



CHAIR, ACADEMIC SENATE  
RIVERSIDE DIVISION  
UNIVERSITY OFFICE BUILDING, RM 225

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December 9, 2025

Ahmet Palazoglu, Chair, Academic Council  
1111 Franklin Street, 12th Floor  
Oakland, CA 94607-5200

**RE: Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility**

Dear Ahmet,

On December 8, 2025, the Riverside Academic Senate Executive Council discussed the *Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility* along with comments received from divisional committees. The most pressing issues identified are the lack of specified resources and funding, leading to fears of an unfunded mandate that places an unsustainable burden on faculty and support units. Committees repeatedly express that the proposed timeline for full compliance by April 2026 is unrealistic without substantial investment in staffing, technology, and training. Additionally, there is concern of the potential for a negative impact on student learning, as faculty may opt to remove valuable course materials rather than risk non-compliance.

In addition to the attached comments, Executive Council asserts that would be beneficial for faculty to request and take advantage of all tools campuses make available to meet digital accessibility compliance. A member also suggested the UC and campuses explore ways to utilize AI to assist with meeting the compliance mandate and deadline.

As you'll find from the attached memos, overall, reviewers, including the Executive Council found the policy acceptable and had no substantive objections or concerns.

Sincerely yours,

A handwritten signature in blue ink that reads "Kenneth Barish".

Kenneth Barish  
Professor of Physics and Astronomy and Chair of the Riverside Division

Encl.

CC: Monica Lin, Executive Director of the Academic Senate  
Cherysa Cortez, Executive Director of UCR Academic Senate Office



School of Business  
Anderson Hall  
900 University Avenue  
Riverside, CA 92521

October 10, 2025

To: Ken Barish, Chair  
Riverside Division of the Academic Senate

From: Jerayr Haleblan  
Chair, School of Business Executive Committee

Re: (Consultation): *Presidential Policy on IT accessibility*

Please let this memo serve as an official notification that the School of Business Executive Committee has no comments or concerns on the proposals noted above.



## *Academic Senate*

### **COMMITTEE ON EDUCATIONAL POLICY**

November 24, 2025

To: Ken Barish, Chair  
Riverside Division

From: Annie Ditta, Chair  
Committee on Educational Policy

**Re: Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility**

The Committee on Educational Policy (CEP) reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility at their November 7, 2025 meeting. The Committee noted concern that the proposed changes do not document which stakeholders are responsible for implementing the changes and what resources will be required to implement this plan at the Divisional level. The Committee also expressed concern that if there is not enough support at the Divisional level for faculty to implement these accessibility changes to their courses, they may instead decide simply not to post these course materials rather than risk being out of compliance with the federal mandate. This would negatively impact student learning, as they would be losing access to important instructional materials.



College of Humanities, Arts, and  
Social Sciences  
EXECUTIVE COMMITTEE

November 14, 2025

TO: Ken Barish, Chair  
Riverside Division of the Academic Senate

FROM: Iván Aguirre, Interim Chair  
CHASS Executive Committee

RE: Proposal: Proposed Revisions to Presidential Policy IMT-1300: Information  
Technology Accessibility

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The CHASS Executive Committee reviewed the proposed revisions and discussed some aspects, mainly around the issues of how the implementation of accessibility would roll out into Canvas courses and what support faculty would have to make this transition. The revisions as such are unclear whether faculty will be mandated to comply and how these changes would be implemented. The committee also discussed intellectual property issues around recorded lectures and archived canvas courses.



## *Academic Senate*

### COMMITTEE ON INTERNATIONAL EDUCATION

November 3, 2025

To: Kenneth Barish, Chair  
Riverside Division

From: Igor Barsukov, Chair  
Committee on International Education

Re: **[Systemwide Review] Proposal: Proposed Revisions to Presidential Policy IMT-1300:  
Information Technology Accessibility**

The Committee on International Education reviewed the [Systemwide Review] Proposal: Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility at their meeting on October 30, 2025, and had no comments.

November 21st, 2025

TO: Kenneth N. Barish, Chair, Academic Senate, UCR Division

FROM: Harry Tom, Chair, Faculty Executive Committee, College of Natural and  
Agricultural Sciences

SUBJECT: [Systemwide Review] Proposal: Proposed Revisions to Presidential Policy IMT-1300:  
Information Technology Accessibility

Prof. Barish,

The CNAS Faculty Executive Committee has reviewed the proposed revisions to presidential policy IMT-1330 at their November 4th meeting and had comments to provide to the Senate.

