



POLICY ON DIGITAL ACCESSIBILITY

UMBC Policy # X-0.00.01

I. POLICY STATEMENT

The University of Maryland, Baltimore County (“UMBC” or the “University”) is committed to providing equitable access for all individuals to its programs, services, and activities, including all digital content and technologies. This policy affirms the University’s obligations under applicable laws and regulations, including Section 504 of the Rehabilitation Act of 1973¹ and Title II of the Americans with Disabilities Act², and implementing regulations for web and mobile accessibility,³ as well as applicable state laws and regulations. This policy reinforces UMBC’s responsibility to apply recognized accessibility standards to all University digital assets, including, but not limited to, websites, learning management systems, software, web-based and mobile applications, and all data and content stored, distributed, or delivered through any UMBC websites, licensing, or contractual arrangements.

II. PURPOSE FOR POLICY

The purpose of this policy is to establish a clear, consistent framework to support compliance with the digital accessibility requirements of applicable federal and state laws and regulations, and to ensure that all electronic and information technology acquired, developed, or used by UMBC delivers equitable access to all individuals.

III. APPLICABILITY AND IMPACT STATEMENT

This policy applies to the University community, including faculty, staff, students, Contractors, vendors, Affiliate Entities, and Third Parties (as hereinafter defined) when using, providing, or creating content for University electronic and information technology.

This policy formalizes UMBC’s commitment to providing an inclusive environment by providing equitable access to information and services. By governing the lifecycle of all electronic and information technology, whether acquired, developed, or substantially modified by or on behalf of UMBC, this policy sets a shared responsibility for proactive accessibility across digital systems.

¹ 29 U.S.C. § 794.

² 42 U.S.C. § 12131 et seq.

³ 28 C.F.R. § 35.200 et seq. (Subpart H – Web and Mobile Accessibility).

IV. CONTACTS

Subject	Contact	Telephone	Email
Digital Accessibility Remediation	Division of Information Technology (DoIT)	410-455-3208	itpolicy@umbc.edu
Policy Clarification	Office of Accessibility and Disability Services	410-455-8455	digitalaccessibility@umbc.edu

V. POLICY

A. Digital Accessibility Requirements for Websites and Mobile Applications.

1. **Required Standards.** All Websites and Mobile Applications will adhere to the Technical Accessibility Standards adopted by the University and the University System of Maryland (“USM”), as amended from time to time, and consistent with applicable federal and state law.
2. **Scope.** All Websites and Mobile Applications connected with any UMBC program, service, or activity fall under the scope of this Policy. This includes, but is not limited to, online classes, course materials, emergency communications, and training software or programs. Accessibility obligations apply to Web Content and Mobile Applications regardless of whether they are publicly available, password-protected, restricted to enrolled users, or otherwise limited by authentication or role-based controls.
3. **Alternate Versions.** Conforming alternate versions of Websites and Mobile Applications may only be used when content cannot feasibly be made directly Accessible due to technical or legal limitations and must provide access that is equally effective.
4. **Legal Limitations.** If full compliance would result in a Fundamental Alteration or would impose an Undue Financial or Administrative Burden, such compliance is not required; however, access must still be provided to the information, service, or activity through alternative means that provide equally effective access.

B. Exceptions.

1. **Application.** The requirements of Section V.A. do not apply to the following limited categories of content, except as otherwise required to ensure equally effective access:
 - a. Archived Web Content;
 - b. Preexisting Conventional Electronic Documents that were available on UMBC Websites or Mobile Applications before the Compliance Date, unless such Conventional Electronic Documents are currently used or required by members of the public to apply for, gain access to, or participate in UMBC programs, services, or activities;
 - c. Individualized Documents that are password-protected or otherwise secured; and
 - d. Preexisting Social Media Content posted before the Compliance Date.

2. **Third Party Content.** Third Party Content is excepted from this Policy only to the extent the University does not select, require, customize, integrate, or otherwise exercise control over the content, and provided that such content is not required for participation in a UMBC program, service, or activity.
3. **Continuing Obligation.** Even where content qualifies for an exception under this Section, UMBC shall provide access through alternative means that assure equally effective access.

C. All Other Electronic Information Technology and Communications.

1. **Nondiscrimination.** All other digital content, communications, and electronic technologies, including content subject to an exception to this Policy, shall not discriminate against individuals with disabilities participating in any UMBC program, service, or activity.
2. **Equitable Access Standard.** All such digital content, communications, and technologies must provide equitable access, meaning that individuals with disabilities have an equal opportunity to:
 - a. Access the same information as individuals without disabilities;
 - b. Engage in the same interactions as individuals without disabilities;
 - c. Conduct the same transactions as individuals without disabilities; and
 - d. Otherwise participate in or benefit from the same services, programs, and activities as individuals without disabilities.

