Ahmet Palazoglu
Chair, Assembly of the
Academic Senate
Faculty Representative,
UC Board of Regents

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

CAMPUSES
Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS
Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES
Lawrence Berkeley
Lawrence Livermore
Los Alamos

December 19, 2025

Van Williams
Chief Information Officer and Vice President, Information Technology Services

Re: Systemwide Review of Presidential Policy IMT-1300 Information Technology Accessibility

Dear Vice President Williams:

As requested, I distributed for systemwide Academic Senate review the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. All 10 Academic Senate divisions and five systemwide Senate committees (CCGA, UCEP, UCFW, UCACC, and UCPB) submitted comments. These were discussed at the Academic Council's December 17, 2025 meeting, and the compiled feedback is attached for your reference.

The proposed policy aligns UC with the technical standard—Web Content Accessibility Guidelines (WCAG) 2.1 AA—established in recent federal digital accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. It requires all covered information technology to comply with these standards unless an approved exception is granted. The policy applies to UC-developed, procured, or provided information technology, including course content such as syllabi, readings, videos, Learning Management System materials, and other instructional technology. It obligates campuses to establish programs to support instructors in meeting the new standards and establishes systemwide and local requirements for IT Accessibility Policy Programs, Accessible Course Content Programs, and Accessible Software/Web Development Programs, as well as procedures for requesting and approving exceptions.

Reviewers affirmed the importance of digital accessibility and expressed support for the overarching goals of the revised policy. Many described the policy as a positive step toward greater inclusion and acknowledged that accessibility should be a foundational design principle for instructional and administrative technology. However, even reviewers supportive of the

policy's intent emphasized that significant practical challenges should be addressed before implementation. Reviewers also emphasized the importance of clearly communicating that the policy establishes a compliance obligation, rather than an instructional mandate, and that the goal should be reasonable compliance rather than immediate or 100% accessibility of all content.

Resource, Reporting, and Administrative Burden

Many reviewers expressed concern about the resource implications of the policy and described the policy as an unfunded mandate. They noted that it imposes extensive obligations on campuses without corresponding funding or staffing, and that compliance will require substantial investments in accessibility experts, instructional designers, procurement specialists, training personnel, and support staff. Reviewers also raised concerns that the policy as written would shift considerable effort and responsibility to faculty, who would be expected to create or remediate accessible content, complete training, and navigate the compliance exception process. Several noted that this workload would not be feasible or sustainable without substantial institutional support. Reviewers also emphasized the importance of clearly distinguishing faculty responsibility for course content from the University's responsibility to provide the resources, tools, and active support necessary to ensure accessibility.

Relatedly, many reviewers emphasized that the policy's reporting and documentation requirements significantly compound these resource concerns. They noted that the policy assumes administrative capacity that does not exist on many campuses and would require additional staff and new administrative structures to monitor compliance, collect data, prepare reports, and track exceptions.

Implementation Timeline

Many reviewers viewed the proposed April 2026 implementation deadline as unrealistic, particularly the requirement to establish complex new programs by that date. Reviewers emphasized that campuses would need significantly more time to hire staff, develop procedures, create training materials, build remediation capacity, and prepare faculty. Several recommended a phased approach or extended compliance periods, particularly for legacy materials and more complex instructional content. Several reviewers also noted the absence of a detailed implementation plan, including clarity on roles, sequencing, and institutional responsibilities.

Need for Clearer Definitions and Guidance

Reviewers called for more precise definitions and more detailed implementation guidance. They recommended providing examples, templates, and use cases to support consistent interpretation and understanding across campuses. Areas highlighted for clarification

include:

- The definition of "materially altered" course content
- Distinctions among new, existing, legacy, and archived content
- Expectations for accessibility of PDF documents, scanned documents, or discipline-specific document formats
- The meaning of "meaningful consultation" in the exception process
- Minimum required functions for LMS-integrated accessibility tools

Exception Process

Reviewers found the proposed exception process to be overly complex, noting that the required steps, documentation, and consultation obligations appear disproportionate to the typical use cases that might require exceptions. Many observed that the two-year renewal cycle, extensive written justification, and multiple levels of review would place substantial burdens on faculty and staff. Some recommended simplifying or streamlining the exception process, particularly for pedagogically essential instructional materials or widely used tools for which accessible alternatives are limited.

Academic Freedom

Several reviewers expressed concern that the policy might unintentionally limit academic freedom by constraining instructional choices. They emphasized that instructors must be able to adopt materials that are central to their disciplines, even if those materials cannot immediately be made fully accessible. Reviewers cautioned that requiring full accessibility compliance before a resource can be used, or interpreting accessibility requirements too rigidly, could discourage the use of important instructional materials and have unintended consequences for teaching and learning. Several noted that in some disciplines, full accessibility may not be achievable without undermining core pedagogical practices.

Training Requirements

While reviewers supported increased training on accessibility principles, many cautioned that the proposed training expectations are unrealistic or burdensome. Reviewers noted that recurring required training would add to already substantial mandatory training loads for faculty and staff. Some suggested that training should be role-specific or integrated into existing professional development frameworks rather than universally imposed.

Recommendations

Reviewers offered several recommendations:

1. Implement a longer or phased timeline, beginning with new or significantly revised content and allowing additional time for legacy materials.
2. Include clear funding commitments, shared systemwide resources, centralized resource procurement support, and staffing models that

reflect the scale of the work.

3. Clarify which content is covered, how legacy or spontaneous materials should be handled, and which materials should be prioritized for remediation.
4. Develop or identify systemwide tools, including artificial intelligence tools if appropriate, to help identify and address inaccessible web content and applications, which would reduce the burden on faculty members to take individual action, and to support consistent compliance across campuses.
5. Simplify the exception process to reduce administrative steps, and to provide standard templates for reporting, Equally Effective Alternative Access Plans (EEAAPs), and remediation plans.
6. Prioritize high-impact instructional materials, high-enrollment courses, and programs with known accessibility needs.

Overall, Senate reviewers expressed strong support for UC's accessibility commitments but had significant concerns that the proposed policy is not feasible without major adjustments. The most consistent themes were the need for substantial funding and staffing, a more realistic implementation timeline, clearer definitions, and streamlined processes. Reviewers agreed that the current draft requires refinement to ensure it can be implemented effectively and sustainably across the UC system.

Sincerely,

Ahmet Palazoglu
Chair, Academic Council

cc: Academic Council
        Senate Division Executive Directors
        Senate Executive Director Lin

December 15, 2025

AHMET PALAZOGLU
Systemwide Academic Senate/Council Chair

Subject: Berkeley Division comments – Proposed Presidential Policy IMT-1300 Information Technology Accessibility

Dear Chair Palazoglu,

On December 15, 2025, DIVCO discussed the proposed *Presidential Policy IMT-1300 Information Technology Accessibility*, informed by comments from the committees of Academic Planning and Resource Allocation (CAPRA); and Diversity, Equity and Campus Climate (DECC), which are included with this letter. In addition, the Berkeley campus Center for Teaching and Learning, including the Chief Academic Technology Officer, presented to DIVCO on "Web Accessibility of Course materials" which contributed to the DIVCO's deliberation.

Broadly, the discussion at DIVCO centered on concerns about the actual implementation of new web accessibility standards, and less on the specific of IMT-1300 processes and procedures. For completeness, I highlight three key concerns related to implementing the new ADA accessibility standards as will be required in April 2026:

1. The extremely high workload required of individual instructors to reach accessibility standards (exceptions and clear messaging will be important)
2. Resulting inequities in workload across disciplines due to variations in the types of course materials typically shared; and
3. The risk that faculty will hold back important course material in view of accessibility considerations, thus reducing the pedagogical quality.

Finally, we note that it would be valuable to have clear guidance regarding the targets for accessibility and the tolerances for those courses that fall short.

Sincerely,

Mark Stacey
Chair, Berkeley Division of the Academic Senate

Enclosures

cc: Thomas Philip, Vice Chair, Berkeley Division of the Academic Senate
    Monica Lin, Executive Director, UC Systemwide Academic Senate
    Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate
    Jason Wittenberg, Chair, Committee on Academic Planning and Resource Allocation
    Debora Lee Chen, Chair, Committee on Diversity, Equity, and Campus Climate
    Milo Knight, Senate Analyst, Committee on Academic Planning and Resource Allocation
    Linda Corley, Senate Analyst, Chair, Committee on Diversity, Equity, and Campus Climate

November 24, 2025

PROFESSOR MARK STACEY
Chair, Berkeley Division of the Academic Senate

*Re: CAPRA comments on proposed revisions to the Presidential Policy
IMT-1300 Information Technology Accessibility*

At its meeting on October 22, 2025, CAPRA discussed proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. The proposed revisions represent a complete rewrite of the IT Accessibility Policy, which was originally issued in 2013. The revisions are designed to provide more thorough and effective guidance and to align UC practice with recent updates to federal accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.

The heart of the revised Policy is a requirement that, by April 24, 2026, all websites, online content, and digital applications and systems meet WCAG 2.1 AA accessibility standards. This requirement extends beyond publicly-available material to include material that is only available to authenticated users.

The overarching themes of our discussion were (1) acknowledgement of the importance of complying with legal requirements and of providing accessible materials to students and other members of our community and the public; (2) concern about the Policy's likely dramatic and challenging consequences for academic planning, budget, and resource allocation.

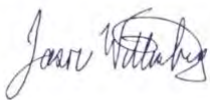Committee discussion focused specifically on these observations, questions, and concerns:

1) The Committee is highly concerned about the likely cost of compliance and the increased burdens on faculty, graduate students, and staff, especially in connection with the preparation of accessible course materials. These concerns are particularly acute in light of ongoing budget threats and uncertainty. It would be valuable for planning purposes if the forthcoming guidance documents referred to in the Policy F.A.Q. included information about the estimated cost of compliance for each campus, in monetary terms and staff effort, although details will vary from campus to campus.

2) The Committee's sense, based both on the Policy itself and Berkeley campus communiques about it, is that ensuring accessibility of course materials will be the responsibility of individual faculty members, in the first instance. (See, e.g., the Oct. 6 CalMessage on

Updated Digital Accessibility Policy & Requirements directing recipients to "[r]eview all digital content and tools for which you are responsible and ensure that it is accessible in accordance with WCAG 2.1 AA.") This raises several concerns and questions:

a) Putting the burden on faculty to ensure compliance will increase faculty workload and may impact pedagogy–e.g. faculty members may simply avoid posting relevant materials that are not easy to convert into an accessible format.

b) The burdens of compliance and pedagogical compromises required may have differential impacts on different departments, as the difficulty of making materials accessible can vary by discipline, resource type, etc.

c) Committee members expressed skepticism that online training (even in conjunction with occasional workshop offerings and consultations offered by Research Teaching and Learning) would be adequate to prepare faculty to comply with their responsibilities under the policy.

d) The burdens of compliance also seem likely to impact graduate student instructors and lecturers. Committee members expressed concern about how this might impact both costs to departments and labor relations.

e) Relying on faculty to ensure compliance may leave significant compliance gaps. Are campuses expected to institute proactive measures to identify those gaps, or is it sufficient to respond to complaints?

f) Some conceivable approaches to lessening the burden on faculty could raise their own concerns. We could imagine, for example, having staff experts devoted to improving the accessibility of materials. In addition to the increased costs this would likely entail, it could impact pedagogical autonomy and flexibility–e.g. if faculty need to prepare class materials with lots of lead time in order to facilitate staff help with compliance.

g) Committee members speculated about the possibility that new automated tools (perhaps incorporating AI) might help reduce the burden, and increase the likelihood, of compliance. Our experience with the "Ally" accessibility tool is that it is more useful for identifying inaccessible material than for ensuring compliance.

Thank you for the opportunity to review the proposed policy.

With best regards,

Jason Wittenberg, Chair
Committee on Academic Planning and Resource Allocation

November 12, 2025

PROFESSOR MARK STACEY
Chair, 2025-2026 Berkeley Division of the Academic Senate

Re: DECC's Comments on the Systemwide Review: Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

The Committee on Diversity, Equity, and Campus Climate (DECC) appreciates the opportunity to provide feedback on the proposed revisions to Presidential Policy IMT-1300 regarding Information Technology Accessibility. Committee members expressed strong support for the intent of the proposed revisions, noting that, in addition to aligning with technical standards regarding the Web Content Accessibility Guidelines (WCAG) 2.1, the revisions promote accessibility and foster a more inclusive digital environment across multiple platforms, including websites, web applications, mobile apps, and electronic documents.

The committee's ensuing discussion centered on several key considerations related to the proposed policy revisions: the implementation of new compliance requirements, the feasibility of meeting the April 24, 2026, implementation date, and the adequacy of resources to support individual instructors.

First, members voiced apprehension regarding the feasibility of meeting compliance standards without more directed guidance and adequate, potentially individualized support. These issues may have direct implications for teaching quality and workload equity, as certain departments or courses may face disproportionately greater challenges in meeting the new standards than others (Film and Media was cited as an example).

Another concern raised was the potential impact on pedagogical integrity. For courses utilizing complex materials, such as specialized historical media, intricate lab simulations, or advanced research websites, faculty members expressed concern that the accommodation may necessitate substituting materials that are less pedagogically appropriate or educationally robust for the foundational course goals. For some, the new policies may inadvertently constrain academic freedom and teaching choices, making materials that require more resource-intensive accommodation (e.g., specialized films or complex web resources) effectively prohibitive to use.

The current policy framework also risks being perceived as burdensome rather than supportive, potentially fostering frustration or resentment toward the accommodation process itself. As articulated by one committee member, instructor sentiment may become that "I have to make these changes, but I don't have the resources," or that "the rules now seem burdensome, but not because I don't want to comply." Similarly, members found it difficult to discern any distinction between required and recommended actions within the policy guidelines, creating ambiguity regarding compliance obligations.

Thank you for the opportunity to provide these comments on the proposed revisions. We respectfully request that consideration be given to the implementation and pedagogical integrity concerns prior to the final adoption of the policy.

Sincerely,

Debora Lee Chen
Chair, Committee on Diversity, Equity, and Campus Climate

DLC/lc

December 10, 2025

Ahmet Palazoglu
Chair, Academic Council

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

Dear Ahmet,

The proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility were forwarded to all standing committees of the Davis Division of the Academic Senate. Eleven committees responded: Academic Freedom and Responsibility (CAFR), Courses of Instruction (COCI), Diversity, Equity and Inclusion (DEI), Faculty Welfare (FWC), Information Technology (CIT), and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Engineering (COE), the College of Letters and Science (L&S), the Graduate School of Management (GSM), and the School of Medicine (SOM).

Committees support the goals of the Presidential Policy and I understand that updates may be needed to remain in compliance with federal laws and regulations. However, committees express concern regarding the lack of more comprehensive planning. The RFC materials lack key details about deployment of IT resources, appropriate staff support, and training to enable instructors and academic units to implement required changes. The Committees argue energetically that the lack of such strategic planning will have consequences for faculty workload, costs, and other outcomes. CIT also provides a number of recommendations for consideration, particularly with regard to local implementation and areas within the policy where clarity may be needed. Finally, FWC, CAFR, and GSM provide a few additional questions and recommendations regarding the policy.

FWC, CAFR, CAES, CIT, and GSM express concern regarding potential impacts on faculty workload. FWC notes the burden on faculty may be substantial if there is not sufficient staff time allocated to implementation, while CAFR emphasizes that it cannot be faculty's responsibility to ensure compliance with federal regulations as they do not have the resources, expertise, or time to fulfill this role. CAES expresses concern that compliance will be checked on a case-by-case basis, which may have the consequences of increasing faculty workload and leading to variability in the quality and extent of compliance. CIT expresses strong concern that updating all Information Technology (IT) course content used in a newly offered course to meet the Accessibility Standard will be infeasible, adding that migrating webpages and content to a dedicated archival area will require considerable time and effort. GSM questions how many hours it will take for faculty to remediate a typical course and participate in mandatory training, and what the expected productivity impact is.

To address some of the concerns raised above, CAFR recommends revising the policy to affirm that faculty remain responsible for course content while the University is responsible for providing resources and active support to make course content accessible. CIT adds that UC Davis will need to establish who would be expected to move content to archival areas and what support and resources will be allocated to them. CIT further recommends establishing a group within UC Davis Information and Educational Technology (IET) to review webpages and assist with making them meet the Accessibility Standard to ease the burden on creators of IT course content, allow the group to develop expertise, and make workflows more efficient.

