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EAST TENNESSEE STATE  
UNIVERSITY

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## **Digital Course Content Accessibility Policy**

# **Policy Name: Digital Course Content Accessibility**

## **Policy Purpose**

This policy specifies ETSU's strategies and commitment to ensuring that all electronic materials used for educational purposes, including technologies, websites, information, programs, and online or otherwise digital activities related to instruction are accessible to individuals with diverse abilities in accordance with federal and state laws.

## **Applicability**

This policy applies to all ETSU employees.

## **Responsible Official, Office, and Interpretation**

The Office of the Provost is responsible for the review and revision of this policy. For questions about this policy, please contact the Office of the Provost. The Provost in consultation with the Office of University Counsel has the final authority to interpret this policy.

## **Defined Terms**

*A defined term has a specific meaning within the context of this policy.*

### Accessible

Course materials that follow established accessibility standards based on [Web Content Accessibility Guidelines](#) (WCAG) that aim for a "single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally" (WCAG).

### Archived Course Content

In alignment with the federal rule on Nondiscrimination on the Basis of Disability; Archived Course Content means content that 1) was created prior to this policy's effective date or reproduces the contents of course material created prior to the policy's effective date, 2) is retained exclusively for reference, research, or recordkeeping, 3) is not altered or updated after the date of archiving, and 4) is organized and stored in a dedicated area or areas clearly identified as being archived. D2L, OneDrive, or Digital Commons are acceptable archiving platforms for these purposes.

# **Policy Name: Digital Course Content Accessibility**

## Assistive Technologies

Products, equipment, and systems that enhance learning, working, and daily living for persons with disabilities. In the context of online learning, these may include screen readers, keyboard navigation, or other hardware or software designed to accommodate users' special needs.

## Instructor of Record (Instructor)

The individual who provides direct instruction for the course and is primarily responsible for assigning the grade. This may include full-time faculty (e.g., tenure-track, tenured, lecturer, instructor, clinical instructor), part-time faculty (e.g., adjunct, tuition associate, graduate associate), and professional or administrative staff.

## Learning Management System (LMS)

The software application or web-based platform used by ETSU to create, administer, deliver, and track online learning and training programs.

## Web Content Accessibility Guidelines (WCAG)

A set of requirements developed by the institution ("Accessibility Guidelines to ensure all online or digital instructor-developed content for a course is accessible. Such content should follow the principles of being perceivable, operable, understandable, and robust. Institutional Accessibility Guidelines are available for reference at [WCAG](#). Institutional Accessibility Guidelines are available for reference at WCAG.

## Third (3<sup>rd</sup>) Party Software

Any application ("app") adopted for use by the Instructor for instruction, including publisher software and materials.

# Policy Name: Digital Course Content Accessibility

## Policy

ETSU is committed to providing inclusive and Accessible course content for all students and to complying with the electronic and information technology accessibility requirements under the federal civil rights laws including Section 504 and Section 508 of the Rehabilitation Act of 1973 (“Section 508”), the Americans with Disabilities Act, 28 C.F.R. pt. 35, and 45 C.F.R. pt.92 (or any subsequent standard adopted by an oversight administrative body, including the Federal Accessibility Board) in regard to all digital course content including academic course content available to students through a Learning Management System.

ETSU’s content standard shall follow the accessibility guidelines published on the WCAG website, which will seek to align with current Section 508 standards and best practices. When updates to the guidelines are published, the Office of the Provost will notify faculty by email. The Office of the Provost is responsible for the implementation and enforcement of this policy. ETSU Instructors are expected to assist in ensuring that content shared in courses adheres to the policy. The institution will provide links to third (3<sup>rd</sup>) party software accessibility statements for commonly used Learning Management System (LMS)-integrated products.

### 1. Digital Content Subject to this Policy.

This policy extends to digital content related to the educational setting, including, but not limited to the institution’s educational technologies and educational websites, and online educational activities associated with courses and educational materials (e.g., D2L course content, webpages, images, video content, audio content, documents, etc.). If a student is seeking an accommodation related to a disability, the student should follow the requirements of the ETSU [Academic Accommodations Policy](#). If a question relates to non-educational digital content, please refer to the [Public Content Accessibility Policy](#).

#### 1.1. Learning Management System (LMS) Pages.

LMS pages will be designed to be accessible and navigable using Assistive Technologies. Best practices include:

- 1.1.1. Writing page titles that accurately reflect the topic on the page.
- 1.1.2. Using proper headings to organize information.

**Policy Effective Date:** 10/14/25 • **Policy Revised:** Insert  
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# Policy Name: Digital Course Content Accessibility

- 1.1.3. Avoiding instructions based solely on location on the page. For example, instead of “in the box to the right,” combine location and text: “in the box to the right, titled, ‘Related Links and Publications.’”
- 1.1.4. Ensuring that linked text makes sense when read out of context, providing specific information about where links will lead. For example, instead of creating links such as “read more” or “click here,” use descriptive links such as “read the President’s 2024 Annual Report.”
- 1.1.5. Keeping linked text to 100 characters or less.
- 1.1.6. Avoiding use of a page URL when linking text.
- 1.1.7. Understanding the differences between ordered, unordered, and definition lists, and using them for their intended purposes (not for visual effect).
- 1.1.8. Using concise statements and clear language and providing definitions for discipline-specific jargon.
- 1.1.9. Including text that meets color contrast ratios for readability.

