

August 30, 2024

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Senior Director, Workplace Technology Services  
0928

**Subject:***Digital Accessibility & Compliance  
Report 2024-05*

The final report for Digital Accessibility & Compliance, Report 2024-05, is attached. We would like to thank all members of the department for their cooperation and assistance during the review.

Because we were able to reach agreement regarding management action plans in response to the audit recommendations, a formal response to the report is not requested. The findings included in this report will be added to our follow-up system. We will contact you at the appropriate time to evaluate the status of the management action plans.

UC wide policy requires that all draft reports be destroyed after the final report is issued. We also request that draft reports not be photocopied or otherwise redistributed.

Christa Perkins  
Director  
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Attachment

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# UC San Diego

## AUDIT & MANAGEMENT ADVISORY SERVICES

Digital Accessibility & Compliance  
Report No. 2024-05  
August 2024

### FINAL REPORT

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## I. EXECUTIVE SUMMARY

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Audit & Management Advisory Services (AMAS) has completed a review of Digital Accessibility & Compliance as part of the approved audit plan for Fiscal Year 2024. The objective of our review was to assess whether UCSD's information technology controls and business processes provide reasonable assurance that access to public-facing internet content and information technology are in compliance with the University of California (UC) Electronic Accessibility Policy.

Based on our review, we concluded that information technology controls and business processes need improvement to provide reasonable assurance that access to public-facing internet content and information technology are effective and in compliance with University policies. Many of these improvements have been initiated by the Website Standards Committee (WSC).

UCSD has implemented controls as it pertains to websites managed in the campus Web Content Management System (CMS), such as maintaining a functional website inventory within CMS. The WSC has achieved several milestones since its initial meeting in August 2023. However, a comprehensive IT Accessibility Program has not been fully developed to include all the required elements for ensuring the accessibility of digital content, platforms, and services. Three elements (i.e., Prioritization, Evaluation, and Exception Processes) have not yet been addressed. We also noted opportunities for improvement for the other seven requirements. The WSC is currently developing this Program to enhance compliance requirements, as the UC Electronic Accessibility Policy is undergoing revisions. UC is in the process of revising the current Policy, and while the ITAPP requirements are slightly modified, two of the three elements required under the current policy will still be required in the Draft Revised version.

In addition, we noted opportunities for improvement related to website management. The planned transition to CampusPress offers an opportunity to address capacity limitations and streamline website management, particularly for sites falling below the CMS threshold. The absence of established procedures for remediation, which hinders prompt issue resolution, remains a challenge.

Training of content and website owners could also be improved to ensure current knowledge of digital accessibility standards, and achieve higher conformance levels and accessibility scoring across websites. The WSC is planning to enhance training in this area. Finally, we noted that some student educational podcast videos did not meet the required caption standards outlined in WCAG 2.0. Management Action Plans to address these findings are summarized briefly below:

### **A. IT Accessibility Program**

1. The WSC will ensure that the IT Accessibility Program includes all elements required by University policy to ensure the accessibility of digital content, platforms, and services.

### **B. Website Management**

1. The WSC will explore solutions for website inventory management system that incorporates automated tools for website discovery, continuous monitoring, and regular updates to ensure the accurate and complete inventory of all UCSD's websites.

2. UCSD Information Technology Services (ITS) is in the process of deploying CampusPress to support websites that are currently not supported in CMS.
3. The WSC will update and maintain a comprehensive list of content and website owners to ensure accountability and facilitate effective communication for compliance with accessibility standards.
4. The WSC will establish a clear reporting structure and recommend roles and responsibilities to content owners, website owners, and a designated IT accessibility coordinator.
5. The WSC will develop a comprehensive remediation process for addressing accessibility issues identified within the websites, which complies with relevant accessibility standards and regulations. WSC has implemented a website accessibility issue reporting form, and drafted a standards document detailing accessibility standards.

**C. Accessibility Awareness and Training**

1. Web Content Management Services will enhance the current CMS training by asking new users to complete introductory accessibility training in Siteimprove and attest to their completion. They will also encourage existing CMS users to take this training through a communications campaign.
2. The WSC will work with ITS to create a centralized and regularly updated registry that includes contact information and responsibilities of all content and website owners.
3. WSC will work with Web Content Management Services to create a campus announcements list that regularly notifies content and website owners of new digital accessibility requirements.