COE, COCI, FWC, and GSM express concern regarding costs. COE expresses concern that, as written and without commensurate financial support, the policy may amount to an unfunded mandate that will greatly increase faculty workload. COE emphasizes that the policy should direct campuses to provide financial support during the transition period. FWC notes that the costs of compliance are likely to be high and departments will not be able to claim limited resources to get exceptions, while COCI calls attention to the fact that there is no budgetary information provided, adding that a detailed financial projection would have been helpful. Echoing these points, GSM provides a series of questions regarding costs, noting that it is unclear who is responsible for funding compliance-related expenses (e.g., department, school, campus, or system), whether the campus will provide any one-time funds to support initial compliance, and how costs will be allocated when multiple units use a shared system. GSM also questions what the estimated costs are for initial compliance, document remediation, captioning services, and accessibility software licenses. GSM adds that it is unclear whether the University has performed a cost-benefit analysis to determine the relative cost of proactively remediating all content now versus responding to individual accommodation requests, and wonders what the estimated financial risk is if the University does not fully comply by the April 24, 2026, deadline.

COCI, GSM, and CIT provide several comments and recommendations regarding technological and human resources, as well as training. COCI highlights that it is unclear whether the administration has deployed the human or technological resources necessary to help faculty update their course material. GSM questions what artificial intelligence (AI) or software tools meet Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards, and wonders if the UC will negotiate systemwide licenses. If not, GSM asks if individual units will be expected to procure these tools independently. Regarding training, CIT notes that an hour-long training may not be sufficient to train someone on how to implement WCAG 2.1 Level AA guidelines, and recommends explicitly stating the purpose of the training, including whether it is meant to provide resources to Workforce Members who are responsible for implementing the policy, or if it is required merely for compliance. GSM adds that it is unclear when detailed guidance documents, training modules, and exception templates will be released and questions how campuses should handle Spring 2026 courses that begin before the April 24, 2026, deadline but run past it.

COCI, DEI, GSM, CAES, and CIT note that the proposal lacks key details that may result in issues for local implementation. COCI highlights that the policy does not identify which individuals or units are responsible for making the required updates, nor does it describe the role of the various units that will likely need to be involved. GSM and DEI add that it is unclear who has the final authority to certify that content is compliant and whether there is a mechanism for accountability such as incentives or penalties. Along similar lines, CAES suggests that the potential pros and cons of a centralized system for achieving compliance should be considered. CIT expresses concern that if few preparations are undertaken beforehand, local implementation may be rushed and result in a lack of stakeholder

consultation, widespread confusion about and objection to the policy requirements, and a diversion of resources away from existing IT services and faculty instruction. To avoid this, CIT urges the UC Davis Office of Compliance and Policy and IET to begin drafting written descriptions of the two required programs, the IT Accessibility Policy Program (ITAPP) and the Accessible Course Content Program (ACCP) and submit them to the Davis Division as separate Requests for Consultation (RFCs). CIT recommends submitting an RFC regarding the ACCP first, as it will be more important to faculty workload and instructional impact and is part of the ITAPP, and subsequently submitting an RFC regarding the ITAPP.

CIT also provides several recommendations to facilitate clarity within the policy. CIT notes that Section III.A.1 states that the Accessibility Standard for the UC is WCAG 2.1 at level AA success criteria and wonders whether this implies that WCAG 2.1 level A success criteria must also be satisfied. If not, CIT suggests revising this section to explicitly exclude satisfaction of the level A success criteria. CIT adds that it is unclear whether non-IT course content needs to meet the Accessibility Standard and, if so, that should be clearly stated in the policy. Regarding archived content, CIT recommends explicitly detailing whether IT course content that was developed before April 24, 2026, and used in a newly offered course is or is not considered archived content. CIT adds that the UC Davis Chief Information Officer (CIO) should request clarification from the Vice President for IT Services on what is necessary for a webpage or content made prior to April 24, 2026, to be "clearly identified as being archived," as detailed in Section II, with particular attention to whether courses listed as "Past Enrollments" on Canvas meet this standard.

CIT further recommends updating Section V.C.1 to state "Workforce Members cannot use free or low-cost IT through Click-through Agreements to create inaccessible digital material unless that material is subsequently made to meet the Accessibility Standard before posting." CIT notes that this clarifies that the primary concern is inaccessible material, not the functionality of the IT. CIT adds that Sections V.C.1.b and V.C.1.c appear to be inconsistent with other policies and should be updated, specifically highlighting that the UC Terms and Conditions of Purchase note that software is expected to meet a slightly different standard that should be clearly noted. Additionally, CIT suggests replacing "department" with "Unit" in Section V.C.4.a to be more general and deleting the words "with Disabilities" from Section V.C.5 to clarify that anyone can request the remediation of inaccessible IT, not just people with disabilities.

Lastly, FWC, CIT, CAFR, and GSM provide a few additional questions and recommendations to consider. FWC expresses concern that UC Davis was not represented on the Electronic Accessibility Committee (EAC), and CIT adds that it is unclear whether any faculty members who are actively teaching or conducting research were members of the committee. CIT recommends that these faculty be involved as early as possible when developing policies with wide-ranging impacts on activities directly related to our teaching and research missions. FWC also notes that the policy includes an incomplete list of UC medical centers, adding that the specificity of the list should be reduced or updated to include recently constructed or acquired facilities. CAFR emphasizes that faculty should retain their rights to their course content when third-party providers are used to make course content accessible. GSM asks if there are current vendors or platforms that are non-compliant and need to be phased out and, if so, what are the expected alternatives for systems that are critical for instruction, communication, or operations.

The Davis Division appreciates the opportunity to comment.

Sincerely,

Katheryn Niles Russ, Ph.D.
Chair, Davis Division of the Academic Senate
Professor of Economics
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate
        Michael LaBriola, Assistant Director, Systemwide Academic Senate
        Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

December 02, 2025

Katheryn (Kadee) Russ
Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Presidential Policy IMT-1300 on Information
Technology Accessibility

The Committee on Information Technology (CIT) has reviewed the Request for Consultation (RFC) on the Proposed Presidential Policy IMT-1300 on Information Technology Accessibility. The purpose of this proposed policy is laudable. It is imperative that, whenever possible, the University provide sufficient assistance to those with disabilities to enable them to use University resources as do those who are not disabled. This especially applies to learning materials and resources as well as research. Upon reviewing the proposed policy on information technology accessibility, the committee's discussion yielded numerous recommendations and concerns. These have been organized into two sections, the first concerning the policy itself and the second concerning preparations to implement the policy at UC Davis.

Policy Concerns

The cover letter states that members of the systemwide Electronic Accessibility Committee (EAC), who are appointed by the CIO Council (CIOC), participated in creating the draft policy. From the membership listed on the UC EAC webpage[1], it is unclear if any are faculty members who are actively teaching or conducting research or if such faculty participated in creating the proposed policy. Therefore, the committee recommends the following:

- Recommendation:
    - Faculty members who are currently teaching or conducting research should be involved as early as possible when developing policies such as this one with wide-ranging impacts on activities that directly relate to the teaching and research missions.

Section III.A.1 states that the Web Content Accessibility Guidelines (WCAG) 2.1 must be satisfied at success level AA. Does this imply that success level A must also be satisfied? If both success levels are to be met, that needs to be explicitly stated because of the way the success levels work. The supporting document "How to Meet WCAG 2.1"[2], when filtered for success level AA has 4 principles, 9 guidelines, and 64 items under the guidelines. For success levels A and AA it has 4 principles, 13 guidelines, and 78 items under the guidelines (see Appendix A for details). The efforts

---

1   https://www.ucop.edu/electronic-accessibility/initiative/leadership-team.html
2   https://www.w3.org/WAI/WCAG22/quickref/?versions=2.1

to meet the two differ, and the policy needs to be explicit about which one is being required.

- Recommendation:
  - Section III.A.1 should be revised to explicitly include or exclude satisfaction of success level A.

The policy should be clearer about the impact of the proposed policy on course materials. First, the committee observes that the second paragraph of Section III states that "IT covered by this Policy must meet the Accessibility Standard", implying that non-IT content does not need to meet that standard. Second, the definition of "Archived Content" in Section II says that Archived Content is content that "[w]as created before April 24, 2026". The policy is clear that archived content is excluded from the accessibility requirements but should explicitly state whether IT course content developed before April 24, 2026, and reused in a newly offered course after April 24, 2026, is considered to be archived content. The committee observes that the answer provided in Section VII.A4 seems to be related, but that IT course content that is part of a newly offered course is not obviously "used to access the UC's services, programs, or activities".

- Recommendation:
  - If non-IT course content does not need to meet the Accessibility Standard, that should be explicitly stated in the policy.
  - If IT course content that was developed before April 24, 2026, and is used in a newly offered course is not considered archived content and needs to meet the Accessibility Standard (as the committee believes is required by federal law), that should be explicitly stated in the policy.

Section V.C.7 says that locations will establish a Disability Access and Awareness Training Program, and that all Workforce Members (including faculty and student employees) who "create or manage electronic content" will be required to take an online Accessibility training that can be at most one hour long. The committee does not believe that one hour is enough to train someone on how to implement the WCAG 2.1 success level AA guidelines and therefore is uncertain what the purpose of the training would be. Moreover, Section V.C.7 says that the CIO will designate individuals to provide the Accessibility training within two years of the effective date of the proposed policy. Given that the proposed policy's effective date is likely to be close to April 24, 2026, this means that the training might not be available until April 2028 even though Workforce Members (including faculty and student employees) would be responsible for implementing the Accessibility Guidelines for nearly two years at that point.

- Recommendation:
  - The purpose of the one-hour mandatory Accessibility training should be more clearly stated. If the purpose of the training is not to provide resources to Workforce Members who are responsible for implementing the policy, then this simply adds to the already excessive number of training modules required merely for compliance.

- ○ Even if the Accessibility training is only intended for compliance, the policy should make clear that any Workforce Member who has not been provided the opportunity to take the training after the policy's effective date cannot be held responsible for violations of the Accessible Standards in content that they create.

The preamble within Section V.C.1 states, "Workforce Members cannot acquire free or low-cost IT through Click-through Agreements if they will use the IT to create inaccessible digital material." As stated, this says that a Workforce Member is not permitted to acquire it regardless of any other uses the IT may have if they would use it to create inaccessible digital material. This does not acknowledge that the inaccessible digital material could simply be a by-product of something else, and at any rate could be made accessible.

- Recommendation
    - ○ The relevant text should be changed to "Workforce Members cannot use free or low-cost IT through Click-through Agreements to create inaccessible digital material unless that material is subsequently made to meet the Accessibility Standard before being posted." This clarifies that the concern is the inaccessible digital material, not the functionality of the IT.

Several of the details in Sections V.C.1.b and V.C.1.c seem to be inconsistent with other policy and should be changed for consistency.

- Recommendation
    - ○ When discussing purchased software, both sections use "should" whereas "must" would be more consistent with the rest of the proposed policy.
    - ○ The UC Terms and Conditions of Purchase[3] make clear the software is expected to meet a slightly different standard[4]. This difference should be noted explicitly.

Section V.C.4.a says that written exception requests "must be signed by the department head". This suggests that the drafters of the policy believe that departments are the only Units that likely to request an exception.

- Recommendation
    - ○ Replacing "department" with "Unit" would make the policy more general and is probably consistent with the intent of this section.

Section V.C.5 states that "[e]ach Location must have a process for individuals with Disabilities to request remediation of Inaccessible IT". This language seems to exclude individuals without disabilities from requesting such remediation.

- Recommendation

---

3   https://www.ucop.edu/procurement-services/policies-forms/uc-terms-conditions-12-14-21.pdf
4   WCAG 2.0AA

- ○ Deleting the words "with Disabilities" would make clear that anyone can request such remediation, as is probably the intent of this section.

Implementation Concerns

It is likely that the proposed policy will only be finalized much closer to the implementation date of April 24, 2026. If there are few preparations beforehand, the implementation at UC Davis could be rushed with a resulting lack of stakeholder consultation, widespread confusion about and objection to the policy requirements, and diversion of resources from existing IT services and faculty instruction. This means that it is in the interests of UC Davis to begin drafting two programs mentioned in the proposed policy as soon as possible and to submit them as RFCs to the Davis Division for comment. This would be both consistent with the principles of shared governance and would engage stakeholders at UC Davis as early as possible to identify concerns with the eventual implementation.

The two programs are the IT Accessibility Policy Program (ITAPP) defined in Section V.C and the Accessible Course Content Program (ACCP) defined in Section V.C.2. The ACCP is the more important of the two from the standpoint of faculty workload and instructional impact and is a part of the ITAPP. Hence, the committee recommends that preparations at UC Davis begin with the ACCP.

- Recommendation:
  - ○ The Office of Compliance and Policy and IET should draft a written description of a UC Davis implementation of the ACCP and submit this as an RFC to the Davis Division for comment.
  - ○ Subsequently, the Office of Compliance and Policy and IET should draft a written description of a UC Davis implementation of the ITAPP and submit this as an RFC to the Davis Division for comment.

Section V.C.2 indicates that course content must comply with the Accessibility Standard. This effectively requires that any faculty member, teaching assistant, or other instructor who creates IT course content be able to design web pages or other materials to meet that standard. Requiring these workforce members to learn and apply the necessary skills would reduce the time that they could spend working with students, performing research, or otherwise serving the community.

- Recommendation
  - ○ A group could be established within IET to review web pages, to assist with making them meet Accessibility Standards, or even to adapt web pages to meet Accessibility Standards. This would ease the burden on creators of IT course content and allow the dedicated group within IET to develop expertise and make workflows more efficient.
  - ○ A warning is appropriate here. The committee is concerned that if all IT course content (including that developed before April 24, 2026) used in a newly offered course needs to meet the Accessibility Standard, then the scope of the undertaking could easily make any such effort infeasible.

Section II, Definition of "Archived Content", Item 4 states that Archived Content, among other criteria, "[i]s organized and stored in a dedicated area or areas clearly identified as being archived".

- Recommendation
    - The UC Davis CIO should request clarification from the Vice President for Information Technology Services on what is necessary for a web page or content made before April 24, 2026, to be "clearly identified as being archived".
    - Specifically, regarding courses, it is possible that courses listed as "Past Enrollments" on Canvas are already clearly indicated as being archived. Migrating web pages and content to a distinct dedicated archival area could require considerable of time and effort. UC Davis would need to establish who would be expected to perform this effort and what support and resources would be provided to them.

The Committee on Information Technology appreciates the opportunity to comment on the on the Proposed Presidential Policy IMT-1300 on Information Technology Accessibility.

Sincerely,

Jeremy Mason
Chair, Committee on Information Technology

December 01, 2025

Katheryn (Kadee) Russ
Chair, Davis Division of the Academic Senate

RE: Request for Consultation on the Proposed Revisions to Presidential Policy IMT-1300 on Information Technology Accessibility

Dear Kadee:

The Committee on Academic Freedom and Responsibility (CAFR) has reviewed the Request for Consultation (RFC) on the Proposed Revisions to Presidential Policy IMT-1300 on Information Technology Accessibility. The proposed revisions are intended to align the entire system with updated legal requirements, assist faculty and staff in creating accessible digital materials, reinforce procurement and oversight processes, and ensure the needs of all students, including those with disabilities are met. While the committee supports the proposed revisions, there are two concerns with respect to this committee's purview of Academic Freedom:

- There should be a clear division of labor: While faculty is in charge of the course content, it cannot be the responsibility of faculty to ensure accessibility and compliance with federal regulation. The danger is that these responsibilities are pushed onto faculty. Faculty has neither the resources, expertise, nor time to fulfill this role. From our perspective, the committee recommends that the policy affirms that faculty remain responsible for course content while acknowledging that the University is responsible for providing resources and active support to make course content accessible and for satisfying federal regulations.
- When third-party providers are used to make course content accessible (e.g. services for transcribing video or similar), faculty should retain their rights to the content. The content should not be used in ways not explicitly approved by faculty.

The Committee on Academic Freedom and Responsibility appreciates the opportunity to comment on the Proposed Revisions to Presidential Policy IMT-1300 on Information Technology Accessibility.

Sincerely,

Burkhard Schipper
Chair, Committee on Academic Freedom and Responsibility

December 3, 2025

Katheryn Russ
Chair, Davis Division of the Academic Senate

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

Dear Chair Russ,

Thank you for asking the Committee on Courses of Instruction (COCI) to provide input on the Request for Consultation *Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility.* COCI reviewed the consultation materials and discussed them at our meeting on October 30, 2025.
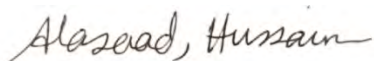
COCI members did not have objection to the content of the revised policy and support policies that improve equitable access, but found this revision lacking key details in many areas necessary for successful implementation of these changes.

- The policy does not identify which individuals or units are responsible for making the required updates and further does not describe the role of the various units that will likely be involved (individual faculty, departments, schools/colleges, SDC, IET, etc.).
- Members did not find evidence that the administration has deployed the human or technological resources necessary to aid faculty with updating their course materials.
- There is no budgetary information provided about how much this effort will cost the campus. Members presume there will be significant up-front labor costs and some on-going costs but would like to have seen a detailed financial projection.

In summary, the proposal lacks the necessary practical and budgetary framework to be successfully adopted and implemented without major confusion and financial strain on already-stressed departments.

