DEPARTMENT OF CORRECTIONS

Policy Number:	**101.160**
Title:	**Digital Accessibility**
Effective Date:	**4/24/2025**

PURPOSE: To provide digitally accessible electronic information and technology to persons with disabilities as required by ADA Title I and Title II, Minnesota Statutes 16E.03, subd.9 and 363A.42 and in compliance with the State of Minnesota Accessibility Policies and Standards, which adopt federal Section 508 standards and current Web Content Accessibility Guidelines (WCAG).

APPLICABILITY: This policy applies to all DOC staff, contractors, volunteers and partners, divisions and offices, councils, boards, commissions and other entities associated with the Minnesota Department of Corrections. Accessibility applies to all electronic information systems, tools, or documents acquired, procured, developed or substantially modified or enhanced.

DEFINITIONS:

Digitally accessible – Electronic materials and technology designed and developed so that individuals with disabilities can access content and technology effectively and independently.

Electronic documents and products - Websites, SharePoint (iShare), software applications, electronic content and multimedia products.

Undue burden – Significant difficulty or expense determined and documented by the funding agency, including but not limited to difficulty or expense associated with technical feasibility.

Unit Accessibility Lead – The point of contact within each DOC unit assisting other unit employees with adhering to digital accessibility policies and procedures. The point of contact within each DOC unit assisting other unit employees with adhering to digital accessibility policies and procedures. The term "unit" comprises office units as well as facility and field services work areas.

PROCEDURES:

A. The DOC will make every effort to provide digitally accessible materials and technology. The DOC will take immediate action to fulfill a request for digitally accessible documents or products, unless an exception or undue burden exists. For exceptions, see the State of Minnesota Accessibility Policies and Standards below. Any request for digital accessibility from the public received by DOC staff will be followed up on in a reasonable amount of time.
   1. Examples of electronic documents and products referred to in this policy can include the following:
      a) Websites and social media

b) Content created electronically including emails, text documents, spreadsheets, presentations, data charts, forms, tables, etc.
c) Digital multimedia products including videos, images, invitations, charts, maps, and posters
d) Computers and other electronic hardware such as tablets, kiosks, and mobile devices
e) Video conferencing and electronic communications
f) Computer software and applications

2. Temporary information is not within the scope of this policy. Examples include information that is not recorded or tangible; notes for an individual's own use; or content distributed to a group that has no known accessibility needs, where the content will not be redistributed.

B. DOC Unit Responsibilities

1. All DOC units must:
   a) Produce digitally accessible electronic documents using DOC templates in Microsoft Office.
   b) Identify a unit accessibility lead to receive training in creating digitally accessible documents.
   c) Work with the communications digital accessibility lead (CDAL) as necessary to learn accessibility standards.
   d) Perform accessibility checks to ensure compliance with accessibility standards and make all necessary corrections prior to disseminating documents.
   e) Take immediate action to notify the CDAL of any citizen complaint or request regarding the accessibility of a DOC document or technology.
   f) Work with the CDAL to evaluate accessibility for all new technology purchases subject to this policy.
   g) Work with the communications unit if seeking an exception to this policy.

C. Communications Unit

1. The communications director, or designee, provides supervisory direction to the DOC's communications digital accessibility lead (CDAL).

2. The communications director, or designee, reviews and approves any Accessibility Exception Request Form after it has been approved by the CDAL.

3. As needed, the communications director, or designee, assists in determining when it is acceptable to distribute documents that are not accessible.

D. ADA Coordinator at Facilities

1. The facility American with disabilities coordinator (ADAC) will process requests from incarcerated people according to existing ADA request policies and will work with the CDAL as needed.

2. The ADAC will inform the CDAL of requests for digital accessibility from incarcerated people and the subsequent resolution for tracking purposes.

E. DOC Unit Managers and Supervisors

1. DOC managers and supervisors are responsible for ensuring that electronic documents and products created or revised by division staff meet accessibility standards. This also applies to partner materials posted on division webpages and all grantee electronic products.

2. DOC managers and supervisors must ensure purchasing and technical contracts include accessibility language, where applicable. See the Request for Proposal (RFP) Accessibility Language for Purchases below.

3. DOC managers and supervisors must ensure that contractors deliver products that are accessible as required by the contract language.

4. DOC managers and supervisors must work with the CDAL to score any received voluntary product accessibility templates (VPATs) or accessibility conformance report (ACRs).

F. MN.IT staff at DOC

1. MN.IT staff at DOC will assist with decision-making for purchasing digitally accessible hardware and software applications in accordance with the State of Minnesota Accessibility Policies and Standards.

2. MN.IT staff at DOC will ensure that digital accessibility standards are incorporated into business requirements and project management plans for IT projects and in-house developed software.

3. MN.IT staff at DOC work with purchasing coordinators to ensure that either a VPAT or ACR is completed by the responding vendor for all electronic products purchased through a Professional Technical/Services Contract. MN.IT staff at DOC will assist in reviewing and scoring those documents as requested by the CDAL.

INTERNAL CONTROLS:

A. Communications maintains an electronic list of all unit accessibility leads.

B. Communications ensures digital accessibility training and support is available to unit leads and other interested staff.

C. CDAL maintains current training and education around accessibility standards and laws.

REFERENCES: 302.022 Offender/Resident Kiosk Services
203.250 Modifications for Incarcerated Persons/Residents with Disabilities
204.035 Secondary Education
204.041 Education - MCF-Red Wing
202.040 Incarcerated Person Intake Screening and Processing
204.080 Recreation / Leisure Programs
500.150 Adaptive Equipment/Medical Authorizations
740.020 Post-Secondary Education Standards for Student Accessibility/Accommodations
760.040 Post-Secondary Education Student Access to Instructional Materials in Restrictive/Secure Housing
Minnesota IT Services, Accessibility Policies & Standards
Request for Proposal (RFP) Accessibility Language for Purchases

REPLACES: All facility policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

ATTACHMENTS: Accessibility Exception Request Form (101.160A)

APPROVAL:
Commissioner of Corrections