



Pima County Community College District Administrative Procedure

INTERIM — EFFECTIVE APRIL 24, 2026

AP Title:

**ADA & Equal Opportunity,
Electronic Information
Technology Accessibility
Guidelines**

AP Number:

AP 2.01.02

Adoption Date:

10/19/16

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Sponsoring Unit/Department:

Office of the Chancellor; Marketing,

Communications & Strategic Outreach

Diversity and Inclusion, BP 2.01

Policy Title(s) & No(s):

Title II and III of the Americans with

Disabilities Act, 42 U.S.C. §12131 et

seq., and its implementing regulation at

28 C.F.R. Part 35; §504 of the

Rehabilitation Act, 29 U.S.C. §794, and

its implementing regulation at 34

C.F.R. Part 104

Cross Reference:

Equal Employment Opportunity, ADA,

Non-Discrimination and Anti-

Harassment (including Sexual

Harassment), BP 5.10

PURPOSE

The College is committed to providing equal and effective access to its electronic information technology (EIT), as required by law. This Administrative Procedure (AP) sets specific standards and duties to meet this commitment.

SECTION 1: Standards for Access

1.1 General Access Requirement

College-sponsored electronic information technology (EIT), including the public website, internal sites, web applications, and digital learning platforms, shall be readily accessible to individuals with disabilities.

1.2 Technical Standard

Effective April 24, 2026, the minimum accessibility standard for College-sponsored EIT is the World Wide Web Consortium's Web Content Accessibility Guidelines 2.1, Level AA (WCAG Standard).

1.3 Scope of Online Content

The WCAG Standard applies to the following electronic information technology (EIT):

- All active web pages, websites, and applications the College operates, maintains, or provides for use by the public, students, or employees. Examples include content on pima.edu, pimasomeday.com, pimaaztecs.com, pimaarts.com, MyPima (internal), or any third-party website accessible through a link included on any College-operated websites.
- All documents, files, media, and links posted on a College website or within a digital learning platform. This includes:
 - **Digital content:** any information or experience available on a website, web page, mobile application (app), or online learning management system (LMS), regardless of whether the content was created, posted, or maintained by an employee or a third-party vendor
 - **Text:** any information in a digital document, including PDFs, Word documents, Google Docs (posted, linked, or shared through a Google drive), spreadsheets, presentations, and interactive elements like forms
 - **Images:** graphics, photos, and infographics
 - **Audio and video:** podcasts, sound recordings, and lectures
 - **Course materials:** all content within a digital learning platform owned or used by the College (e.g., D2L Brightspace or Percipio), including digital textbooks, online assignments, online assessments and online student communication systems, whether or not for credit.

1.4 Limited Exceptions

This accessibility standard does not apply to:

- Secured documents about a specific person, their property, or their account (e.g., a password-protected individual student record)
- Social media posts created before the April 24, 2026 effective date
- Content posted by a member of the public that the College cannot control or change (such as comments on an external message board).

SECTION 2: Responsibility for Implementation and Coordination of this AP

2.1 Employee Responsibility

Effective April 24, 2026, employees shall ensure that any EIT they upload, post, purchase, or maintain meets the required WCAG Standard and, to the extent practicable, the current standard recommended by the WCAG. Prior to April 24, 2026, employees should use their best efforts to meet the WCAG Standard for EIT that they publish or maintain. Guidance is available at www.Pima.edu on the “Faculty and Staff” page.

2.2 Unit Responsibility

The Lead Administrator of each College Unit is responsible for:

- Creating and sharing clear guidelines to ensure EIT published by their unit meets the WCAG Standards.
- Ensuring that employees in their unit are trained on the guidelines and this AP.
- Ensuring that their unit’s EIT is regularly checked to verify that it remains compliant.

SECTION 3: Exemption

3.1. Exemption Criteria

Exemptions are rare and only approved when it is technically impossible to make the content accessible or doing so causes unreasonable hardship and alternate access can be provided.

3.2 Exemption Process

If EIT online content cannot be made fully accessible, the Lead Administrator of the responsible Unit must receive an exception from the College’s Access & Disability Resources Office (ADR).

3.3 **Alternate Access**

For any content that is exempted, the law requires that the College provide an equally effective way for individuals with a disability to access that same information or service in a substantially equivalent amount of time and with the same level of privacy and independence. This alternate access must be approved by ADR and must be free and equally easy to use.

SECTION 4: Complaints

4.1 **Requests for Access**

Requests for access to EIT from students and members of the public can be submitted to ADR by email at ADRhelp@pima.edu or by phone at 520-206-6688. Employees should contact the Employee Service Center at 520-206-4945 to request an accommodation.

4.2 **Complaints**

Complaints about access to EIT can be submitted to the College's Office of Dispute Resources (ODR) using any of the following methods:

- Call ODR at 520-206-4686
- Email ODR at dispute-resources@pima.edu
- Call the Compliance and Ethics Hotline at 1-855-503-8072
- File an electronic report with the Compliance and Ethics Hotline - Complaint Form available at www.pima.edu/administration/complaint-resources/odr.

SECTION 5: Definitions

“Access” or “Readily Accessible” means individuals with disabilities have equivalent ease of use and functional access to EIT, ensuring that the online content can be used by people with a wide-range of disabilities as effectively as it can be used by individuals without disabilities.

“ADR” means the College’s Access & Disability Resources Office.

“AP” means Administrative Procedure.

“College” means Pima Community College or the Pima County Community College District.

“Digital Learning Platform” means any College-operated or College-sponsored electronic system designed to deliver instructional content, manage student or employee learning, or facilitate educational activities.

“Electronic Information Technology” and **“EIT”** is the scope of online content identified in section 1.3 of this AP.

“WCAG Standards” means the minimum accessible standard for College-sponsored EIT identified in section 1.2.