

STOCKTON UNIVERSITY



PROCEDURE

Digital Accessibility and Communication

Procedure Administrator: Office of the President

Authority: N.J.S.A. 18A:64-8; Title II of the Americans with Disabilities Act of 1990 as amended 42 U.S.C. § 12131 et seq; Civil Rights Act of 1964 as amended, 42 U.S.C. § 2000d et seq. Rehabilitation Act of 1973, as amended, 29 U.S.C. § 701 et seq.

Effective Date: October 27, 2025

Index Cross-References: Policy I-67, Procedure 6950

Procedure File Number: 6960

Approved By: Dr. Joe Bertolino, President

I. PURPOSE:

This procedure is established to comply with Title II of the Americans with Disabilities Act (ADA), which prohibits discrimination on the basis of disability by public entities. The University is committed to providing equal access to its digital content, technologies, and online services to assure that individuals with disabilities have an opportunity equivalent to that of individuals without disabilities.

II. DEFINITIONS

Public Accommodation: An entity that provides goods or services to the public and is generally open to the public (Stockton University). The Americans with Disabilities Act (ADA) prohibits discrimination in public accommodations based on disability.

Digital Accessibility: The design and development of digital content, tools, and technologies (e.g., websites, documents, videos, applications) that can be used by people with a wide range of disabilities. It ensures that content is perceivable, operable, understandable, and robust, as outlined in the WCAG 2.1 AA standards.

ADA Title II: Requires equal access to public services, including education for students with disabilities.

WCAG 2.1 Level AA: The design and development of digital content, tools, and technologies (e.g., websites, documents, videos, applications) that can be used by people with a wide range of disabilities. It ensures that content is perceivable, operable, understandable, and robust, as outlined in the WCAG 2.1 AA standards.

Alt Text: A written description of an image that is added to digital content to help people who use screen readers understand what the image shows. It also displays in place of an image if it fails to load.

Third Party Vendors: External entities that provide goods or services to Stockton University.

Mobile Applications: Any software program designed to run on mobile devices either developed or purchased by Stockton must be digitally accessible.

III. Applicability

This procedure applies to all individuals who create digital content for the University.

IV. Web Content Accessibility Guidelines (WCAG)

- A. Videos – should provide closed captions, audio descriptions, and transcripts for video content to meet the varied needs of users with disabilities. Videos should be organized consistently for ease of navigation with screen readers and other assistive technologies
- B. Online Documents – Online documents should use readable fonts, alternative text for images, appropriate color contrast, and clear structure with headings and lists. Use the built-in Accessibility Checkers within Word and PowerPoint to make sure the document is accessible. Confirm PDFs are tagged appropriately for screen readers. Creating PDFs directly from text-based sources (like Word documents) is preferred. Scanned PDFs are often inaccessible unless processed with Optical Character Recognition (OCR) software and manually checked for accuracy. PDFs must be tagged for proper reading order including headings, lists, and tables, and have fillable and navigable form fields.
- C. Images/Graphs/charts
 - 1. Verify all image files have meaningful alt(alternative) text. Follow alt text best practices (refer to Section 508.gov Authoring Meaningful Alternative Text for best practices).
 - 2. For complex images like graphs, convey the meaning of the data with longer descriptions.
- D. Audio-only/Visual-only content
 - 1. Provide a transcript or other alternatives for audio-only content.
 - 2. Visual only (images) provide accurate and equivalent text alternatives for informative images, ensure sufficient color contrast for text within images, and use alt text for purely decorative images
- E. Online Learning Management Systems
 - 1. All materials placed in a learning management system (LMS) such as Stockton's current LMS, Blackboard Learn, must be accessible (compliant with WCAG 2.1 AA standards). Instructors should use built-in accessible design features within the Ultra course view. This includes using heading styles, bulleted lists, and descriptive hyperlinks in course content. When uploading documents (PDFs, Word files, PowerPoints) to Blackboard, instructors should confirm that all files are accessible—using readable fonts, alternative text for images, appropriate color contrast, and clear structure with headings and lists.
 - 2. Use the built-in Accessibility Checkers within Word and PowerPoint to assure the document is accessible. Verify PDFs are tagged appropriately for screen readers. Creating PDFs directly from text-based sources (like Word documents) is preferred. Scanned PDFs are often inaccessible unless processed with Optical Character Recognition (OCR) software and manually checked for accuracy.

3. Videos should include captions or transcripts, and content should be organized consistently for ease of navigation with screen readers and other assistive technologies.
4. Anthology Ally is available in Blackboard Learn to identify and improve the accessibility of course content. Ally provides accessibility indicators (gauge indicator next to uploaded files) that rate content accessibility. Ally offers step-by-step guidance to improve accessibility scores. Ally will automatically generate alternative formats, such as audio, ePub, and electronic braille. Users may download alternative formats directly. Instructors are encouraged to regularly review course Ally reports to identify content needing improvement and to enhance accessibility for all learners.