Please let me know if COCI can assist with any additional feedback.

Sincerely,

Alasaad, Hussain

Hussain Al-Asaad
Chair, Committee on Courses of Instruction

December 1, 2025

Katheryn Russ
Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

Dear Katheryn,

The Committee on Diversity, Equity, and Inclusion has reviewed the RFC regarding proposed revisions to Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility and believes that thorough revisions on this policy there is one key element missing, accountability. It is apparent compliance, and reporting will be collected, yet what will happen for locations that are not compliant? How will locations be incentivized or penalized for not complaining with this policy?

Francisco Javier Aruaga

Chair, Committee on Diversity, Equity and Inclusion

c: Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

November 21, 2025

Katheryn Russ
Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

Dear Chair Russ:

The Committee on Faculty Welfare has reviewed the RFC – Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility. Overall, the committee had concerns related to the administrative burdens, as it is quite possible that many of our departmental websites, faculty lab websites, apps, teaching materials etc. will not meet this technical standard. It is not clear if there will be sufficient staff time allocated to implement this, and if not, burden on faculty may be substantial. Additionally, it was noted that the costs of compliance are likely to be high, and departments won't be able to claim limited resources to get exceptions. Concern was also expressed that no one from the Davis campus was involved in developing this new policy, and it was recommended that there needs to be a broader discussion about its implications for both UCD campuses. Finally, a member noted that the policy document has an oddly specific but incomplete list of UC medical centers. The specificity should be reduced or updated to include recently constructed or acquired facilities such as UC Davis Rehabilitation Hospital, UCSF's formerly Catholic hospitals, etc.

Sincerely,

Janet Foley
Chair, Committee on Faculty Welfare

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

FEC: College of Agricultural and Environmental Sciences Committee Response

December 3, 2025

CAES FEC members noted that this is ostensibly an updating process to bring current policy into line with federal regulation. We are concerned that the current version appears to place the responsibility for making sure IT accessibility is in compliance on a case by case basis. This will have the unwelcome consequences of (a) increasing faculty workload, and (b) opening up the possibility of variability in the quality and extend of compliance from case to case. Discussion of the potential pros and cons of a centralized system for achieving compliance should be considered.

UC Davis: Academic Senate
College of Engineering FEC

November 18, 2025

To: Katheryn Russ
      Chair, Davis Division of the Academic Senate

From: Michael Kleeman
         Chair, College of Engineering FEC

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

Dear Chair Russ:

The College of Engineering FEC has reviewed the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. The committee acknowledges the benefits of making web content and course content accessible to people with disabilities, but members expressed concern at the workload associated with updating existing materials to be compliant with the new policy. The cover letter for the policy states that locations will be required to establish an accessible course content program to ensure faculty support in creating accessible course content and to assist faculty in remediating course content. Notably absent from the policy is any directive to provide financial support to implement the required changes. As written, this policy amounts to an unfunded mandate that will greatly increase faculty workload with no support from campus administration. We urge the Academic Senate to request changes that direct each campus to provide financial support during the transition period.

Thank you for the opportunity to comment on this proposed policy revision.

Sincerely,

Michael Kleeman

Chair, COE FEC

UNIVERSITY OF CALIFORNIA, DAVIS

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO · SANTA BARBARA • SANTA CRUZ

UC Davis Graduate School of Management

ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8734

November 29, 2025

To: Professor Kathryn Russ
Chair, Davis Division of the Academic Senate
From: Graduate School of Management Faculty Executive Committee (FEC)

Re: Request for Consultation – Systemwide Review of Proposed Presidential Policy IMT-1300 Information Technology Accessibility

Dear Chair Russ,

The Faculty Executive Committee (FEC) of the Graduate School of Management (GSM), in consultation with our school's IT Committee, has reviewed the Request for Consultation regarding the proposed Presidential Policy IMT-1300 on Information Technology Accessibility.

We strongly support the goals of accessibility and inclusion and recognize the importance of aligning UC policy with federal accessibility regulations, including the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. However, before this policy is finalized, we believe several important implementation questions require clarification. These questions fall into three broad categories:

1. Cost
- Audit Costs: What are the estimated costs for the initial compliance assessment? What are typical per-page costs for document remediation, and per-minute costs for captioning services? What is the expected cost range for accessibility software licenses?
- Labor Requirements: What percentage of a full-time staff member will be needed for each of the five designated roles under the IT Accessibility Policy Program (ITAPP)? How many hours will it take for a faculty member to remediate a typical course? How many hours will be required for mandatory training, and what is the expected productivity impact?
- Cost-Benefit/Risk Comparison: Has the University evaluated the relative cost of proactively remediating all content now versus continuing to respond to individual accommodation requests? What is the estimated financial risk if UC does not comply fully by the April 2026 deadline?

2. Budgetary Responsibility
- Cost Allocation: Which level—department, school, campus, or system—is responsible for funding compliance-related expenses (e.g., tools, licenses, training, accommodation services, and exception management)?
- Shared Systems: How will costs be allocated when multiple units use a shared system (e.g., central LMS, jointly offered courses)? Who bears the cost for cross-listed courses?
- Transitional Support: Will the campus provide any one-time funds to support initial compliance in advance of the April 2026 deadline?

3. Implementation Resources and Timeline
- Technology Solutions: Which AI or software tools meet the WCAG 2.1 Level AA standard? Will the UC negotiate system-wide licenses, or are individual units expected to procure these independently?

- Guidance and Timeline: When will detailed guidance documents, training modules, and exception templates be released? How should campuses handle Spring 2026 courses that begin before the April deadline but run past it?
- Vendor Transition: Which current vendors or platforms are non-compliant and would need to be phased out? What are the expected alternatives for systems critical to instruction, communication, or operations? Who is responsible for managing exception requests and developing Equally Effective Alternative Accommodation Plans (EEAAPs)?
- Quality Control: Who has final authority to certify that content is compliant? What is the appeals process when automated tools incorrectly flag content?

We appreciate the opportunity to provide feedback on this important policy and respectfully request clarification on these questions before implementation proceeds. These practical considerations are crucial to ensuring meaningful, sustainable compliance across all units.

Sincerely,

Faculty Executive Committee
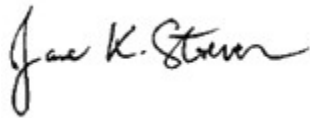Graduate School of Management
University of California, Davis

UC Irvine
Academic Senate

307 Aldrich Hall
Irvine, CA 92697-1325
senate@uci.edu
www.senate.uci.edu

December 3, 2025

Ahmet Palazoglu
Chair, Academic Council

Re: Proposed Revisions to Presidential Policy IMT-1300

The Irvine Division Cabinet discussed the proposed revisions to Presidential Policy IMT-1300, Information Technology Accessibility, at its meeting on December 2, 2025. The Council on Research, Computing, and Libraries (CORCL), the Council on Teaching, Learning, and Student Experience (CTLSE), the Council on Equity and Inclusion (CEI), and the Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) also reviewed the proposal. The councils' feedback is attached for your review.

The Irvine Division appreciates the opportunity to comment.

Sincerely,

Jane Stoever, Chair
Academic Senate, Irvine Division

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
        Jisoo Kim, Executive Director
        Gina Anzivino, Associate Director

UC Irvine
Academic Senate
Council on Equity and Inclusion

307 Aldrich Hall
Irvine, CA 92697-1325
senate@uci.edu
www.senate.uci.edu

October 27, 2025

Jane Stoever, Chair
Academic Senate, Irvine Division

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

The Council on Equity and Inclusion (CEI) reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility at its meeting on October 5, 2025.

Members raised the following implementation and communication concerns:
1. As cost could be a major impediment to faculty implementation and compliance, what are the resources available to faculty to comply in a "timely manner"?
2. Identify and communicate which course materials are a first priority and which are second or tertiary priorities, so faculty focus their effort accordingly. Syllabus, course materials, classroom notes, etc.
3. Prioritize communicating the current campus resources or existing training programs.
4. Clearly highlight to faculty the policy exception around archived content or content that is not being actively used, so faculty can focus energy accordingly.
5. It's not clear if content that university licenses and subscribes to falls under this policy.
6. Given the goal to maintain accessibility for future years, the workload to make content accessible will be forever on-going, and a new normal. What resources will become permanent fixtures to aid faculty? We are concerned that faculty may omit content that requires this additional workload, and that this workload will not be experienced equitably among topics. How will the University systems continue to minimize faculty strain and inequitable workloads? Could the present resources for performing adaptation at UCI please be extended out throughout the 2025-2026 academic year, and not end in Fall quarter? We believe it is unrealistic to expect faculty to adapt their Winter and Spring courses in the Fall, when they are focused on adapting their Fall courses.

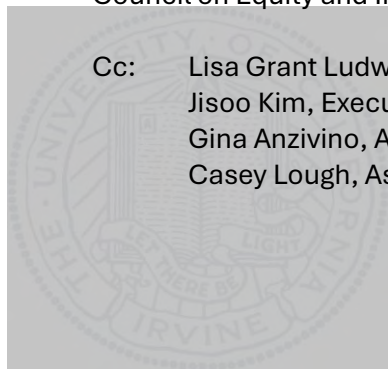The council appreciates the opportunity to comment.

If you have any questions, please do not hesitate to reach out to me.

Sincerely,

Kristina Uban, Chair
Council on Equity and Inclusion

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
        Jisoo Kim, Executive Director
        Gina Anzivino, Associate Director
        Casey Lough, Assistant Director & CEI Analyst

UC Irvine
Academic Senate
Council on Faculty Welfare, Diversity, and Academic Freedom

307 Aldrich Hall
Irvine, CA 92697-1325
senate@uci.edu
www.senate.uci.edu

November 21, 2025

JANE STOEVER, CHAIR
ACADEMIC SENATE – IRVINE DIVISION

Re: Systemwide Proposed Revisions to Presidential Policy IMT-1300

Systemwide Senate Chair Palazoglu distributed for systemwide review proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility. The IT Accessibility Policy issued in 2013 required updating after more than a decade and underwent a complete rewrite not only to allow UC to align with recent updates to the federal accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act but also to provide campuses with adequate guidance for effectively initiating and maintaining an accessibility program.

The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) discussed this issue at its meeting on November 18, 2025, and submits the following comments:

> Members expressed concern regarding the lack of clear, targeted communication from departments and Schools to raise awareness of the quickly approaching deadline for compliance. While the Division of Teaching Excellence and Innovation (DTEI) has done some outreach and has a team of students to assist instructors with compliance, serious concern was raised that there is an overall lack of adequate resources to appropriately support instructors with the process.

Sincerely,

Ben Lourie

Ben Lourie, Chair
Council on Faculty Welfare, Diversity, and Academic Freedom

C: Julie Kennedy, CFW Analyst
Academic Senate

Jisoo Kim, Executive Director
Academic Senate

UC Irvine
Academic Senate
Council on Research, Computing & Libraries

307 Aldrich Hall
Irvine, CA 92697-1325
senate@uci.edu
www.senate.uci.edu

November 26, 2025

JANE STOEVER, CHAIR
ACADEMIC SENATE, IRVINE DIVISION

RE: Proposed Revisions to Presidential Policy IMT-1300

At its November 20, 2025 meeting, the Council on Research, Computing, and Libraries (CORCL) discussed the proposed revisions to Presidential Policy IMT-1300.

The proposed changes to the IT Accessibility Policy align with recent updates to the federal accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. The revisions are also designed to give greater guidance to help initiate and maintain an accessibility program.

The proposed revisions intend to address the following key issues:

- Aligning with the technical standard (Web Content Accessibility Guidelines (WCAG) 2.1 AA) set by two new digital accessibility regulations that implement Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
- Requiring locations to establish an accessible course content program.
- Providing guidance for procurement of accessible products, a more defensible exception process for goods and/or services that do not conform to WCAG 2.1 AA, and a complaint/grievance process.
- Establishing a reporting requirement for better systemwide oversight and coordination.

Overall, CORCL observed that the proposed policy is reasonable and straightforward.

The Council appreciates the opportunity to comment.

On behalf of the Council,

Mike Fortun, Chair

UC Irvine
Academic Senate
Council on Teaching, Learning, and Student Experience

307 Aldrich Hall
Irvine, CA 92697-1325
senate@uci.edu
www.senate.uci.edu

November 12, 2025

JANE STOEVER, CHAIR
ACADEMIC SENATE – IRVINE DIVISION

Re: Systemwide Proposed Revisions to Presidential Policy IMT-1300

Systemwide Senate Chair Palazoglu has distributed for systemwide review proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility. The IT Accessibility Policy issued in 2013 required updating after more than a decade and underwent a complete rewrite not only to allow UC to align with recent updates to the federal accessibility regulations implementing Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act but also to provide campuses with adequate guidance for effectively initiating and maintaining an accessibility program.

The Council on Teaching, Learning, and Student Experience (CTLSE) discussed this issue at its meeting November 3, 2025. Overall, members were satisfied with the proposed revisions but highlighted the need for better faculty engagement with the upcoming deadline.

Sincerely,

Mary McThomas

Mary McThomas, Chair
Council on Teaching, Learning, and Student Experience

C:

Julie Kennedy, CTLSE Analyst
Academic Senate

Jisoo Kim, Executive Director
Academic Senate

Gina Anzivino, Associate Director
Academic Senate

Casey Lough, Assistant Director

UCLA Academic Senate
Executive Board

December 8, 2025

Ahmet Palazoglu
Chair, UC Systemwide Academic Senate

Re: (Systemwide Senate Review) Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

Dear Chair Palazoglu,

The UCLA divisional Executive Board (EB) reviewed the proposed revisions to presidential policy IMT-1300: Information Technology Accessibility, and the committee/council feedback at their meeting on December 4, 2025. EB members agreed to share the comments from the divisional councils for systemwide consideration.

Members noted that implementation will require additional resources for faculty including technology support and infrastructure improvements such as properly equipped classrooms.

Sincerely,

Megan McEvoy
Chair, UCLA Academic Senate

Encl.

Cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
      April de Stefano, Executive Director, UCLA Academic Senate
      Tim Groeling, Vice Chair/Chair Elect, UCLA Academic Senate

UCLA Academic Senate
Committee on Academic Freedom

December 1, 2025

To: Megan McEvoy, Chair
        UCLA Academic Senate

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

Dear Chair McEvoy,

The Committee on Academic Freedom (CAF) discussed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility at its meeting on November 14, 2025. Members share the following comments for consideration.

Members agreed that accessibility of information technology and course content materials is important, however they expressed concern that ensuring course materials fulfill the requirements of the accessible course content program may create a significant administrative burden on faculty. Similarly, members raised the issue that the local exceptions process for faculty to request that inaccessible course content be approved may also be burdensome. As a result, members feared that faculty may decide to change their course content as a result of the requirements.

Members questioned whether plans for local implementation take into consideration the possibility that accessibility guidelines may come into conflict with pedagogical best practices. For example, a member noted that instructors may determine that best practices include demonstrating by hand how to solve mathematical problems in real time. However, accessibility issues may arise with this method. If a conflict were to arise, would faculty be allowed to use pedagogically sound course materials that may not fulfill all accessibility requirements? Members agreed that the office responsible for the local implementation of this policy should aim to reduce the administrative burden on faculty and to allow for faculty to use an efficient exceptions process for including course materials that are based on pedagogical best practices.

The committee appreciates the opportunity to comment on this policy. If you have any questions, please contact me at haselton@ucla.edu or via the CAF analyst, Tara Hottman, at thottman@senate.ucla.edu.

Sincerely,

Martie Haselton, Chair
Committee on Academic Freedom

cc: April de Stefano, Executive Director, Academic Senate
        Tara Hottman, Senior Policy Analyst, Academic Senate
        Kathy Bawn, Immediate Past Chair, Academic Senate
        Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
        Committee on Academic Freedom Members

UCLA Academic Senate
Council on Planning & Budget

November 25, 2025

Megan McEvoy, Chair
Academic Senate

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

Dear Chair McEvoy,

At its meeting on November 10, 2025, the Council on Planning and Budget (CPB) reviewed and discussed the proposed revisions to IMT 1300 Information Technology Accessibility. While members did not comment on the policy revisions, they emphasized the need to define cost responsibility during implementation, rather than focusing solely on regulatory aspects. They suggested that every policy distributed for comment should include a section addressing cost considerations.

If you have any questions for us, please do not hesitate to contact me at desjardins@ucla.edu or via the Council's analyst, Elizabeth Feller, at efeller@senate.ucla.edu.

Best regards,

Richard Desjardins, Chair
Council on Planning and Budget

cc: Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
        Kathleen Bawn, Immediate Past Chair, Academic Senate
        April de Stefano, Executive Director, Academic Senate
        Elizabeth Feller, Associate Director, Academic Senate
        Members of the Council on Planning and Budget

UCLA Academic Senate
Undergraduate Council

November 20, 2025

To: Megan McEvoy, Chair, Academic Senate

From: Jeff Maloy, Chair, Undergraduate Council

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

At its meeting on November 14, 2025, the Undergraduate Council discussed the proposed revisions to the systemwide IT accessibility policy. We were joined by guests Jess Gregg (Senior Associate Director, CEILS; Senior Advisor for Digital Accessibility Strategic Planning, Teaching and Learning Center) and Travis Lee (UCLA Disabilities and Computing Program Coordinator).