**D. Caption Compliance for Student Lecture Podcasts**

1. The WSC will work with Educational Technology Services to optimize auto-captioning of student lecture content wherever possible, including evaluating new alternate AI captioning vendors for accuracy metrics.
2. The WSC will work with Educational Technology Services to identify provide and promote effective training resources on digital accessibility for instructors to improve awareness on accessibility requirements.

Observations and related management action plans are described in greater detail in section V. of this report.

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## II. BACKGROUND

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Audit & Management Advisory Services (AMAS) has completed a review of Digital Accessibility & Compliance as part of the approved audit plan for Fiscal Year 2024. This report summarizes the results of our review.

The University of California (UC) is committed to supporting an information technology (IT) environment that is accessible to all and, in particular, to individuals with disabilities. UC has established the UC Electronic Accessibility Policy, *IMT-1300 Information Technology Accessibility (Policy)*, which “seeks to deploy information technology that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies.” The Policy outlines the minimum requirements for Locations to comply with the following components:

- The establishment of an IT Accessibility Program (ITAP).
- Developing, purchasing, and acquiring hardware and software products that are accessible to people with disabilities.
- Promoting awareness of the Policy to the University community, website owners, and content owners.

The ITAP is expected to establish processes to address IT accessibility. The Chancellor must designate an individual and/or committee to oversee the Program that represents a broad range of functional areas and be able to address academic, research and administrative needs. The Program must include 10 elements; Authority and responsibility, Audience, Prioritization, Design process, Procurement, Training, Awareness Campaign, Compliance Monitoring, Evaluation, and Exception.

Current policy requires that electronic information must meet the Web Content Accessibility Guidelines (WCAG) 2.0. The WCAG 2.0 was created by the World Wide Web Consortium (W3C) to provide recommendations for making web content more accessible. These guidelines are based on four principles of accessibility, which dictate the criteria a website must have to be accessible: the website content must be Perceivable, Operable, Understandable and Robust. An overview of the principles and conformance levels is provided in **Attachment A**.

UC is in the process of revising this Policy and there has been a limited circulation of the draft to select campus leadership for review. The revisions are expected to reflect a continued commitment to supporting an Information Technology environment that is accessible to all, particularly individuals with disabilities. As currently written, the draft revised Policy will require higher standards (WCAG 2.1); will apply to content used and/or viewed by students, faculty, staff, and the public, even if such content is behind a firewall or authentication; will require designation of five oversight roles; and updates the requirements of the IT Accessibility Policy Program (ITAPP) (from 10 to eight). UC Locations will be required to implement the required elements of the ITAPP by January 1, 2026.

### [Committee Oversight](#)

UCSD has established a Digital Accessibility Council to advance electronic accessibility across the campus. This entails raising awareness through training and events, providing guidance on best practices, and fostering collaboration among web designers and developers. The committee hosted the Global Accessibility Awareness Fair in May 2021, during which attendees engaged in interactive

exercises to learn about being an accessible digital marketer, web navigator, and technology implementer.

UCSD has also established a Cabinet supported Website Standards Committee (WSC) that is charged with ensuring that all public-facing website content adheres to the University's website standards, accessibility, security, and privacy guidelines. The WSC is critical in ensuring that website presence is aligned with the University's mission and values while meeting legal and regulatory requirements. One of the committee's responsibilities is to ensure video content on University-controlled contribution platforms is in compliance with captioning and transcription requirements. Per the Committee's charge and in connection with the finalization of the revised UC Electronic Accessibility Policy, the Committee will regularly audit and catalog non-compliant websites within the University domain, provide remediation solutions to owners of non-compliant web properties, and monitor Content Management Systems (CMS) websites for compliance with up-to-date standards. CMS is a platform that enables users to create, publish, and manage digital content lifecycle.

