



**OFFICIAL POLICY**

**9.1.11.1**

**Digital Accessibility Policy**

**02/24/2026**

**Policy Statement**

The College of Charleston (“College”) is committed to providing everyone with equal access to its educational opportunities, facilities, programs, services, and activities. This commitment extends to all digital, electronic, and information technologies, including the procurement, development, distribution, implementation, and ongoing maintenance of all digital materials in accordance with Title II of the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act of 1973, as amended.

Accessible digital information is a key component in ensuring the University’s commitment to fostering an inclusive environment. In order to maintain equal opportunities for all individuals, this policy aims to achieve accessibility as a proactive need, rather than a reactive response. While timely accommodation is required whenever accessibility is not achieved, an accommodation-only strategy is insufficient to ensure equal access to all individuals.

Providing accessible digital information is the responsibility of all members of the University community. Division heads are responsible for implementation of this policy within their respective divisions.

**Policy Manager and Responsible Department or Office**

The Division of Information Technology, in collaboration with the ADA Coordinator, oversees the administration of this policy to uphold university standards that ensure accessible digital environments across the institution. Division heads are responsible for implementation of this policy within their respective divisions.

**Policy**

- A. **General Statement:** The College acquires, develops, and maintains computers, computer systems, networks, websites, website-based applications, mobile applications, and other Information Technology (IT) resources. Consistent with applicable federal law, all technology used for the College’s business must be accessible to people with disabilities. This includes technology the College provides directly or through contracts, licenses, or other arrangements. Expectations to meet these standards include, but are not limited to, providing captions for multimedia, providing alternative text for images, and using software that is compatible with keyboard navigation and assistive technologies.
- B. **Websites and Mobile Applications:** All websites, website-based applications, and mobile applications should meet at least those minimal technical standards required by federal and state laws and regulations at any given time.

This requirement covers all websites, website-based applications, and mobile applications that are connected with all programs, services, and activities operated by the College. These include, but are not limited to, online classes, all course materials presented or offered in a digital or online format, emergency communications, and web or mobile application-based training programs. Conforming alternate versions may only be used when it is not possible to make web content directly accessible due to technical or legal limitations.

C. *Exceptions to Requirements of Accessibility of Website and Mobile Applications from Section B:* There are seven exceptions to the requirements stated in Section B. Even if a need or request falls under an exception, access will be provided consistent with access under Part D stated below. The exceptions are as follows:

1. *Fundamental alteration* is a change that is so significant or substantial that it modifies the essence of or disrupts the core nature or purpose of the goods, services, programs, activities, facilities, privileges, advantages, or accommodations offered. Determinations about fundamental alteration are made by the Digital Accessibility Compliance Committee, which is comprised of the Provost or their designee, the Vice President of IT or their designee, the Vice President of Communications or their designee, the General Counsel or their designee, and the ADA Coordinator or their designee. The determination must be accompanied by a written rationale for that conclusion.
2. *Undue financial or administrative burden* is a significant disruption, expense, or difficulty that may result from the provision of websites, website-based applications, and mobile applications. Determinations about undue financial or administrative burden are made by the Digital Accessibility Compliance Committee, which is comprised of the Provost or their designee, the Vice President of IT or their designee, the Vice President of Communications or their designee, the General Counsel or their designee, and the ADA Coordinator or their designee. The determination must be accompanied by a written rationale for that conclusion.
3. *Archived web content.* Defined as content that:
  - a. Was created before April 24, 2026, reproduces paper documents created before April 24, 2026, or reproduces the contents of other physical media created before April 24, 2026;
  - b. Is retained exclusively for reference, research, or recordkeeping;
  - c. Is not altered or updated after April 24, 2026; and

d. Is organized and stored in a dedicated area or areas clearly identified as being archived.

4. *Preexisting conventional electronic documents.* Conventional electronic documents that are available as part of the College's web content or mobile applications before the date the College is required to comply with this subpart, unless such documents are currently used to apply for, gain access to, or participate in the College's services, programs, or activities. These include but are not limited to PDFs, word process documents, spreadsheets, or presentations.
  5. *Content posted by a third party.* Content posted by a third party unless the third party is posting due to contractual, licensing, or other arrangements with the College.
  6. *Individualized, password-protected or otherwise secured conventional electronic documents.* Conventional electronic documents such as PDF's, word processing documents, spreadsheets, or presentations. This may include individual student assignments that are conventional electronic documents. These documents must be:
    - a. About a specific individual or their account; and
    - b. Password-protected or otherwise secured.
  7. Preexisting social media posted before April 24, 2026.
- D. *All Other Electronic Information Technology and Communications:* All remaining technologies, including those subject to the exception under Part C, shall not discriminate against people with disabilities if they are part of a program, service, or activity operated by the College. If access problems are identified with any of these technologies, equally effective alternatives should be provided. These alternatives need to ensure that the person with a disability has:
1. Access the same information as individuals without disabilities;
  2. Engage in the same interactions as individuals without disabilities;
  3. Conduct the same transactions as individuals without disabilities; and,
  4. Otherwise participate in or benefit from the same services, programs, and activities as individuals without disabilities.