Members echoed guests' comments that the timeline for implementation is limited, given the scope of the policy. We also note the absence of bridge funding from the Office of the President to supplement divisional efforts to meet digital accessibility standards. While we appreciate the extensive work underway locally to achieve compliance, it is neither efficient nor cost-effective in the long term to expect campuses to create individualized resources. We recommend that UCOP develop centralized and standardized trainings for faculty and staff across the system.

Thank you for the opportunity to opine.

cc: April de Stefano, Executive Director, Academic Senate
         Kathy Bawn, Immediate Past Chair, Academic Senate
         Tim Groeling, Vice Chair/Chair Elect, Academic Senate
         Julia Nelsen, Principal Policy Analyst, Undergraduate Council

U N I V E R S ITY OF C A LI F OR N IA, M ER C ED

ACADEMIC SENATE, MERCED DIVISION   UNIVERSITY OF CALIFORNIA, MERCED
Kevin Mitchell, Chair, Merced Division of the Academic Senate

December 8, 2025

To: Ahmet Palazoglu, Chair, Academic Council

From: Kevin Mitchell, Chair, UCM Divisional Council (DivCo)

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

The proposed Presidential Policy IMT-1300, Information Technology Accessibility, was circulated to the Merced Division Senate Committees and School Executive Committees for review. The committees listed below provided thoughtful feedback and raised points for consideration. Their comments are summarized in this memo and appended for full context and detail.

- Committee on Rules and Elections (CRE)
- Committee for Equity, Diversity and Inclusion (EDI)
- Graduate Council (GC)
- School of Natural Sciences Executive Committee (NSEC)

On December 3, DivCo members engaged in a substantive discussion of the committees' feedback. The summary below highlights the central themes that emerged during the DivCo deliberations, and the range of perspectives offered across the committees.

DivCo members expressed support for the policy's core goals: ensuring compliance with state and federal accessibility laws and promoting broad access to instructional materials. However, significant concerns centered on implementation, impact on instruction, and the potential for the policy to exceed legal requirements.

Questions were raised about whether commonly used instructional software meets the new standards. A major shared concern, particularly from EDI and NSEC, is that the policy will create substantial additional workload for faculty, graduate student instructors, and staff. DivCo noted a broader pattern in which campuses bear the costs of unfunded mandates, leading to cumulative burdens on personnel without corresponding resource support. EDI recommended that UCOP provide centralized funding and that accessibility compliance be treated as a shared, institutionally supported responsibility rather than an individual burden.

CRE highlighted ambiguity about whether the policy applies to student-created content posted on LMS platforms such as Canvas, especially for assignments requiring students to create web pages, wikis, or

similar materials, and suggested clarifying definitions for LMS systems, LTI systems, and terms like "edtech" to reduce ambiguity and ensure consistent interpretation.

NSEC emphasized the importance of testing policy implementation in real-world scenarios, including specialized instructional and laboratory software, to ensure practicality and equity, and alignment with policy goals. NSEC suggested considering waivers for customizable experimental software that cannot easily meet accessibility standards and cautioned against shifting compliance responsibilities entirely to faculty without adequate support.

DivCo also questioned the restrictiveness of the policy's interpretation, noting that it may prohibit common pedagogical practices, such as uploading handwritten solutions, certain PDFs, or other materials that do not meet narrow accessibility criteria, even when no student in the course requires accommodation. Some raised concerns that UC may be driven by risk aversion and fear of litigation rather than by legal necessity and emphasized the need to distinguish clearly between true legal requirements and anticipatory overcompliance.

DivCo members emphasized the importance of defining what constitutes a *reasonable* accommodation, noting that some instructional contexts (e.g., art history) cannot be made fully accessible without undermining the nature of the discipline. GC noted initial concerns about creating accessible PDFs with LaTeX but found extensive guidance from online and academic sources, supporting the policy's focus on instructional materials while recommending that LaTeX accessibility resources be included and regularly updated as tools and practices evolve.

Finally, the timeline for implementation, by April 24, 2026, seems aspirational at best. Is the intent that all public facing UC content will be in compliance by this date?

Summary of Committee Comments

CRE seeks clarification on the policy's scope, specifically, whether it applies to student-generated content posted on university platforms such as LMS systems (e.g., Canvas). It is unclear whether student-created websites, wiki pages, or videos that do not comply with the policy would constitute violations. Although the policy notes that UC-produced content is included and third-party material is excluded, it does not clearly address student content posted on UC platforms. CRE also suggest refining the following definition in Section II (Information Technology): "A Learning Management Systems (LMS)…and content that faculty and other educational teams provide…" "Systems" should be singular, "LTIs" should be revised to "LTI (learning tools interoperability) systems," and terms like "e-courses" and "edtech" may be redundant or overly broad and could be clarified.

EDI supports the policy's goals of ensuring digital accessibility and legal compliance. However, implementation at UCM raises major equity, workload, and resource concerns, particularly given the campus's limited IT and risk management budgets.

EDI's Core Findings:
- No new UCOP funding has been provided for IMT-1300. UCM has already repurposed an instructional designer position to create a digital accessibility coordinator, but additional staff will be needed to meet compliance timelines.
- Document remediation (PDFs, slides, instructional materials) will fall largely on faculty, staff, and graduate students and is expected to be the most labor-intensive, and costly, aspect of compliance.

- Lack of centralized tools and funding for LMS accessibility software (e.g., Ally, Panorama) and ongoing remediation, training, reporting, and procurement may make full compliance financially unrealistic.
- The campus workforce, significantly composed of underrepresented and lower-paid instructional staff, will disproportionately absorb the additional labor under a decentralized model.
- Union CBAs (UC-AFT, UAW) do not explicitly treat accessibility remediation as a required duty. Treating it as implied labor may constitute an uncompensated increase in workload and expose UC to potential PERB grievances if unions are not notified.

EDI's Key Recommendations:
1. Centralized UCOP Funding: Provide recurring UCOP financial support for implementation, including staffing, software procurement, and ongoing remediation.
2. Campus Staffing Support: Fund additional FTE positions in accessibility coordination and instructional design to prevent overextension.
3. Instructional Remediation Support: Provide systemwide licensing or negotiated contracts for remediation tools, captioning, LMS add-ons, and accessibility software.
4. Union Notification: Issue formal notice to UC-AFT and UAW, as document remediation likely constitutes a material workload change.
5. Centralized Training Development: UCOP should develop and maintain the Disability Access and Awareness Training program and fund participation time.
6. Equity and Labor Impact Reporting: Require each campus to submit an Equity and Labor Impact report tracking staffing, workload, demographics, training completion, and grievances.

EDI affirms the policy's intent but emphasizes that without centralized funding, labor protections, and shared institutional support, IMT-1300 risks reinforcing inequities, overburdening contingent employees, and creating significant compliance and labor-relations challenges for UCM.

GC highlighted the proposed requirement for campuses to establish accessible course content programs as a key step in supporting faculty, students, and regulatory compliance. While focused on instructional materials, not research, GC noted initial concerns about creating accessible PDFs with LaTeX but found extensive guidance from online and academic sources. Overall, the revisions are seen as reasonable and necessary, with a recommendation that LaTeX accessibility resources be included and regularly updated as tools and practices evolve.

NSEC emphasized that while the policy aligns with UC's commitment to IT accessibility, implementation is challenging due to its broad scope and resource demands. Within the School of Natural Sciences, discussions highlighted concerns about course materials and instructional software, citing a Physics lab software example that is inaccessible and difficult to remediate. NSEC suggests considering a waiver for customizable experimental software. NSEC also expressed concern that compliance responsibilities could shift to faculty and recommends testing procedures in real-world scenarios before formal adoption to ensure practicality, equity, and alignment with policy goals.

We thank you for the opportunity to review the proposed revisions to this policy.

Cc:
DivCo Members
Chairs of CAF, P&T, and LASC
School Executive Committee Chairs
UCM Senate Office
UCOP Senate Office

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RULES AND ELECTIONS (CRE)

UNIVERSITY OF CALIFORNIA, MERCED

October 24, 2025

To: **Kevin Mitchell, Chair, Divisional Council**

From: **Committee on Rules and Elections (CRE)**

Re: **Presidential Policy IMT-1300: Information Technology Accessibility**

The Committee on Rules and Elections (CRE) reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility and offers the following comments.

CRE requests clarification on the scope of the Policy. Specifically, does the Policy apply to content posted by students on Learning Management System (LMS) platforms, such as Canvas? If a student creates a website or publishes a wiki page or video that fails to comply with the Policy, it is unclear whether such actions would be considered violations. Although the Policy states that content produced by the UC is included and third-party material is excluded, it remains unclear whether content posted by students on university platforms is also covered.

Additionally, CRE notes that the following statement could be improved:

II. Definitions - Information Technology (IT) (Page 3 of the Policy)
3.   "A Learning Management Systems (LMS), including instructional software and LTIs (learning tools interoperability), and content that faculty and other educational teams provide or make available, e-courses, edtech;"

 "Systems" should be singular, and "LTIs (learning tools interoperability)" should be revised to (for example) "LTI (learning tools interoperability) systems". "E-courses" and "edtech" are broad and may be covered by "content that faculty and other educational teams provide or make available," therefore the language surrounding those terms could be improved for clarity.

We thank you for the opportunity to review and comment.

CC: CRE Members
            Senate Office

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION   UNIVERSITY OF CALIFORNIA, MERCED
COMMITTEE FOR EQUITY, DIVERSITY AND INCLUSION (EDI)

November 3, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Sean Malloy, Chair, Committee for Equity, Diversity and Inclusion (EDI)

Re: Presidential Policy IMT-1300: Information Technology Accessibility

The Committee for Equity, Diversity and Inclusion (EDI) reviewed the proposed revisions to
Presidential Policy IMT-1300: Information Technology Accessibility and offers the following
comments.

EDI commends the policy's clear commitment to ensuring that University of California (UC) digital
environments are accessible to individuals with disabilities and for aligning the University's
obligations with state and federal law, including the Americans with Disabilities Act and Section 504
of the Rehabilitation Act. The policy is a necessary step toward achieving equal access and reducing
risk across the UC. Nevertheless, EDI's review focuses on how implementation at the financially
compressed UC Merced intersects with resource allocation, labor equity, and workforce composition.
This evaluation draws upon a consultation with the UC Merced Chief Information Officer (CIO) and
the Director of Academic & Campus Technology Support[1], who provided insights into the operational
scope and anticipated costs of implementing the policy at UC Merced.

Executive Summary
EDI finds the principles underpinning IMT-1300 laudable and essential to UC's mission of inclusive
excellence. However, the implementation framework under Section V. Procedures (pages 7-16 of the
policy) raises serious equity concerns if executed without centralized funding from UCOP, workload
protections for Senate, non-Senate, staff, and graduate students, or clear recognition of compensable
labor.
EDI concludes that:
1. Centralized funding from UCOP must accompany IMT-1300 to ensure that UC Merced, with a
   leaner and smaller risk management and IT budget, can meet compliance requirements without
   compromising staff workload, well-being, or instructional equality.
2. Implementation guidance should explicitly align with the University Council American
   Federation of Teachers (UC-AFT) and United Auto Workers (UAW) collective bargaining
   agreements (CBAs), clarifying that substantial remediation duties may be compensable and that
   both unions are properly notified of material labor condition changes.
3. Accessibility compliance must be institutionalized as a shared responsibility, supported by
   dedicated staff and technology resources, rather than devolved to individual Senate and non-

---
[1] Consultation occurred on October 21, 2025, through coordination of Senate analyst requests for meetings.

1

Senate faculty or graduate employees as part of the planned remediation cost-saving measure for UC Merced.

Summary of Consultation

The CIO and Director of Academic & Campus Technology Support explained that the CIO had repurposed an instructional designer line to create a new digital accessibility coordinator position. Although this repurposing demonstrates proactive and responsive leadership in meeting the conditions of IMT-1300's ambitious timeline for compliance by April 24, 2026, it also underscores the absence of new base funding from UCOP to support implementation. Due to the UC Merced plan to make faculty, staff, and graduate students responsible for remediation of their teaching materials as a cost-savings reduction plan, the CIO anticipates that as faculty become accountable for ensuring the accessibility of course materials, the campus will likely need to add another instructional designer position to prevent overextension (estimated cost of salary and benefits, $130,000).

The campus currently maintains a Siteimprove contract for website accessibility monitoring, which substantially aids in reducing risk and remedying content issues. However, for the learning management system, Canvas, only two major vendors—Ally and Panorama—dominate the market. The Director of Academic & Campus Technology Support observed that several campuses are reviewing licenses for procurement, and the CIO suggested that the UC CIO Council may consider a systemwide licensing agreement to reduce cumulative costs. Remediation of high-priority accessibility issues will be funded internally through UC Merced's Risk Management group based on the availability of funding. However, the full implementation of IMT-1300 will require ongoing resources for staff reporting, faculty training, software procurement, and continuous remediation, which may not always be available due to campus budget constraints. The CIO also highlighted the productivity cost of the Disability Access and Awareness Training Program, which should be factored into budget analyses using campus salary data to estimate lost work time and training-system maintenance.

Finally, and most consequentially, the CIO and Director of Academic & Campus Technology Support noted that document remediation, which involves converting and reformatting PDFs, slides, and other instructional materials, will largely be carried out by faculty and staff. This is expected to be the most labor-intensive and costly component of compliance.

Equity, Inclusion, and Labor Context

From an equity standpoint, IMT-1300 must be understood as an equity-infrastructure investment, not simply a compliance measure for risk reduction. UC Merced's workforce composition reveals why implementation requires such framing.

As of Fall 2024, UC Merced employed approximately 2,171 individuals, with 52% identifying as female, 40% identifying as male, and 8% identifying as non-binary or unreported. The racial and ethnic composition included 36% Hispanic, 12% Asian, 4% Black, 5% Multiracial, 3% International, and 0.5% Native American[2]. In this context, a decentralized implementation model that transfers accessibility remediation to faculty and staff effectively shifts institutional and system compliance costs onto underrepresented populations. Such a redistribution of labor risks entrenching inequities rather than advancing inclusion, as the work of accessibility remediation, while essential to institutional equity, will likely fall to contingent and lower-paid instructional staff, including Unit 18 faculty and graduate student employees.

---

[2] UC Merced Tableau server, "Faculty and Staff Story."

Without dedicated UCOP funding to cover the cost of document remediation through a software program or workload credit, the responsibility for ensuring compliance will reinforce existing hierarchies of academic labor, wherein permanent and higher-paid faculty and staff benefit from systemwide compliance. In contrast, contingent faculty and staff absorb the cost of implementation. Contingent and lower-paid employees are more exposed to additional compliance work because their duties are more tightly tied to course delivery, content management, and daily instructional tasks. Tenured and higher-paid faculty and senior administrators are less directly burdened by this layer of work because they typically delegate or share course support responsibilities or have higher and more stable salaries that buffer the absorbed, uncompensated labor cost.

Labor Agreements and Interpretative Analysis
EDI examined two relevant CBAs[3] to understand how accessibility remediation aligns with existing workload and compensation structures.

UC-AFT
The CBA defines the creation of pedagogically sound, effective course materials as a regular part of teaching duties but does not explicitly include digital accessibility remediation. Major course redesigns may warrant adjusted workload credit or separate compensation (see Article 24) under a summer by-agreement (see Article 23).

SRU-TA
The CBA similarly contains no language requiring or compensating accessibility remediation. The only reference appears in a Side Letter on Workplace Accessibility[4], which establishes a joint committee to discuss accessibility resources; it does not authorize pay or workload modification.

Interpretative Analysis
Given the contractual silence, the UC would likely interpret accessibility work as an implied professional obligation under both CBAs, i.e., an expectation incorporated within existing teaching duties.

From an equity and risk reduction perspective, EDI cautions against this reading. Accessibility remediation of existing materials may constitute substantive new work that has not been treated as past practice or "reasonably comprehended[5]" at UC Merced and will require technical skill and significant time investment. Treating it as an implied duty effectively transforms a system-level compliance responsibility into uncompensated labor borne by individual employees, especially Unit 18 faculty and graduate students, who have the least control over workload assignment and the fewest resources to absorb it.