### Siteimprove

UCSD utilizes Siteimprove to assess accessibility of public-facing websites, including running automated accessibility and quality assurance checks. Siteimprove generates reports identifying different issues, including major accessibility problems such as captions, links, audio descriptions, and visibility, to assess compliance. One of the key items noted in the report is "points to target," which provides the user with the number of points needed to reach a customized goal for specific sites, including the accessibility score.

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## III. AUDIT OBJECTIVE, SCOPE, AND PROCEDURES

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The objective of our review was to assess whether UCSD's information technology controls and business processes provide reasonable assurance that access to public facing internet content and information technology<sup>1</sup> are in compliance with the UC Electronic Accessibility Policy. In order to achieve our objective, we performed the following:

- Reviewed:
  - University Policy UC IMT 1300 IT Accessibility;
  - Website Standards, including Web Accessibility Guidelines (WCAG) 2.0 and 2.1;
  - CMS Training materials for digital accessibility content;
- Utilized Siteimprove to run sample department accessibility reports;
- Interviewed the following personnel from Information Technology Services:
  - User Experience Designer;
  - Writer Editor;
  - Web Content Owners;
  - Site Owners; and
- Evaluated digital content on:
  - CMS for accessibility and compliance with WCAG 2.0;
  - Kaltura platform outside of CMS to ensure captions are included in lecture videos.

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<sup>1</sup> Our review did not evaluate websites protected by University authentication protocols.

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## IV. CONCLUSION

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Based on our review, we concluded that information technology controls and business processes need improvement to provide reasonable assurance that access to public-facing internet content and information technology are effective and in compliance with University policies. We identified selected areas where ITAP requirements had not been implemented, and other opportunities for improvement to enhance the overall effectiveness of the IT accessibility framework. Many of these improvements are underway, and UCSD has proactively taken steps, including commissioning the WSC and developing guidelines for public facing electronic media with consequences for non-conformance.

UCSD has implemented some controls as it pertains to websites managed in the campus Web Content Management System (CMS), such as maintaining a functional website inventory within CMS, although a small percentage of UCSD websites address a majority of the elements as required by policy. A Website Standards Committee has also been established, and has achieved several milestones since its initial meeting in August 2023.

However, a comprehensive IT Accessibility Program has not been fully developed to include all the required elements for ensuring the accessibility of digital content, platforms, and services. Three elements (i.e., Prioritization, Evaluation, and Exception Processes) have not yet been addressed. We also noted opportunities for improvement for the other seven requirements. The WSC is currently developing this Program to enhance compliance requirements, as the UC Electronic Accessibility Policy is undergoing revisions. Without these controls, UCSD cannot ensure effective management of risks related to digital accessibility. UC is in the process of revising the current Policy, and while the ITAPP requirements are slightly modified, two of the three elements required under the current policy will still be required in the Draft Revised version.

In addition, we noted opportunities for improvement related to website management. The planned transition to CampusPress offers an opportunity to address capacity limitations and streamline website management, particularly for sites falling below the CMS threshold. The absence of established procedures for remediation, which hinders prompt issue resolution, remains a challenge. WSC's plan to establish clear procedures for remediation and adherence to accessibility standards is significant.

Training of content and website owners could also be improved to ensure current knowledge of digital accessibility standards, and achieve higher conformance levels and accessibility scoring across websites. The WSC is planning to enhance training in this area.

Finally, we noted that some student educational podcast videos did not meet the required caption standards outlined in WCAG 2.0. Ensuring caption compliance for prerecorded media, particularly lecture podcasts, is essential for enhancing accessibility for individuals who are deaf and hard of hearing. Oversight of student educational podcasts also falls under the purview of the WSC.

These opportunities for improvement are discussed in greater detail in the balance of this report.



**V. OBSERVATIONS REQUIRING MANAGEMENT ACTION**

<b>A.</b>	<b>IT Accessibility Program</b>
A comprehensive IT Accessibility Program has not been fully developed with all the required elements for ensuring the accessibility of digital content, platforms, and services.	
<b>Risk Statement/Effect</b>	
Non-compliance with accessibility policy and standards such as Web Content Accessibility Guidelines increases risk that University content is not accessible to all relevant populations.	
<b>Management Action Plan</b>	
<b>A.1</b>	The WSC will ensure that the IT Accessibility Program includes all elements required by University policy to ensure the accessibility of digital content, platforms, and services.

