



University of Illinois System Offices

Electronic Information Technology Accessibility Policy

Purpose

The purpose of this policy is to: (1) ensure electronic and information technologies (“EIT”) developed, procured, maintained, used, or provided by the University of Illinois System Offices are accessible to individuals with disabilities; (2) ensure appropriate parties are notified of and can respond to complaints and queries about EIT accessibility concerns; (3) foster compliance with its legal and ethical responsibilities; and (4) enhance EIT accessibility.

Scope

This policy applies to all EIT developed, procured, maintained, used, or provided by any unit within the University of Illinois System Offices for use by its employees, students, or the public.

Authority

Executive Vice President and Vice President for Academic Affairs for the University of Illinois System.

Policy

The University of Illinois System Offices will implement applicable federal and state law requirements for electronic and information technology accessibility, as set forth in Section 508 of the Rehabilitation Act of 1973 as amended (“Rehabilitation Act”) and the Illinois Information Technology Accessibility Act (“IITAA”). Current recommended standards set are the Web Content Accessibility Guidelines (WCAG).

Periodic Assessment of the Policy

The University of Illinois System Offices shall review this policy at least every three years. This review shall include an assessment of the effectiveness of the policy on EIT in the system offices. This review will be conducted by representative stakeholders from the system offices; its results will be shared with appropriate governance bodies.

Definitions

Accessible means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. A person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.

Electronic and Information Technologies (EIT) refers to all computer hardware and software, operating systems, web-based information and applications, telecommunications products, kiosks, and video equipment and multimedia products that are used to access, create, convert, disseminate, or duplicate data or information needed to facilitate the core missions of the University.

EIT includes but is not limited to websites, digital content, classroom deliverables, virtual meeting spaces, software, and mobile applications.

Equally Effective Alternative Access refers to an alternative format, medium, or other aid with respect to EIT that timely and accurately communicates the same content as does the original format or medium, and that is appropriate to an individual's disability.

Responsibilities

System Offices Accessibility Review Committee

The Executive Vice President (EVP) and Vice President for Academic Affairs (VPAA) shall establish a System Offices Accessibility Review Committee ("SOARC"), with representatives from the offices of the President, Vice President and Chief Financial Officer (VP/CFO), and EVP/VPAA. The SOARC shall consist of up to two individuals from System Human Resource Services, with one as chair of the committee; one individual from University Ethics and Compliance Office; up to two individuals from Administrative Information Technology Services; up to two individuals from System Purchasing and Support Services; and up to three individuals from the remaining System Offices units. The SOARC shall:

1. Periodically review the accessibility guidelines and standards established by law, including without limitation the current standards set in Web Content Accessibility Guidelines (WCAG),

to determine whether any revisions or updates to this policy or its implementing procedures are necessary.

2. Review exception requests and make recommendations to the EVP/VPAA about granting or denying exceptions.
 - a. Exception requests must detail why EIT standards cannot technically be met.
 - b. Exception requests must be accompanied by a plan that provides Equally Effective Alternative Access.
3. Upon a finding of non-compliance by appropriate system offices authorities and to the extent that individuals with disabilities are unable to perform their required functions, potentially recommend to EVP/VPAA that use of such EIT be discontinued until the EIT is made to conform or an exception is granted along with providing an Equally Effective Alternative.
4. Regularly review non-compliant EIT developed or purchased by system offices units for progress towards policy conformity.
5. Share accessibility findings with EVP/VPAA and system universities when there is an impact.

Administrative Information Technology Services

1. Assign up to two individuals to participate on SOARC.
2. Work with System Purchasing and other system offices to evaluate and apply EIT standards to prospective vendors seeking to develop or provide EIT.

University Ethics and Compliance Office

Assign one individual to participate on SOARC.

System Human Resource Services

1. Assign up to two individuals to participate on SOARC and designate one as chair of the committee.
2. Oversee the development, administration, implementation, and monitoring of this policy and guidelines and procedures for system offices.
 - a. In consultation with VP/CFO and EVP/VPAA, maintain an “Implementation Plan” containing processes, procedures, and guidelines for effectuating this policy, including a process for handling exception requests.
 - b. Coordinate and deliver communications to system offices about this policy and related procedures, processes, guidelines, and information.
 - c. Oversee and coordinate the system offices’ efforts to provide both mandatory and recommended training and education to faculty, staff, and students on compliance with this policy.
3. Facilitate system offices’ compliance with this policy to ensure the guidelines and procedures follow established provisions and protocols for EIT.
 - a. Coordinate the review of EIT for accessibility according to the Implementation Plan.

- b. Coordinate the triennial policy review process.
- c. Coordinate and deliver system offices' reporting to the Board of Trustees, when requested.

System Purchasing and Support Services

1. Assign up to two individuals to participate on SOARC.
2. Include EIT provisions in supplier work statements and solicitations.
3. Work with system offices units to review solicitations and work products for compliance with EIT.
4. Assure that purchase orders and contracts with suppliers/vendors conform to EIT guidelines, unless there is a documented exception.

Each System Offices Unit

1. Facilitate unit compliance with this policy to ensure unit practices, procedures, tools, equipment/materials, and resources follow the EIT provisions and protocols. Depending on the extent and complexity of EIT within a unit, this may include designating an individual(s) as an EIT compliance contact who will: complete mandatory training, educate/inform those who contribute to and develop EIT, share relevant communications, and liaise with the SOARC as needed.
2. Include compliance with this policy when procuring, soliciting, and/or contracting for EIT products or services.

Exceptions

Requests for exceptions to this policy must be submitted in writing to System Human Resource Services, as Chair of the SOARC and acting for the EVP/VPAA. Individuals requesting an exception must provide a plan that would provide Equally Effective Alternative Access, unless such an alternative is not possible due to technological constraints or if the intended purpose of the technology at issue does not allow for an alternative. The Implementation Plan shall describe expectations for how long exception processing will take.

The SOARC will make a recommendation to the EVP/VPAA about approving or denying requested exceptions. If an exception is denied by the EVP/VPAA, the submitter may appeal to the EVP/VPAA as described in the Implementation Plan. Unapproved subject technology shall not be used.



Contact

Associate Vice President and Chief Human Resources Officer, University of Illinois System

Contact information [here](#).

Policy Information

Effective Date: May 10, 2021

Other Accessibility Policies and Resources

UIS: <https://www.uis.edu/academicstaffhandbook/university-policies/digital-resource-accessibility-policy/>

UIUC: <https://itaccessibility.illinois.edu>

UIC: <https://accessweb.uic.edu>

Web Content Accessibility Guidelines (WCAG) 2.0: <https://www.w3.org/TR/WCAG20/>

Section 508 of the Rehabilitation Act of 1973, as amended: <https://www.ecfr.gov/cgi-bin/text-idx?node=pt36.3.1194>

Illinois Information Technology Accessibility Act (IITAA): <https://www.dhs.state.il.us/page.aspx?item=32765>