Absent clear guidance and funding, the UC also engages in high-risk (financial) labor grievances under both the UC-AFT and UAW CBAs, including assigning new duties without compensation, and due to a lack of past practice, and "reasonably comprehended" may be construed as a unilateral modification of working conditions if the UC does not notice each union. Lack of notice, combined with working condition modifications, may be perceived as a violation of collective bargaining obligations and may result in grievances that may ultimately be decided in favor of either union under the Public

---

[3] EDI did not review additional CBAs and UC Merced may want to further investigate whether notice under other CBAs are needed.
[4] See Joint Labor Management Committee, Workplace Accessibility.
[5] See PERB Decision 2942H—Regents of the University of California (Los Angeles) section 602.01000 and the "Eureka standard" for "measure[ment] whether a deviation from the status quo is sufficiently material to trigger a bargaining obligation."

Employment Relations Board (PERB). Because both the UC-AFT and UAW agreements prohibit unilateral increases to duties without bargaining, the UC Merced plan to push out document remediation to faculty, staff, and graduate students may materially expand teaching and support obligations. These obligations should be treated as compensable work, or at the very least, be adequately noticed to both unions for a period of comment and potential for bargaining engagement regarding compliance and risk reduction.

Final Recommendations
Based on EDI's evaluation, the following actions and investments are recommended to ensure the equitable and sustainable implementation of IMT-1300 across the UC, particularly at UC Merced.

1. Dedicated and Recurring UCOP Funding for IMT-1300 Implementation
    a. Recommendation: Establish a centralized UCOP fund earmarked for campus-level IMT-1300 implementation support.
    b. Rationale: Smaller campuses like UC Merced lack sufficient discretionary IT and instructional design capacity to absorb new compliance costs past an initial start-up of reviewing high-risk items. Without centralized funding, implementation will perpetuate inequities in digital access and exacerbate workforce burdens.
    c. Amount: A base allocation of an application of up to $500,000 per campus annually for a 3-year initial rollout period, with continuation of an application of up to $300,000 per campus for ongoing compliance and reporting thereafter.
2. UC Merced Campus Staffing Investment
    a. Recommendation: UCOP funding for at least 2.0 additional staff FTE dedicated to accessibility program management and training for each campus on an as-needed basis.
    b. Amount: Variable upon market conditions at each campus for salary and benefits between $260,000–$350,000.
3. Instructional Support for Accessibility Remediation
    a. Recommendation: Provide centralized instructional support for course and document remediation.
    b. Provide recommendations to the UC Information Security Council to determine whether system or local needs require licensing agreements, aiming to help reduce per-campus costs.
    c. Amount: Variable based on vendor-assisted document remediation and system-wide negotiation of contracts between $5M and $6M for the entire workforce, PDF, PPT, Word, remediation, captioning, and media accessibility vendors, LMS, and website accessibility tools as appropriate for both local needs and systemwide financial cost analysis estimates.
4. Notice UC-AFT and UAW Regarding Material Changes to Workload
    a. Recommendation: Provide written notices to both unions regarding UC Merced's plan to push out document remediation to Unit 18 faculty and graduate students.
    b. Rationale: Document remediation may constitute a substantial material change for unionized workers and thus open the opportunity for bargaining under PERB.
5. Centralized UCOP Training Program Development
    a. Recommendation: Allocate funding through UCOP to develop, deploy, and track the mandatory Disability Access and Awareness Training program.

      b.   Amount: Variable based on one-time development cost, annual updates, compliance tracking, and campus-wide participation time for the entire workforce, based on salary averages at 1 hour per two-year cycle.

6. Equity-Impact and Labor-Relations Safeguards
      a.   Recommendation: As part of the IMT-1300 "procedures," each campus must file an additional Equity and Labor Impact report.
              i.   Report to include staffing levels, demographic breakdowns, training completion, total remediation hours by employment class, and a numerical and summary of any grievances or workload complaints, along with remedies.
      b.   Rationale: This reporting measure will ensure transparency and enable UCOP and each campus to identify and mitigate disproportionate impacts or labor-relations risks early.

We thank you for the opportunity to review and comment.

Cc: EDI Members
         Senate Office

ACADEMIC SENATE, MERCED DIVISION   UNIVERSITY OF CALIFORNIA, MERCED
GRADUATE COUNCIL (GC)

November 3, 2025

To: **Kevin Mitchell, Chair, Divisional Council (DivCo)**

From: **Irenee Beattie, Chair, Graduate Council (GC)**

Re: **Presidential Policy IMT-1300: Information Technology Accessibility**

Voting members of the Graduate Council (GC) reviewed the proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility and offer the following comments.

GC identified the most significant proposed change as the requirement that campuses establish an accessible course content program. This initiative is designed to support faculty in both creating accessible course materials and remediating existing content. Notably, the emphasis is solely on instructional content and does not appear to extend to research activities. GC views this as a critical advancement in supporting both students and faculty, while also reinforcing institutional compliance with accessibility regulations.

GC initially expressed concern regarding the difficulty of creating accessible PDFs using LaTeX, the de facto standard for scientific publishing. However, after exploring online resources, GC discovered a wealth of guidance available from both non-academic platforms, such as Stack Exchange, the TeX Users Group, Overleaf, and academic institutions including Michigan State University, University of Washington, University College London, and University of Wisconsin–Madison. These resources offer practical tips and highlight common challenges. Academic materials are typically hosted on library and departmental websites, academic blogs, and digital accessibility offices, such as the one at the University of South Carolina.

Overall, GC found the proposed revisions to be reasonable and necessary for compliance. However, when establishing an accessibility program, the campus should ensure that accessibility resources for LaTex users are included. Importantly, accessibility features for LaTex and PDFs are constantly evolving, so it will be important for the program to keep the campus community updated with the latest tools and practices.

GC thanks you for the opportunity to review and comment.

Cc: Graduate Council
        Senate Office

From: Jennifer Manilay <jmanilay@ucmerced.edu>
Sent: Friday, November 7, 2025 3:09 PM
To: Fatima Paul <fpaul@ucmerced.edu>; Kevin Mitchell <kmitchell@ucmerced.edu>
Cc: Susan DeRiemer <sderiemer@ucmerced.edu>; Michael Dawson <mdawson@ucmerced.edu>; Jay Sharping <jsharping@ucmerced.edu>; Tao Ye <tye2@ucmerced.edu>; Mayya Tokman <mtokman@ucmerced.edu>
Subject: RE: [Systemwide Review Item] Presidential Policy IMT-1300: Information Technology Accessibility (Due by 11/7/2025)

Dear Fatima and Kevin:

The policy aligns with UC's commitment to ensuring accessibility in education. However, its implementation presents challenges due to the breadth of its scope (covering all IT systems rather than those limited to teaching, learning, or research) and the substantial human and financial resources required to achieve full compliance.

Within SNS, our discussion focused largely on course materials and instructional software. The Physics Department offered a concrete example of a software package currently used in undergraduate laboratory courses that would be out of compliance under the proposed policy and difficult to remediate. This software, widely used for experiment automation and data acquisition, has been deemed inaccessible. The vendor has not been able to provide the required accessibility assurances and attempts to obtain a waiver have been unsuccessful. Although it is possible to ensure that students with disabilities can access the educational value of the experiments themselves, customizing the software is considerably more challenging. The authors of the policy may wish to consider a waiver clause that applies to customizable software used for experimental or laboratory work.

Members of SNSEC also expressed concern that responsibility for verifying compliance could shift to faculty. The draft policy requires each location's Executive Officer to establish and implement local procedures and specifies that exceptions must be approved by the Executive Officer or their designee. This creates uncertainty about how compliance review responsibilities will be distributed.

SNSEC recommends that the administration should conduct due diligence by testing the proposed procedures across a range of real-world scenarios, including cases like the laboratory software example, before the policy is formally ratified. This will support refinement of the policy document and help ensure that implementation is practical, equitable, and aligned with the policy's goals.

Thank you for the opportunity to provide feedback on this policy.

Sincerely,

Jennifer O. Manilay, PhD (*pronounced mah-NEE-lie, sounds like "money-lie"*)

Professor, Dept. of Molecular and Cell Biology

Chair, Natural Sciences Executive Committee AY-25-26

School of Natural Sciences

University of California, Merced

jmanilay@ucmerced.edu

Pronouns: she/her/hers

UNIVERSITY OF CALIFORNIA, RIVERSIDE

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

Kenneth Barish
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5023
EMAIL: kenneth.barish@ucr.edu

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,

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

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.

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

---

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.

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.
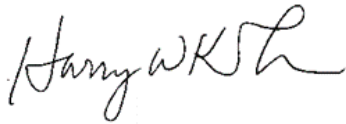
The committee feels that the technology currently in place, such as the Yuja captioning software, is not sufficient for the needs of the faculty to ensure complete compliance with this policy. There are inconsistencies with the software, in the captions produced, for faculty who are using particular 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,

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.

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.

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.
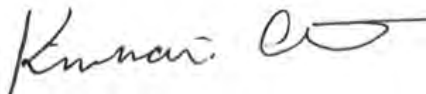
4. Definition of "Material Alteration" Is Overly Broad

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

UC RIVERSIDE | School of Medicine

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:

Adam Godzik

F3F7FC0ECB4E4AD...

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

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0002
TELEPHONE: (858) 534-3640
FAX: (858) 534-4528

December 10, 2025

Professor Ahmet Palazoglu
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of Proposed Presidential Policy IMT-1300: Information Technology
        Accessibility

Dear Chair Palazoglu,

The proposed Presidential Policy IMT-1300: Information Technology Accessibility was distributed to San Diego Divisional Senate standing committees and discussed at the December 8, 2025 Divisional Senate Council meeting. Senate Council supported the intent of the proposed revisions to the policy to improve digital accessibility and acknowledged that the proposal is due to legal requirements. At the same time, Council was troubled by the aggressive implementation timeline and disappointed in the overall lack of training and resources to support faculty compliance with the new policy requirements. Council offered the following comments for consideration.

Reviewers commend the policy's intent but stressed that it is unworkable without substantial systemwide and local support. As an unfunded mandate, campuses are unlikely to meet the April 24, 2026 deadline, especially without dedicated funding, training, and assistance. It was suggested that a phased-in approach is likely more realistic. Because digital accessibility is not common knowledge for faculty, clear training and guidance must be provided; otherwise, non-compliance could inadvertently expose the university to additional risk. Reviewers also noted that because of the effort required to create accessible materials, the policy may be counterproductive, as faculty might revert to low-tech options such as whiteboards in lieu of slide decks or become reluctant to share supplemental resources for fear of non-compliance. Many existing accessibility tools currently available to the university are considered noncompliant, while faculty lack access to those that are compliant due to cost or licensing constraints. Reviewers supported relying on existing, local resources, such as UC San Diego's Teaching and Learning Commons, as they would be equipped to help promote compliance if they had more resources. It was noted that teaching assistants would also need to comply and would likely assist instructors with the task of making course materials accessible, so this responsibility would need to be formally incorporated into TA job descriptions. Ultimately, the university must actively support faculty in implementing this mandate, providing clear guidance on the protections available to them during the transition period to ensure instructional quality is maintained.

The responses from the Divisional Committee on Academic Information Technology, Committee on Faculty Welfare, and Educational Policy Committee are attached.

Sincerely,

Rebecca Jo Plant
Chair
San Diego Divisional Academic Senate

Attachment

cc: Akos Rona-Tas, Vice Chair, San Diego Divisional Academic Senate
         Lori Hullings, Executive Director, San Diego Divisional Academic Senate
         Monica Lin, Executive Director, UC Systemwide Academic Senate

October 30, 2025

CHAIR REBECCA PLANT
Academic Senate, San Diego Division

SUBJECT: Proposed Presidential Policy IMT-1300 Information Technology

Dear Chair Plant,

At its October 27, 2025, meeting, the Committee on Academic Information Technology (CAIT) reviewed and discussed the report from the *"Proposed Presidential Policy IMT-1300 Information Technology"*. CAIT supports the strengthened emphasis on equitable access, alignment with federal accessibility standards, and the establishment of campus-level IT Accessibility Policy Programs (ITAPPs). The committee commends the comprehensive scope of the policy, which extends accessibility expectations across instructional, administrative, research, and clinical domains.

CAIT's discussions focused on three areas where further clarity and coordination could enhance policy effectiveness and implementation consistency:

1. Resourcing and Implementation
The policy mandates extensive campus-level responsibilities, including course content audits and staff training. Campuses will require dedicated resources to meet these requirements by the April 2026 deadline.
Recommendation: UCOP should provide systemwide implementation support and shared tools, training resources, and templates to reduce duplication of effort across campuses.

2. Coordination and Accountability
The policy assigns oversight to local Executive Officers but does not specify how campus accessibility leads, CIOs, or Senate committees will coordinate efforts.
Recommendation: Establish clear reporting lines between ITAPP coordinators, campus CIOs, and divisional Senate committees such as CAIT to ensure accountability and shared governance in accessibility oversight.

3. Faculty Engagement and Support
The requirement for accessible course content will place new demands on faculty, particularly in decentralized teaching environments.
Recommendation: Each campus should provide remediation assistance and clear guidance through centers for teaching and learning (TLC) to support faculty compliance without overburdening instructors.

CAIT fully supports the intent of the revised IMT-1300 policy and its goal of achieving digital accessibility across all UC locations. A number of committee members noted how under resourced implementation may lead to instructors withholding previously provided instructional materials to the

detriment of learning outcomes. Successful implementation will depend on adequate resourcing, systemwide coordination, and integration with existing IT governance structures to ensure consistent, sustainable, and equitable access for all members of the UC community.

Sincerely,

Barry Grant, Chair
Committee on Academic Information Technology

cc: J. Coomer
        L. Hullings
        N. Komarova
        A. Rona-Tas

November 24, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

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

Dear Chair Plant,

At its November 19, 2025 meeting, the Committee on Faculty Welfare (CFW) reviewed the proposed Presidential Policy IMT-1300: Information Technology Accessibility. From CFW's perspective, the revised accessibility policy represents a significant and important modernization aligned with updated federal ADA and Section 504 regulations. The Committee supports the overarching goal of ensuring equitable access for students, faculty, and staff. At the same time, CFW notes that the expanded scope of the policy raises substantial questions about workload, instructional autonomy, implementation support, and equitable impact across diverse disciplines.

The proposed policy introduces new obligations for faculty to ensure that digital instructional materials, course technologies, and online content comply with the WCAG 2.1 AA accessibility standard. While the intent is clear and consistent with federal guidance, CFW is concerned about how these requirements will affect faculty workload, particularly in departments with substantial digital, multimedia, or practice-based teaching. There is also uncertainty regarding procurement restrictions, exception processes, and complaint mechanisms, all of which may place additional administrative burdens on faculty and departments unless adequately resourced. The committee emphasizes the need for clear campus-level support structures, dedicated staffing, training, and protections for faculty navigating these responsibilities.

CFW offers the following specific comments for consideration.

1. Faculty Workload and Implementation Support
The requirement that new and substantially revised course materials comply with WCAG 2.1 AA may significantly increase instructional preparation time. CFW is concerned that the policy does not specify what level of instructional design, remediation assistance, or technological support campuses will provide. It is also not clear what "specialized training resources" will be available or how they will be funded.

2. Procurement and Instructional Autonomy
The policy places new constraints on software adoption and requires accessibility vetting for instructional tools. The Committee noted uncertainty regarding how the procurement program will be evaluated in practice. Specifically, on Page 8, the requirements for verifying that suppliers' IT products meet accessibility standards—such as testing environments, proof-of-concept demonstrations, and examples of previous work—need further clarification. Faculty will also need clear direction on how to vet new software, because most faculty are not familiar with how to do that in practice. CFW is also concerned that these restrictions may limit pedagogical flexibility, especially in disciplines with specialized or experimental digital tools.

3. Complaint and Exception Processes
The committee found the definition of "reasonable accommodation" insufficiently clear, especially as it relates to the establishment of a complaint process. The proposed structure for reporting accessibility barriers may introduce new administrative responsibilities for faculty. CFW recommends clear campus procedures, protections for faculty acting in good faith, and staffing to handle remediation and compliance.

4. Departmental and Budget Implications
Implementing accessibility standards across all course materials and technologies will have financial and staffing implications. CFW is concerned that departments may be expected to absorb these costs without additional UCOP or campus-level resources.

5. Equity Across Disciplines
Disciplines that rely heavily on multimedia, complex software tools, or visual/performative content may face disproportionate burdens. CFW stresses the need for equitable implementation that accounts for disciplinary differences.

6. Need for Campus-Level Guidance
The policy requires the creation of a comprehensive IT Accessibility Program by April 2026. CFW requests clarity on how this program will be staffed, the role of faculty in shaping local implementation, and how campus policies will interface with systemwide requirements.

Sincerely,

Amy Adler
Chair
Committee on Faculty Welfare

cc: Akos Rona-Tas, Senate Vice Chair
        Lori Hullings, Senate Executive Director
        Jenna Coomer, Senior Senate Analyst
        Jeffrey Clemens, Vice Chair, Committee on Faculty Welfare

November 26, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

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

At its November 24, 2025 meeting, the Educational Policy Committee (EPC) reviewed the proposed Presidential
Policy IMT-1300: Information Technology Accessibility. The Committee had no objections to the proposal. The
Committee offered the following comment for consideration:

- The Committee recommends including examples of how disabilities may be accommodated,
  particularly given the wide range of technological tools available. For instance, there may be ways
  generative artificial intelligence tools could be leveraged as note-taking aids for certain disabilities.
- EPC suggests that the policy also consider how emerging technologies, such as generative artificial
  intelligence, may affect IT accessibility.