**A. IT Accessibility Program – Detailed Discussion**

University Policy (UC IMT 1300) requires Locations to establish an IT Accessibility Program (ITAP) to address digital accessibility. The Chancellor must designate an individual, and or a committee to develop and oversee the Program and to promote coordination with systemwide IT accessibility initiatives. Any designated individual, and/or a committee must represent a broad range of functional areas and be able to address academic, research, and administrative concerns and needs. At UCSD, WSC oversees this Program. The Program should include 10 elements, which are discussed in **Attachment B**. In the current Revised Draft Policy under review, the required elements of the IT Accessibility Policy Program (ITAPP) have been revised from 10 to eight<sup>2</sup>. The new policy also provided greater details of what is required of these elements than the current policy.

We observed that the WSC has been assigned to ensure compliance with guidelines and standards for accessibility, security, and privacy. Since the inaugural committee meeting on August 17, 2023, the WSC has achieved several milestones:

- Established the Web Standards Committee's responsibilities and mission, including two subcommittees: (1) The Standards and Remediation and (2) Reporting and Communications.
- Established and published a website accessibility issue reporting form, which now appears in the footer of all sites within the campus CMS domain and automatically generates ServiceNow tickets to track and log accessibility issue reports.
- Draft standards document detailing accessibility standards, applicable content and individuals, remediation request processes, non-compliance procedures, exceptions guidelines, and training resources to ensure compliance.

<sup>2</sup> Some elements have been added such as Accessible Procurement Program (APP); Accessible Software/Web Development Program and Complaint/Grievance Process. Some have been removed, renamed or reorganized such as Audience, Design Process; Evaluation, Procurement, Prioritization, Training, and Awareness Campaign.

- Improved training achievements through a University Communications pilot program and a push for committee members to undergo training, which demonstrated progress within the Siteimprove Training platform.

In addition, WSC has also established Roadmap Items which includes exploring providers for in-depth web-based accessibility training specifically for web content developers, with consideration of new Department of Justice guidance.

However, we noted that UCSD lacked a formal IT Accessibility Program with all elements required by policy. Three of the 10 elements required of an ITAP have not been established. The three elements include:

- **Prioritization** – A process to prioritize effort that takes into consideration local needs, practices, and available resources, including providing access to centralized IT accessibility support.
- **Evaluation** – An evaluation process to measure the effectiveness of the Program. The current Revised Draft policy omits the “Evaluation” requirement in the IT Accessibility Policy Program requirement, so this may not be required going forward.
- **Exception Process** – A process for determining exceptions and for ensuring the development, documentation, and communication of effective alternate forms of access.

The remaining seven elements in the current policy version have been implemented to various degrees; however, we identified opportunities for improvement in these areas to further promote accessibility of content. Additional detail on these items is provided in **Attachment B**.

<b>B.</b>	<b>Website Management</b>
We noted gaps in the website management processes, as a majority of UCSD websites were outside of the CMS environment and did not have clear procedures on how they are managed or designated content owners.	
<b>Risk Statement/Effect</b>	
The lack of defined management procedures increases the risk of non-compliance with accessibility standards, as it may lead to oversight in addressing accessibility issues. Additionally, without a complete list of content and website owners outside of the CMS, there is a risk of missing accessibility issues that need to be addressed. Furthermore, the absence of an established remediation process may prolong the resolution of accessibility concerns, thus impacting the overall user experience.	
<b>Management Action Plans</b>	
B.1	The WSC will explore solutions for a website inventory management system that incorporates automated tools for website discovery, continuous monitoring, and regular updates to ensure the accurate and complete inventory of all UCSD’s websites.
B.2	UCSD Information Technology Services (ITS) is in the process of deploying CampusPress to support websites that are currently not supported in CMS.

B.3	The WSC will update and maintain a comprehensive list of content and website owners to ensure accountability and facilitate effective communication for compliance with accessibility standards.
B.4	The WSC will establish a clear reporting structure and recommend roles and responsibilities to content owners, website owners, and a designated IT accessibility coordinator.
B.5	The WSC will develop a comprehensive remediation process for addressing accessibility issues identified within the websites, which complies with relevant accessibility standards and regulations. WSC has implemented a website accessibility issue reporting form, and drafted a standards document detailing accessibility standards.

