

An Access Ready Sample Policy

Businesses

[COMPANY] is committed to the full and equal inclusion and participation of people with disabilities in its workforce and all its activities. Because the infrastructure of the twenty-first century is information and communications technology (ICT), in order to meet our goal, our technologies must be accessible. Just as physical structures, such as sidewalks, are required to be accessible to people with disabilities when they are designed, built or renovated, public- and employee- facing ICT infrastructure must also be accessible to people with disabilities. [COMPANY] will play a leading role in providing its customers and employees with disabilities equal access to the services and employment opportunities that it provides.

It is the policy of [COMPANY] that its communications, programs, services, and activities offered through the Internet and ICT will be accessible to and usable by people with disabilities and that employees and prospective employees with disabilities will be able to use all the web- and ICT-based tools available to employees without disabilities. To accomplish this goal, [COMPANY] has adopted and will implement an Access Ready policy. It is the policy of [COMPANY] that access for people with disabilities is a first consideration at the beginning of development of all goods and services, that accessibility considerations will not be an afterthought, that [COMPANY] staff and contractors will make concerted efforts to investigate and be aware of accessibility features and capabilities in order to include them into the design of information and communications technology system requirements, and that these efforts shall include the opinions of people with disabilities who are actual users of such features.

[COMPANY] also requires that employment decision makers will not consider the accessibility costs related to the employment of a person with a disability. Leaders developing programs and services will take careful consideration of potential opportunities for employees with disabilities and shall seek input from vocational rehabilitation experts in those considerations. The federal government requires that federal contractors meet a goal of 7% of their workforce at all levels being people with disabilities. [COMPANY] shall seek to meet the same requirement.

The purpose of this policy is to promote equal access to communications, goods, services, and activities offered through the Internet and ICT technology, for all members of the community and all [COMPANY] employees, including those with disabilities. The policy provides a uniform process by which [COMPANY] staff and contractors will create, implement, remediate and maintain new and existing ICT

and Internet content and tools to ensure that technology is accessible to individuals with disabilities.

[COMPANY] adopts WCAG 2.1 A and AA as its accessibility standard for the [COMPANY's] Websites, Mobile Apps, and other ICT and will achieve and maintain a fully and equally accessible Website, Mobile App, and other ICT by taking the steps outlined below. [COMPANY] may not be in full compliance on Day 1, but this Policy outlines a good faith, aggressive approach to attaining WCAG 2.1 A and AA compliance as soon as practicable.

[COMPANY] will make this Policy public and inform the public of its progress in implementing this Policy.

TRAINING AND RESOURCES

By [DATE], [COMPANY] will appoint a high-level official with budget authority to oversee, manage, and coordinate [COMPANY's] accessibility program and reporting to [COMPANY] leadership and the public.

By [DATE], [COMPANY] will appoint a qualified Coordinator with expertise in disability and accessibility, who will:

- * Provide training, advice, and assistance to staff on disability and accessibility of ICT, including on creating accessible content, remediating accessibility barriers, and testing accessibility
- * Arrange automated and user testing of ICT products, services, and content;
- * Assist staff and contractors to identify commercially available accessible ICT; and
- * Provide notice to the public and employees about [COMPANY's] Access Ready policy, how to report accessibility barriers, and how to request equally effective alternate access.

By [DATE], the Coordinator will train all [COMPANY] customer service personnel to promptly escalate calls, emails and other communications from users with disabilities who encounter difficulties using the [COMPANY's] Website, Mobile App, or other ICT. [COMPANY] will train a sufficient number of personnel who manage escalated calls timely to assist such customers and employees with disabilities.

By [DATE], the Coordinator will ensure all staff and contract ICT developers are trained on:

- * This Policy
- * How to achieve compliance with WCAG 2.1 Level A and AA.
- * [COMPANY's] process for testing and/or verifying that new content posted to [COMPANY's] Website, Mobile App, and other ICT meets WCAG 2.1 A and AA;
- * [COMPANY's] policy and process for procurement, development, and maintenance of accessible ICT.

ICT ACCESSIBILITY COMMITTEE

[COMPANY] will appoint a qualified ICT Accessibility Committee. The ICT Accessibility Committee will:

- * Serve as a resource for ICT purchases and other acquisitions for compliance with accessibility requirements;
- * Assess the commercial availability of accessible alternatives;
- * Evaluate any requests for exceptions, approve only exceptions that meet the commercial availability, fundamental alteration or undue burden standards, and document the approval or denial of any exceptions and the basis therefor;
- * Inform [COMPANY] leadership and staff of any exceptions, along with a method for providing equally effective alternate access;
- * Include members of a recognized disability organization and/or a body of individuals with expertise in the fields of disability and accessibility appointed by [COMPANY] for practical usability testing; and
- * Report at least annually to [COMPANY] leadership about progress in implementing the [COMPANY] Access Ready policy.

PROCUREMENT

All ICT software, hardware, services, or content purchased or adopted by [COMPANY] after [DATE] will comply with WCAG 2.1 Level A and AA and be usable by individuals with disabilities unless accessible technology is not commercially available, or accessibility would cause a fundamental alteration or undue burden.