                        Sincerely,

                        Stanley Lo, Chair
                        Educational Policy Committee

cc: J. Coomer, Senior Senate Analyst
        L. Hoang, Educational Policy Committee Vice Chair
        L. Hullings, Senate Executive Director
        A. Rona-Tas, Senate Vice Chair

UCSF Academic Senate

Office of the Academic Senate
Wayne & Gladys Valley Center for Vision
490 Illinois Street, 5th Floor
San Francisco, CA 94158
Campus Box 0764
academic.senate@ucsf.edu
https://senate.ucsf.edu

Errol Lobo, MD, PhD, Chair
Marta Margeta, MD, PhD, Vice Chair
Kartika Palar, PhD, MA, Secretary
Spencer Behr, MD, Parliamentarian

December 10, 2025

Ahmet Palazoglu
Chair, Academic Council
Systemwide Academic Senate
University of California Office of the President
1111 Franklin St., 12th Floor
Oakland, CA 94607-5200

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

Dear Chair Palazoglu:

The San Francisco Division of the Academic Senate is pleased to provide comments on the Systemwide Review of Proposed Presidential Policy IMT-1300 Information Technology Accessibility. It goes without saying that the UCSF Senate supports the goal to create an inclusive digital environment at the University of California (UC). Our Committee on Equal Opportunity (EQOP) provided the following points on this Presidential Policy:

1. **Clear Expectations**: Faculty seek clarification on the division of responsibilities between instructors and campus units, including the level of training, tools, and support available. Explicit guidance for instructors on practical steps to meet accessibility standards is needed to ensure consistent compliance.

2. **Campus-level Resources and Systemwide Consistency**: Faculty request better visibility and direction to existing campus resources, such as digital accessibility offices, instructional designers, tools like Ally, and instructional materials, to facilitate accessibility efforts. In addition, campuses with established accessible content programs and training models should share their approaches systemwide to promote consistency and minimize redundancy in developing new structures.

3. **Resources and Implementation Timelines**: Adequate staffing, training, tools, and support are critical for implementation by the April 2026 deadline. Draft guidance documents and phased timelines should be provided to help faculty plan effectively and avoid undue burdens on instructors.

Thank you for considering our comments. If you have any questions, please reach out to me or the UCSF Executive Director, Todd Giedt (todd.giedt@ucsf.edu).

Sincerely,

Errol Lobo, MD, PhD, 2025-27 Chair
UCSF Academic Senate

Enclosures (1)
Cc: Sara Ackerman, Chair, Committee on Equal Opportunity (EQOP)

Committee on Equal Opportunity
Sara Ackerman, PhD, MPH, Chair

December 8, 2025

Errol Lobo, MD, PhD
Division Chair
UCSF Academic Senate

Re: EQOP Comments on Systemwide Review of Proposed Presidential Policy IMT-1300 Information Technology Accessibility

Dear Chair Lobo,

The UCSF Committee on Equal Opportunity (EQOP) is writing to comment on the Proposed Presidential Policy IMT-1300 Information Technology Accessibility. The EQOP Committee fully supports the goal of creating an inclusive digital environment for all members of the UC community and appreciates the significant work that has gone into aligning the policy with AD and Section 504 requirements.

From a faculty perspective, we respectfully raise the following considerations:

1. **Clear expectations for individual faculty and for campuses.** This policy rightly requires campuses to establish programs to support accessible course content. However, it would be helpful to clarify the division of responsibilities between instructors and campus units, including what level of training, tools, and remediation support that instructors can expect. Without clearly defined and adequately resourced support structures, compliance may disproportionately burden individual faculty.

    In addition, while the policy describes campus-level structures, individual instructors would benefit from explicit, practical guidance on what they should begin doing now to ensure that their course materials, websites, and digital resources meet the standard. Many faculty members are eager to comply but do not yet know which concrete steps, e.g., document formatting, captioning, LMS structures, are required or where to begin. Clearly articulating the baseline expectations for faculty creators of digital content would support more consistent adoption across campuses.

2. **Signposting to local resources and support.** Faculty would benefit from clearer direction on how to access the tools, training, and remediation support available at their home campus. Some campuses may already have digital accessibility offices, instructional designers, LMS-integrated checkers such as Ally, and short "how-to" resources. Ensuring that the policy framework explicitly includes signposting to these supports would make them more visible and consistently used.

3. **Leveraging existing UC models.** Several campuses may have already developed strong models for accessible course-content programs, faculty training, and remediation.

Referencing and sharing these models systemwide could promote consistency and reduce the need for each campus to independently develop parallel structures. Encouraging a systemwide learning-and-sharing approach would strengthen implementation and reduce duplication.

4. **Resources and Timelines for implementation.** Because implementation will rely heavily on forthcoming guidance documents, it would be helpful for draft versions of these materials to be shared during the comment period so that stakeholders can understand the operational implications of the policy. Clear implementation timelines or phased expectations would also help faculty plan effectively.

   To meet the April 2026 timeline, campuses will need adequate staffing, training capacity, accessible-authoring tools, and remediation support. Clarifying that these resources are expected at the campus level would help ensure faculty are not left solely responsible for large volumes of legacy content or highly technical accessibility tasks.

We appreciate the thoughtful work reflected in the draft policy and the commitment to ensuring equitable digital access across the UC system. Thank you for considering these comments.

If you have any questions regarding the above feedback, please feel free to reach out to me or our Senate analyst Kirstin.McRae@ucsf.edu.

Sincerely,

Sara Ackerman, PhD, MPH
Committee on Equal Opportunity Chair

cc: Todd Giedt, UCSF Senate Executive Director

Academic Senate
Rita Raley, Chair
Shasta Delp, Executive Director

1233 Girvetz Hall
Santa Barbara, CA 93106-3050
http://www.senate.ucsb.edu

UC SANTA BARBARA

December 10, 2025

To: Ahmet Palazoglu, Chair
        Academic Senate

From: Rita Raley, Divisional Chair
        Academic Senate

Re: Proposed Presidential Policy IMT-1300 - Information Technology Accessibility

The Santa Barbara Division distributed the Proposed Presidential Policy IMT-1300 - Information Technology Accessibility to the Council on Faculty Welfare, Academic Freedom, and Awards (CFW), the Council on Planning and Budget (CPB), the Graduate Council (GC), the Undergraduate Council (UgC), the Committee on Diversity and Equity (CDE), the Committee on Courses and General Education (CCGE), the Committee on Research Policy and Procedures (CRPP), the Committee on Library, Information, and Instructional Resources (CLIIR), the Committee on International Education (CIE), the Committee on Information Technology (CIT), and the Faculty Executive Committees (FECs) for the College of Letters and Science (L&S), the College of Engineering (COE), the College of Creative Studies (CCS), the Gevirtz Graduate School of Education (EDUC), and the Bren School of Environmental Science and Management (BREN). CFW, UgC, CIE, and the CCS and BREN FECs elected not to opine.

The Santa Barbara Division acknowledges both the necessity of updating policy to comply with federal accessibility standards and the importance of ensuring course materials are accessible to all students. However, the reviewing groups express substantial concerns that the proposal is critically under-resourced and lacks the detail necessary for successful implementation.

Nearly all of the reviewing groups share a deep concern regarding the collective effort and anticipated infrastructural and labor resources required to operationalize this program. As noted by CIT, "faculty fear they cannot meet the requirements alone; substantial remediation support and instructional design services are essential." This sentiment echoes broader systemwide trends; as CPB observed, "the Campus workforce is already overburdened and is likely to become more so given budgetary constraints, both ongoing and anticipated." Without a comprehensive resource analysis, it is impossible to gauge the feasibility of these policy changes. Given that the policy revision responds to a federally unfunded mandate, the UC must either secure dedicated funding or adjust expectations to match existing campus capacities.

Beyond resource constraints, the reviewing groups call attention to significant ambiguities in the policy that would impede compliance. They request specificity regarding compliance

responsibilities for units and personnel, how course remediation priorities will be ranked, the structure of training and support programs, and the enforcement mechanism and exception process. Further clarification is needed regarding privacy and intellectual property protections and potential impacts on academic freedom. The Division also seeks clarification regarding the implementation timeline and the definition of "archived content." The definition (p. 2) and its exclusion from the category of "IT" (p. 4) together suggest that faculty may only be required to remediate print documents posted online after April 24, 2026; however, the text is ambiguous. We request clarification on whether this exclusion applies strictly to legacy content or if it creates a rolling requirement for new materials.

Finally, reviewers highlighted friction in the technical execution of the policy. They request clear guidance on permissible technologies and raised specific concerns regarding the procurement process for vendor products.

All of the agencies' individual responses are attached for appropriate consideration.

December 15, 2025

To: Rita Raley, Chair
UCSB Academic Senate

From: Barry Giesbrecht, Chair
Council on Planning & Budget

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

The Council on Planning and Budget (CPB) has reviewed the Proposed Presidential Policy IMT-1300 on Information Technology and Accessibility, as sent out on September 15, 2025 by Van Williams, the systemwide Vice President for Information Technology. The proposal outlines a number of new policies concerning the establishment of an IT Accessibility Policy Program (ITAPP). The proposal requires executive officers – from the departmental to the campus-wide level – to oversee the establishment of an ITAPP.

As to the cost of proposed programs, we note that financial penalties are invoked for non-compliance, for example, the denial of equipment orders. The proposal also states: "Locations may use new or existing Workforce Member(s) to fulfill" the "roles" involved in implementing the policy. CPB notes that no new financing is mentioned for implementation of ITAPP. We also note that the campus workforce is already overburdened and is likely to become more so given budgetary constraints, both ongoing and anticipated.

We would further like to mention that while the recording of classes is not explicitly addressed as an accommodation, this could also be a problem area. This is the case due to privacy and academic freedom concerns on the part of both faculty and students, which have only accelerated in the present atmosphere.

We therefore recommend revisions to the proposed ITAPP along the above lines, namely:

1. Allocation of sufficient funds for implementation.
2. Privacy and academic freedom safeguards concerning the recording of classes, compliant with state and federal legislation.

cc: Shasta Delp, Academic Senate Executive Director

December 3, 2025

To: Rita Raley, Divisional Chair
        Academic Senate

From: Joe McFadden, Chair
        Graduate Council

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

At its meeting of December 1, 2025, Graduate Council discussed the Proposed Presidential Policy IMT-1300 Information Technology Accessibility with Josh Bright, Associate Vice Chancellor for Information Technology and Chief Information Officer, and Elise Meyer, Executive Director, IT Strategy & Academic/Research Support, Information Technology Services, and has the following comments.

AVC Bright and Executive Director Meyer shared their overall approach to building the structure needed to implement the policy on campus, and the feedback they have received so far. It is clear that this will require a significant investment from the campus and UC as a whole. And given the substantial investment to implement the policy, it is unfortunate that it is unknown whether the current Federal administration will choose to actually enforce these new rules or not. However, the Council feels that implementation is the right thing to do regardless since it will result in a campus that is more accessible for all.

The Council wonders if disabled students and faculty members throughout the UC system have been consulted on the policy? Campus offices that already work on making courses accessible, such as the Disabled Students Program, and the Office of Teaching and Learning, are already overburdened. The Council feels that department wide training would be beneficial post implementation because of this.

The Council would appreciate clarity on if websites hosted off-campus are subject to this policy. For example, many faculty and graduate students have their own websites that are hosted on platforms like Wordpress. Would these websites require remediation as well?

The Council would also like to know if the prioritization list that appears under the Accessible Course Content Program section on page 9 is a ranked list or not. The Council feels that any prioritization of course remediation should be determined by each local campus in consultation with the faculty.

CC: Shasta Delp, Executive Director, Academic Senate

November 19, 2025

To: Rita Raley, Divisional Chair
        Academic Senate

From: Ruth Hellier, Chair   *Ruth Hellier*
        Committee on Diversity & Equity

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

At its meeting of November 17, 2025, CDE reviewed the proposed Presidential Policy IMT-1300 on Information Technology Accessibility and has the following comments.

The Council feels the policy in its current form lacks the detail needed to understand the impact of the policy on UCSB. A detailed implementation plan is necessary in order to ensure the policy can not only be enacted, but actually carried out on campus.

The Council wants to make sure the requirements of the policy are well enacted and is concerned about how the policy will affect the already overburdened Office of Teaching and Learning, and Disabled Students Program. Does the implementation plan include ways to mitigate additional workload on these offices? Can the policy be implemented on campus despite the lack of staff and extra resources?

CC: Shasta Delp, Executive Director, Academic Senate

DATE: December 5, 2025

TO: Rita Raley, Chair
               Academic Senate

FROM: Andy Merolla, Chair
               Committee on Courses and General Education

RE: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

The Committee on Courses and General Education (CCGE) reviewed the Proposed Presidential Policy IMT-1300 Information Technology Accessibility during their meeting of December 2nd. CCGE endorses the proposal and strongly supports steps to ensure all students have necessary access to technology. CCGE also wishes to underscore the importance of providing campus staff members with sufficient funding and resources to successfully implement the proposals. This is critical given staff members' already heavy workload.

CC: Shasta Delp, Executive Director, Academic Senate

December 2, 2025

To: Rita Raley, Divisional Chair
      Academic Senate

From: David Valentine, Chair *David Valentine*
       Committee on Research Policy and Procedures

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

At its meeting of November 14, 2025, the Committee on Research Policy and Procedures (CRPP) discussed the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. The committee acknowledged the importance of maintaining the Americans with Disabilities Act Standards and found the proposed revisions to be reasonable.

Members of CRPP also raised several questions regarding implementation, including: what an exception process to meeting compliance standards would look like; where resources and support would come from when departments are already understaffed; and how much this would cost UCSB, especially during the current period of budget cuts at higher education institutions.

CRPP supports the proposed revisions, but is concerned about the implementation, as compliance must be met by April of 2026.

CC: Shasta Delp, Executive Director, Academic Senate

October 17, 2025

To: Rita Raley, Divisional Chair
        Academic Senate

From: Tess Shewry, Chair
        Committee on Library, Information, and Instructional Resources

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

At its meeting of October 10, 2025, the Committee on Library, Information, and Instructional Resources (CLIIR) reviewed and discussed the Proposed Presidential Policy IMT-1300 Information Technology Accessibility.

CLIIR was generally supportive of the policy, but raised questions about the details of its local implementation, especially the likely significant impacts on instructional and library resources. CLIIR asked how faculty and staff time would be affected, as well as whether the policy would increase the workload of the Disabled Students Program (DSP) and the Library. CLIIR also expressed concern about what support would be provided to faculty, staff, and campus units during the implementation of the policy.

CC: Shasta Delp, Executive Director, Academic Senate

December 9, 2025

To: Rita Raley, Chair

From: Christopher Kruegel, Chair
        Committee on Information Technology

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

The Committee on Information Technology (CIT) reviewed Proposed Presidential Policy IMT-1300 on Information Technology Accessibility at its meeting of October 31. CIT acknowledges the University's responsibility to provide accessible course content to students and to enact a policy that complies with Federal law. A significant concern is that faculty fear they cannot meet the requirements alone; substantial remediation support and instructional design services are essential.

Members suggest that, in terms of implementation, resources be deployed on the campuses to support suitable tooling and staff to assist with compliance and risk mitigation. In this vein, system-wide shared resources (including LMS integrations of accessibility tools, standardized training, remediation capacity and guidance) would help avoid duplication across the UC system. Artificial intelligence might be appropriately used in translating course materials for this purpose.

The committee also suggests that consideration might be given to ways to manage the exception process in a maximally efficient manner.

October 27, 2025

To: Rita Raley
Chair, Divisional Academic Senate

From: Claudio Campagnari
Chair, L&S Faculty Executive Committee *Claudio Campagnari*

Re: Request for Comment on Proposed Presidential Policy IMT-1300 Information Technology Accessibility

At its meeting on October 23, 2025, the Faculty Executive Committee of the College of Letters and Science (FEC) reviewed the proposed policy on Information Technology Accessibility. This represents a revision to the UC Information Technology Accessibility policy last updated in 2013, responding to updated federal regulations and Web Content Accessibility Guidelines and creating new procedures and oversight for IT accessibility.

After discussion, committee members expressed two main concerns with the revised policy, focused around clarity of impact and financial feasibility.

First, the policy is very general and lacks detail on implementation and how it will specifically affect the workload of faculty and staff. There is particular concern about the very minimal descriptions of training that will be available, especially to aid faculty in updating course materials to meet the new standards. Beyond that, there is a concern that the potentially time-consuming process of evaluating the accessibility compliance of every resource, for example PDF files incorporating print and images, could disincentivize instructors from providing as many resources to students, assuming adequate resources are not available to support instructors in this process.

