

SOUTHWESTERN

LAW SCHOOL
Los Angeles, CA

Website and Digital Accessibility Policy

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Related policies: Disability Accommodations Policy (Including Standards for the Study of Law); Policy to Prevent Discrimination, Harassment, and Retaliation; Course Content Accessibility Policy; Disability Accommodations Policy for Employees and Job Applicants; Student Complaint and Grievance Policy and Procedures (Including Complaints Implicating ABA Standards)

Scheduled Review Date: April 2028 (General Counsel, Chief Information Officer, Digital Accessibility Coordinator, and Communications & Marketing)

Table of Contents

- A. Purpose
- B. Scope
- C. Standards
- D. Website Accessibility Statement
- E. Governance and Oversight
- F. Policy Exemptions
- G. Training
- H. Vendors
- I. Comments, Suggestions, Assistance, and Complaints
- J. Procedures for Website Accessibility Complaints
- K. Monitoring and Evaluation

L. Policy Revisions

A. Purpose

Southwestern Law School is committed to building a community of access, belonging, and inclusion. Consistent with this commitment and understanding that accessible digital content generally enhances usability for all individuals, Southwestern strives to ensure that all students and employees can access Southwestern's website and other digital content. Southwestern also seeks to ensure prospective students, clinic clients, and visitors can access Southwestern's public-facing website and digital materials. Another purpose of this policy is to conform with the Americans with Disabilities Act, 42 U.S.C. § 12101 et seq., and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.

This policy is part of Southwestern's integrated accessibility framework. Along with the Disability Accommodations Policy (Including Standards for the Study of Law) and the Course Content Accessibility Policy, it is intended to support accessibility of digital platforms, websites, and services for all users. This policy focuses on institutional standards, oversight responsibilities, and compliance processes for digital accessibility, including procurement, training, and complaint resolution. Student requests for disability accommodations are addressed in the Disability Accommodations Policy (Including Standards for the Study of Law). Employee requests for disability accommodations are addressed in the Disability Accommodation Policy for Employees and Job Applicants. Requirements and responsibilities for ensuring that course content, regardless of format, is accessible to students with disabilities and complies with applicable accessibility standards are set forth in the Course Content Accessibility Policy.

B. Scope

This policy applies to all Southwestern digital content, platforms, and services, including its website, portal applications, mobile apps, social media content, learning management systems, videos, digital documents, and any other electronic or digital platforms, systems, or devices through which Southwestern provides information or services.

C. Standards

Southwestern is committed to creating an inclusive digital experience for everyone. All websites, applications, digital documents, and multimedia should be designed to meet recognized accessibility standards and, at a minimum, strive to align with the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA.

Southwestern will also plan for compliance with WCAG 2.2, Level AA, or higher as those standards are adopted, and will monitor developments in accessibility guidelines. This policy will be updated periodically to reflect these evolving best practices.

D. Website Accessibility Statement

All official Southwestern webpages must include a footer link labeled Website Accessibility that directs users to Southwestern’s website accessibility statement and information on website accessibility standards.

E. Governance and Oversight

Southwestern will designate a Digital Accessibility Coordinator to oversee implementation of this policy and ensure institutional compliance with federal and state disability access laws. The Digital Accessibility Coordinator will:

- Serve as the primary contact for digital accessibility issues and complaints;
- Oversee accessibility audits, remediation efforts, and training programs;
- Maintain records of accessibility compliance and exemptions; and
- Report annually to senior leadership on progress and areas for improvement.

To support these efforts, Southwestern has a Digital Accessibility Committee comprised of representatives from Information Technology, Communications & Marketing, Academic Administration, Student Services (including Accessibility Services), and other relevant offices. The Digital Accessibility Committee will:

- Meet regularly to review accessibility metrics and audit results;
- Prioritize and coordinate remediation efforts across departments;
- Recommend policy updates, resource allocation, and training needs; and
- Ensure accountability for continuous accessibility improvement.

F. Policy Exemptions

In limited circumstances, Southwestern may grant an exception to this policy when full compliance with accessibility standards would impose an undue administrative or financial burden, or would fundamentally alter the nature of a program or service.

1. Request process

Any request for an exception must be submitted in writing to the Digital Accessibility Coordinator. The request must include:

- A detailed explanation of why compliance is not feasible, including cost or technical factors; and
- A description of the equally effective alternative method of access that will be provided (for example, a text transcript in place of an inaccessible video).

2. Review and documentation

The Digital Accessibility Coordinator, in consultation with the Chief Information Officer, General Counsel, and Accessibility Services, will review each request. If an exception is approved, the justification and the alternative method of access will be documented in writing and retained for institutional records.

3. Limitations

Blanket or indefinite exemptions will not be granted. Exceptions are temporary and subject to annual review to ensure continued necessity and adequacy of the alternative access provided.

G. Training

Southwestern requires all employees involved in creating, managing, or procuring digital content or services to complete accessibility training appropriate to their responsibilities. The Digital Accessibility Coordinator will provide or arrange regular training sessions and workshops, and track completion rates.

H. Vendors

Vendors engaged to provide digital products or services must demonstrate conformance with the WCAG 2.1, Level A and AA, and with applicable requirements of Section 508 of the Rehabilitation Act.

