DIGITAL MATURITY SELF-ASSESSMENT
EXECUTIVE SUMMARY
By: President's Advisory Committee on Disability Issues (PACDI)

Background

The Americans with Disabilities Act (ADA) and other laws prohibit universities from excluding people with disabilities from participating in its programs, services, and activities. Inclusion of individuals from all backgrounds is a shared Universities of Wisconsin value, mission, goal, and commitment. Considering our transition to remote learning and work in response to the COVID-19 pandemic, and our increasing reliance on digital tools to share information and complete tasks such as paying tuition, registering for and completing courses, or entering vacation leave, UW universities are increasingly dependent on technology.

In this context, the President's Advisory Committee on Disability Issues (PACDI) proposed a self-assessment project as an opportunity to review digital accessibility across all 13 UW universities to ensure that our shared obligations and commitments to equal access and inclusion are upheld in the digital space. Throughout 2023, PACDI worked with leadership and stakeholders to create and implement a self-assessment process that brought together key university subject matter experts to closely examine their own policies and practices related to digital access—using a self-assessment survey developed around a best-practices framework. A project proposal was presented to President Rothman and the Universities of Wisconsin Chancellors in February 2023, receiving their endorsement. Chief information officers were briefed on the project in April, self-assessment teams were assembled at each university, and surveys were distributed in late May 2023 to be completed over the summer.

This self-assessment's main purpose was to help each institution create awareness around digital access, identify gaps, and develop benchmarking. To highlight successes, best practices, and identify areas for improvement, the self-assessment asked campus teams to review the following areas related to their digital accessibility policy and practice:

- Vision and leadership commitment
- Planning and implementation
- Resources and support
- Assessment

The intended work-products resulting from this project are twofold: 1) for each UW university to receive benchmarking summaries and recommendations to help them develop plans that set the foundation for continuous improvement in accessibility across the ever-changing digital environment; and 2) to identify themes and recommendations that emerged across the Universities of Wisconsin that would benefit from system-level training and support. PACDI will continue to serve as a resource to support university and system-level efforts to improve digital accessibility.

Digital access is a critical aspect of American society due to the ever-increasing reliance on digital tools to share information and complete transactions. Ensuring that technologies are accessible for disabled individuals to privately and independently complete the same transactions and gain the same benefits as their nondisabled peers, without having to rely on the development of reasonable accommodations, is vital to maintaining the spirit of full inclusion set forth under disability laws.

Process

Chancellors were asked to assign a team of professionals to collaborate on the self-assessment process. While team make-up varied by campus, chancellors were encouraged to consider representation from the following groups in assembling their teams:

- Marketing
- Teaching & Learning Centers
- Digital Learning Platform management
- Disability/Accessibility Services
- Information Technology
- Individuals with disabilities

- Shared governance
- Compliance/Risk Management
- Procurement
- ADA Coordinator
- Human Resources
- Website/Software Developer

University teams were asked to complete a Digital Maturity Self-Assessment (DMSA) survey during Summer 2023 and were provided PACDI member contact information for questions. Several universities requested the PACDI chair, Dr. Elizabeth Watson, to attend a workgroup meeting and provide some context and guidance. The last completed self-assessment was received in September 2023, after which members of a PACDI sub-committee engaged in additional follow-up with campuses for clarification of responses. Analysis of the surveys was completed during November and December 2023, including a university-team review of the initial analysis for verification, feedback, and corrections. Campus-level reports were finalized in January 2024 and disseminated to the Chancellors, chief information officers, DMSA workgroup leads, and other stakeholders in early February 2024. **This system-level executive summary serves as the final work-product in the self-assessment process and will be presented to President Rothman and the same university stakeholders who received individual university reports.**

PACDI recognizes the time and effort of each UW university to participate and thoughtfully complete the project. All universities were engaged, followed through, and responded to the PACDI sub-committee as necessary. The interdisciplinary PACDI team extensively reviewed all campuses' responses, and below are the summary findings and detailed system-level recommendations.

Brief Summary of Findings

These findings are presented based on the survey's four focus areas:

Vision and Leadership

There were several common themes across all UW universities related to knowledge distribution, development, and implementation of digital access policies. Two UWs were able to identify their digital access policy. Two noted that review and improvement of digital access of their campus

websites were goals or part of their strategic mission. Some UWs highlighted specialized policies or practices for some specific aspects of digital access, such as a captioning policy or guidance documents on how to create accessible documents or websites. **While most universities identified a committee dedicated to general disability issues, digital access typically was not integrated into the scope of work.** Only two UWs had digital access committees with interdisciplinary membership. Minimally, all universities did identify where students or employees could request disability accommodations.

Planning and Implementation

Only one UW university identified a campuswide implementation plan related to digital access. Most noted some training was available, especially for individuals who manage websites or instructional staff teaching online. **Only two universities had fully developed digital access policies that clearly identified accessibility standards, procedures, or institutional authority**.

