

POLICY TITLE: Digital Accessibility Policy

POLICY NUMBER: TBD

DIVISION: Student Affairs

DEPARTMENT: Student Well-Being & Success

POLICY OWNER/POSITION TITLE: Jennifer Parks-Tigert, ADA Coordinator and Manager

PURPOSE

Northeast Wisconsin Technical College (NWTC) is committed to providing accessible digital content, technologies, and services in compliance with federal disability laws, including the Americans with Disabilities Act (ADA) Title II and Section 504 of the Rehabilitation Act.

This policy establishes the legal accessibility standards the college will follow for digital content and services. NWTC adopts the Web Content Accessibility Guidelines (WCAG) 2.1 Level A and Level AA as the technical standard required under the U.S. Department of Justice (DOJ) Title II regulations.

SCOPE

This policy applies to all digital content and digital services created, procured, used, or maintained by NWTC for students, employees, or the public, including but not limited to:

- **Websites and Web-Based Applications:** College websites and public-facing content must conform to WCAG 2.1 Level A and AA.
- **Internal Platforms and Portals:** Internal systems requiring login must meet WCAG 2.1 A/AA unless covered by a federal exception.
- **Learning Management System (Canvas):** All instructional materials developed, uploaded, or linked must meet accessibility standards.
- **Documents and Digital Media:** All documents and media shared digitally must comply with WCAG 2.1 Level A and AA requirements for structure, navigation, and accessibility. This includes ensuring that documents, images, audio, and video adhere to technical standards for accessible formats.
- **Digital Communication:** Email, text messaging, instant messaging, and all other electronic communications created or distributed by NWTC employees must be accessible to the extent required by ADA effective communication standards.
- **Third-Party Tools and Services:** All procured or integrated digital tools must provide evidence of accessibility, such as a Voluntary Product Accessibility Template (VPAT) or an Accessibility Conformance Report (ACR). If a tool does not fully conform, NWTC must provide an accessible alternative or accommodation to ensure effective communication.
- **Internal Systems:** Faculty and staff intranets, internal communication platforms, and administrative tools must conform to WCAG 2.1 Level A and AA, unless covered by a federal exception, and must meet ADA effective communication requirements.
- **Social media:** Social media content created before the federal compliance date is exempt under the DOJ Title II rule. Future posts created or managed by NWTC must comply with applicable accessibility requirements and follow WCAG 2.1 Level A and AA standards to the extent feasible within the limitations of each platform.

EXCEPTIONS (Aligned to DOJ Title II Regulation):

Even where an exception applies, NWTC remains responsible for providing effective communication and ensuring individuals with disabilities receive accessible formats when needed. NWTC will apply the following federal exceptions exactly as defined in the U.S. Department of Justice Title II regulations:

1. Archived Web Content

Content created before the federal compliance date that:

- is maintained only for reference, research, or recordkeeping,
- is not altered after archiving, and
- is stored in a designated archive.

Staff responsible for maintaining archives must ensure archived content is clearly labeled and not modified after archiving.

2. Preexisting Conventional Electronic Documents

Documents created before the federal compliance date that are not currently used to apply for, gain access to, or participate in a college program, service, or activity.

3. Third-Party Content Not Under NWTC Control

Content posted exclusively by independent third parties where NWTC has no contractual or programmatic control.

4. Individualized, Password-Protected Documents

Documents about a specific individual, their property, or their accounts, that are:

- password-protected or secured, and
- accessible only by that individual (e.g., billing statements, financial aid documents).

5. Preexisting Social Media Posts

Posts created before the federal compliance date.

COMPLIANCE TIMELINE

NWTC will implement this policy consistently with the compliance dates established in the DOJ Title II digital accessibility regulations. Specific internal milestones, workflows, and remediation timelines will be detailed in college procedures and implementation plans and may be updated as needed.

