THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NO. 3-307   09 March 2026

DIGITAL ACCESSIBILITY POLICY

1. PURPOSE

The purpose of this policy is to ensure that all members of The Citadel community, including students, employees, visitors, and the public, have equitable access to the institution's digital content, online services, and learning technologies. This policy affirms the institution's commitment to the principles of inclusion and equal opportunity in accordance with Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), and the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA published by the World Wide Web Consortium (W3C).

2. REFERENCE

Rehabilitation Act of 1973, Section 504

Americans with Disabilities Act (ADA)

Web Content Accessibility Guidelines (WCAG) 2.1 Level AA (as published by W3C)

3. DEFINITIONS

Digital Accessibility: The design and creation of content, tools, and technologies such that individuals with disabilities can use them effectively.

Digital Content: Any electronic information or communication created, maintained, or distributed by the institution in support of academic instruction, research, student services, administrative functions, or public engagement. This includes, but is not limited to, institutional websites, learning management systems, course materials, documents, presentations, multimedia, email communications, mobile applications, and software tools used by students, faculty, staff, or the public.

Equally Effective Alternative Access: An alternative means of providing access to information or functionality that enables individuals with disabilities to obtain the same information, engage in the same interactions, and achieve the same outcomes as others, with substantially equivalent ease of use, accuracy, and timeliness.

LMS: Learning Management System— a software application for managing, delivering, and tracking education and training online. It acts as a central hub where instructors can create and distribute content, and learners can access materials, track their progress, and complete assignments. An LMS may be used in support of credit or noncredit courses regardless of modality.

Third-Party Vendor: Any external individual, company, publisher, or service provider that supplies digital platforms, software, content, instructional materials, or services used in academic instruction, research, student services, or institutional operations. This includes vendors providing learning technologies, publisher content, cloud-based services, and externally hosted websites or applications accessed by students, faculty, staff, or the public on behalf of the institution.

Senior Administration: Institutional leadership with executive authority and responsibility for academic, administrative, and operational oversight, including policy approval, resource allocation, and compliance with federal and state accessibility requirements.

VPAT: Voluntary Product Accessibility Template—documentation provided by vendors describing compliance with accessibility standards.

WCAG 2.1 Level AA: A set of internationally recognized guidelines ensuring that web content is perceivable, operable, understandable, and robust for users with disabilities.

4. POLICY

A. The purpose of this policy is to ensure that all members of The Citadel community, including students, employees, visitors, and the public, have equitable access to the institution's digital content, online services, and learning technologies. This policy affirms the institution's commitment to the principles of inclusion and equal opportunity in accordance with Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), and the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA published by the World Wide Web Consortium (W3C).

   The Citadel adopts WCAG 2.1 Level AA as the minimum conformance standard for all web and digital content created or updated after the effective date of this policy.

B. This policy applies to:

   1. All official Citadel websites, web applications, and digital publications;
   2. All electronic course materials and instructional technologies used for credit and non-credit courses;
   3. Digital documents (PDFs, Word, PowerPoint, etc.) and multimedia content created, purchased, or distributed by the institution;

4. Third-party web applications and vendor-hosted content under contractual or functional control of the institution; and
5. Internal systems, intranets, and portals used by students, faculty, and staff.

This policy does not apply to The Citadel Foundation, The Citadel Brigadier Foundation, The Citadel Real Estate Foundation or similar independent organizations affiliated with The Citadel.

C. Roles and Responsibilities

1. Content Owners and Editors

Each academic or administrative unit is responsible for ensuring that the digital content they publish or manage conforms to WCAG 2.1 Level AA standards. Faculty are responsible for making sure their digital teaching materials posted in the Learning Management System (LMS) are compliant.

2. Procurement and Vendor Management

All contracts for digital content, platforms, or services must include accessibility requirements. Vendors are expected to provide a Voluntary Product Accessibility Template (VPAT) or equivalent documentation verifying conformance with WCAG 2.1 Level AA and Section 508 to the Department of Financial Services. VPAT documentation will be collected during the purchasing process by The Citadel's Procurement Officer or another representative from the Department of Financial Services.

