# SOM Tech

# Digital Accessibility Commitment

March 13, 2023

**Final**

Level Access Home Office

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## Our Commitment & Commitment

SOM Tech is a part of the UCSF School of Medicine Dean’s Office. We are committed to providing inclusive experiences by ensuring our programs, products and services are accessible, equitable, and non-exclusive of all identities and lived backgrounds. We are working to ensure our websites and online services are accessible for everyone. We have best practices in place to help ensure that we comply with the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.1[[1]](#footnote-2) Level A and AA guidelines for websites and applications. We are also firmly dedicated to complying with the [Americans with Disabilities Act (ADA)](https://www.ada.gov/pubs/adastatute08.htm) Titles II and III, [Section 504](https://www2.ed.gov/policy/rights/reg/ocr/edlite-34cfr104.html) and [Section 508](https://www.section508.gov/manage/laws-and-policies) of the Rehabilitation Act of 1973, the [21st Century Communications and Video Accessibility Act](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-303939A1.doc). This Commitment establishes minimum accessibility requirements for outward-facing digital assets, including digital experiences such as websites, web applications, and other internal and outward-facing digital content.

## Definitions

For purposes of this commitment the following terms shall have the indicated meanings:

* "Accessibility" means, "the degree to which an environment, service, or product allows access by as many people as possible, in particular, people with disabilities."
* "Accessibility Standards incorporated by reference" means conventions, norms or requirements intended to provide access to an environment, product, or service, particularly by people with disabilities. The principle of accessibility may be mandated in law, and then specified in detail per regulations, standards, or codes.
* "Alternative Formats" means information presented in Braille, in large print, via audio recording, or in an electronic format that can be accessed by people with disabilities. The Alternative format must make the same content available and provide an equivalent level of access to the content by people with disabilities that is available to others who access the original document.
* "Internal Digital Content" includes, but is not limited to, electronic or digital content, communications or applications that are:
	+ Salesforce
	+ Drupal
	+ Internal digital documents such as policies, standards, and procedures
* "Outward-facing Digital Content" includes, but is not limited to, electronic or digital content, communications or applications that are:
	+ In HTML, non-HTML or future mobile platform digital formats
	+ Outward-facing and broadly disseminated, including products and services information, account information, etc.
	+ Public support mechanisms (e.g., chat, email, etc.)
	+ Digital marketing and social media content
	+ For the purposes of this Commitment – “outward-facing digital assets” shall not include archival documents stored or retained solely for archival purposes to preserve an exact image of a hard copyor draft versions of documents that are not outward-facing, or which are intended for limited distribution.
* “Readily Achievable” is defined as easily accomplishable and able to be carried out without much difficulty or expense. Failure to remove accessibility barriers where “readily achievable” constitutes discrimination. Determining what is “readily achievable” often involves analyzing the nature and cost of removing barriers and the overall financial resources of the business organization, among other factors. The analysis seeks to balance the benefit of the barrier’s removal and the harm (e.g., cost) to the business.

## Scope

This accessibility commitment applies to all SOM Tech internal and outward-facing digital assets that are developed, procured, maintained, or used while offering products, services and online information to students, staff, or faculty. This includes any accompanying support documentation and services associated with the outward-facing digital channel. Employees of SOM Tech and contracted third-party vendors shall comply with this Commitment. The larger UCSF system of sites is not in scope for this commitment.

## Alternative Format Requests

All Alternative Format requests shall be completed in a commercially reasonable timeframe. Equal access to the requested information may be provided in lieu of making the original material accessible.

## Technical and Hardware Standards

SOM TECH has adopted the WCAG 2.1[[2]](#footnote-3) Level A and AA guidelines for websites and applications. These standards apply across all outward-facing digital assets, regardless of whether the digital applications, devices and services are accessed via computers, laptops, tablets, smart phones, etc. Unless qualifying for an Exception as defined below, as of the Effective Date of this Commitment, all new and revised outward-facing digital assets developed, purchased, or controlled by SOM TECH must conform to the standards referenced above.

