University of Rhode Island Digital Accessibility Compliance Plan

The University of Rhode Island began drafting this compliance plan in response to the Notice of Proposed Rulemaking ("NPRM") issued by the Department of Justice ("Department"), Civil Rights Division on July 20, 2023, titled "Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities," RIN 1190-AA79.

The Department issued the final rule ("Final Rule") on June 24, 2024, revising the regulations implementing Title II of Americans with Disabilities Act ("ADA") to adopt and implement the Web Content Accessibility Guidelines ("WCAG") 2.1 as the technical standards for web content and mobile applications. Read more about the final rule by accessing this link.

This compliance plan reaffirms the University's commitment to promoting equal opportunity for all and describes action steps the University has taken and will take to comply with the new technical standards. In carrying out this compliance plan, the University will seek feedback from individuals with disabilities and those who share a common interest in identifying and addressing barriers to access.

To access this compliance plan in an alternative format or for questions regarding accessibility at the University of Rhode Island, please contact the Office of Equal Opportunity by emailing equalopportunity@uri.edu, or calling 401-874-4009. For TTY assistance, R.I. Relay Services at 711. To learn more about digital accessibility at URI, visit uri.edu/accessibility. For all other accessibility resources, visit the ADA Compliance landing website.

Last Updated: 04-22-2026
Version 1

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DIGITAL ACCESSIBILITY WORKING GROUP

The Department is requiring public entities, such as the University of Rhode Island, to comply with WCAG 2.1, Level AA, under Title II of the ADA. To comply with this requirement, the University established a Digital Accessibility Working Group:

- Matthew McDonald, Vice President for Communications and Marketing
- Brandon Fuller, Assistant Director, Digital Strategy
- Dorca P. Smalley, Director, ADA Coordinator, Office of Equal Opportunity
- Lauren Jensen, Esq., Deputy General Counsel
- Catherine Scott, Manager, Social Media
- Karen Lokey, Associate Director, ITS Innovation Services
- Heather Sharpes-Smith, Executive Director, URI Online

The first meeting of the Digital Accessibility Working Group took place on November 2, 2023. Since then, the University has engaged several individuals and offices across campus. The University has made significant financial investments to strengthen its digital accessibility efforts, as detailed in this plan.

COMPLIANCE DEADLINE

The University is located in the State of Rhode Island, which has a total population of 1,097,379.[1] Per 28 CFR Part 35.104, "total population" means:

> *If the public entity has a population calculated by the United States Census Bureau in the most recent decennial Census, the population estimate for that public entity as calculated by the United States Census Bureau in the most recent decennial Census; or*
>
> *If a public entity does not have a population estimate calculated by the United States Census Bureau in the most recent decennial Census but is an instrumentality of one or more State or local governments that do have such a population estimate, the combined decennial Census population estimates for any State or local governments of which the public entity is an instrumentality.*

Per 28 CFR Part 35.200, a public entity with a total population of 50,000 or more is subject to a compliance date of April 24, 2026.

The subsequent sections of this plan describe steps taken to evaluate and enhance existing digital accessibility practices at the University in preparation for the compliance deadline.

[1] 2020 Decennial Census

BACKGROUND AND APPLICABILITY TO THE WORLD WIDE WEB CONSORTIUM

The World Wide Web Consortium (W3C) develops standards and guidelines to help everyone build a web-based experience guided by the principles of accessibility, internationalization, privacy, and security. The Department has adopted the internationally recognized accessibility standard for web access, WCAG 2.1 Level AA, published in June 2018, as the technical standard for web and mobile app accessibility under Title II of the ADA.

WCAG 2.1 Level AA, published by W3C WAI, specifies success criteria and requirements that make web content more accessible to all users, including individuals with disabilities. The Department incorporates WCAG 2.1 Level AA by reference into this rule, instead of restating all of its requirements verbatim. To the extent there are distinctions between WCAG 2.1 Level AA and the standards articulated in this rule, the standards articulated in this rule prevail. 102 See Public Law 104–121, sec. 212, 110 Stat. 847, 858 (1996) (5 U.S.C. 601 note). 103 44 U.S.C. 3501 et seq. 104 2 U.S.C. 1503(2). The Department notes that when W3C publishes new versions of WCAG, those versions will not be automatically incorporated into this rule.

