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,

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