Policy

All [COMPANY] offices will:

- * Include the Access Ready Policy and accessibility and usability requirements in all Requests for Proposals for ICT products, services, or content;
- * Purchase or acquire only accessible ICT, in accordance with these procedures, after [DATE], unless such ICT is subject to an approved exception;

- * Include accessibility requirements in all purchase orders, contracts, other arrangements, or renewals for purchase, acquisition, or use of ICT after [DATE];
- * Secure Voluntary Product Accessibility Templates (VPATs), if available, or other documentation from potential suppliers of ICT, and/or other data and test results regarding accessibility of any proposed ICT;
- * Provide all available information on the accessibility of proposed ICT to the IT Accessibility Committee for assessment and verification;
- * Ensure all contracts or agreements for the acquisition or use of ICT require the vendor to warrant that the technology or content meets [COMPANY's] accessibility requirements;
- * Develop and provide equally effective alternate access for any ICT subject to an exception, to ensure, to the maximum extent possible, that individuals with disabilities receive the same benefits and services as their nondisabled peers; and
- * Respond in a timely manner to requests for equally effective alternate access to ICT subject to an exception.

Process

Purchase orders, contracts, other arrangements, or renewals for purchase, acquisition, or use of ICT or digital content will require the supplier to:

- * Verify and warrant that its product, service, or content complies with WCAG 2.1 Level A and AA;
- * Provide the most recent accessibility testing procedure and results for its product, service, or content;
- * Permit [COMPANY] or its agent and its ICT Accessibility Committee to re-test the product's, service's, or content's accessibility and usability;
- * Resolve and remediate any complaint regarding accessibility of its product, service, or content in a timely manner and provide an updated accessible version at no cost; and
- * Indemnify and hold harmless [COMPANY] from any claims arising out of the supplier's failure to comply with the requirements of WCAG 2.1 Level A and AA.

Exceptions

ICT products, services, or content purchased, acquired, or used from a third-party supplier may be granted an exception to accessibility requirements by the ICT Accessibility Committee if [COMPANY] can show that:

- * No equivalent accessible option is commercially available;

- * Purchasing, acquiring, or using an equivalent accessible option would cause a fundamental alteration of the [COMPANY] service, program, or activity; or
- * Purchasing, acquiring, or using an equivalent accessible option would cause an undue burden in light of all [COMPANY's] available resources.

An exception must be sought in writing from the ICT Accessibility Committee. In granting such an exception, the ICT Accessibility Committee must document the basis and supporting information for the exception, and [COMPANY] must develop and provide equally effective alternate access to ensure, to the maximum extent possible, that people with disabilities receive the same benefits and services as their nondisabled peers.

ICT DEVELOPMENT

All ICT software, hardware, services, or content created or developed by [COMPANY] after [DATE] will comply with WCAG 2.1 Level A and AA and be usable by individuals with disabilities unless accessibility would cause a fundamental alteration or undue burden.

Policy

All [COMPANY] offices will:

- * Ensure any ICT product, service, and content is accessible and usable, in accordance with these procedures, after [DATE], unless such ICT is subject to an approved exception;
- * Document accessibility and usability of ICT, and provide data and test results regarding accessibility of any proposed ICT;
- * Provide all available information on the accessibility of proposed ICT to the ICT Accessibility Committee for assessment and verification;
- * Permit the ICT Accessibility Committee to re-test the product's, service's, or content's accessibility and usability.
- * Develop and provide equally effective alternate access for any ICT subject to an exception, to ensure, to the maximum extent possible, that individuals with disabilities receive the same benefits and services as their nondisabled peers; and
- * Respond in a timely manner to requests for equally effective alternate access to ICT subject to an exception.

Exceptions

ICT products, services, or content created or developed by [COMPANY] may be granted an exception to accessibility requirements by the ICT Accessibility Committee if [COMPANY] can show that:

- * Purchasing, acquiring, or using an equivalent accessible option would cause a fundamental alteration of the [COMPANY] service, program, or activity; or
- * Purchasing, acquiring, or using an equivalent accessible option would cause an undue burden in light of all [COMPANY's] available resources.

An exception must be sought in writing from the ICT Accessibility Committee. In granting such an exception, the ICT Accessibility Committee must document the basis and supporting information for the exception, and [COMPANY] must develop and provide equally effective alternate access to ensure, to the maximum extent possible, that people with disabilities receive the same benefits and services as their nondisabled peers.

EXISTING ICT AND CONTENT

By [DATE], [COMPANY] will conduct an audit of its Website, Mobile Apps, and other ICT by a qualified ICT accessibility expert. The audit will identify all existing accessibility barriers.

[COMPANY] will make changes, replace, or eliminate current ICT products, services, and content as necessary to remediate accessibility and usability barriers for customers and employees with disabilities. Remediation will be prioritized based on factors including the severity of the barrier to access, the importance of the good, service, activity, or communication, and the ease of remediation. [COMPANY] will monitor and report on the progress of remediation and evaluate the accessibility and usability of remediated IT through both automated and user testing. Remediation will be completed in five budget cycles or less from the date of this policy.

[COMPANY] will provide mechanisms for customers and employees to report accessibility barriers and will respond timely to such reports. [COMPANY] will develop and provide equally effective alternate access for any inaccessible ICT, to ensure, to the maximum extent possible, that individuals with disabilities receive the same benefits and services as their nondisabled peers. Such alternate access will not be used as a reason for not requiring remediation of inaccessible ICT.

[COMPANY] will periodically, at least annually, audit its Website, Mobile App, and other ICT products to ensure remediation has been successfully completed and accessibility has been maintained. [COMPANY] will remediate accessibility barriers identified in periodic audits in accordance with priorities based on the severity of the barrier to access, the importance of the good, service, activity, or communication, and the ease of remediation.