W3C describes web standards as "blueprints-or building blocks -of a consistent and harmonious digitally connected world. [Standards] are implemented in browsers, blogs, search engines, and other software that power our experience on the web."

WCAG 2.1, which was introduced by W3C, defines how to make web content more accessible to people with disabilities and it is guided by four principles.

THE FOUR PRINCIPLES OF ACCESSIBILITY

WCAG follows four principles, also known as POUR, which establish the foundation necessary for anyone to access and use web content:

1. **Perceivable:** Information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented (it can't be invisible to all of their senses).

2. **Operable:** User interface components and navigation must be operable. This means that users must be able to operate the interface (the interface cannot require interaction that a user cannot perform).

3. **Understandable:** Information and the operation of the user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding).

4. **Robust:** Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to

access the content as technologies advance (as technologies and user agents evolve, the content should remain accessible).

If any of these are not true, users with disabilities will not be able to access the web.

BENEFITS

The University's website is for everyone. When the University ensures that its digital content is accessible, students, faculty, staff, visitors, alumni, vendors, affiliates, and community partners, including individuals with visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities, benefit. These benefits include, but are not limited to:

1. Improved efficiency for individuals accessing University services, programs, and activities online or via the Rhody App versus in-person or on the phone.
2. Time savings for users of University websites or mobile applications.
3. Reduced administrative burden for University offices, as a result of receiving fewer support requests.
4. Increased engagement and satisfaction for students, their supporters, and families.
5. Improved educational access and degree attainment rate.

TERMS AND DEFINITIONS

The following definitions have been adopted from 28 CFR Part 35, issued on April 4, 2024, as well as the W3C. The University is drafting a Policy on Public Web Communications, which will further define terms of relevance.

Archived Web Content: Web content that (1) was created before the date the public entity is required to comply with subpart H of 28 CFR Part 35, reproduces paper documents created before the date the public entity is required to comply with subpart H, or reproduces the contents of other physical media created before the date the public entity is required to comply with subpart H; (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.

Conformance: Satisfying all the requirements of a given standard, in this case, WCAG 2.1, Level AA.

Conventional Electronic Documents: Web content or content in mobile apps that is in the following electronic file formats; (1) portable document formats ('PDFs'); (2) word processor file formats; (3) presentation file formats; and (4) spreadsheet file formats. Examples of conventional electronic documents include Adobe PDF files (*i.e.*, portable document formats), Microsoft Word files (*i.e.*, word processor files), Apple Keynote or Microsoft PowerPoint files (*i.e.*, presentation files), Microsoft Excel files (*i.e.*, spreadsheet files), and FileMaker Pro or Microsoft Access files (*i.e.*, database files). The term "conventional electronic documents" is intended to describe those

documents created or saved as electronic files that are commonly available on public entities' websites and mobile apps in either an electronic form or as printed output.

Mobile Applications (Apps): Software applications that are designed to be downloaded and run on mobile devices such as smartphones and tablets. Mobile apps are distinct from a website that can be accessed by a mobile device because, in part, mobile apps are not directly accessible on the web, they are often downloaded on a mobile device. Mobile apps include, for example, native apps built for a particular platform (*e.g.*, Apple iOS, Google Android, among others) or device and hybrid apps using web components inside native apps.

Social Media Platform: The Department is using the term "social media platforms" to refer to websites or mobile apps of third parties whose primary purpose is to enable users to create and share content in order to participate in social networking (*i.e.*, the creation and maintenance of personal and business relationships online through websites and mobile apps like Facebook, Instagram, X, and LinkedIn).

