

SOUTHWESTERN

LAW SCHOOL
Los Angeles, CA

Course Content Accessibility Policy

Faculty and Administrative policy approved April 17, 2026. Effective immediately.

Revision history: None; new policy.

Related policies: Website and Digital Accessibility Policy; Disability Accommodations Policy (Including Standards for the Study of Law); Academic Freedom Policy; Approved Software List; Authorized Software Policy; Authorized Applications List; Policy to Prevent Discrimination, Harassment, and Retaliation; Student Complaint and Grievance Policy and Procedures (Including Complaints Implicating ABA Standards)

Related resources: Digital Accessibility Webpage on the Portal

Scheduled Review Date: May 2027 (Digital Accessibility Committee)

Table of Contents

- A. Purpose
- B. Scope
- C. Accessibility Standards
- D. Definitions
- E. Third-Party Content and External Resources
- F. Roles and Responsibilities for Accessible Course Content
- G. Use of Approved Software and Applications
- H. Monitoring and Quality Assurance
- I. Reporting Inaccessible Course Content
- J. Escalation for Continued Non-Compliance
- K. Policy Revisions

A. Purpose

To support equitable access to instruction, Southwestern Law School requires that all Course Content (defined below), regardless of format (e.g., print, digital, audio, or video), be accessible to all enrolled students, including those with disabilities. Southwestern is committed to complying with applicable disability laws, including Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, as amended.

This policy is part of Southwestern's integrated accessibility framework. Along with the Website and Digital Accessibility Policy, which establishes institutional standards and oversight responsibilities for digital accessibility, and the Disability Accommodations Policy (Including Standards for the Study of Law), which includes student processes for requesting accommodations. The framework establishes expectations designed to support equitable access to Course Content for all enrolled students.

B. Scope

This policy applies to and defines the responsibilities of faculty, including adjunct faculty, and others (e.g., Teaching Assistants, Academic Administration, and instructional designers) who create, post, share, or distribute Course Content with students (Content Creators) in ensuring that Course Content meets applicable accessibility standards.

This policy applies to all formats of Course Content (e.g., documents, videos, LMS materials, etc.).

C. Accessibility Standards

Digitally distributed Course Content, including content posted to the learning management system (LMS, currently Canvas) or shared through other means, must comply with the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA standards.

Non-digital Course Content (e.g., printed handouts) must also be accessible to students with disabilities. Content Creators must select and prepare such materials with accessibility in mind, and Alternative Formats will be provided as needed in a timely manner in coordination with Academic Administration or Accessibility Services.

In circumstances where Course Content cannot be made fully compliant with applicable accessibility standards, Content Creators must consult with the Digital

Accessibility Coordinator or Accessibility Services to determine appropriate next steps, including the provision of Equally Effective Alternative Access.

In rare cases where making Course Content accessible would constitute a Fundamental Alteration (defined below) or impose an Undue Burden (defined below), the Content Creator must follow the institutional review described in this policy. If an exception is granted, Southwestern will provide Equally Effective Alternative Access (as defined below), as appropriate and consistent with the standards and limitations set forth in this policy.

D. Definitions

1. Alternative Format

A version of Course Content provided in a format different from the original to ensure accessibility for individuals with disabilities. An Alternative Format must preserve the essential information and enable comparable use. Examples include, but are not limited to, electronic text versions of printed materials, audio recordings, Braille, large print, tactile graphics, captioned or transcribed videos, accessible PDFs, or screen reader-compatible documents. Alternative Formats are typically developed in response to a specific accessibility need and will be provided in a timely manner.

2. Course

As used in this policy, Course means a credit-bearing academic offering listed in the course catalog.