Second, the proposal appears to be an unfunded mandate, offering no clarity on how the organizational overhead, enforcement structure, and the additional staff and faculty workload created by these requirements will be funded. This presents obvious challenges to its practical implementation, and raises further questions about the impact to campus in the current budget climate.

Thank you for the opportunity to comment.

cc: Michael Miller, AVC and Dean of Undergraduate Education
Charlie Hale, Dean of Social Sciences
Daina Ramey Berry, Dean of Humanities and Fine Arts
Shelly Gable, Dean of Science

December 3, 2025

TO: Rita Raley
             Divisional Chair, Academic Senate

FROM: Dahlia Malkhi, Chair
             College of Engineering, Faculty Executive Committee

Signed by: **Dahlia Malkhi**
2D51752F8998416...

             Arpit Gupta, Vice Chair
             College of Engineering, Faculty Executive Committee

DocuSigned by: **Arpit Gupta**
19DD369A870247E...

RE: Proposed Presidential Policy IMT – 1300 Information Technology Accessibility

The College of Engineering FEC met on November 18th and December 2nd and discussed the proposed policy changes.

The committee understands that the policy document is meant to provide guidance to campuses regarding accessibility. However, the guidelines are very complex and lack practical implementation information. This raises questions and concerns about practicability, who will implement the guidelines at UCSB, how will that impact staff and faculty workloads, and what technologies will be utilized.

Notably, the scope of the policy and guidelines should be clarified. It would be advisable to make sure the policy only targets specific needs as they are present, rather than blanket requirements. The committee recommends sharpening the language related to compliance expectations to prevent unnecessary or overly burdensome obligations. Additionally, the policy should clarify with whom the initiative lies, what individual faculty's responsibilities are, and make sure the university provides all necessary knowledge and resources to comply with the policy.

Additionally, committee members raised concerns about the cost and complexity for procuring technology through vendors, an already overly-bureaucratic process.

UC SANTA BARBARA

December 3, 2025

To: Rita Raley
        Chair, Executive Council

From: Tim Dewar
Chair, Faculty Executive Committee, GGSE

DocuSigned by:

Tim Dewar

7111BBF2649A4EA...

Re: Proposed Presidential Policy IMT-1300 Information Technology Accessibility

To whom it may concern,

The FEC of the GGSE acknowledges that this initiative will establish campus-wide policy and procedures. Members appreciate that the policy will include mechanisms to ensure that all Canvas content is accessible. Several faculty noted their commitment to making their courses accessible but emphasized that they will need institutional support to do so effectively. The committee expressed support for the policy, alongside a request for appropriate resources and guidance for both TAs and faculty as this work moves forward.

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

1156 HIGH STREET
SANTA CRUZ, CALIFORNIA 95064

Office of the Academic Senate
SANTA CRUZ DIVISION
125 CLARK KERR HALL
(831) 459 - 2086

December 1, 2025

AHMET PALAZOGLU
Chair, Academic Council

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

Dear Ahmet,

The Santa Cruz Academic Senate has reviewed the request for feedback on the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. Our Committees on Faculty Welfare (CFW), Educational Policy (CEP), Graduate Council (GC), Information Technology (CIT), Library and Scholarly Communication (COLASC), and Planning and Budget (CPB) have opined. The Santa Cruz Division fully acknowledges the importance of IT accessibility to ensure inclusivity and equity.

 However, our responding committees raised several concerns about the policy and the proposed revisions. These were primarily focused around implementation, resources, support, and workload, many of which are exacerbated by a tight timeline and challenging budget environment.

Implementation, Resources, and Support
All of our responding committees raised concerns about the additional workload that will fall on faculty, staff, graduate student instructors (TAs, GSIs), and campus units to implement the proposed policy, without adequate resources or support, and particularly on such a short timeline. *Critically, this lack of resources and support must be taken into account when developing plans for implementation.* Beyond financial support, our responding committees emphasized that faculty typically lack the technical expertise to ensure their instructional materials fully meet WCAG 2.1 AA standards. This means that the policy requirement that each location establish an Accessible Course Content Program with training, tools, and oversight, Compliance *will require significant institutional support*, including instructional design assistance, automated accessibility tools integrated with learning management systems, and dedicated staff to remediate content. Without such infrastructure and ongoing funding, the burden could fall disproportionately on individual faculty and instructors, who likely will not have the expertise to make the project successful. As such, faculty representation on committees that determine best practices for meeting accessibility

needs on each campus will be necessary to ensure that these changes can be effectively implemented.

CIT also raised specific concerns about the potential staffing and financial impacts of IMT-1300 on our campus's Information Technology Services (ITS) unit, which would be magnified by continuing and severe budget cuts on our campus. The proposed policy calls for several new positions within ITS to ensure that the campus remains compliant. Realistically, if created, these new positions would likely reduce ITS services in other areas due to personnel or budget reassignments. It is unclear whether there may be existing off-the-shelf software available to check and remediate compliance issues without significant FTE or monetary investments. The Santa Cruz Division strongly advocates that the UC Office of the President (UCOP) take the lead in negotiating licensing agreements for such software to minimize impacts on individual campuses.

Implementation Timeline
The accessibility compliance deadline raised additional concerns. Despite the compliance date being set at April 2026, UCOP is not expected to provide system-wide training material on technology accessibility and compliance until 2 years later (2028). This suggests that the responsibility and burden of providing initial training will fall on individual campuses, which raises important issues including that of equity in that campuses on a quarter system are required to be fully complaint for spring quarter 2026, which is completely unrealistic given the policy is not expected to be finalized in Winter quarter 2026, and instructors would realistically require at least a full quarter of notice to prepare materials.

Faculty Control
While accessibility-related adjustments are appropriate, the Santa Cruz Division contends that any changes that alter the intellectual or pedagogical content of course materials must not be made without faculty/instructor approval. CFW emphasized the importance of maintaining faculty control over the academic and intellectual integrity of instructional content while supporting accessible compliance. Further, CEP identified the need for substantial faculty input on guidance documents, given the importance of faculty's close contact with students to be accommodated, and faculty expertise on the potential impact of accommodations and modifications on course materials and subject matter. As GC noted in its response, it is crucial that faculty and graduate representatives participate in every step of the process, overseeing the practical implementation of this policy.

Quality of Instruction
Finally, additional concerns were raised about the potential effect of IMT-1300 on teaching and the overall quality of instruction, by de facto discouraging innovation by adding a new effort burden to new materials. Specifically, one of our responding committees questioned to what extent compliance requirements *without providing adequate training, support, or lead time* may lead to "stagnant" instructional materials if instructors cannot upload new course material without making it through a "gatekeeper" compliance software integrated in into platforms such as Canvas.

In that regard, we also note that the process to request an exception to the mandate seems cumbersome and places much of the burden on departments teaching the courses. The Santa Cruz Division suggests that risk assessment include a more straightforward process for courses with

small enrollments, in which a case-by-case approach, depending on the range of student disability/accessibility needs, may be more efficient. Full engagement and responsiveness to Disability Resource Center and ITS requests would be needed from instructors for this alternative to be successful.

Thank you for the opportunity to provide feedback on these proposed revisions.

Yours Sincerely,

Matthew D. McCarthy, Chair
Academic Senate, Santa Cruz Division

Enc: Senate Committee Responses (Bundled)

cc: Heather Shearer, Chair, Committee on Academic Freedom
       Amanda Rysling, Chair, Committee on Courses and Instruction
       Tanner WouldGo, Chair, Committee on Educational Policy
       Yat Li, Chair, Committee on Faculty Welfare
       Jerome Fiechter, Chair, Committee on Information Technology
       Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
       Michael Hance, Chair, Committee on Library and Scholarly Communications
       Raphael Kudela, Chair, Committee on Planning and Budget
       Chad Saltikov, Chair, Graduate Council
       Matthew Mednick, Executive Director, Academic Senate

November 6, 2025

MATTHEW McCARTHY
Chair, Academic Senate

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

Dear Matt,

The Committee on Educational Policy (CEP) has reviewed the proposed revisions to Presidential Policy IMT-1300. We note the revisions removed most of the timelines for implementation, except those imposed by federal regulations. We further note the policy wording has been changed to indicate that it should serve as guidance, and that the revisions include provision for guidance documents to be finished after the comment period. CEP identifies the need for substantial faculty input on these guidance documents, given the importance of faculty's direct contact with students to be accommodated, and faculty expertise on the potential impact of accommodations and modifications on course materials and subject matter.

CEP identifies a significant concern over faculty workload, which is amplified when faculty are required to make changes to course materials without adequate technological and staffing support. Faculty representation on committees that determine best practices for meeting accessibility needs on our campus is required to ensure that these changes can be most effectively implemented. Appropriate adjustments in workload are necessary to make this representation feasible.

Sincerely,

Tanner WouldGo, Chair
Committee on Educational Policy

cc: Jerome Fiechter, Chair, Committee on Information Technology
        Amanda Rysling, Chair, Committee on Courses of Instruction
        Gabriela Arredondo, Chair, Committee on Diversity, Equity, and Inclusion
        Yat Li, Chair, Committee on Faculty Welfare
        Heather Shearer, Chair, Committee on Academic Freedom
        Michael Hance, Chair, Committee on Library and Scholarly Communication
        Chad Saltikov, Chair, Graduate Council

October 29, 2025

MATTHEW MCCARTHY
Chair, Academic Senate

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

Dear Matt,

During its meeting of October 9, 2025, the Committee on Faculty Welfare (CFW) discussed the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility. CFW supports the University's commitment to digital inclusion and recognizes that ensuring accessibility of electronic and instructional materials is essential to UC's educational and public-service mission. However, members raised concerns about faculty support and resources.

While the policy requires each location to establish an Accessible Course Content Program with training, tools, and oversight, CFW emphasizes that faculty typically lack the technical expertise to ensure their instructional materials fully meet WCAG 2.1 AA standards. Compliance will require significant institutional support, including instructional design assistance, automated accessibility tools integrated with learning management systems, and dedicated staff to remediate content. Without such infrastructure and ongoing funding, the burden could fall disproportionately on individual faculty.

In addition, members noted that while technical assistance and accessibility-related adjustments are appropriate, any changes that alter the intellectual or pedagogical content of course materials must not be made without faculty approval. CFW emphasizes the importance of maintaining faculty control over the academic and intellectual integrity of instructional content while supporting accessibility compliance.

Thank you for the opportunity to provide feedback.

Sincerely,

Yat Li
Chair, Committee on Faculty Welfare

cc: Heather Shearer, Chair, Committee on Academic Freedom
        Amanda Rysling, Chair, Committee on Courses and Instruction
        Tanner Wouldgo, Chair, Committee on Educational Policy
        Jerome Fiechter, Chair, Committee on Information Technology
        Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
        Michael Hance, Chair, Committee on Library and Scholarly Communication

Raphael Kudela, Chair, Committee on Planning and Budget
Chad Saltikov, Chair, Graduate Council

November 19, 2025

MATTHEW MCCARTHY
Chair, Academic Senate

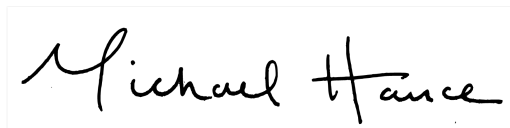**Re: Systemwide Review - Proposed Revisions to Presidential Policy IMT-1300 Information Technology Accessibility**

Dear Matt,

During its meeting of November 5, 2025, the Committee on Information Technology (CIT) discussed the proposed revisions to Presidential Policy IMT-1300 Information Technology Accessibility.

While CIT clearly recognizes the value of making digital media fully accessible and compliant with federal policies, the committee is concerned with the potential staffing and financial impacts of IMT-1300 on Information Technology Services (ITS). These impacts will likely be magnified by the continuing budget cuts implemented by campus administration. The proposed policy revision notably calls for several new positions that will have to be filled within Information Technology Services (ITS) to ensure that UC Santa Cruz is and remains compliant with IMT-1300. Members questioned whether the creation of these new positions may lead to reduced ITS services in other areas due to personnel or budget reassignments.

It is also unclear to what extent existing off-the-shelf software to check and remediate compliance issues will be readily implementable by ITS without significant FTE or monetary investments. In that regard, CIT strongly advocates that the Office of the President (UCOP) takes the lead on negotiating licensing agreements for said software to minimize financial impacts on individual campuses. Furthermore, CIT notes that despite the compliance date being currently set to April 2026, UCOP is not expected to provide system-wide training material on technology accessibility and compliance until 2 years later (2028). This strongly suggests that the responsibility and burden of providing initial training on a very short lead time will fall on individual campuses, which raises important issues including that of equity. For example, will campuses on a quarter system be required to be fully compliant for spring quarter 2026? This seems unrealistic considering that the IMT-1300 policy is not expected to be finalized until early 2026 and instructors should be given at least a full quarter notice to prepare for compliance.

With regard to teaching, CIT is concerned by the potentially unrealistic commitment that instructors will face to ensure their course material is compliant without much training or lead time. CIT members questioned to what extent this may lead to "stagnant" instructional material and possibly the inability for instructors to upload new course material without significant effort to ensure compliance (e.g., making it through a "gatekeeper" compliance software integrated in Canvas). In that regard, CIT notes that the process to request exception to the mandate is rather cumbersome and places much of the burden on departments teaching the courses. CIT suggests that risk assessment include a more straightforward process for courses with small enrollment where a case-by-case approach, depending on the range of student disability/accessibility needs, may be more efficient. Of course, CIT also recognizes that full engagement and responsiveness to Disability Resource Center and ITS requests would be needed from instructors for this alternative to be successful.

Thank you for the opportunity to opine on this matter.

Sincerely,

Jerome Fiechter Chair
Committee on Information Technology

cc: Heather Shearer, Chair, Committee on Academic Freedom
        Tanner WouldGo, Chair, Committee on Educational Policy
        Yat Li, Chair, Committee on Faculty Welfare
        Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
        Michael Hance, Chair, Committee on Library and Scholarly Communication
        Raphael Kudela, Chair, Committee on Planning and Budget
        Chad Saltikov, Chair, Graduate Council

November 20, 2025

MATTHEW MCCARTHY
Chair, Academic Senate

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

Dear Matt,

The Committee on Library and Scholarly Communication has reviewed the Systemwide Proposed Presidential Policy IMT-1300 Information Technology Accessibility at their October 23 meeting.

COLASC noted this is important and required work, but has concerns that implementation will fall to faculty and staff without resources or support. We expect that other faculty senate committees will note the potential impact on faculty workload, so in this communication we wish to point out the unique role that the library plays in ensuring accessibility of a broad range of materials used for instruction and research.

Even under current policies, the library is at the front line of providing accessible materials, in partnership with the California Digital Library, Information Technology Services, the Disability Resource Center, and other campus units. The proposed policy revisions also come at a time when the library, like other units on campus, is facing budget challenges that limit its ability to respond to new compliance burdens. The University Library staff are devoting significant time to ensure compliance, without additional resources. Therefore it is natural that there are costs to the library's ability to address other core library functions.

COLASC considers it essential to take these challenges into account when developing implementation plans for the updated policy.

Sincerely,

Michael Hance, Chair
Committee on Library and Scholarly Communication

Cc: Heather Shearer, Chair, Committee on Academic Freedom
        Tanner WouldGo, Chair, Committee on Educational Policy

Yat Li, Chair, Committee on Faculty Welfare
Jerome Fiechter Chair Committee on Information Technology
Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
Raphael Kudela, Chair, Committee on Planning and Budget
Chad Saltikov, Chair, Graduate Council

November 24, 2025

MATTHEW McCARTHY
Chair, Academic Senate

Re: Systemwide Review of Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

Dear Matt,

At its meeting of November 6, 2025, the Committee on Planning and Budget (CPB) discussed proposed revisions to Presidential Policy IMT-1300: Information Technology (IT) Accessibility. The following comments include recommendations about the policy itself as well as its implementation in locations like UC Santa Cruz.

CPB fully acknowledges the importance of IT accessibility in promoting inclusivity and equity in our mission as a public higher education institution. Our support of these goals notwithstanding, CPB members expressed numerous concerns on a number of issues regarding the policy itself and the procedures mandated to promote the UC accessibility effort. Many of these issues are interrelated and exacerbated by a very tight timeline, since policy implementation is mandated by April 24, 2026.