University Entities: Colleges, schools, departments, programs, divisions, centers, and offices directly affiliated with the University of Rhode Island

WCAG 2.1: Refers to the 2018 version of the voluntary guidelines for web accessibility, known as the Web Content Accessibility Guidelines 2.1 ("WCAG").

Website: Includes not only the websites hosted by the public entity but also websites operated on behalf of a public entity by a third party. For example, public entities sometimes use vendors to create and host their web content. Such content would also be covered by the Final Rule.

Web Content: The information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content's structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents.

PROJECT SCOPE AND EXEMPTIONS

Title II of the ADA applies to all services, programs, and activities offered by the University, including those provided via web and mobile applications. This compliance plan was designed to clarify the steps the University has taken and will take to meet ADA compliance obligations and ensure equal access to programs, services, and activities for people with disabilities engaging with the University digitally. Per the NPRM:

> *It is critical to ensure that people with disabilities can access important web content and mobile apps quickly, easily, independently, and equally. Just as steps can exclude people who use wheelchairs, inaccessible web content can exclude people with a range of disabilities from accessing government services.*

Per the Final Rule: "a public entity … shall ensure that web content and mobile apps that the public entity provides or makes available, directly or through contractual, licensing, or other arrangements, comply with Level A and Level AA success criteria and conformance requirements specified in WCAG 2.1, unless the public entity can demonstrate that compliance with this section would result in a fundamental alteration of the nature of a service, program, or activity or in undue financial and administrative burdens."

The following seven (7) categories are exempt from meeting the website accessibility requirements. Thus, the University is exempted from needing to make such content conform to WCAG 2.1 Level AA standards, unless there is an applicable limitation to the exception.

1. Archived web content, as defined in §35.104.

2. Preexisting conventional electronic documents. Conventional electronic documents that are available as part of a public entity's web content or mobile apps before the date the public entity is required to comply with this Final Rule, unless such documents are currently used to apply for, gain access to, or participate in the public entity's services, programs, or activities.

3. Content posted by third parties, unless the third party is posting due to contractual, licensing, or other arrangements with the public entity.

4. Individualized, password-protected or otherwise secured conventional electronic documents that are (1) about a specific individual, their property, or their account; and (2) password-protected or otherwise secured. This excludes password-protected classes or course content of postsecondary institutions, which will be treated like any other content. Public educational institutions will need to ensure that all course content, unless archived, complies with WCAG 2.1, Level AA. This means that all learning materials disseminated in digital form to learners, including content hosted in Brightspace or Engage, the University's learning management systems ("LMS"), must comply with WCAG 2.1, Level AA.

5. Preexisting social media posts. A public entity's social media posts that were posted before the date the public entity is required to comply with the Final Rule.

The exceptions apply to conventional electronic documents available through mobile apps. Even though the seven (7) areas listed above are exempted, upon request from a specific individual, the University may have to provide web content or content in mobile apps to that individual in an accessible format to comply with existing obligations under other regulatory provisions.

WCAG 2.1 IMPLEMENTATION REPORT: SUCCESS CRITERIA

While the Department has adopted WCAG 2.1 as the technical standard for assessing web content and mobile app accessibility under Title II of the ADA, higher standards may apply in certain contexts, such as procurements conducted pursuant to the State of Rhode Island Department of Administration procurement regulations.

However, this document will focus on compliance requirements as outlined in the final rules, which mandate the University to meet 12 new Level A and Level AA success criteria that were added in WCAG 2.1 in addition to the 38 success criteria contained in WCAG 2.0 Level A and Level AA. The 38 success criteria contained in WCAG 2.0 Level A and Level AA, may be accessed by following this link: https://www.w3.org/TR/WCAG20/.

WCAG 2.1 explains how to make web content more accessible to people with disabilities. WCAG covers websites, applications, and other digital content. It is developed by the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI). WCAG is an international standard. There are three levels of conformance:

1. Level A is the minimum level.

2. Level AA includes all Level A and AA requirements.

3. Level AAA includes all Level A, AA, and AAA requirements.

Conformance at higher levels requires conformance at lower levels. In other words, to conform with Level AA, a website must meet Level A (minimum) and Level AA (medium) conformance levels. The W3C does not recommend that Level AAA conformance be required as a general policy for entire websites because it is not possible to satisfy all Level AAA (highest) criteria for some content. For that reason, and because the University is only required to comply with AA, per the Final Rule, the implementation section of this compliance plan will be limited to Level A and Level AA.