The committee has voiced their concern for the impact that the policy changes will make on the experience of the students and on the faculty's ability to create meaningful content.

There is general consensus that consistent faculty support early on and through this transition needs to be in place and include:

1. Transparency of policy expectations and clearly defined compliance standards.
2. Consistent, timely, and equal distribution of information related to these policies, to ensure everyone is progressing together through this process and don't receive conflicting guidance.
3. Training for faculty on the policies and the programs that are available with accessibility features to understand the updates and changes they need to make moving forward to be in compliance.
4. Clearer communication of resources available (E.g., XCITE) that faculty can reach out to for guidance and help during the transition and moving forward.

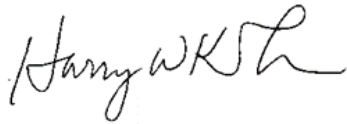
The committee feels that the technology currently in place, such as the Yuja captioning software, is not sufficient for the needs of the faculty to ensure complete compliance with this policy. There are inconsistencies with the software, in the captions produced, for faculty who are using particular jargon that the software doesn't understand and misnotes. With the policy expectation of a 24-hour turnaround for recorded lecture material, faculty will not be able to meet expected deadlines as it can take hours to edit videos to the level of necessary compliance (99% accuracy). The committee feels that there is a need for better software that can help with live commentary and recordings and that the university needs to make the investment in more accurate technology to support the implementation of this policy.

The committee also raised concerns that current staffing on campus in place to support faculty with this compliance, particularly in XCITE, is not sufficient to address the amount of support needed by all faculty on campus. There are already reports that available resources are delayed by at least a week for support services, which, given this policy, is too late to be in compliance. The committee would like to

suggest that, should these policy changes be implemented, that more staff be put in place before and through the transition to help faculty in updating their current content to reach compliance standards, to ensure minimal impact to students.

In order for faculty to be in compliance, most of the content currently available will need to be taken offline to be assessed and updated to meet accessibility standards and there is a concern that many faculty will decide to not republish the information, given the number of requirements to address and the time it will take to complete them. In the interim, the level of access to material that all students have become accustomed to will be diminished along with their learning outcomes and their experience in taking the course. We would be doing a disservice to the students should adequate support not be provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry Tom". The signature is fluid and cursive, with the first name "Harry" written in a larger, more prominent script than the last name "Tom".

Harry Tom, Ph.D

Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences



**COMMITTEE ON DIVERSITY, EQUITY, & INCLUSION**

November 3, 2025

To: Kenneth Barish, Chair  
Riverside Division Academic Senate

From: Esra Kurum, Chair   
Committee on Diversity, Equity, & Inclusion

Re: **[Systemwide Review] (Proposal) Proposed Revisions to Presidential Policy IMT-  
1300: Information Technology Accessibility**

The Committee on Diversity, Equity, and Inclusion (CODEI) has reviewed the above proposal. Though appreciative of the initiative and understanding the need to improve Information Technology access for faculty, staff, and students, several points of concern arise. Generally, the plan presents an ambitious timeline that does not adequately address needs on campus that will arise during the transition period. As this initiative is to be established by April of 2026, though comprehensive, the plan is still in need of a detailed analysis of the ways this policy change will negatively contribute to an already labyrinthine IT experience. The committee also appreciates that this review item draws attention to IT as a concern on campus.





## *Academic Senate*

### **COMMITTEE ON COURSES**

October 24, 2025

To: Ken Barish, Chair  
Riverside Division

From: Emma Stapely, Chair  
Committee on Courses

**Re: Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility**

The Committee on Courses reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility at their October 23, 2025 meeting. The Committee noted concern that the resources needed to implement the proposed changes were not clearly presented in the policy. The Committee recommends that the proposal be updated to provide greater clarity on the resources and labor needed to implement the proposed changes.



## *Academic Senate*

### **GRADUATE COUNCIL**

November 20, 2025

To: Kenneth Barish, Chair  
Riverside Division

From: Viji Santhakumar, Chair  
Graduate Council

**RE: [Systemwide Review] (Proposal) Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility**

Graduate Council reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility at their November 20, 2025 meeting. The Council had no comments about the proposed revisions.



## *Academic Senate*

### **Committee on Information Technology**

October 8, 2025

To: Kenneth Barish, Chair  
Riverside Division

From: John Franchak, Chair  
Committee on Information Technology

**Re: 25-26. Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility**

The committee discussed the proposed revisions and had no additional comments.