## B. Website Management – Detailed Discussion

University Policy (UC Policy BFB-IS-3 Electronic Information Security, Section VIII) requires the identification of institutional information and the assignment of appropriate responsibilities. To ensure the comprehensive coverage of all websites under campus oversight, maintaining an inventory of websites across various platforms is important. One requirement of an ITAP per Policy UC IMT 1300 is that roles, authority, responsibilities, and accountability be assigned to ensure compliance.

The CMS maintains an inventory of registered websites. During our review of CMS, we identified 434 sites that were managed on the CMS platform at the time we obtained the data. Additionally, there were 546 websites listed on Siteimprove, and our review noted that the websites that were managed in the CMS platform were on Siteimprove. To establish a comprehensive web registry of websites associated with UCSD, ITS utilizes Little Forest, which identified a total of 3,613 sites, according to a report provided by management. Therefore, with only 434 sites in CMS and 546 sites in Siteimprove, there are over 3,000 sites without clear procedures on how they are assessed for accessibility.

CMS primarily supports permanent sites with UCSD.edu domain names but the platform does not support smaller sites such as course sites, labs, student organizations, and personal faculty sites. Siteimprove is a systemwide tool that is available for all campus site owners. In response to the challenges and limitations of managing websites within the CMS system, plans are underway to implement an alternative solution using CampusPress, a WordPress-powered platform tailored for higher education websites. It will primarily cater to smaller sites that are not supported by CMS and will offer accessibility-compliant templates to ensure inclusivity and ease of management.

### Content and Website Owners

Content and website owners play a key role in meeting the requirements of ITAP, which stipulates the need to assign roles and responsibilities to ensure compliance with the policy. While a current list of content owners exists within the campus CMS, there is no comprehensive, up-to-date list of content and website owners for UCSD sites outside the campus CMS.

### Remediation

The WSC is currently drafting accessibility guidelines, which encompass procedures for remediation and protocols for takedown of websites that do not meet the established standards. However, there is

currently no established process for remediation in place. The development of this process will be guided by the ongoing work of the WSC committee. As currently written, the Revised Draft policy states that remediation priority must be given to: (A) IT that provides the most essential functions to, or are most broadly and extensively used by, the UC Community; (B) Any Material Alteration to IT, which is defined by the policy to include Any change to Information Technology that: (1) alters the nature of its content; (2) alters the way the content is structured/organized; (3) impacts a user’s interaction with the content; or (4) changes the underlying software and/or platform.

<b>C. Accessibility Awareness and Training</b>	
Processes for training did not ensure that content and website owners were aware of digital accessibility requirements or tools to assess compliance.	
<b>Risk Statement/Effect</b>	
The lack of ongoing training could result in non-compliance with website accessibility standards, potentially leading to legal consequences for the University.	
<b>Management Action Plans</b>	
C.1	Web Content Management Services will enhance the current CMS training by asking new users to complete introductory accessibility training in Siteimprove and attest to their completion. They will also encourage existing CMS users to take this training through a communications campaign.
C.2	The WSC will work with ITS to create a centralized and regularly updated registry that includes contact information and responsibilities of all content and website owners.
C.3	WSC will work with Web Content Management Services to create a campus announcements list that regularly notifies content and website owners of new digital accessibility requirements.

**C. Accessibility Awareness and Training – Detailed Discussion**

University policy (IMT – 1300) specifies that as a requirement of an ITAP, a training plan, along with an accessibility awareness campaign to raise awareness about IT accessibility, needs to be established for personnel who develop and maintain electronic information resources, author web content, or make IT-related purchases. This establishment will ensure that personnel possess the necessary skills to create accessible digital content and contribute to a broader culture of understanding and adherence to web accessibility standards. Our review of the current Revised Draft Policy IMT-1300 indicates that an Awareness Campaign and Training Plan are key elements that will still be required.