The 12 new success criteria, which have been listed below, are intended to improve accessibility for mobile web content and mobile apps for people with low vision, manual dexterity disabilities, and cognitive learning disabilities.

Success Criterion	Level	Implementation List	Objective
1.3.4: Orientation	AA	12	Flexible display options allow devices to be used in any orientation (i.e., portrait, landscape orientation).
1.3.5: Identify Input Purpose (autocomplete)	AA	2	Simplifies the process of filling out forms due to the autofill function (i.e., an order form with separate billing and shipping addresses that are filled automatically).
1.4.10: Reflow	AA	15	Content can be enlarged without requiring horizontal scrolling.
1.4.11: Non-Text Contrast	AA	16	Important visual information meets the same minimum contrast required for larger text (i.e., meaningful visual cues achieve 3:1 against the background; text input has a dark border around the white editable area; a graph uses a light background and ensures the colors for each line have a 3:1 contrast ratio against the background)
1.4.12:Text Spacing	AA	15	Users can adjust text spacing to make it easier to read (i.e., text fits within the bounds of its containing box without being cut off and without overlapping with other boxes)
1.4.13: Content on Hover or Focus	AA	8	More users can perceive and dismiss non-persistent content (i.e., users with low vision will be able to view content on hover or focus without reducing their desired magnification; users with low vision or cognitive disabilities will have adequate time to perceive additional content appearing on hover or focus)
2.1.4: Character Key Shortcuts	A	6	Reduce accidental activation of keyboard shortcuts (i.e., benefits speech users by allowing single-key shortcuts to keyboard users)
2.5.1: Pointer Gestures	A	7	Let users operate touchscreens with one finger and reduced gestures
2.5.2: Pointer Cancellation	A	13	Reduces accidental activation controls
2.5.4: Motion Actuation	A	5	Content is not dependent on user's ability to move a device
2.5.5: Label in Name	A	17	Visible label for control is a trigger for speech activation (i.e., speech-input users can directly activate controls on a page with fewer surprising changes of focus; text-to-speech

			users will have a better experience because the labels that they hear match the visible text labels that they see on the screen)
4.1.3: Status Messages	AA	7	Makes users aware of important changes in content (i.e., page content is updated after a user presses the search button; shopping cart shows the number of items added to the shopping cart)

SUCCESS CRITERION EVALUATION

To meet a given conformance level, a site must satisfy all the success criteria at that level. A success criterion is satisfied by being actively implemented with sufficient techniques, or by virtue of being not applicable to the content of the site. The converse is also true, that there must be no failures of the success criterion requirements on the site.

To exit Candidate Recommendation, there must be documentation of four implementations that conform to A, four that conform to AA, and two that conform to AAA. Additionally, there must be at least one site that demonstrates the concept of Partial Conformance (at any level).

BARRIERS ANALYSIS

A barrier analysis is a rapid assessment tool used to identify barriers commonly encountered by people with disabilities. A barrier analysis provides an effective approach to conduct a "self-evaluation" and identify existing barriers. While not required by the ADA, a serious effort to conduct self-assessments can save resources by identifying the most efficient means of providing required access and can diminish the threat of litigation. This barrier analysis serves as evidence of good-faith efforts to comply with the barrier removal requirements as outlined under Title II of the ADA. The subsequent sections describe: (1) barriers to web accessibility at the University; (2) barriers to social media accessibility at the University; (3) barriers to mobile application and information technology services accessibility at the University; and (4) barriers to accessible course design, digital course materials, and quality control.