## External Communication

SOM TECH will maintain publicly available statement(s) with information about SOM TECH’s digital assets Accessibility Commitment. The statement should complement the existing UCSF accessibility statement but be specific about SOM TECH’s commitment to accessibility in the organization. This statement(s) should be available from an appropriate area directly from the SOM TECH homepage (e.g. a footer link). Relevant information about the accessibility of member-facing websites, future mobile apps or other digital communications should be provided, as well as an accessible means by which members with disabilities can get further assistance. The information should be kept up to date with any newer developments.

## Compliance

All SOM TECH employees and clients responsible for outward-facing digital assets shall collaborate with the SOM TECH designee to understand accessibility requirements, receive accessibility training, address accessibility of covered outward-facing digital assets, and document how the outward-facing digital assets conform to Technical Standards referenced in this Commitment. SOM TECH is responsible for implementing procedures to inform authors, developers, publishers, and procurers about applicable laws, policies and contractual obligations. SOM TECH reserves the right to remove or suspend distribution of outward-facing digital assets found to be in noncompliance with this Commitment.

## Evaluation & Monitoring

SOM TECH is responsible for outward-facing digital assets and shall provide standards conformance reports for outward-facing digital assets they are responsible for, on an ad hoc basis, including both components developed by SOM Tech as well as components developed by third-party vendors and deployed on or integrated into SOM Tech managed platforms or applications. SOM Tech will conduct automated accessibility tests of SOM Tech managed web applications, at regularly scheduled intervals mandated by SOM Tech, to identify any instances where or other key digital communications are not in conformance with the Technical Standards referenced in this Commitment.

SOM Tech shall obligate its third-party vendors to conduct periodic reviews of outward-facing digital assets acquired by SOM Tech under contract and provide such reports to SOM Tech upon request.

## Training

This Commitment will be communicated to all SOM Tech employees responsible for outward-facing digital assets, including, but not limited to, product managers, project managers, designers, developers, engineers, content authors, QA engineers, and security managers. The Commitment will also be communicated to and be binding upon external vendors and contractors who develop member-facing digital assets for SOM Tech. Training will be offered on an as-needed basis to help identified staff to implement the Commitment. Training will be coordinated and facilitated by SOM Tech or their designee.

## Exceptions

Where compliance with this commitment is not possible, exceptions to this commitment may be granted by SOM Tech. Exceptions may be granted in the following scenarios, as applied to products or major product components, not at the individual build or sprint level:

* “Not Readily Achievable” – Compliance with this Commitment may be reevaluated by the SOM Tech if the nature and cost of removing digital accessibility barriers exceeds the financial resources of the business organization. This does not include lack of planning/budgeting for addressing digital accessibility barriers and should only be used in extreme circumstances where addressing digital accessibility barriers would financially harm the business organization.
* "Fundamental alteration" – Compliance with this Commitment may be waived if addressing digital accessibility barriers would result in a fundamental alteration in the nature of the SOM TECH service, program, or activity or result in undue financial and administrative burdens.
* "User generated content" – Content that is created by end users may be exempted from compliance with this Commitment. This exception only applies to the content itself, not the controls provided in association with the content, such as "Like" or "Follow" buttons, next page links, logins which may be incorporated into a SOM TECH published or controlled website or application.
* "Linked sites and resources" – Sites, resources, or systems that are linked to or from any SOM Tech published or controlled website or application, but which are provided by a third party outside of SOM Tech operations may be exempted from compliance with this Commitment, unless there is a contract in place with a vendor who is being paid to provide access to the third-party component, website, resource or system.
* "External Digital Content" – Digital Content about or relating to SOM Tech that is hosted by third parties may be exempted from compliance with this Commitment, unless there is a contract in place with a vendor who is being paid to provide such Digital Content.
* "Short Term Digital Content" – Digital Content that is hosted for less than three weeks may be exempted from compliance with this Commitment if it does not involve a core area of the business.
* "Orphaned Digital Content" – Digital Content that is orphaned or available but not linked directly from any web site published or controlled by SOM Tech may be exempted from compliance with this Commitment.
* "Back Office" – SOM Tech digital assets used for administration or monitoring of outward-facing hardware and digital content, but which are not available for use by the public are exempted from Compliance with this Commitment.

## Effective Date

The effective date ("Effective Date") of this commitment is [07/01/2023].

1. <https://www.w3.org/TR/WCAG21/> [↑](#footnote-ref-2)
2. <https://www.w3.org/TR/WCAG21/> [↑](#footnote-ref-3)