## *Academic Senate*

November 20, 2025

To: Kenneth Barish, Chair  
Riverside Division

From: Joseph Genereux, Chair  
Committee on Library and Scholarly Communications

Re: 25-26. SR. Systemwide Review of Proposed Presidential Policy IMT-1300 Information Technology Accessibility

The committee endorses efforts to extend accessibility of instructional materials. We are glad that Student Disability Resource Center is working closely with the libraries but do believe that it would be valuable for this revision to explicitly require that students with disabilities be included on Location advisory committees to ensure that implementation matches *our* students' perception of needs in addition to formal compliance. We also anticipate that faculty and other stakeholders will be concerned about the efforts required to make their own materials compliant, and hope that XCITE will be properly prepared to provide the necessary support.

Finally, even though we recognize that accessibility is important and must be central to the library's mission, unfunded mandates place stress on library resources. The success of this initiative will in part depend on the resources that UCOP and UCR dedicate to support faculty and relevant academic units, including the libraries. Their current success at doing more with less should not be seen as a guarantee that they can continue to do so.

11/21/2025

**To:** Kenneth Barish, Chair of the Assembly of the Academic Senate  
and Cherysa Cortez, Executive Director of the UCR Academic Senate

**From:** Kinnari Atit, Ph.D., Faculty Chair of the School of Education Executive Committee

**Subject:** School of Education's Feedback on the Proposed Revisions to Presidential Policy IMT-1300:  
Information Technology Accessibility

The SOE Executive Committee reviewed the "Proposed Revisions to Presidential Policy IMT-1300:  
Information Technology Accessibility".

Comments/feedback were solicited at our executive committee meeting and via email.

Thank you for the opportunity to provide feedback on the draft revisions to Presidential Policy IMT-1300. Faculty strongly support the University's commitment to digital accessibility and equitable access for all learners. However, we have several concerns regarding the feasibility and implementation of the draft policy as written.

#### 1. Implementation Timeline Is Not Feasible

The requirement for full compliance with WCAG 2.1 AA and full implementation of each campus's IT Accessibility Policy Program (ITAPP) by April 24, 2026 is not realistic given the scale of work involved. A phased implementation timeline with clear milestones and campus-level flexibility would significantly improve feasibility and compliance.

#### 2. Substantial New Operational Burdens Without Resource Commitments

The policy introduces major new responsibilities for faculty and academic units, including:

- Mandatory accessibility training every two years
- Creating and maintaining fully accessible LMS and digital course materials
- Participating in advisory committees
- Remediating legacy content
- Completing multiple levels of reporting, consultation, and exceptions processes

The policy does not specify how these new duties will be supported or funded. Faculty request explicit commitments for instructional design support, accessibility specialists, technical assistance, and resources for remediation to ensure equitable and sustainable implementation.

#### 3. Scope of Faculty Responsibility Requires Clarification

The draft appears to place responsibility on faculty for remediating:

- All pre-2026 instructional materials still in use
- Third-party instructional tools or platforms
- Any LMS content that does not pass automated accessibility checks

Given the decentralized nature of course development, faculty need clearer guidance regarding institutional versus individual responsibilities, reasonable expectations for time investment, and protection from liability for complex technical compliance issues outside their expertise.

#### 4. Definition of “Material Alteration” Is Overly Broad

The policy requires any “Materially Altered” course to be brought into full compliance with accessibility standards, but the definition encompasses nearly any change to content or structure—including routine updates such as adjusting slides, refreshing assignments, or updating a syllabus.

Faculty request a narrower, more practical definition that distinguishes minor routine updates from substantial course redesigns, so compliance expectations are clear and manageable.

Thank you for the opportunity to provide feedback.

Sincerely,



Kinnari Atit  
Chair, Faculty Executive Committee  
School of Education  
University of California, Riverside  
Email: [kinnari.atit@ucr.edu](mailto:kinnari.atit@ucr.edu)



November 12, 2025

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine

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

Dear Ken,

The SOM Faculty Executive Committee has reviewed the Proposed Presidential Policy IMT-1300 Information Technology Accessibility.

The FEC supports the general direction of the revisions, which aim to update existing rules from 2013 to align with new regulations.

Yours sincerely,

DocuSigned by:  
  
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Adam Godzik, Ph.D.  
Chair, Faculty Executive Committee School of Medicine