BARRIERS TO WEB ACCESSIBILITY AT THE UNIVERSITY

As of December 2025, The University has hundreds of public websites across multiple subdomains of uri.edu, which receive an average of 2.2M pageviews per month from visitors. At the time the Digital Accessibility Working Group began to meet on November 2, 2023, Brandon Fuller, Assistant Director of Digital Strategy, identified the following barriers to accessibility:

1. **Significant legacy content:** The University's WordPress network contained hundreds of sites that were old, obsolete, and/or unmaintained;
2. **Fragmented theme adoption:** Sites on the WordPress network primarily ran one of three different themes, two of which were legacy themes and had significant accessibility issues;
3. **Fragmented server management:** Aside from the WordPress network, other web servers exist, managed by individual units, that serve public web content with unknown risks;
4. **Limited user management:** A decentralized and largely flat web publishing model means there are hundreds of users with editing access, making it difficult to effectively govern content creation and maintenance;
5. **Limited user training:** While guidance has long been provided, a digital accessibility training and credentialing program does not exist, leading to an overreliance on passive learning and good-faith editing.
6. **Lack of official policy:** The University lacks a comprehensive, official public web communications policy, which should include policy on digital accessibility; nothing compels individuals or units to host their content on University servers where it can benefit from administrative oversight and take advantage of any compliance tools the University might procure;
7. **Lack of software tools:** Content administrators and editors lack comprehensive accessibility auditing tools, making it difficult to identify issues broadly and automatically;

The following steps have been taken so far to address the above challenges:

1. **Removal of obsolete sites:** A comprehensive audit conducted between December 2023 and June 2025 reduced the number of total sites on the network by over 350;
2. **Adoption of single WordPress theme:** The comprehensive audit, in tandem with a years-long migration effort, resulted in the complete transition to a single theme, maintained by DERC, in June 2025;
3. **Progress in user management:** While significant work remains to establish a true portfolio management model, the comprehensive audit resulted in the removal of hundreds of legacy, inactive, and/or obsolete users from the network;
4. **Development of public web policy:** A draft policy has existed since May 2025 and a working group was formed in November 2025 to shepherd it through the administrative policy process;
5. **Exploration of vendor platforms:** Vendor platforms to aid in automated auditing, training, and credentialling are currently being evaluated, and selection and onboarding is expected to take place before April 2026

More information about website accessibility can be found at https://web.uri.edu/accessibility/.

BARRIERS TO SOCIAL MEDIA ACCESSIBILITY AT THE UNIVERSITY

As of December 2025, there are at least 132 official University Entities that have at least one social media account, with many entities operating multiple accounts across platforms. At the time the Digital Accessibility Working Group began to meet on November 2, 2023, Catherine Scott, Social Media Manager, identified the following barriers to accessibility:

1. **Limited centralized oversight:** The large number of independently managed accounts across various social media platforms makes it difficult to monitor, support, and enforce social media guidelines, including accessibility standards.
2. **Limited training for staff:** Account administrators and contributors have differing levels of familiarity with accessibility requirements, resulting in inconsistent application of accessibility standards across platforms.
3. **Content-related accessibility issues:** Barriers sometimes appear in the content itself, including missing or inaccurate alt text, inconsistent or unreviewed auto-generated captions, graphics with low color contrast or text-heavy designs, inaccessible text formatting, and unclear or screen-reader-unfriendly post structures.
4. **Platform and tool limitations:** Social platforms vary in their support for accessibility features. Some post types offer limited or no alt text options, caption accuracy varies widely, and certain third-party scheduling tools do not reliably retain accessibility metadata.
5. **Resource and capacity challenges:** Many units rely on student workers or staff with limited time for content review, leading to gaps in accessibility compliance. High turnover and competing responsibilities further limit consistency in applying accessibility standards.