D. Course Content Accessibility. Faculty are required to integrate digital accessibility considerations when developing and delivering course content. This requirement applies to all materials, resources, and activities, regardless of modality or platform.

E. Agreements with Contractors. The University shall require that written agreements for the acquisition, licensing, or use of electronic and information technology include provisions requiring the Contractor to comply with applicable federal and state digital accessibility requirements and this Policy.

VI. TRAINING

UMBC shall require appropriate training on digital accessibility for employees and other covered entities whose roles involve the creation, procurement, maintenance, or delivery of digital content or technologies. The scope, frequency, and manner of such training shall be set forth in implementing procedures.

VII. DEFINITIONS

Accessible or Accessibility	This means that individuals with disabilities are able to independently access the same information, engage in the same interactions, and enjoy the same services with substantially equivalent ease of use and timeliness as individuals without disabilities. In the context of this policy, this term specifically refers to digital accessibility, ensuring that all electronic content, resources, and platforms are navigable and understood by users with and without visual, auditory, motor, or cognitive issues, allowing for equitable access and participation at UMBC.
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Affiliate Entity or Affiliate Entities	Any entity that has a relationship with UMBC authorized by the University System of Maryland (“USM”) Board of Regents or by law, and/or affiliated foundations, recognized affiliated business entities, and other USM institutions.
Archived Web Content	Content that: 1) was created before the Compliance Date or reproduces paper documents or other physical media created before the Compliance Date; 2) is retained exclusively for reference, research or recordkeeping; 3) has not been substantively modified, altered or updated after the Compliance Date; and 4) is organized and stored in a dedicated area or areas clearly identified as being archived.
Compliance Date	The date(s) by which the University must conform to federal and state digital accessibility mandates, specifically, the dates established by 28 CFR 35.200 (Subpart H), or as otherwise mandated by applicable state or federal law or regulation.
Contractor	An individual or entity engaged by the University through contract, license, or other arrangement to provide, develop, or maintain University digital content or services. Content provided by Contractors pursuant to such engagement is considered University content and Contractors must comply with the accessibility standards of this Policy. Content provided by Contractors is not Third Party Content.
Conventional Electronic Documents	Electronic files in non-HTML format, specifically: PDFs, word processing documents, spreadsheets, and/or presentations, as well as other common file formats that are created, stored, or accessed on computers.
Course Content	Digital materials, resources, and activities used for instruction, including, but not limited to, documents, presentations, multimedia, assessments, textbooks, and learning activities posted in any Learning Management System (“LMS”) or other third-party platform.
Fundamental Alteration	A change so significant that it alters the essential nature or core learning objectives of a University course, program, or activity offered.
Individualized Documents	A document in a limited set of file formats, created for or about a specific individual, their property, or their account, and secured. Technical Accessibility Standards do not apply to Individualized Documents.
Mobile Applications (“Apps”)	Software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.
Technical Accessibility Standards	The version of the Web Content Accessibility Guidelines (WCAG) adopted by the University and the USM, as further described in the implementing procedures.
Third Party Content	Content or applications provided by an individual or entity other than the University that is linked from, embedded in, or integrated into a UMBC-controlled or -hosted digital platform. Third Party Content does not include content provided pursuant

	to a contract, license, or other arrangement with a Contractor under which the University selects, requires, customizes, or exercises control over the content, or requires its use in connection with a UMBC program, service, or activity.
Undue Financial or Administrative Burden	A change that would require significant difficulty or expense, evaluated on a case-by-case basis. If an action is determined to be an Undue Financial or Administrative Burden, there remains an obligation to pursue alternative, equally effective, and accessible means of providing the information or service without imposing the burden.
Website	Any web content, including web pages, web applications, and learning management systems, regardless of whether it is protected by a password or not.

VIII. APPROVAL AND PROCEDURES

- A. The Division of Institutional Equity and the Division of Information Technology shall implement procedures in furtherance of this Policy, which may be amended from time to time without the need to amend this Policy.
- B. All implementation procedures will be vetted by the designated governance body responsible for digital accessibility oversight prior to publication and dissemination.

IX. RELATED POLICIES, PROCEDURES AND GUIDELINES:

- A. [USM VI-1.00 Policy on Non-Discrimination and Equal Opportunity](#)
- B. [USM Accessible Technology and Information Guidelines](#)

Administrator Use Only

Policy Number: UMBC X-0.00.01

Policy Section: Section X: Information Technology

Responsible Administrator: Chief Diversity Officer and Vice President

Responsible Office: Division of Institutional Equity

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