[WCAG 2.0 Compliance](#)

UCSD adheres to WCAG 2.0 conformance levels A and AA standards, as specified in the Policy. The target of achieving a minimum score of 87% for websites is based on industry best practices and standards. During our evaluation of 10 sample websites, nine scored between 60% and 81%, with one site achieving 88% as of December 2023, when Siteimprove generated the reports.

ITS manages Siteimprove, with individual site owners accountable for tracking scores for their respective sites. Currently, the team conducts spot-checking, and moving forward, the WSC will oversee the monitoring of public-facing websites. Within the framework of web standards guidelines, notification and takedown triggers and processes will be activated for sites that do not meet the established standards.

While reviewing Siteimprove reports for the 10 core sites sampled above, we focused on specific accessibility issues and discussed the required conformance to A and AA standards with content and website owners. Of the 10 content/site owners, five were unaware of the campus Siteimprove tool, and the applicable WCAG 2.0 standards related to digital accessibility. Six out of 10 owners were also not aware of the UC IMT-1300 accessibility policy.

CMS Training

The CMS training is a self-paced exercise completed in the Sandbox training site, where CMS users navigate through the process of creating a new webpage in a dedicated training environment. Covered topics include creating a page, incorporating links, templates, editing, images, and the final publishing steps. Notably, the training emphasizes creating content on web pages with an accessibility component. Regular updates to the training are implemented based on user feedback, addressing issues identified during website content work. In addition, the training offers resources that underscore the importance of accessibility, including policy guidelines and compliance with WCAG 2.0 web standards.

While content and website owners must complete the initial CMS training before editing or creating websites, an ongoing training gap exists for staying current with new digital accessibility requirements. Our sample of 10 content/website owners revealed they underwent CMS training over a year ago and lacked awareness of how to access updated training. This gap underscores uncertainties regarding awareness of the latest knowledge and skills required for effective website management and compliance with digital accessibility standards. Management indicated that this gap will be addressed by the WSC requirement for new and recurring training for website content managers.

<b>D.</b>	<b>Caption Compliance for Student Lecture Podcasts</b>
Some student educational podcast videos did not meet the required caption standards outlined in WCAG 2.0.	
<b>Risk Statement/Effect</b>	
Inaccessible content increases risk of exclusion of students who are deaf and hard of hearing.	
<b>Management Action Plans</b>	
D.1	The WSC will work with Educational Technology Services to optimize auto-captioning of student lecture content wherever possible, including evaluating new alternate AI captioning vendors for accuracy metrics.

D.2	The WSC will work with Educational Technology Services to identify provide and promote effective training resources on digital accessibility for instructors to improve awareness on accessibility requirements.
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#### D. Caption Compliance for Student Lecture Podcasts – Detailed Discussion

The WCAG 2.0 standards, specifically section 1.2.2 regarding captions for prerecorded media, mandate the inclusion of captions to make content accessible to individuals who are deaf and hard of hearing. Guideline 1.2.4 further emphasizes that captions should be accurate, synchronized with the audio, and presented in an easily readable format.

Kaltura is UCSD’s video and multimedia hosting platform and is integrated into Canvas. Types of videos that can be added include Zoom Cloud recordings, Kaltura capture videos, and course lecture capture (locally branded as “podcasts”), among others. Lecture content generated through Zoom is integrated into Kaltura and posted on the podcast site. Instructors sign podcast agreements to utilize Kaltura to record lectures, with the majority of content having restricted access to only enrolled students in the class. Lecture halls feature audio and video podcasting technology, including tracking cameras and screen capture functionalities that integrate with Kaltura.

Captions for media content are generated by Kaltura’s captions (generated by a subcontractor called Verbit) or via pulling Zoom integration and have an estimated accuracy of 70-80%. While suggestions for caption editing aimed at improving accuracy were proposed, they were not mandated due to the significant effort required. We selected a sample of podcasts with videos from Summer Session II 2023, Spring 2023, Winter 2023, and Fall 2022 (See table below). The total number of podcast lectures viewed amounted to 329, with 232 (71%) accessible through locked access and 97 (29%) publicly available on the internet.