The following steps have been taken so far to address the above challenges:

1. **Audit of official University accounts and administrators:** An audit of official University Entities with social media accounts has been completed to identify the individuals responsible for ensuring that content meets or exceeds accessibility standards.
2. **Creation of a social media directory:** A directory is being developed to serve as a central repository of all official accounts and their administrators. This will improve monitoring and compliance, strengthen communication, and support more effective resource sharing and consultation on accessibility. The directory will be maintained and updated regularly by the Social Media Manager in Communications and Marketing.
3. **Updated Social Media Guidelines:** The University's social media guidelines are being revised to provide clear, actionable expectations for alt text, captioning, color contrast, formatting, and other accessibility requirements. These guidelines also outline where to find accessibility features on various social media platforms, as well as where to find information on third-party scheduling tool limitations related to accessibility.

4. **Development of an institutional social media policy:** A new policy is being developed to codify accessibility standards and ensure alignment with Title II of the ADA and WCAG 2.1 Level AA standards across all official University-managed social media accounts.
5. **Training materials and educational resources:** New guides, templates, and instructional materials are being developed to help account administrators and content contributors understand and apply accessibility standards and integrate them into their workflows. These include guidance on alt text, captioning, color contrast, graphic design, accessible writing, and other relevant accessibility standards.
6. **Ongoing consultation with account administrators:** During this period, the Social Media Manager has met with several account administrators to share information, clarify expectations, and provide resources on digital accessibility standards. These consultations will continue to ensure ongoing support, improve understanding, and promote consistent adoption of accessibility best practices across all University accounts.

For questions regarding social media accessibility, please contact Catherine Scott, Social Media Manager, catherine_scott@uri.edu.

BARRIERS TO MOBILE APP AND INFORMATION TECHNOLOGY SERVICES ACCESSIBILITY AT THE UNIVERSITY

The University currently supports one mobile app, Rhody Connect, along with several digital platforms managed across departments. As of November 2, 2023, when the Digital Accessibility Working Group first convened, Karen Lokey, Associate Director of ITS Innovation Services, identified the following key barriers to digital accessibility:

1. **Legacy content volume:** Many older documents and webpages need to be remediated, archived, or replaced to meet accessibility standards.
2. **Decentralized ownership:** Content is managed across numerous ITS teams, creating challenges with coordination, consistency, and accountability.
3. **Competing priorities:** Teams must balance accessibility efforts with other project demands and institutional deadlines.
4. **Noncompliant tools:** Some themes, plugins, or pages – particularly those built using code - lack accessibility support or require technical remediation. In some cases, existing tools are no longer supported or well understood by current staff.
5. **ITS WordPress environment technical debt and update risk:** The University has a skill and experience gap related to the back end of the ITS WordPress environment, including pages that rely on legacy coded components and automations created by prior developers. While updates to WordPress core, themes, plugins, and page structures may be required for security and stability, they can also unintentionally disrupt these coded elements. This limits the ability to maintain accessible web content and resolve accessibility issues efficiently.

6. **Limited training and experience:** Not all staff feel confident making accessibility-related updates, particularly in complex systems like WordPress, where changes may unintentionally impact legacy coding, automations, or site behavior.
7. **Incomplete and fragmented service inventory:**
   The University has not had a complete, centralized inventory of ITS-supported application services, including service owners, technical contacts, and primary user groups. Existing documentation has been distributed across multiple locations, making it difficult to confirm ownership, assess accessibility impact, and coordinate remediation efforts.
8. **Legacy custom applications with distributed campus reliance:**
   ITS has identified many custom PHP applications that were created and hosted by ITS but are used across other colleges and units. These applications may have unclear ownership, inconsistent documentation, and varying levels of accessibility compliance, creating challenges for coordinated remediation, modernization planning, and risk management.
9. **High volume of accessibility issues in knowledge base content:**
   During an internal review, ITS identified 200+ public-facing knowledge base articles and 45 ITS-facing articles. Many contain incorrect heading structures and missing alt-text, creating accessibility barriers and increasing the remediation workload.