Resources
The task ahead of us is Herculean in its scope, and demands substantial resources in terms of funding, administrative support, and staff and faculty labor. The challenge is especially acute in campuses like ours that face a severe budget crisis. The policy specifies that personnel charged to implement the accessibility policy must have the expertise and bandwidth to do so. However, our human resources are not inexhaustible and are already taxed, while budget cuts will make the hiring of new workforce members difficult. What resources will be made available to support our efforts (and can UCOP commit resources to assist us)? It should be noted that there are already concerns about the Teaching and Learning Center (TLC), the Disability Resource Center (DRC), and Information Technology Services (ITS) at UC Santa Cruz being under strain, and that these units would face increased pressures as the policy gets implemented. How are we going to protect faculty and staff from further overload and burnout? The policy sets demanding requirements and complex processes to meet our accessibility obligations but does not offer a clear avenue of feasible implementation when resources are lacking. In this regard, time is another particularly valuable and scarce resource, as we are fast approaching the implementation deadline of April 24, but the policy is not yet finalized, and by extension procedures, guidance, training, and resources are not yet in place.

We also note that classes will be prioritized based on poorly-defined need. Will instructors who teach such courses be given adequate and timely guidance, training, and resources? Additionally, depending on what courses they teach, some faculty members might face a disproportionately high workload to support accessibility compliance efforts. We recommend that such labor be discussed and recognized in personnel reviews.

Legal protection and data protection
The accessibility mandate that goes into effect on April 24, 2026 threatens to create large liability risks and makes the university and its employees vulnerable to legal actions. The current

political climate intensifies such risks, since accessibility complaints may be weaponized to target individuals. What guardrails will be in place to protect us? Are university employees (including faculty, lectures, GSIs, TAs, and staff) legally protected, and will individual locations offer legal advice and representation if their employees are sued as individuals? If a class is not prioritized, will the campus assume legal responsibility for any complaints during the period where resources are not available to update the material?

A parallel concern, which is also more acute in the current political climate, relates to data protection. Accessibility tools used in Learning Management Systems (e.g. Canvas) must be thoroughly vetted so that they do not pose any security or privacy threats.

Prioritizations

The policy lays out some prioritization guidelines that need to be further refined to be adequately effective and helpful. It should be noted that neither the exception process nor the prioritization plan seem to waive any IT accessibility compliance requirements until a later time. Instead, individuals with disabilities must be provided an alternative means to access and/or use the IT while a remediation process is set in motion to ensure future full compliance. As such, the exception process and its requirements can incur substantial costs in terms of human and other resources. In this context, it is unclear how helpful the prioritization plan can actually be, for example in the case of course content. We encourage the systemwide Electronic Accessibility Committee (EAC) in charge of policy revisions to develop clear and more detailed guidelines regarding course content accessibility requirements and prioritization recommendations, particularly given the extensive labor needed to address these issues.

CPB notes that additional clarifications are needed especially in the case of prioritized "courses with a high number of individuals with Disabilities who receive Reasonable Accommodations." How should we define "high number"? Would it be an absolute number or a percentage of students in each course, or a combination of both? We note that the number of students who receive disability accommodations through the DRC in any given class may change during the quarter (as new students seek affiliation with the DRC). At the same time, not all students with disabilities are affiliated with the DRC. Are such students equally eligible for IT accessibility accommodations (in practical or legal terms)? Additional clarifications are also needed in the case of the prioritization of non-course IT "that has large numbers of known users with Disabilities." How do we define "large numbers" in this part of the policy, and how can we collect data about known users? Does the prioritization of course content and of other IT *on the basis of the number of **known** users with disabilities* increase liability risks for the university (especially if any user can sue)? Does this approach to prioritization undermine our commitment to accessibility as an equity and inclusion practice?

The policy also specifies that IT that "has critical features with known Accessibility defects" should be prioritized. How do we define "critical features"? For example, in the case of course content, could required readings be critical and optional material be non-critical? Can instructors make optional material accessible at a later time, or is all course content considered critical?

Complaint process

The policy specifies that all locations should have a process by which individuals with disabilities can report IT accessibility issues, ask for remediation, and file complaints. The policy adds: "Locations should post a link to the complaint process website *on all Location websites and web applications*" (emphasis added). CPB believes that it is important to cultivate a

collaborative culture in support of accessibility efforts while avoiding litigious language. Could this goal be advanced through more nuanced terminology and a tiered structure in the reporting process? For example, the first step could allow individuals to identify accessibility issues and request remediation rather than "file a complaint." A confidential process for tracking and streamlining submitted requests (which could, for example, flag duplications) could help staff and instructors manage such requests more effectively. This could be standardized across all classes by embedding a campus-wide link into Canvas pages so that there is a consistent reporting mechanism and less work for individual instructors.

As we develop the above processes, it would also be helpful to provide clear information to UC employees about legal and other repercussions in cases of IT accessibility non-compliance. Understanding the legal risks we face as an institution and individuals can motivate our community in our compliance efforts and will allow us to provide relevant information to new hires, particularly lecturers, who may not be aware of personal legal risk. It is also important to consider what internal processes will be in place by April 26 to *ensure* remediation and compliance once requests (or complaints) are filed by individuals who use university IT materials.

Guidelines and Training
The policy envisions the *concurrent* development of training and implementation. CPB views training as a prerequisite for efficient implementation. In addition, we strongly believe that system-wide training should be developed by UCOP for all accessibility tasks that are shared across several locations, to avoid unnecessary replication of labor and to provide more streamlined support (while individual locations can develop specialized training for their particular needs). We fail to understand why the policy mandates the authorization of a system-wide training development within two years from the policy implementation and not immediately. Such training should have been already created to support our efforts, and is potentially a waste of resources if the UCOP training supersedes campus-level solutions.

In summary, given the scope and complexity of the accessibility compliance endeavor, the UC community is in need of detailed processes, clear guidelines, extensive resources, effective training, comprehensive information, and timely communication. One critical step that can support our efforts is the creation and socialization of clear and accurate instructions about which IT materials need to be compliant and how, and which do not.

CPB thanks the systemwide Electronic Accessibility Committee for their work and we hope to see their implementation guidelines and templates as soon as possible.

Sincerely,

Raphael Kudela, Chair
Committee on Planning and Budget

cc: Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
        Jerome Fiechter, Chair, Committee Information Technology
        Michael Hance, Chair, Committee on Library And Scholarly Communication

Yat Li, Chair, Committee on Faculty Welfare
Amanda Rysling, Chair, Committee on Courses of Instruction
Chad Saltikov, Chair, Graduate Council
Heather Shearer, Chair, Committee on Academic Freedom
Tanner WouldGo, Chair, Committee on Educational Policy
Matthew Mednick, Executive Director, Academic Senate

November 26, 2025

MATTHEW McCARTHY
Chair, Academic Senate

Re: Systemwide Review of Proposed Revisions to Presidential Policy IMT-1300: Information Technology Accessibility

Dear Matt,

At its meeting of November 20, 2025, Graduate Council (GC) discussed proposed revisions to Presidential Policy IMT-1300: Information Technology Accessibility.

GC remains fully supportive of efforts to meet ADA obligations and acknowledges the work done to incorporate Senate feedback into the revised policy. However, GC remains concerned by the key issue of supporting faculty and other teaching staff—including graduate student instructors (TAs, GSIs)—in reaching accessibility goals. Attention needs to be brought to anticipated challenges, such as the increased workload required by added tasks, the feasibility of implementing accommodations for course materials that are often updated weekly or in real time, and the associated costs of implementation. For these reasons, it is crucial that faculty and graduate representatives participate in every step of the processes overseeing the practical implementation of this policy.

Sincerely,

Chad Saltikov, Chair
Graduate Council

cc: Gabriela Arredondo, Incoming Chair, Committee on Diversity, Equity, and Inclusion
        Jerome Fiechter, Chair, Committee Information Technology
        Michael Hance, Chair, Committee on Library And Scholarly Communication
        Raphe Kudela, Chair, Committee on Planning and Budget
        Yat Li, Chair, Committee on Faculty Welfare
        Amanda Rysling, Chair, Committee on Courses of Instruction
        Heather Shearer, Chair, Committee on Academic Freedom
        Tanner WouldGo, Chair, Committee on Educational Policy
        Matthew Mednick, Executive Director, Academic Senate

UNIVERSITY COMMITTEE ON ACADEMIC COMPUTING AND
COMMUNICATIONS (UCACC)
Ilya Brookwell, Chair
Email: ilya.brookwell@ucr.edu

December 15, 2025

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: Review of Proposed Presidential Policy IMT-1300: Information
Technology Accessibility

Dear Chair Palazoglu,

The University Committee on Academic Computing and Communications
(UCACC) discussed the proposed Presidential Policy on Information
Technology Accessibility at its meeting on December 12, 2025. UCACC first
viewed a draft version of the policy in October 2024, when the committee
met with policy development leads from IT and UC Legal.

Committee members are most concerned about the lack of an
implementation plan, the financial impacts of the policy, and the additional
burden on faculty. Faculty fear they cannot meet the requirements alone,
and some may reduce provision of digital materials due to fear of non-
compliance. Providing help for creators of electronic course content will be
key to successful implementation of the policy.

UCACC members are also concerned that the creation of new positions to
comply with the policy may lead to constraints for ITS services in other
areas, especially at campuses with fewer resources.

Regarding the policy and procedures:
- There is concern about the two-year window for the systemwide CIO to
  designate individuals to provide basic online training on IT accessibility.
  This suggests that the responsibility for providing initial training falls to
  the campuses. The university should make clear that any employee
  who has not been provided the opportunity to take the training after the
  policy's effective date cannot be held responsible for violations of the
  policy.
- Examples of "Archived Content" using real world situations would be
  useful, as it seems that these materials are excluded from the policy
  requirements. It would be helpful to know what is necessary for a web

page or content made before April 24, 2026, to be "clearly identified as being archived."

- There should be more clarity on enforcement, liability, and faculty protections during the transition period and beyond.

UCACC supports these practical suggestions:

- There should be systemwide collaboration of shared resources (including LMS integrations of accessibility tools, standardized training, and guidance) to help avoid duplication across the UC system.
- Each campus should designate a dedicated group to review web pages and course materials and assist faculty with adapting their materials to meet the accessibility standards.
- Instructional technology or support offices should offer extensive and multiple workshops every week throughout winter and spring on how to identify and make basic corrections in course content. These could include training on use of AI tools that will be licensed to help to convert items.
- To maximize remediation and compliance efforts, locations should make a list of "easy wins" - things that faculty can change that are not time-consuming (five minutes or less) and easy to do as they create new content. This could be a systemwide handout.
- Campuses should plan to give credit and allocate funding for faculty and staff working beyond their normal duties towards achieving the accessibility policy. Right now, many feel that compliance is all or nothing. It is conceivable that several courses will require greater than the allotted timeline to fully remediate, and there should be a review group empowered to read appeals for extensions and issuing course releases to instructors who fall into these outlier cases.

Finally, UCACC would like to remind the administration to include active faculty members as early as possible when developing policies that impact faculty work. We suggest that the systemwide CIO regularly follow up with each of the campus administrations to ensure that they are working *with instructors* to facilitate the implementation of the policy.

Sincerely,

Ilya Brookwell
Chair, University Committee on Academic Computing and Communications

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

CAMPUSES

Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS

Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES

Lawrence Berkeley
Lawrence Livermore
Los Alamos

UNIVERSITY COMMITTEE ON FACULTY WELFARE
KAREN BALES, CHAIR

December 10, 2025

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: Systemwide Review of Proposed Presidential Policy IMT-1300
Information Technology Accessiblity

Dear Chair Palazoglu,

The University Committee on Faculty Welfare (UCFW) has completed its
portion of the systemwide review of the Proposed Presidential Policy on
IMT-1300 Information Technology Accessibility, and we have several
comments.
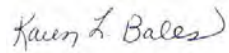
We understand that there was no "red-line" copy available since the policy
is a near total rewrite of the previous policy and that the impetus was a
desire to be in compliance with ADA Section 504. Nevertheless, we find
this to be an unfunded mandate with significant labor associated with it.
There are eight areas identified for improvement, but no resources – human
or other – identified or provided. If contracted vendors cannot comply,
especially in the health sciences, the impacts are unclear. If legacy content
cannot be brought into compliance, they may have to be abandoned or
recreated wholesale. How graphs, charts, tables or other images can be
brought into compliance is unclear. Indeed, laboratory work, medical
procedures, and studio and performance arts will be challenging to bring
into compliance.

The composition of exemption committees is not specified, nor are the
standards by which they could grant exemptions. The role of the Senate in
the review and exemption granting process requires clarification.

Implicated in this policy, as well as in other practices, is the definition of reasonable accommodation, which remains non-standardized.

Thus, we cannot support the current revisions until they address the critical omissions outlined above.

Sincerely,

Karen Bales, UCFW Chair

Cc: Academic Council Vice Chair Susannah Scott
        Senate Executive Director Monica Lin
        UCFW Members

UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB)
Robert Brosnan
rjbrosnan@ucdavis.edu

October 15, 2025

Ahmet Palazoglu
Chair, Academic Council

RE: UCPB Systemwide Review of Proposed Presidential Policy IMT-1300
Information Technology Accessibility

Dear Chair Palazoglu,

The University Committee on Planning and Budget discussed the
Proposed Presidential Policy IMT-133, Information Technology
Accessibility, at the October committee meeting.
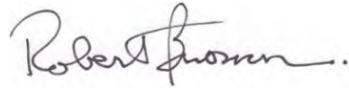
This policy change brings the UC into alignment with federal
accessibility regulations. The new policy provides divisions and other
units with enough actionable information to create and maintain a
compliant accessibility program.

UC should provide inclusive digital experiences for all users, enabling
ease of use and accessibility for those with disabilities. The new
policy's use of federal deadlines only is appropriate for divisions and
units to follow as they make the needed changes.

UCPB notes that changes, training, course revisions, and other
requirements will require resources from an already-strapped
university budget. Faculty and staff will be directed to perform work to
bring the UC into compliance at the behest of outside forces, forces
which do not provide additional resources. The committee hopes that

OP has identified ways to ease the cost burden of these required changes.

Sincerely,

Robert Brosnan
Chair

Alyssa Brewer
Vice Chair

cc: UCPB

UNIVERSITY
OF
CALIFORNIA

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

CAMPUSES
Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS
Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES
Lawrence Berkeley
Lawrence Livermore
Los Alamos

UNIVERSITY COMMITTEE ON EDUCATIONAL POLICY (UCEP)
Catherine Sugar, Chair
csugar@ucla.edu

December 8, 2025

Ahmet Palazoglu
Chair, UC Academic Council

RE: Proposed Presidential Policy IMT-1300 Information Technology
Accessibility

Dear Ahmet,

The University Committee on Educational Policy (UCEP) discussed the
Proposed Presidential Policy IMT-1300 Information Technology
Accessibility during our December 1st videoconference. We understand
that the proposed policy is a response to recent updates to the federal
accessibility regulations implementing Title II of the Americans with
Disabilities Act and Section 504 of the Rehabilitation Act but we have
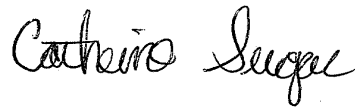identified several concerns.

While the overall policy appears to be straightforward, the proposal fails to
acknowledge the significant amount of work required to create the
necessary infrastructure to make course content accessible, train
instructors and administrators in its use, and implement the changes for
materials across all courses and instructional programs. As a result, the
specified timelines may not be feasible, especially since (per the FAQs)
work on creating implementation guidelines and templates will not take
place until after the policy is updated. It is particularly concerning that
faculty are not being allowed a reasonable amount of time to comply with
the new policy even though the University was aware of the changes being
made to the federal regulations in early 2024. Furthermore, the demands
on faculty time to create accessible content will may vary widely depending
on the size of the class.

It will be critical for faculty and other relevant stakeholders to have a voice

regarding what will be the most useful training, guidance documents, and other resources and for faculty to have the support they need from their campuses to ensure that students receive materials that are genuinely accessible. UCEP would strongly recommend that the Office of the President develop centralized training modules for use by the divisions in the interest of efficiency, rather than having each campus come up with its own plan. Finally, the committee would like to draw attention to the importance of protecting the intellectual property rights and privacy of faculty as we strive to ensure that all students can easily access and interact with course materials in all forms.

UCEP appreciates the opportunity to comment on this matter. Please contact me should you have any questions.

Sincerely,

Catherine Sugar, Chair
UCEP

UNIVERSITY OF CALIFORNIA

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

CAMPUSES
Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS
Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES
Lawrence Berkeley
Lawrence Livermore
Los Alamos

COORDINATING COMMITTEE ON GRADUATE AFFAIRS
Partho Ghosh, Chair
pghosh@ucsd.edu

December 10, 2025

Ahmet Palazoglu
Academic Senate Chair

Dear Chair Palazoglu,

At its October meeting, CCGA discussed the proposed Presidential Policy
IMT-1300 Information Technology Accessibility.

Members felt that the proposed policy does not adequately address ADA
compliance, faculty training, and administrative support related to this
proposed policy. Members would like to see the proposed policy
strengthened in these areas.

Please let me know if I can answer any questions for you.

Sincerely,

Partho Ghosh
CCGA Chair

cc: Academic Senate Vice Chair Scott
       Academic Senate Executive Director Lin
       Academic Senate Assistant Director LaBriola
       CCGA Members

1