	Course Name	Session	Population	Locked	Unlocked
1	COGS 18 - Introduction to Python - LE [A00]	Summer II 2023	22	11	11
2	EDS 126 SOCI 126 - Social Organization/Education - LE [A00]				
3	MATH 168A - Topics/Applied Math-Comp Sci - LE [A00]				
4	BENG 182 BIBM 182 CSE 182 - Biological Databases - LE [A00]	Spring 2023	96	53	43
5	CHEM 111 - Origins of Life & the Universe - LE [A00]				
6	ECE 276B - Planning & Learning Robotics - LE [A00]				
7	DSC 291 - Topics in Data Science - LE [E00]	Winter 2023	109	85	24
8	COGS 17 - Neurobiology of Cognition - LE [A00]				
9	USP 2 - Urban World System - LE [A00]	Fall 2022	102	83	19
10	CSE 8A - Intro to Programming 1 - LE [C00]				
	<b>Total</b>		<b>329</b>	<b>232</b>	<b>97</b>

We reviewed a sample of 10 unlocked podcast videos featuring student lecture content, and identified areas requiring improvement to align with accessibility standards. Among the 10 podcast videos, one lacked captions entirely, while another had only partial captions. Subsequently, updates to the podcast were made to add captions after the review. Furthermore, two podcast videos contained inaccuracies in their transcriptions. While we did not evaluate professional course video content intended for online degree programs, management indicated that those courses are captioned with high accuracy as part of the course design and build process. Ensuring that lecture video content complies with WCAG 2.0 standards is crucial to ensure that lecture video content is accessible to a diverse audience, including those who are deaf and hard of hearing.

### Attachment A – Web Accessibility Guidelines (WCAG)

In order to ensure compliance with WCAG 2.0 requirements, websites must undergo improvements across levels A, AA and AAA. The table below provides a summary of the guidelines outlined in WCAG 2.0 that need to be met in the following areas (levels): A, AA and AAA.

Principle	Description
<b>Perceivable</b>	Information and user interface components must be presented in ways that users can perceive, ensuring it is not invisible to any of their senses.
<b>Operable</b>	Users must be able to operate the interface effectively.
<b>Understandable</b>	Users should comprehend both the information and operation of the interface, ensuring content and functionality are comprehensible.
<b>Robust</b>	Content accessibility should persist as technologies evolve, enabling users to access it regardless of advancement in technology.

Principle	Guideline	Conformance Level <sup>1</sup>
<b>Perceivable</b>	1.1 Text Alternatives	A, AA, AAA
	1.2 Time-based Media	A, AA, AAA
	1.3 Adaptable	A, AA, AAA
	1.4 Distinguishable	A, AA, AAA
<b>Operable</b>	2.1 Keyboard Accessible	A, AA, AAA
	2.2 Enough Time	A, AA, AAA
	2.3 Seizures and Physical Reactions	A, AA, AAA
	2.4 Navigable	A, AA, AAA
<b>Understandable</b>	3.1 Readable	A, AA, AAA
	3.2 Predictable	A, AA, AAA
	3.3 Input Assistance	A, AA, AAA
<b>Robust</b>	4.1 Compatible	A, AA, AAA
	4.2.1 Parsing	A, AA, AAA
	4.2.2 Name, Role, Value	A, AA, AAA

<sup>1</sup> **Level A:** This is the minimum level of conformance, indicating that a website or web application meets all the Level A success criteria in WCAG 2.0. Achieving Level A conformance ensures some basic accessibility features are implemented.

**Level AA:** This level of conformance indicates that a website or web application meets all the Level A and Level AA success criteria in WCAG 2.0. Achieving Level AA conformance improves accessibility further by addressing broader range of accessibility issues.

**Level AAA:** This is the highest level of conformance, indicating that a website or web application meets all the Level A, Level AA, and Level AAA success criteria in WCAG 2.0. Achieving Level AAA conformance provides the highest level of accessibility and ensures that the website is accessible to a wide range of users, including those with more severe disabilities.



Attachment B – IT Accessibility Program Elements

The ITAP requires the implementation of 10 elements to fulfill digital accessibility requirements per University policy. Currently, UCSD has seven of these elements in place, although there remain opportunities for improvement in each. The remaining three elements, integral to an accessibility process, have yet to be established. Below, details are provided outlining the program elements and policy accessibility requirements.