The following steps have been taken so far to address the above challenges:

1. **Content inventory and review**: Encouraged units to inventory and assess their content, with guidance on identifying content that can be archived or removed.
2. **Accessibility integration in content creation**: Integrated accessibility considerations into new content creation to prevent growth of inaccessible materials.
3. **Staff training and resources:** Created a SharePoint page with accessibility training resources for all ITS staff
4. **Policy shift – Accessibility as core quality:** Positioned accessibility as a core quality and risk-management requirement, not an optional enhancement.
5. **Workflow improvements**: Encouraged teams to embed accessibility checks into existing workflows (content creation, web publishing, procurement, and project delivery).
6. **Legacy content decommissioning**: Content that remains inaccessible after remediation deadlines may be archived, unpublished, or taken offline to protect the overall accessibility and integrity of University web platforms and reduce institutional risk.
7. **Service inventory review and consolidation:**
   Reviewed and updated known lists of ITS-supported services and platforms, including service owners, purpose, and primary user groups, across both vendor-supplied and locally customized systems.
8. **Custom application identification and tracking:**
   Developed an initial inventory of 200+ ITS-hosted custom applications, including links and original requestors. In many cases, the original requestors are no longer at the University, even though the applications remain in use.

9. **Accessibility checks and incremental remediation in the knowledge base:** Implemented a cursory accessibility compliance check for all new knowledge base articles and began fixing missing elements in existing articles as issues are identified.

For questions regarding accessibility in mobile applications and information technology services, please see the Accessibility in Ed Tech web page. For TTY assistance, contact R.I. Relay Services at 711.

BARRIERS TO ACCESSIBLE COURSE DESIGN AND DIGITAL COURSE MATERIALS AT THE UNIVERSITY

The Office of the Provost has designated Heather Sharpes-Smith, Executive Director of URI Online (URIO), as the University's institutional point of contact for digital accessibility in learning.

Within URI Online, the Online Education and Instructional Design (OEID) team supports the design, development, and quality of fully online courses and programs. OEID works directly with faculty teaching in online and hybrid modalities to implement evidence-based instructional practices and promote accessible, high-quality online learning experiences.

IT Teaching & Learning Services (TLS) provides institution-wide support for instructional technologies, including Brightspace, the University's Learning Management System (LMS), and other academic technology tools used across all instructional modalities.

In collaboration, the URIO/OEID and TLS teams have identified the following barriers to digital accessibility across the University:

1. **Decentralized course ownership and scale**
   The University supports a large and distributed instructional portfolio across multiple colleges and departments. Faculty are primarily responsible for creating and maintaining course content and instructional materials. The scale of course offerings, combined with varied instructional modalities, and limited staffing within URIO and TLS, limits the ability to ensure all course materials are fully accessible on a continuous basis.
2. **Faculty awareness and training variability**
   While accessibility compliance requirements predate the updated Title II regulations, faculty familiarity with accessibility standards varies widely. This results in inconsistent application of accessibility best practices across courses, tools, and instructional materials.
3. **Volume and lifecycle of courses in the LMS**
   The University hosts a significant number of courses within Brightspace, including active and archived courses. Managing accessibility across new, active, and legacy course content presents ongoing challenges, particularly for materials developed prior to current accessibility standards.
4. **Platform and third-party tool limitations**
   Accessibility barriers may originate within enterprise systems and third-party tools used

for instruction. While the University makes reasonable efforts to select accessible technologies, not all platforms or updates immediately align with the most current WCAG standards. Ongoing review and remediation of tools such as Brightspace-integrated applications, document formats, and video platforms is required.

The following steps have been taken so far to address the above challenges:

