



OFFICE OF THE VICE PRESIDENT AND  
CHIEF INFORMATION OFFICER  
Information Technology Services

OFFICE OF THE PRESIDENT  
1100 Broadway, 6<sup>th</sup> Floor  
Oakland, California 94607-4192

September 15, 2025

CHANCELLORS  
ACADEMIC COUNCIL CHAIR PALAZOGLU  
LABORATORY DIRECTOR WITHERELL  
ANR VICE PRESIDENT HUMISTON

**Re: Systemwide Review of Proposed Presidential Policy IMT-1300 Information Technology Accessibility**

Dear Colleagues:

Enclosed for systemwide review are proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility.

The IT Accessibility Policy was issued in 2013, and it was overdue for a revision. The policy update provides UC with the opportunity to align with recent updates to the federal accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. Additionally, the initial version of the policy was too sparse to provide locations with the necessary guidance to effectively initiate and maintain an accessibility program, so the policy was completely rewritten during the revision process.

Interested members of the systemwide Electronic Accessibility Committee (EAC), which has membership appointed by the CIO Council (CIOC), participated in creating the draft policy. The drafters represented a range of locations: Berkeley, Irvine, UCLA, San Diego, Santa Cruz, UCLA Health, UCSD Health, and Office of the President.

The draft policy that is being submitted for systemwide review today addresses the following key issues:

- Aligns with the technical standard (Web Content Accessibility Guidelines (WCAG) 2.1 AA) set by two new digital accessibility regulations, which implement Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
- Requires locations to establish an accessible course content program to ensure faculty support in creating accessible course content and to assist faculty in remediating course content.
- Provides guidance and necessary frameworks for procurement of accessible products, a more defensible exception process for goods and/or services that do not conform to the WCAG 2.1 AA technical standard, and a complaint/grievance process.
- Establishes a reporting requirement for better systemwide oversight and coordination.

- Provides additional guidance around processes and authority.

From April 2024 through February 2025, the policy group shared the draft with stakeholders representing key departments at UCOP and locations, including IT, academic affairs, disability service offices, human resources, legal, procurement, the systemwide Academic Senate, and technology and learning.

The policy group received substantial feedback on impactful issues and has already incorporated the feedback into the current draft. The key issues raised by stakeholders that were addressed in the attached draft policy include:

- Added language for vendor agreements that are not on UC terms.
- Updated the policy definitions of "IT" and "disability."
- Removed most of the timelines, except those imposed by federal regulations.
- Added reference to guidance documents, which stakeholders frequently requested.
  - The policy group will finalize guidance documents during the comment period.
- Softened wording to emphasize that the policy serves as a guidance document, not procedures.
- For digital instruction, added language to leverage campus accessibility efforts.

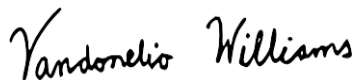
### **Systemwide Review**

Systemwide review is a public review distributed to the Chancellors, the Chair of the Academic Council, the Director of the Lawrence Berkeley National Laboratory, and the Vice President of Agriculture and Natural Resources requesting that they inform the general University community, especially affected employees, about policy proposals. Systemwide review also includes a mandatory, 90-day full Senate review.

Employees should be afforded the opportunity to review and comment on the draft policy. Attached is a Model Communication which may be used to inform non-exclusively represented employees about these proposals. Systemwide Labor Relations at the Office of the President is responsible for informing the bargaining units representing union membership about policy proposals.

We would appreciate receiving your comments no later than **December 19, 2025**. Please submit your comments and questions to [ITAPcomments@ucop.edu](mailto:ITAPcomments@ucop.edu).

Sincerely,



Van Williams  
Vice President for Information Technology Services and  
Chief Information Officer

Enclosures:

- 1) Draft Presidential Policy IMT-1300 Information Technology Accessibility
- 2) Model Communication

cc: President Milliken

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Executive Vice Chancellors/Provosts  
Executive Vice President and Chief Operating Officer Nava  
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