

Operating Policy and Procedure

OP 30.009 Accessibility in Technology

DATE: October 15, 2025

PURPOSE: The purpose of this Operating Policy/Procedure (OP) is to establish minimum standards for the accessibility of technology-related environments considered necessary to meet this goal and ensure compliance with applicable state and federal regulations and law.

REVIEW: This OP will be reviewed as needed, or upon revision of relevant regulations and laws, by the Accessibility Task Force. Revisions will be forwarded to the Board of Trustees through President’s Council by the Office of the President.

POLICY/PROCEDURE

1. General Policy

Kellogg Community College (KCC) is committed to providing equitable access to information technology for KCC Users, including services and the environments in which information technology is used. This policy establishes minimum standards for the accessibility of technology-related environments considered necessary to meet this goal and ensure compliance with applicable state and federal regulations and laws.

2. Scope

- a. This policy applies to all KCC Users of technology-related environments.

3. Definitions

- a. *Accessible:* A person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, it must still ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in its use.
- b. *Assistive Technology:* Assistive, adaptive, and rehabilitative devices for people with disabilities.
- c. *Compliance:* An adherence to the web accessibility standards and practices detailed in the Web Content Accessibility Guidelines 2.0 WCAG Priority 2, AA web accessibility standards.
- d. *Content Owner:* KCC User who creates or posts information or documents in a KCC Technology-related Environment, such as one of the following:

- i. Any individual capable of creating and posting information or documents in any of KCC's Technology-related Environments.
 - ii. Any third party responsible for posting documents or information on behalf of KCC.
 - iii. A web-based service contracted by KCC that serves a KCC business and the KCC employees responsible for administering those sites.
- e. *KCC Users*: Kellogg Community College employees, students, board members, contractors, vendors, and guests of the institution.
 - f. *Non-Availability Exceptions*: Hardware or software for which no equivalent accessible option is available (non-availability). All areas of the college are responsible for documenting the following efforts in verifying compliance with this exception.
 - g. *Remediation*: The process that is undertaken to retrofit, redesign, or remove the content that is found out of compliance and does not meet a non-availability exception.
 - h. *Technology-related Environments*: Any environment in which technology is made available for general use by KCC Users.
 - i. *Universal Design for Instruction (UDI)*: An approach to teaching that consists of the proactive design and use of inclusive instructional strategies that benefit a broad range of learners, including students with disabilities. The nine Principles of UDI provide a framework for college faculty to use when designing or revising instruction to be responsive to diverse student learners and to minimize the need for "special" accommodations and retrofitted changes to the learning environment. UDI operates on the premise that the planning and delivery of instruction, as well as the evaluation of learning, can incorporate inclusive attributes that embrace diversity in learners without compromising academic standards.

4. Establish KCC Accessibility Standards

- a. Use of Web Content Accessibility Guidelines (WCAG) developed by the Web Accessibility Initiative (WAI) design standards. These standards will guide accessibility in areas such as:
 - i. Digital documents
 - ii. Electronic communications
 - iii. KCC social media content
 - iv. Use of hardware and software products that promote universal design and access.
 - v. Design and implementation of accessible technology-related work environments that accommodate all users.

5. Monitoring

- a. Continual monitoring of applicable laws and regulations from the state and federal levels pertaining to technology accessibility will be done through annual updates to the KCC Policy Manual and consultation with KCC legal counsel as necessary.
 - i. Communication of relevant topics pertaining to technology will be communicated to college personnel as necessary through standard communication mechanisms.
 - ii. Institutional compliance with this policy is the responsibility of each department with oversight and/or decision-making authority over any item mentioned above.
- 4. Establish KCC Accessibility Standards.*

6. Accountability

- a. All KCC employees are accountable for this policy and must ensure that environments created within their scope are accessible.
 - i. Procurement and maintenance of accessible technology solutions acquired through purchase or open source.

7. Training

- a. Initial training will be required of all KCC employees who use college-owned technology internally and externally. Periodic updates will be communicated through standard communication mechanisms as new information becomes available.
- b. Training for all KCC employees will be coordinated through standard professional development mechanisms.

8. Forms

- a. Non-Availability Exception

9. Roles and Responsibilities.

- a. Technology questions: Information Research and Technology
- b. Website and social media: Communication and Advancement
- c. Student disability accommodations: Center for Student Success
- d. Employee disability accommodations: Human Resources
- e. Community accommodation coordination: Sponsoring department/division

10. Persons/Departments Affected: This policy affects KCC Users of Technology-related Environments.

11. Authoritative References

- a. All electronic and information technologies shall comply with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. Section 794, and its implementing regulation at 34 C.F.R. Part 104, and the Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. Section 12131 et seq., and its implementing regulation at 28 C.F.R. Part 35.

- b. Related Resources
 - i. [Web Accessibility Initiative](#) (WAI)
 - ii. [World Wide Web Consortium](#) (W3C)
 - iii. [WebAim.org](#)
 - iv. Rehabilitation Act Amendments of 1998, [Section 508](#)
 - v. [Americans with Disabilities Act of 1990](#) Accessibility Requirements
 - 1. Section 504 of the Rehabilitation Act of 1973
 - 2. [Proposed Regulations](#)
 - vi. [National Center on Disability and Access to Education](#) (NCDAE)
 - 1. [GOALS](#)

12. Right to Change Policy. The College reserves the right to interpret, change, modify, amend, or rescind this policy, in whole or in part, at any time, without prior notice.

13. Approval Date: February 2018.

14. Past Revisions.

- a. June 19, 2019
- b. October 15, 2025