Resources and Support

All UWs noted a lack of centralized fiscal resources dedicated to digital accessibility or insufficient staffing to support digital access at a broad institutional level. One identified barrier is regarding the procurement of technology, with only one UW (Madison) having an available review process for departments purchasing technology to determine if it is accessible prior to purchase. Another general issue is the lack of centralized training around digital accessibility. Unlike the construction of facilities, anyone can create digital content, such as a report or website, so training is critical to raise awareness of accessibility as a shared responsibility.

One strength identified is the attention to accessibility that is given to teaching and learning technologies that are part of the systemwide [Digital Learning Environment](#) (DLE). A key characteristic of the DLE is that accessibility and the principles of universal design are fundamental to their work, so all students, regardless of ability and learning preference, can succeed in all instructional modes.

Assessment

None of the UWs had developed assessment and evaluation plans to gauge digital access or benchmark the current state of accessibility of their tools and resources. Several institutions did have means for individuals to report a digital access barrier.

Opportunities and Recommendations for Universities of Wisconsin Administration

The following recommendations are provided based on the survey's focus areas, the responses provided from each university, and the themes summarized above. These system-level recommendations align with recommendations provided to UW universities and would support them in organizing, prioritizing, and implementing their recommendations.

Vision and Leadership:

1. Affirm accessibility as a critical value within UW university missions, vision, strategic priority, and other statements.
    a. Accessibility is a shared responsibility and leadership affirmation about the importance of digital accessibility sets the floor for inclusion at each university.
    b. Accessible design reduces the need for costly accommodations and disability labor.
2. Policy development and maintenance.
    a. Charge PACDI to review *Regent Policy Document 14-10, Nondiscrimination on Basis of Disability*, and develop an overarching digital accessibility policy or procedure similar to [UW System Administrative Procedure 1031.B](#) that was created for information security.
        i. A broad systemwide policy or procedure affirms Universities of Wisconsin's value for disability access and inclusion.
        ii. This would create an opportunity to delineate a responsible Universities of Wisconsin Administration officer to support digital accessibility at the system-level and influence access within each campus.
        iii. This would support each campus with digital access by setting guidance for procurement, access standards, scope, and remediation.
    b. Require each university to develop or maintain a local digital accessibility policy.
        i. This would establish each university's commitment and would provide details regarding technology scope, accessibility standards, and processes.
        ii. Policies establish oversight and authority for the resolution of issues.
        iii. Policies are an indicator of a university's value for inclusion and reinforce to vendors that their products must be accessible.

Planning and Implementation:

1. Require a digital accessibility committee for each UW university and Universities of Wisconsin Administration.
    a. At each university this could be the same committee that completed the survey and should minimally be composed of a cross-campus group of stakeholders including students, employees, policy handlers, and leadership.
    b. This committee should report to the leadership at least once a year on disability access issues, concerns, strengths, and recommendations related to digital access.
    c. This committee can provide guidance for their local digital access policy.
    d. The Universities of Wisconsin Administration committee could be composed of UWSA employees and a subcommittee of PACDI.
2. Direct each university to develop an implementation plan regarding their digital access policy.
    a. Since digital resources and tools are pervasive, an implementation plan establishes a structured roadmap to make each tool accessible.

Resources and Support:

1. Training
   a. Develop training at the system level to be available for campuses to raise awareness about disability nondiscrimination obligations, importance of digital access, and the need to respond to barriers promptly.
2. Dedicated IT accessibility staff
   a. Direct Universities of Wisconsin Administration and each university to assign a staff member to lead digital access efforts as part of their job functions.
      i. Based on the size of each UW university, consideration of a full-time staff member dedicated to digital access and/or a standalone unit for digital access may be needed.
      ii. Dedicated accessibility staff separates access issues from reasonable accommodations and gives clarity that access allows disabled individuals to seamlessly use and benefit from digital tools without the need for a reasonable accommodation.
3. Job descriptions
   a. Require accessibility to be a qualification requirement for positions that directly interact with technology, whether an IT-focused position or one responsible for resources and information associated with a digital tool (i.e., posting information to a website).
4. Central funding for digital accessibility
   a. Procure systemwide enterprise tools to assist with website evaluation and digital tool remediation that is available for all campuses.
   b. Allocate funding to, or require each campus to maintain, a central fund exclusively dedicated towards digital access.

Assessment:

1. Accessibility barrier reporting form
   a. Direct each campus, and Universities of Wisconsin Administration, to develop or maintain an accessibility barrier reporting form for university community stakeholders to notify digital tool owners about barriers impeding independent access. Universities currently without a form were provided a link to [Guidance for Creating an Accessibility Barrier Reporting Form](#) in their individual campus reports.
   b. Per the guidance document, universities should develop a process for reviewing data collected from the reporting form, communicating concerns to appropriate campus entities, documenting resolutions, and periodically reporting trends to leadership.
2. System- and campus-wide assessment
   a. Direct Universities of Wisconsin Administration and each university to evaluate their digital tools to establish a baseline of access gaps and create a remediation plan to make those tools accessible.
      i. Evaluating current tools helps determine which resources should be prioritized for accessibility.
      ii. Evaluating digital tools aligns with the ADA's self-evaluation plan requirement of public entities and demonstrates an entity's good-faith effort to proactively address barriers.