Vendors will be asked to provide accessibility documentation, such as a Voluntary Product Accessibility Template (VPAT®) or Accessibility Conformance Report (ACR), for all products or services that impact students, employees, or the public.

When accessibility gaps are identified in a vendor's product or service, Southwestern will evaluate the nature and impact of those gaps on access and usability. If the gaps are determined to be too significant and cannot be adequately mitigated or remediated, Southwestern may decline to engage with, or may discontinue use of, the vendor's product or service.

If a current VPAT or ACR is unavailable, Southwestern may require the vendor to cooperate with accessibility testing of the product or service to assess

conformance with WCAG 2.1 Level AA. Such testing may include both automated and manual evaluations and can be conducted by the vendor, the Digital Accessibility Coordinator, or a qualified third-party assessor.

Southwestern may require periodic updates or third-party verification to confirm ongoing accessibility. Procurement decisions will consider a vendor's demonstrated commitment to accessibility, and Southwestern reserves the right to decline or discontinue use of products or services that fail to meet these requirements.

I. Comments, Suggestions, Assistance, and Complaints

Individuals who have comments or suggestions regarding website accessibility or encounter a barrier with Southwestern's website may contact Communications & Marketing and the Digital Accessibility Coordinator by emailing webaccessibility@swlaw.edu.

Current students who need technical assistance or individual accommodations related to inaccessible digital content will be referred to or should contact Accessibility Services by emailing accessibility@swlaw.edu in the Student Services Office. Accessibility Services will work with students to arrange accommodations or alternate formats as appropriate under the Disability Accommodations Policy (Including Standards for the Study of Law).

Current employees who need technical assistance or individual accommodations related to inaccessible digital content will be referred to or should contact Human Resources (HR) by emailing HR@swlaw.edu. HR will work with employees to arrange accommodations or alternate formats as appropriate under the Disability Accommodation Policy for Employees and Job Applicants.

Concerns that involve allegations of discrimination may also be pursued under the Policy to Prevent Discrimination, Harassment, and Retaliation. Student discrimination complaints will be handled by Sabrina Calica, Title IX Coordinator and Civil Rights Investigator, and employee discrimination complaints will be addressed by Max Holt, Deputy Title IX Coordinator. Both may be contacted by emailing TitleIX@swlaw.edu.

J. Procedures for Website Accessibility Complaints

This complaint process applies to individuals who encounter a barrier with Southwestern's website. Southwestern provides a prompt and equitable process for resolving accessibility complaints in compliance with federal and state disability laws.

1. Submission

Complaints may be submitted by email to Communications & Marketing and the Digital Accessibility Coordinator at webaccessibility@swlaw.edu. Submissions should describe the issue, the location of the inaccessible content, and the requested remedy.

2. Acknowledgment

Southwestern will acknowledge receipt of the complaint within 5 business days.

3. Investigation

Communications & Marketing will investigate the complaint in consultation with Information Technology, the Digital Accessibility Coordinator, Accessibility Services, relevant content owners, and others as appropriate.

4. Resolution

Within 30 calendar days of receipt, Southwestern will provide a written response to the complainant. The response will outline the findings of the investigation, the steps taken or planned to remediate the issue, or the reasons no action is required. If additional time is required due to the complexity of the issue, Southwestern will provide a status update within the initial 30 calendar days, including the reason for the delay and an estimated timeline for resolution.

5. Appeal

If the complainant is dissatisfied with the outcome, they may appeal in writing to the President and Dean (Dean) of Southwestern Law School within 30 calendar days of receiving the initial resolution. The Dean or designee, in consultation with relevant senior administrators, will review the matter and issue a final institutional response.

6. External remedies

Complainants are also informed of their right to pursue external remedies through the U.S. Department of Education's Office for Civil Rights or the U.S. Department of Justice.

7. Recordkeeping and reporting

The Digital Accessibility Coordinator will maintain records of complaints received, resolutions, and appeals. Aggregate data, such as the number of

complaints and average resolution time, will be reported annually to senior administrators and used to guide continuous improvement efforts.

K. Monitoring and Evaluation

Southwestern recognizes that digital accessibility is an ongoing responsibility and not a one-time effort. To maintain compliance and promote continuous improvement, the following monitoring and evaluation measures will be in place:

1. Automated scans

Public-facing website and applications will undergo automated accessibility scans on a regular basis using industry-standard tools. Results will be reviewed and tracked by Communications & Marketing and the Digital Accessibility Coordinator.

2. Manual audits

Southwestern will conduct accessibility audits of (i) its website (swlaw.edu) and (ii) a representative sample of digital documents and videos to identify issues not captured by automated tools.

3. Third-party and user testing

Periodically, Southwestern may engage an external consultant or incorporate user testing by individuals with disabilities to validate accessibility and usability of digital platforms.

4. Reporting

The Digital Accessibility Coordinator will maintain records of testing and remediation efforts. Each year, a summary report of key findings and progress (e.g., percentage of pages tested, number of issues remediated) will be provided to senior leadership and used to inform resource allocation and training priorities.

L. Policy Revisions

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