3. Course Content

Any material or resource created, distributed, or made available to students in connection with Courses at Southwestern, regardless of format or method of distribution. Course Content includes, but is not limited to:

- Printed materials (e.g., syllabi, handouts, in-class worksheets);
- Digital documents (e.g., Word, PDF, PowerPoint);
- Audio and video recordings;
- Images and graphics, including animations;
- Webpages and online learning modules;
- Digital assessments;
- Content shared through Southwestern's LMS, including pages, files, embedded tools, etc., videoconferencing platforms (e.g., Zoom, Teams), email, or other digital distribution methods.

4. Digital Accessibility Coordinator

The individual designated by Southwestern to oversee the implementation of this policy and coordinate institutional efforts related to digital accessibility. This role is currently held by the Program Manager, Digital Accessibility and Content. The Digital Accessibility Coordinator can be reached at digitala11yhelp@swlaw.edu.

5. Equally Effective Alternative Access

Access to information or functionality that is comparable in timeliness, accuracy, content, and usability to that provided to others, even if the format, medium, or delivery method differs. The objective is to ensure that individuals with disabilities can obtain the same information and engage in the same interactions as others, with substantially equivalent ease. Equally Effective Alternative Access is determined on a case-by-case basis, taking into account the nature of the Course Content, the instructional objectives, and the specific accessibility barrier presented. It may be achieved through various methods (e.g., providing an Alternative Format, substitute assignment aligned with the same learning objectives, alternative delivery platform, or structured support).

6. Fundamental Alteration

A Fundamental Alteration is a change that would substantially modify the essential nature of a course, academic program, instructional activity, or institutional service. A Fundamental Alteration may exist when making Course Content accessible would compromise essential learning objectives or academic standards.

The determination as to whether a Fundamental Alteration exists will be made on a case-by-case basis. This assessment will ordinarily be conducted by Accessibility Services or Student Services Office staff, in consultation with the faculty member(s) responsible for the affected course or program and, as appropriate, representatives from the General Counsel's Office and relevant subject matter experts in disability rights. The Dean or Vice Deans may participate in the determination process when warranted by the circumstances.

A determination that a requested modification constitutes a Fundamental Alteration does not eliminate Southwestern's obligation to provide access. In such cases, Southwestern will identify and implement alternative measures that provide Equally Effective Alternative Access to the extent

feasible and consistent with the essential requirements of the course or program.

All determinations must be documented in writing and maintained by the Student Services Office.

7. Undue Burden

An Undue Burden exists when making Course Content accessible would impose significant difficulty or expense, given the institution's overall resources and the nature and cost of the proposed action.

The determination that an Undue Burden exists must be made on a case-by-case basis and may not be based on speculative or convenience-based considerations. This assessment will ordinarily be conducted by Accessibility Services or Student Services Office staff, in consultation with the faculty member(s) responsible for the affected course or program and, as appropriate, the Digital Accessibility Coordinator and representatives from the General Counsel Office, Finance Office, and Information Technology, as well as relevant subject matter experts in disability rights. The Dean or Vice Deans may participate in the determination process when warranted by the circumstances.

When an Undue Burden is found, Southwestern will provide Equally Effective Alternative Access.

All determinations must be documented in writing and maintained by the Student Services Office.

E. Third-Party Content and External Resources

Content Creators may include links to third-party websites and digital resources within their courses. These external websites and online resources are not under the institution's control, and Southwestern does not guarantee that such third-party content will meet digital accessibility standards. Content Creators must consider the accessibility of third-party resources and provide alternative accessible materials or equivalent information if a required resource is not accessible to a student with a disability.

Students who encounter accessibility barriers with required third-party resources are encouraged to contact Accessibility Services within the Student Services Office at accessibilityservices@swlaw.edu to request accommodations or Equally Effective Alternative Access.

F. Roles and Responsibilities for Accessible Course Content

Ensuring accessible Course Content is a shared responsibility across the Southwestern community. Faculty and other Content Creators are expected to design and distribute materials that comply with WCAG 2.1, Level AA standards, or any successor standard adopted by Southwestern. Institutional support is provided through coordinated efforts: the Digital Accessibility Coordinator leads training and compliance initiatives, while Academic Administration, Accessibility Services, Information Technology, and other departments offer tools and technical assistance. However, these offices do not assume authorship of Course Content, and Content Creators remain ultimately responsible for ensuring that their Course Content meets accessibility requirements.