F. Online exams/quizzes

1. Confirm questions can be navigated by keyboard.
2. For A-H, follow all other guidance for formatting in the following the POUR Principles of WCAG: Perceivable, Operable, Understandable, and Robust.

1) Perceivable Content:

- a) Text Alternatives: Provide alt text for images and captions for videos, including transcripts for audio and video content.
- b) Contrast: Provide sufficient color contrast, which is the difference in brightness between text and background (at least 4.5:1 for normal text, 3:1 for large text or graphical elements).
- c) Sensory Characteristics: Confirm information conveyed by color is also available through other means, such as text cues.

2) Operable Functionality:

- a) Keyboard Navigation: Make all functionality accessible via keyboard, with visible focus indicators.
- b) Navigational Aids: Provide "Skip to Content" links and clear headings and labels for easy navigation.
- c) Time Controls: Allow users to control time limits on interactive elements.
- d) Seizure-Safe Content: Avoid content that can trigger seizures (e.g., flashing content).

3) Understandable Content:

- a) Clear Language: Use clear and understandable language.
- b) Predictable Navigation: Assure consistent navigation and clear page titles.
- c) Input Assistance: Provide clear instructions and error messages for forms and interactive elements.

4) Robust Compatibility:

- a) Assistive Technology: Verify compatibility with various assistive technologies like screen readers.
 - b) Browser Compatibility: Verify functionality across different browsers and devices.
- 5) Testing and Auditing:
- a) Automated Tools: Utilize accessibility checkers and browser extensions for initial scans and identify common issues.
 - b) Manual Audit: Conduct a thorough manual audit with a technical accessibility expert to identify issues that automated tools may miss.
 - c) User Testing: Involve users with disabilities in testing to gather real-world feedback.
 - d) Remediation and Re-audit: Address identified issues and conduct a re-audit to confirm fixes.
 - e) Offer alternative formats if needed.

G. Forms

1. Perceivability:

- 1) Text Alternatives: Provide text alternatives for non-text content, such as images or buttons.
- 2) Color Contrast: Maintain a color contrast ratio of at least 4.5:1 for normal text and 3:1 for large text or graphical elements like input field borders.
- 3) Don't Rely Solely on Color: Avoid using color as the only means to convey information (e.g., indicating required fields or errors); use text labels, icons, or patterns in conjunction with color.

2. Operability:

- 1) Keyboard Accessibility: Make all form functionality available via keyboard, allowing users to navigate and submit forms without a mouse or touch input.
- 2) Visible Focus Indicators: Provide clear and visible focus indicators to show users which element is currently active when navigating with the keyboard.

3. Understandability:

- 1) Clear Labels and Instructions: Use descriptive labels and provide clear, concise instructions for each form field. Link labels to their corresponding input fields using the for attribute and matching input IDs.
- 2) Semantic HTML and ARIA: Utilize semantic HTML elements and ARIA (Accessible Rich Internet Applications) attributes like aria-labelledby or aria-label to improve screen reader compatibility and structure.
- 3) Accessible Error Handling: Provide clear, actionable error messages that are both visually and programmatically accessible,

guiding users to correct any issues.

4. Robustness:

- 1) Consistent Design: Maintain uniformity in layout, spacing, and focus indicators across the form.

5. Mobile-Friendly Design:

- 1) Verify the form is responsive and can be used effectively on various devices, including the ability to zoom or enlarge for users with low vision.
- 2) Hyperlinks - include descriptive link text, adequate color contrast, and clear visual cues like underlines, while also providing keyboard accessibility and avoiding redundancy

H. New Social Media Posts

1. Confirm all image files have meaningful alt text. Follow alt text best practices.
2. Provide closed captions, audio descriptions, and transcripts for video content.
3. Limit your use of emojis and avoid placing several emojis next to each other.
4. Verify each word in a multiword hashtag has been capitalized, and that you have avoided the use of any special characters.