GOVERNANCE AND RESPONSIBILITIES:

- **ADA Coordinator (Policy Owner)**
 - Administers this policy
 - Coordinates accessibility planning, reviews, and audits
 - Oversees effective communication responsibilities
 - Reviews accessibility complaints
 - Approves exceptions consistent with federal regulations
- **Disability Services**
 - Coordinates accommodations and accessible alternative formats

- Supports students encountering digital accessibility barriers
- **Teaching & Learning Center (TLC)**
 - Provides training, support, and consultation to faculty
 - Ensures accessible instructional design practices
- **Information & Instructional Technology (IIT)**
 - Ensures NWTC-managed systems support accessibility
 - Supports accessibility testing and remediation
 - Collaborates with Procurement and College Services on vendor accessibility review
- **Marketing & Communications**
 - Ensures public-facing content and college-wide digital communications conform to WCAG
 - Manages accessible design for web, social media, and college-level digital communication channels
- **Content Owners (Faculty, Staff, and Contractors)**
 - Responsible for ensuring the accessibility of digital content they create, publish, assign, or distribute
 - Must follow accessibility procedures and training requirements applicable to their role
- **Procurement and College Services**
 - Collaborates with IIT to verify the accessibility of digital products and services using VPATs/ACRs or equivalent evidence
 - Collaborates with the ADA Coordinator and IIT on an accessibility risk evaluation.
 - Ensures all vendors have a digital accessibility rider on file

TRAINING AND RESOURCES

NWTC requires all employees that create or share digital content to complete accessibility training. Additional role-based training will be provided for faculty, designers, developers, content creators, and procurement staff. The ADA Coordinator, TLC, and Talent & Culture will oversee training requirements and curriculum.

REMEDIALATION & MONITORING

- **Accessibility Reviews:** NWTC will conduct periodic accessibility evaluations using a combination of:
 - automated scanning tools,
 - manual testing, and
 - assistive technology testing.
- **Remediation:** Identified barriers must be remediated within specified timelines and priority levels defined in procedures. High-priority content essential for participation must be remediated first.
- **Feedback:** NWTC will maintain a process for community members to report accessibility barriers and request accessible formats.

- **Policy Review:** This policy will be reviewed annually and updated to reflect changes in law, standards, or institutional needs.

ENFORCEMENT

Failure to comply with this policy may result in corrective action consistent with applicable employee, faculty, or student conduct policies. Noncompliance with accessibility requirements will be addressed through existing college accountability mechanisms. Vendors who fail to comply may be subject to contract termination in accordance with the agreement's terms and conditions. Concerns about noncompliance may be addressed with the ADA Coordinator.

DEFINITIONS

- **Digital Content:** Any information or service delivered or accessed electronically, including but not limited to websites, documents, media, software, and electronic communications used for college programs, services, or activities.
- **Digital Accessibility:** Design and development that enables people with disabilities to access and use digital content effectively.
- **WCAG 2.1 A/AA:** Technical standards published by the W3C governing accessible digital content, adopted by DOJ as the legal standard.
- **Conventional Electronic Documents:** PDFs, word-processing documents (e.g., Microsoft Word), presentation files (e.g., PowerPoint), and spreadsheet files (e.g., Excel) as defined under DOJ Title II regulations.
- **Individualized, Password-Protected Documents:** Conventional electronic documents about a specific individual, their property, or their account that are available only in a secure, authenticated environment.
- **Effective Communication:** ADA requires us to provide information in formats that ensure equal access for people with disabilities.
- **Archived Content:** Content that meets the DOJ definition of archived material and is not updated after archiving.

RELATED POLICIES AND REFERENCES

- Accessible Instructional Content Policy (Draft in folder)
- Procurement Accessibility Policy (Draft in folder)
- Feedback & Remediation Policy (Draft in folder)
- [NWTC Non-Discrimination Policy](#)
- [NWTC Web Guidelines](#)
- [ADA](#), [Section 504](#), [Section 508](#)

REVISION HISTORY

Revision Number	Effective Date	Description	Author
1	8/6/2025	Initial Version- Anne Koors	Anne Koors
2	9/23/2025	Update Draft Version	Anne Koors
3	10/15/2025	Update Draft for department reviews/policy committee	Anne Koors
4	10/23/2025	Update Draft for Cabinet Review	Kristin Ray-Sprenger
5	11/18/2025	Draft with updated Cabinet Revisions	Anne Koors
6	12/18/2025	Comments Resolved for Final Approval	Anne Koors
7	1/23/2026	Updated department name, remediated for accessibility compliance	Kristin Ray-Sprenger