of all staff and faculty of the University. All University employees are responsible for ensuring that ICT, Web Content, and/or Mobile Applications procured, developed, maintained, or used under their purview meets the requirements identified in this policy.

Instances of non-compliance with or violation or breach of this policy will constitute a violation of the Bylaws and Policies of the Board of Regents of the University of Nebraska and may lead to discipline up to and including termination from the University.

The University’s ADA/504 Coordinators shall assist in providing policy consultation and assistance, coordinate training and resources, review and approve exemption requests, conduct periodic audits for compliance, and oversee the investigation of complaints of non-compliance with this policy.

## **9. Reporting an Accessibility Issue**

The University shall establish, and make publicly available, mechanisms for individuals to report accessibility issues or concerns.

Dated this 14th day of January 2026.

A handwritten signature in black ink, appearing to read "Jeffrey P. Gold".

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Jeffrey P. Gold, President

Reference: January 14, 2026