1. **Training and professional development**
   The Office of the Provost, in partnership with Information Technology Services, hosted an "Accessibility in the LMS" training on December 18, 2025. This session introduced faculty to accessibility tools and practices within Brightspace, including the Accessibility Checker, ReadSpeaker webReader and docReader, color contrast guidance, heading structures, and text-to-speech supports. URI Online and ITS are actively engaged with identifying, updating, and promoting training resources focused on creating accessible digital content across platforms such as Brightspace, Microsoft Word and PowerPoint, PDFs, Zoom, Panopto, and related instructional technologies.
2. **Monitoring, evaluation, and cross-unit collaboration**
   ITS Teaching & Learning Services will continue to collaborate with URI Online and ITS Innovation Services to identify instructional platforms and tools that may not fully meet accessibility standards and to make reasonable efforts to address gaps in alignment with updated Title II regulations. This work includes ongoing evaluation of enterprise systems, vendor updates, and instructional technologies used across the University.
3. **Course Content Remediation**
   Working collaboratively, TLS and URIO have begun prioritizing Spring and Summer 2026 courses for initial accessibility review and remediation. TLS and URIO are also engaged in identifying longer-term strategies that may include the implementation of large-scale accessibility checking and automatic remediation software and potential process changes to the availability of prior term content within Brightspace.

For questions regarding accessible course design and digital course materials, please contact Joannah Portman-Daley, Director of Online Education and Instructional Design, joannahportman@uri.edu. For TTY assistance, contact R.I. Relay Services at 711.

RELATIONSHIP TO OTHER LAWS

42 USC § 12101 et seq. (The Americans with Disabilities Act (ADA) of 1990)

42 USC §2000d et seq. (Title VI of the Civil Rights Act of 1964 ["Title VI"], as amended)

29 USC § 794 (Section 504 of the Rehabilitation Act of 1973) ("Section 504")

36 CFR Part 1194, Appendix D (Electronic and Information Technology Accessibility Standards)

Executive Order 13166 (Aug. 11, 2000), 65 FR 50121

U.S. Department of Justice, Final LEP Guidance (June 12, 2002)

Title VI guidance of each federal agency that provides Federal financial assistance to the University

DIGITAL ACCESSIBILITY PROGRAM AT THE UNIVERSITY

A Digital Accessibility Program creates a framework to promote equal access and make digital content more accessible to all users, including people with disabilities. Per the newly adopted §35.200(a), the Department requires a public entity to "ensure the following are readily accessible to and usable by individuals with disabilities: (1) web content that a public entity makes available to members of the public or uses to offer services, programs, or activities to members of the public; and (2) mobile apps that a public entity makes available to members of the public or uses to offer services, programs, or activities to members of the public."

The University has designated: (1) Communications and Marketing as the department responsible for ensuring web content and social media content meet accessibility standards; (2) Information Technology Services is responsible for ensuring the ITS website, the Rhody App, platforms, and systems meet the accessibility standards outlined in the final rule; and (3) the Office of the Provost is responsible for ensuring online course content and electronic course materials meet accessibility standards. Each of these offices or departments is responsible for the implementation of the compliance areas under their scope, and may solicit technical assistance from the Working Group, as needed. All activities carried out must be align with institutional efforts.

While the departments noted above have taken significant steps to remove barriers to access, the University has identified the following areas for improvement and will take the steps outlined on the next page to promote access to web content and mobile apps for all.

ACCESSIBILITY COMPLIANCE PROGRAM RECOMMENDATIONS

Opportunity for Improvement Area #1: Decentralized approach to digital accessibility compliance efforts.

Recommendation #1: Introduce a centralized approach to digital accessibility compliance.

Opportunity for Improvement Area #2: Unclear roles and responsibilities.

Recommendation #2: Define roles and responsibilities.

Opportunity for Improvement Area #3: Inconsistent control system.

Recommendation #3: Introduce a control system to enhance administrative support and oversight of websites, systems, platforms, and online course content.

Opportunity for Improvement Area #4: Effective self-assessment process.

Recommendation #4: Introduce an official self-assessment mechanism to track and monitor digital accessibility for compliance with WCAG 2.1, level AA.

Opportunity for Improvement Area #5: Inconsistent digital accessibility compliance training.

Recommendation #5: Introduce a digital accessibility training program following WCAG 2.1 standards.

Opportunity for Improvement Area #6: Unclear digital accessibility reasonable accommodation request process and complaint reporting mechanism.

Recommendation #6: Enhance the awareness of the existing ADA framework for requesting accommodations to access digital materials in alternative formats.