<b>Elements</b>	<b>Policy Requirements</b>	<b>Accessibility Process in Place</b>	<b>Opportunity for Improvement</b>
<b>Authority and Responsibility</b>	Assignment of roles, authority, responsibilities, and accountability for achieving policy compliance.	WSC, Digital Accessibility Council and Content Owners List.	The Content Owners may not have awareness of their responsibilities to execute policy requirements for digital accessibility.
<b>Audience</b>	A strategy to address the different needs of the academic, research, and administrative functions and to support IT accessibility for decentralized academic and research activities.	WSC.	WSC is developing a strategy to communicate to the different audiences on campus regarding digital accessibility standards.
<b>Prioritization</b>	A process to prioritize effort that takes into consideration local needs, practices and available resources, including providing access to centralized IT accessibility support.	The process is not yet in place.	Implementing a prioritization process for addressing accessibility concerns can enhance the timeliness of resolving critical issues, thereby ensuring the inclusivity of all user groups, including individuals with disabilities.
<b>Design Process</b>	A strategy to incorporate accessibility into the design and authoring process of electronic information resources.	ITS utilizes Siteimprove as the automatic testing tool that tracks and reports progress towards accessibility compliance. However, site and content owners lack familiarity with how to utilize the tool.	Providing comprehensive training on the functionalities of Siteimprove to site owners can enhance their proficiency and contribute towards accessibility compliance.
<b>Procurement</b>	A procedure to incorporate IT accessibility into the procurement process, including the establishment of a formal means for evaluating the accessibility of products or systems under consideration for procurement.	UCOP has a Guideline for Purchasing IT Accessibility Products and Services dated June 2015, which incorporates guidelines for suppliers to adhere to WCAG 2.0 standards.	The WSC should inquire with UCOP regarding updating the Guideline for Purchasing IT Accessibility Products and Services.

Attachment B – IT Accessibility Program Elements

Elements	Policy Requirements	Accessibility Process in Place	Opportunity for Improvement
<b>Training</b>	A training plan for personnel who develop and maintain electronic information resources, author web content, or make IT related purchases.	Current training for site and content owners on accessibility involves self-paced exercises completed in the Sandbox training site emphasizing the creation of content on web pages with an accessibility component.	During our review, we found that some site and content owners lack awareness of the accessibility guidelines. A proactive notification system that regularly informs site and content owners about updates and changes to accessibility guidelines would improve content owners’ knowledge in this area.
<b>Awareness Campaign</b>	A communication plan and campaign to raise awareness about IT accessibility.	On May 20, 2021, the Digital Accessibility Council (formerly known as Electronic Accessibility Oversight Committee) hosted a Global Accessibility Awareness Fair. The focus was on barriers and solutions in digital spaces that can be addressed in websites or software development. While this event raised awareness, there is no formal process to have awareness shared on a quarterly or annual basis.	The establishment of a formal process for regular campaigns on digital accessibility can sustain momentum and ensure ongoing education and awareness.
<b>Compliance Monitoring</b>	Processes for monitoring compliance, including compliance with any standards listed in the policy.	The policy requires UCSD to implement standards for Web Content Accessibility Guidelines WCAG 2.0 at level AA success criteria.	Enhance accessibility monitoring by instituting mandatory routine accessibility audits and reviews by site and content owners, scheduling them quarterly or bi-annually to maintain consistent compliance with established standards.
<b>Evaluation</b>	An evaluation process to measure the effectiveness of the Program.	The process is not yet in place.	Establishing an evaluation framework, including metrics such as user feedback, accessibility compliance rates, and usability testing results, would provide insight into the

Attachment B – IT Accessibility Program Elements

Elements	Policy Requirements	Accessibility Process in Place	Opportunity for Improvement
			effectiveness of the ITAP.
<b>Exception Process</b>	A process for determining exceptions and for ensuring the development, documentation, and communication of effective alternate forms of access.	The process is not yet in place. The WSC indicated that an Exception Coordinator role will be established once the policy has been finalized.	A formalized process for identifying and managing exceptions, as well as for creating, documenting, and communicating effective alternative forms of access, should be implemented.