



## Executive Summary of Feedback Received from the Policy Portal to the Digital Content Accessibility Policy

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Comments received during the Digital Content Accessibility Policy 30-day review and comment period, (December 5, 2025 to January 4, 2026) are addressed below.

### 1. Legal guidance specific to specialized instructional materials

At least two respondents commented that the policy does not address instructional materials that *cannot be made accessible*, such as topographic, physiographic, and geologic maps; specialized mapping software; molecular or chemical structures; and other highly visual or technical resources routinely used in certain disciplines. Specific concerns include whether faculty may continue using these essential disciplinary tools, whether such materials qualify for *limited exceptions* under the policy, and whether a formal process exists for requesting those exceptions. Additionally, some expressed concerns about potential personal liability if they use essential course materials that are not accessible and have not been formally approved.

#### Administrative Response:

The College has been actively collaborating with its legal counsel and the SUNY system to clarify the interpretation and application of Title II regulations in instructional context. As a result of this engagement, the College is now in the *developmental phase* of establishing a Title II Fundamental Alteration Review Board. This board will be composed of faculty and staff with relevant subject-matter expertise. Its primary role will be to review specialized instructional materials, such as topographic maps, geologic diagrams, mapping software, and molecular structure models, and determine whether proposed accessibility modifications would fundamentally alter the nature of the material, program, or activity, or whether such changes would constitute an undue financial or administrative burden under Title II exceptions.

This above exception is intentionally narrow; therefore, the College must still demonstrate that certain alterations could potentially significantly disrupt the essential purpose or learning outcomes of a course. For instance, just as a podiatrist wouldn't handle cardiac issues, course materials can't be modified in ways that compromise core learning objectives. The Review Board ensures that instructional materials are diligently examined, remediated when needed, and preserved to maintain academic integrity.

To further support faculty and the broader campus community, the College is also developing a comprehensive procedure to accompany the drafted policy. This procedure will include clear, step-by-step guidance for addressing common accessibility needs. In addition, the College is creating a dedicated accessibility website designed to provide centralized resources,

troubleshooting guidance, and practical tools for resolving accessibility challenges. Finally, the College is reviewing a range of accessibility tools to ensure that any existing issues can be identified and effectively addressed.

In terms of personal liability, the College is ultimately responsible for compliance with Title II; individual faculty and staff are not personally liable. However, while the College holds the legal liability, failure to comply with College accessibility policies and procedures, or failure to use approved College accessibility tools, may result in internal review and potential disciplinary action by the department and/or the College.

## **2. Student-generated materials and alternative text requirements**

A respondent commented that the policy does not address accessibility requirements for student-generated materials shared in class as part of instruction and evaluation, particularly in online courses. Specific concerns include whether students' work such as presentations and slides must meet ADA Title II compliance standards, and whether a formal process exists for determining these obligations.

Additionally, the respondent noted that the policy provides conflicting guidance on alternative text and audio description requirements. Specific concerns include whether "meaningful alt text" alone is sufficient for images, charts, and graphics, or whether descriptive audio must be provided for every visual element.

### **Administrative Response:**

After careful consideration of the comments submitted, the College has made revisions to the policy to address the points raised regarding accessibility standards.

The feedback concerning the need for clarification on ADA Title II compliance for student-generated materials is well-taken. To eliminate ambiguity, the "Course Materials & Academic Content" section has been updated with the following:

*"Student-generated content shared with peers on digital platforms (e.g., group projects, peer-review submissions, discussion boards, or shared files within the LMS) must meet required accessibility standards".*

This addition explicitly states that student work intended to be shared with other students, such as for group work or peer review, must be created in a compliant format.

Furthermore, to resolve concerns noted in the "Captions & Transcripts" section, the language has been revised for greater accuracy. The policy now clarifies that *"Videos must include descriptive audio (or equivalent text alternatives) for visual elements that are essential to understanding the instructional content."* This change makes a clear distinction, establishing that descriptive audio is required for essential visual information in video formats, while meaningful alt text is the appropriate standard for static images, charts, and graphics. These updates ensure the policy is both clear and consistent.