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Section UAP Section 2000: Administration
Applicability University Administrative (UAP)

UAP 2715: Digital Accessibility

Authorized by [RPM 3.1 Responsibilities of the President](#)

Process Owner: University ADA Coordinator

1. General

The University of New Mexico (UNM) will provide an inclusive and accessible digital environment for all individuals. In compliance with current applicable federal laws, including the Americans with Disabilities Act of 1990 (ADA) and Section 508 of the Rehabilitation Act of 1973, and applicable New Mexico state laws, UNM will make its digital content and applications accessible by complying with the standards identified in state and federal rules.

2. Applicability

This policy applies to all digital content and applications used, acquired, or maintained by the University. It covers all UNM employees, students, student organizations, contractors, IT goods and services, and any third parties providing digital content, services, or products on behalf of the University.

Any individual or department responsible for creating, maintaining or procuring digital content, and IT services used by the University must comply with this policy. Failure to comply by contractors or third-party providers may result in the termination of contracts.

2.1 Digital Content and Compliance

- **New Content and Technology:** All new content created after the applicable effective date of the applicable law must conform to current digital accessibility technical standards identified in state and federal rules. This includes new web pages, web applications, mobile applications and tools, web content created by artificial intelligence, and digital content, including no-cost digital content used by the University.

- **Existing Content and Technology:** All web pages, web applications, mobile applications, and digital content published before April 2026 must be reviewed and brought into compliance with the current technical standards within a reasonable timeframe established by the Advisory Council on Digital Accessibility.
- **Legacy Content** must be made accessible upon request within a reasonable timeframe established by the Advisory Council on Digital Accessibility.
- **Learning Management System (LMS):** Any content used, created, shared, redeveloped or modified within the University's LMSs must conform to the digital accessibility technical standards identified in state and federal rules.

3. Exclusions

No exclusions apply.

4. Definitions

- **ADA Coordinator:** The individual at UNM designated to coordinate compliance with the Americans with Disabilities Act (ADA), as required under the ADA.
- **CEEO:** The office of Compliance, Ethics & Equal Opportunity. This office serves as a centralized resource and neutral campus entity designated to ensure compliance with all University policies that apply to civil rights, including investigations of civil rights violations.
- **Digital Content and Applications:** All digital content (text, images, sounds, video, and documents) published on University websites, and any software applications that the University provides or makes available directly or through contractual licensing, or other arrangements and are designed to run on mobile devices, desktop computers, or laptops.
- **Equally Effective Alternative Access Plan (EEAAP):** A documented plan that ensures a person with a disability can obtain the same information, engage in the same interactions, and enjoy the same services as a person without a disability, in an equally effective and timely manner.
- **Learning Management System (LMS):** A software application primarily used to deliver educational content, courses, and training.
- **Legacy Content:** Web pages, digital content, mobile applications, or digital tools that were created and published before the effective date of this policy and are no longer actively used or maintained. While all content must be made accessible upon request, legacy content may be prioritized for remediation after newer or actively used content.
- **Multimedia:** All media presented in digital content and applications, including text, images, sounds, videos, and documents.
- **Technical Standard:** A standard or guideline outlined in state or federal rules, policy or regulation specifically stating what is needed for something to be accessible. A document or set of documents that specify design, predicted performance, operation, and maintenance

specifications for materials, devices, or methods.

5. Advisory Council on Digital Accessibility

The **Advisory Council on Digital Accessibility** (“Advisory Council”) will advise on this policy and implementation in collaboration with the **Office of Compliance, Ethics & Equal Opportunity (CEEEO)** and UNM Information Technologies. The Advisory Council is responsible for maintaining a charter that outlines membership requirements and procedural considerations, such as voting and tie breaking.

The Advisory Council will review updates, reports, recommendations, and emerging digital accessibility practices and technologies, and will meet as needed but no less than twice annually. The Advisory Council is comprised of key representative stakeholders, and the Advisory Council Chair will be appointed by the University President or their designee. The ADA Coordinator will serve as an *ex officio* member of the Advisory Council.

The Advisory Council serves as a permanent working group that reviews changes in digital accessibility laws, policies, and regulations, and provides recommendations to support University compliance.

6. Procurement

Effective as of the date of this policy, the UNM procurement process will include a formal evaluation of the mechanisms for digital accessibility of all proposed digital content and applications and tools. Final purchasing recommendations and determining whether supplier accessibility standards comply with this policy will remain with departmental purchasers and the designated procurement office, and all standard procurement processes will be followed.

6.1 Procurement Requirements

- **Digital Accessibility Documentation:** All vendors and service providers must provide and must maintain accessibility documentation that evaluates the capacity to support digital accessibility of the product in accordance with state and federal technical standards and is thorough, accurate, and reflects the current product version.
- **Evaluation:** UNM procurement teams, with support from CEEEO, IT, and the Advisory Council on Digital Accessibility, will conduct an in-depth evaluation of submitted accessibility documentation and other provided documentation. This evaluation may include a third-party accessibility audit.
- **Remediation:** If full conformance is not immediately possible, the vendor must provide a documented remediation plan with specific timelines. The Advisory Council may be consulted to review such plans to assess and determine whether the plan is reasonable and appropriate.
- **Equally Effective Alternative Access Plan:** Products that do not meet accessibility standards may not be purchased unless a documented Equally Effective Alternative Access Plan (EEAAP) is reviewed and recommended by the ADA Coordinator or their designee and approved by the designated procurement authority. Denials may be protested through the University’s

procurement protest process, and the Advisory Council on Digital Accessibility may be consulted.

7. Reporting Digital Accessibility Issues

Any person experiencing accessibility issues with UNM's digital content or technology may report the issue to [CEEEO](#). CEEEO will respond pursuant to federal and state laws and its grievance procedures.

8. Exceptions

An exception to this policy may be requested if meeting the digital accessibility requirements is not reasonably feasible, would require extraordinary measures due to the function or purpose of the content or technology, or is already carved out as an exception in the existing state or federal rules. The request must be submitted to the ADA Coordinator who will process the request. Final decisions will be made by the appropriate executive vice president or their designee. Guidelines for review of exceptions will be published by the Advisory Council in collaboration with CEEEO following applicable state and federal rules. Exception guidelines are reassessed as needed or at least every three years.

9. References

9.1 Related Policies

[RPM 2.3 \("Equal Opportunity, Affirmative Action, Anti-Discrimination, Anti-Harassment, and Anti-Retaliation"\)](#)

[UAP 2310 \("Reasonable Accommodation for Students with Disabilities"\)](#)

[UAP 3110 \("Reasonable Accommodation for Employees, Job Applicants, and Participants with Disabilities"\)](#)

9.2 Applicable Laws

[28 CFR Part 35: Nondiscrimination on the Basis of Disability in State and Local Government Services](#)

Americans with Disabilities Act of 1990

Sections 504 and 508 of the Rehabilitation Act

Approval Signatures

Step Description

Approver

Date

Applicability

University Administrative (UAP)

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