D. Implementation, Remediation and Exemptions

1. New or substantially revised digital content must comply with WCAG 2.1 Level AA at the time of publication. The Citadel will act promptly to remediate existing content upon notice to the school, preferably within twenty-dour (24) months of the policy's effective date or upon its next major update, whichever occurs first.

2. When compliance would cause an undue burden or fundamentally alter the nature of the service, Equally Effective Alternative Access must be provided in a timely manner.

3. The following digital content is exempt from these requirements:

   a. Archived Web content created prior to 2018 and kept unaltered in an area marked as archived content
   b. Unpublished content in the LMS, until published
   c. Preexisting conventional electronic documents
   d. Word processing documents, spreadsheets, presentations and PDFs created and posted prior to 2018

e. Third-party content

f. Content posted as part of a contract or license with The Citadel

4. All third-party vendors must provide an up-to-date VPAT (Voluntary Product Accessibility Template) to demonstrate WCAG 2.1 Level AA compliance

E. Training and Support

The institution will provide periodic training and resources to all web editors, content creators, instructional designers, and faculty who develop or post digital materials. Accessibility training will be required for all new website editors and instructional technology staff. All new faculty will be trained in how to ensure digital teaching materials are compliant.

F. Monitoring and Evaluation

The Citadel will:

1. Conduct annual accessibility audits using automated and manual testing tools;
2. Document and track remediation efforts;
3. Provide an annual summary report to senior administration; and
4. Maintain an updated accessibility statement and feedback mechanism on institutional websites.

G. Feedback and Reporting

Accessibility issues should be reported to digitalaccessibility@citadel.edu Reported issues will be addressed promptly within an appropriate timeline.

5. NOTES

A. Date of official enactment and amendments:

Approved by the Provost of The Citadel on 9 March 2026 and applies to all web and digital content created, published, or substantially revised thereafter.

B. Responsible Department

Office of the Provost

C. Responsible Official

Chief Information Officer

D. Cross References

None.

E. Review

This policy will be reviewed, and revised, if necessary, every two years to maintain alignment with evolving accessibility standards unless an earlier revision is necessitated by a change in legal requirements.

6. RECISSION

None.

FOR THE PRESIDENT:

OFFICIAL   *xx*/BG SALLY SELDEN, Ph.D., SPHR
                                     Provost and Dean of the College

Appendices:
Appendix A: Accessibility Statement
Appendix B: Procurement Language for Digital Accessibility

Appendix A

Accessibility Statement

The Citadel is committed to ensuring accessibility of its digital content to all people regardless of ability. To this end, we aim to comply with best practices and standards as defined by the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.1, Level AA. We continually improve the user experience for everyone and apply relevant accessibility standards.

If you discover a web page that is not accessible, please contact digitalaccessibility@citadel.edu. Please describe the nature of the difficulty you are experiencing with the page and be sure to provide the relevant URL as well as an email address or phone number where we can reach you. If we cannot fix the problem immediately, we will put you in touch with the appropriate office to provide you with the information you need.

If you are a content author on The Citadel's website and would like more information about making your pages accessible, please contact the Office of Communications and Marketing at webocm@citadel.edu. If you are a faculty member and need support in making your digital teaching material accessible, please contact the Center for Excellence in Teaching and Learning at ceitl@citadel.edu.

To learn more about the resources available to students with disabilities, please see Disability Services at https://www.citadel.edu/ssc/disability-services/

Appendix B

Procurement Language for Digital Accessibility

All procurement of web-based software, systems, or digital content must include language requiring compliance with WCAG 2.1 Level AA and Section 508 standards. Vendors shall provide a current Voluntary Product Accessibility Template (VPAT) or equivalent conformance documentation, and must provide The Citadel access to test such compliance. Contracts should specify timelines for remediation of any identified accessibility issues.