V. Exceptions

Permissible exceptions to full compliance with WCAG 2.1 at the AA level:

1. Archived Web Content – Web content that is clearly labeled as archived and is no longer in use on the University's public web pages that was created before April 24, 2026 and is retained for recordkeeping, research, or reference purposes. If the document is updated or required by an individual for current use, it is no longer exempt as an archived document.
2. Legacy Electronic Files – e.g., Word documents, PDFs, presentations) created before April 24, 2026, unless such documents are currently in use.
3. Content Posted by a Third Party – Content posted by a third party who has no contractual, licensing, or other arrangement with Stockton is exempt. The exemption does not apply to third party content posted by Stockton for an authorized contractor/vendor, or third-party tools and platforms used by Stockton.
4. Password Protected Individualized Documents – Word processing documents, presentation, PDFs, or spreadsheet files that are about a specific person, property, or account that is password protected or otherwise secured.
5. Legacy Social Media Posts - Any social media posts made before April 24, 2026 do not need to be made retroactively accessible. However, should a person request an accessible version from social media information, an accessible version or reasonable alternative accessible content should be provided.

VI. Email Communications

Use clear subject lines and simple language, ensuring sufficient color contrast, providing text alternatives for non-text content, and making sure functionality is accessible via keyboard and descriptive link text.

1. Key Practices for WCAG 2.1 AA Compliant Email Communication:

a. Content Clarity and Structure:

- 1) Use clear and concise language, avoiding jargon and complex sentences.
- 2) Use headings, paragraphs, and lists to structure content logically for easier reading and navigation by assistive technologies.
- 3) Use a clear email subject line to convey the message's purpose.

2. Visual Design and Readability:

- a. Provide a sufficient color contrast ratio between text and background, at least 4.5:1 for normal text and 3:1 for large text (18pt or 14pt bold). Use Web AIM's Contrast Checker to verify combinations.
- b. Choose accessible, sans-serif fonts like Arial, Calibri, or Verdana.
- c. Use legible font sizes (e.g., at least 14px for body text) and ensure text can be resized by the user without loss of content or functionality (e.g., up to 200%).
- d. Align text to the left for optimal readability; avoid center-aligned or justified text for long paragraphs.
- e. Incorporate adequate white space for better readability and reduced cognitive load.

3. Non-Text Content and Functionality:

- a. Provide alt text for meaningful images, ensuring they convey the same information as the image.
- b. Verify all functionality can be accessed via keyboard, with visible focus indicators.
- c. Use descriptive anchor text for hyperlinks (e.g., "Learn more about WCAG" instead of "Click here"). Avoid using URLs as link text.
- d. Do not rely solely on color to convey information; combine color with other cues like text or symbols.

4. Avoid Harmful Elements:

- a. Avoid flashing or blinking content as it can trigger seizures or be distracting for users with certain conditions.
- b. Avoid using all caps for extended periods.

VII. Third-Party Vendors

Under Title II Digital Accessibility update, Stockton University must ensure that third-party vendors who provide software applications must be digitally accessible.

VIII. University Resources

1. University Relations and Marketing (URM)

Maintains the CMS (content management system) and templates for stockton.edu. In addition, URM maintains the Accessibility Statement affirming that the website endeavors to conform to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.1 AA to make web content more accessible for people with disabilities.

URM also assists individuals with website content, development and any other inquiries. For questions concerning stockton.edu, contact URM at 609-626-3600 or universityrelations@stockton.edu.

2. Information Technology Services

Provides accessibility tools provided by the university to assist with making documents and content accessible.

3. Richard E. Bjork Library

Maintains public-facing sites that provide information resources to the Stockton community. Bjork library maintains an accessibility statement affirming that we endeavor to conform our platforms to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines WCAG 2.1 AA.

Bjork Library makes available, through purchase or subscription, millions of journal articles, books, reports, theses, streaming media, etc. and open access digital items. Compliance details can be found on our accessibility document, with links to additional vendor and publisher information.

Bjork Library will check and endeavor to upgrade documents not locked for editing, and stored in library platforms - such as interlibrary loan documents the library mediates.

Most documents, however, are owned and hosted by external publishers and vendors. Bjork Library will assist patrons who request assistance with non-WCAG compliant documents obtained through library services

Bjork Library checks for WCAG compliance before procuring new content, including closed captioning, etc. for streaming video. For more information on ADA accessibility in the Library, please visit the Bjork Library ADA Digital Compliance page or call 609-652-4346.

4. Center for Teaching and Learning Design

Offers expertise in course design and the use of digital resources and technology to promote inclusive student success. For questions concerning course design, instructional technologies, and the use of digital resources in teaching, contact 609-626-3828 or ctld@stockton.edu.

5. Learning Access Program

Provides a list of programs and applications that may be helpful for students struggling with reading, writing, note taking, and time management. For questions concerning the accessibility toolbox, contact 609-652-4988 or lap@stockton.edu.

Review History:

	Date
Procedure Administrator	08/21/2025
Divisional Executive	09/18/2025
Faculty/Staff/Union Leaders	09/25/2025
General Counsel	09/18/2025
Senior Leadership Team	10/23/2025
President	10/27/2025