A guideline, to be applied flexibly, for implementing this section shall be Section 508 of the Rehabilitation Act of 1973 (updated in 1998) guidelines, except where an accessibility standard is adopted. The standard used will be at least those minimal technical standards required by federal and state laws and regulations at any given time.

## Definitions and Acronyms

**College Business:** For the purposes of this policy, College business refers to business and academic activities, the delivery of content, or the interaction with individuals for administrative, instructional, or informational purposes.

**Conforming Alternative Version:** At times the College may need to have two versions of the same web content or content in a mobile app: one version that is not accessible and another version that is accessible and provides all the same information and features. The second version is called a “conforming alternate version.”

**Conventional electronic documents:** Web content or content in mobile apps that is in the following electronic file formats: portable document formats (“PDF”), word processor file formats, presentation file formats, and spreadsheet file formats.

**Digital Materials:** Information, products, and services available for download or distribution in an electronic format or that is presented on a web page or that is accessed through a web browser, computer application or mobile application platform.

**Disability:** Disability is defined by the ADA as “a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.” The ADA does not specifically name all of the impairments that are covered.

**Equal Access:** An opportunity that is as effective for people with disabilities as people without disabilities to participate in and benefit from the programs, services, and activities of the College. It should be provided in the most integrated and similar setting as possible.

**Equally Effective Alternative:** Alternative access to electronic content that permits the user to: access the same information as individuals without disabilities; engage in the same interactions as individuals without disabilities; conduct the same transactions as individuals without disabilities; and otherwise participate in or benefit from the same services, programs, and activities of the College as individuals without disabilities.

**Fundamental Alteration:** A change that is so significant or substantial that it modifies the essence of or disrupts the core nature or purpose of the goods, services, programs, activities, facilities, privileges, advantages, or accommodations offered.

**Social Media:** Refers to websites or mobile apps of third parties whose primary purpose is to enable users to create and share content in order to participate in social networking (i.e., the creation and maintenance of personal and business relationships online through websites and mobile apps like Facebook, Instagram, X (formerly Twitter), and LinkedIn).

**Undue Burden:** A significant disruption, expense, or difficulty that may result by the provision of accessible digital materials and other electronic and information technology (EIT). This means the College is not required to provide an accommodation if doing so would be excessively costly, disruptive, or fundamentally alter its operations, but it must then look for an effective alternative. Factors in this determination include the nature and cost of the accommodation, the College’s overall financial resources, the impact on its operations, available accessible alternatives, and the difficulty and disruption in changing the technology in question. Once determined to be an undue burden, access by alternative means will still need to be provided.

### **Departments/Offices Affected by the Policy**

This policy affects all College faculty and staff in all divisions, departments, and offices; student employees who produce or distribute digital materials on behalf of the College; vendors and third parties who distribute, host, or manage digital materials on behalf of the College; and any person conducting College business.

### **Procedures Related to the Policy**

Each division represented in the President’s Cabinet will develop procedures appropriate to their respective division to implement this policy, including procedures for ensuring ongoing compliance.

### **Related Policies, Documents or Forms**

Prohibition of Discrimination and Harassment, Including Sexual Harassment and Abuse Policy

Reasonable Accommodation and Equal Access Policy

[College of Charleston Accessibility and Accommodation Statements](#)

[College of Charleston Web Accessibility Statement](#)

[College of Charleston Statement on Video and Multimedia Accessibility](#)

[College of Charleston Online Education Official Divisional Policy, Section 6.5](#)

[College of Charleston Faculty Administration Manual: “Students With Disabilities” \(2023-2024 FAM, VIII C, pp. 142-144\)](#)

[College of Charleston Center for Disability Services Statement on “Accessible Course Content”](#)

Issue Date: 02/24/2026

Next Review Date: 02/24/2031

**POLICY APPROVAL**

**(For use by the Office of the Board of Trustees or the Office of the President)**

Policy Number: 9.1.11.1

President or  
Chairman, Board of Trustees



Date: 02/24/2026