G. Use of Approved Software and Applications

To protect accessibility, data security, and ensure compatibility with Southwestern's learning platforms and support systems, Content Creators may not use unapproved software, platforms, or applications to create, modify, or distribute Course Content.

If a Content Creator wishes to use a new or alternative tool not currently approved, they must first submit the tool for review and obtain prior written approval from Information Technology. This includes evaluating the tool's accessibility features, technical compatibility, and data privacy implications.

For more information on approved tools and the process for requesting new software or applications, Content Creators should consult the following policies available on Southwestern's Institutional Policies webpage:

- Approved Software List
- Authorized Software Policy
- Authorized Applications List

Questions about these policies and approved software and applications should be directed to Information Technology.

The use of unapproved software or applications without prior Information Technology approval may result in delays in deploying Course Content, increased remediation burdens, or temporary removal of Course Content until appropriate accessibility and security reviews are completed.

H. Monitoring and Quality Assurance

The Digital Accessibility Coordinator will conduct periodic audits of Course Content to assess compliance with applicable accessibility standards, including

WCAG 2.1, Level AA, or any successor standard adopted by Southwestern. Audits may include manual review or analysis of reports generated by accessibility tools such as YuJa Panorama. The purpose of these audits is to monitor institutional progress, identify common barriers, and support continuous improvement.

If accessibility issues are identified through an audit, the Content Creator will be notified and provided with guidance and resources to support timely remediation.

The Digital Accessibility Coordinator will keep records of audit results and provide progress reports to the Vice Deans.

I. Reporting Inaccessible Course Content

Students, faculty, and others who encounter Course Content that is not accessible are encouraged to report the issue promptly so that appropriate action can be taken.

- Students with approved accommodations should report accessibility concerns to Accessibility Services at accessibility@swlaw.edu. Reports should include the course name, a description of the content at issue, and the specific accessibility concern. Accessibility Services will review the report, work with the student and relevant faculty or staff, facilitate remediation of the inaccessible Course Content, and ensure Equally Effective Alternative Access as appropriate.
- Faculty, staff, and others who identify accessibility barriers in Course Content, whether through audits, LMS accessibility reports, or personal review, should report these issues to the Digital Accessibility Coordinator at digitala11yhelp@swlaw.edu for follow-up and remediation support.

This policy does not replace the formal complaint procedures set forth in the *Website and Digital Accessibility Policy*, the *Disability Accommodations Policy (Including Standards for the Study of Law)*, or the *Policy to Prevent Discrimination, Harassment, and Retaliation*. Each policy provides distinct processes depending on whether the issue involves an individual accommodation, a systemic barrier in digital services, or an allegation of discrimination.

J. Escalation for Continued Non-Compliance

Southwestern is committed to working collaboratively with faculty and staff to ensure Course Content is accessible to all students. Southwestern recognizes that accessibility requires ongoing learning and support. If a Content Creator's Course Content repeatedly receives low accessibility scores or fails to meet established standards, an escalation process will apply. The process is designed to prioritize

counseling, additional training, and targeted support before further action is taken.

- Counseling and training: The Content Creator will receive feedback and be required to participate in individualized counseling or training sessions arranged by the Digital Accessibility Coordinator.
- Administrative escalation: If accessibility issues persist after additional support, the matter will be referred to the appropriate administrator:
 - Faculty: Vice Deans' Office;
 - Staff: Human Resources.
- Ongoing monitoring: The responsible administrator, in consultation with the Digital Accessibility Coordinator, will monitor progress and determine whether additional measures are needed.

K. Policy Revisions

Southwestern expressly reserves the right to change or modify any aspect of this policy at any time, with or without prior notice.