## 1.2. Images.

Information presented in images will be accessible to those with visual impairments using a screen reader, and best practices include:

- 1.2.1. All images, form fields, and buttons have appropriate alt text.
- 1.2.2. Text contained within images is replicated on page as html.
- 1.2.3. Linked images provide a description of alt text.
- 1.2.4. Graphs and diagrams include accompanying text to explain the meaning.

## 1.3. Video Content.

All videos are accessible to those who are visually or hearing-impaired, and best practices include:

- 1.3.1. Accurate, proofread closed captions provided for video content.
- 1.3.2. Descriptive transcripts in the form of SRT files created and proofread for all video files. Transcript files should contain not only dialogue but also descriptions of visual elements/scenes and descriptions of non-verbal audio. For videos with no audio, a visual transcript will be provided. A version of the video with burned-in captions will be provided when closed-captions are not available.

**Policy Effective Date:** 10/14/25 • **Policy Revised:** Insert  
**Procedures Effective Date:** N/A • **Procedures Revised:** Insert

## **Policy Name: Digital Course Content Accessibility**

- 1.3.3. If flashing lights or strobe effects are used, the video will contain the following warning at the beginning: “This video contains effects that may cause discomfort or illness or trigger seizures for individuals with photosensitivity. Viewer discretion is advised.”
- 1.3.4. Text and graphics on videos will be accessible to those who have visual limitations. Any text or graphic overlays will meet WCAG contrast standards. Text will be on the screen long enough to be read (left on the screen long enough to read through two (2) times) and large enough to be read at a distance (i.e., from the back of an auditorium if shown on a large screen).

### **1.4. Audio Content.**

All audio shared in a LMS will be accessible, and best practices include:

- 1.4.1. Transcripts will be provided alongside any audio file and be synchronized to the audio. Descriptions of non-verbal audio will be included (i.e., “birds chirping”).
- 1.4.2. Audio will be crisp and clear with limited background noise.

### **1.5. Documents.**

Documents shared in courses will be accessible. This includes but is not limited to slide decks, PDFs, and text files which adhere to the following:

- 1.5.1. Embedded documents must pass the platform’s accessibility checker.
- 1.5.2. Headings, lists, and other structural elements will be used for navigation, not for visual effect.
- 1.5.3. Descriptive text will be used for links and images.

## **2. Instructor of Record Responsibilities.**

The Instructor is responsible for following institution accessibility guidelines related to course content and Accessibility, sharing course learning materials, and/or making accommodations for closed-group content sharing. The Instructor will include, in the course, links to Third (3<sup>rd</sup>) Party Software accessibility statements (Voluntary Product Accessibility Template (VPAT) or WCAG) for any software used, where available. The Instructor will provide a statement about Accessible course content on their syllabi through the ETSU syllabus attachment. All new course content will be reviewed by the

# **Policy Name: Digital Course Content Accessibility**

Instructor for Accessibility before being provided to students. Accessibility errors must be corrected prior to making new content available to students. Chairs will conduct regular reviews of existing content for accessibility compliance. Exceptions may be made for Archived Course Content (see defined terms).

Users can report Accessibility issues by emailing their Instructor or contacting the Provost (or designee). All reported issues will be addressed promptly and, where possible, course content will be corrected or an accessible alternative will be provided.

## **3. Training.**

### **3.1. Training for Instructors.**

Academic Technology Services (ATS), the Center for Teaching Excellence (CTE), and Disability Services will provide training, support, and consultation to faculty to identify accessible resources.

### **3.2. Instructor Assistance.**

Instructors are encouraged to visit the [CTE](#), [ATS](#), or [CTE](#) webpages to learn of training opportunities and resources.

## **4. Inaccessible Course Content.**

The Provost (or designee), in consultation with Information Technology Services, will ask faculty to address inaccessible course content within 14 calendar days. If faculty are unable to make changes within this timeframe, the Provost (or designee) may direct the removal of inaccessible course content from a course in order to comply with this policy.

# **Policy Name: Digital Course Content Accessibility**

## **Procedures**

N/A

## **Applicable Forms and Websites**

[ETSU Academic Accommodations Policy](#)

[ETSU Public Content Accessibility Policy](#)

[Web Content Accessibility Guidelines](#)

## **Authority and Revisions**

**Authority:** Focus Act § 49-8-203, et seq.

**Previous Policy:** N/A

The ETSU Board of Trustees is charged with policy making pursuant to TCA § 49-8-203, et seq. On March 24, 2017, the Board delegated its authority to ETSU's President to establish certain policies and procedures for educational program and other operations of the University, including this policy. The delegation of authority and required process for revision to this policy can be found on the [Policy Development and Rule Making Policy webpage](#).

To suggest a revision to this policy, please contact the responsible official indicated in this policy. Before a substantive change to the policy section may take effect, the requested changes must be: (1) approved by the responsible office; (2) reviewed by the Office of University Counsel for legal sufficiency; (3) posted for public comment; (4) approved by either Academic Council or University Council; and (5) approved by ETSU's President.