

Digital Accessibility

Information and Communication Technology Accessibility Policy

Purpose

The purpose of this policy is to: (1) ensure information and communication technology (ICT) 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 ICT accessibility concerns; (3) foster compliance with its legal and ethical responsibilities; and (4) enhance ICT accessibility.

Scope

This policy applies to all ICT 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

The System Human Resource Services 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 ICT 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.

Information and Communications Technology (ICT) is information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. The term ICT is adopted to broaden the term information technology (IT) and to emphasize the way in which IT is used for interaction and the creation and manipulation of data. Examples of ICT include but are not limited to; computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; Web sites; videos; and electronic documents,

presentations, and emails. ICT also refers to “Electronic and Information Technology (EIT) as that term was formerly used in the requirements of Section 508 of the Rehabilitation Act.

Equally Effective Alternative Access refers to an alternative format, medium, or other aid with respect to ICT 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 System Human Resource Services shall establish a System Offices Accessibility Review Committee (“SOARC”). The SOARC membership consists of up to two individuals from System Human Resource Services, with one as chair of the committee and one ADA IT Coordinator; one individual from University Ethics and Compliance Office; up to two individuals from Administrative Information Technology Services; up to one individuals from System Purchasing and Support Services; and up to three individuals from the remaining system office units; an ADA IT Coordinator representative from each university (UIC, UIUC and UIS). 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 Senior Director of System Human Resource Services about granting or denying exceptions.
 - a. Exception requests must detail why ICT 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 Senior Director of System Human Resource Services that use of such ICT be discontinued until the ICT is made to conform or an exception is granted along with providing an Equally Effective Alternative.
4. Regularly review non-compliant ICT procured by system offices units for progress towards policy conformity.

Administrative Information Technology Services

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

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 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 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 ICT.
 - a. Coordinate the review of ICT 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 one individual to participate on SOARC.
2. Include ICT provisions in supplier work statements and solicitations.
3. Work with system offices units to review solicitations and work products for compliance with ICT.
4. Assure that purchase orders and contracts with suppliers/vendors conform to ICT 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 ICT provisions and protocols. Depending on the extent and complexity of ICT within a unit, this may include designating an individual(s) as an ICT compliance contact who will: complete mandatory training, educate/inform those who contribute to and develop ICT, share relevant communications, and liaise with the SOARC as needed.

2. Include compliance with this policy when procuring, soliciting, and/or contracting for ICT 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. 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 System Office Accessibility Exception Review Process shall describe expectations for how long exception processing will take.

The SOARC will make a recommendation to the Senior Director of Human Resource Services about approving or denying requested exceptions. If an exception is denied by the Senior Director of Human Resource Services, the submitter may appeal to the Senior Associate Vice President and Chief Human Resource Officer as described in the System Office Accessibility Exception Review Process. Unapproved subject technology shall not be used.

Contact

Associate Director for Diversity, Equity Inclusion and Belonging, on behalf of the Senior Associate Vice President and Chief Human Resource Officer, University of Illinois System

[See contact information for this policy.](#)

Policy Information

Effective Date: February 13, 2024

Other Accessibility Policies and Resources

[Digital Accessibility Decision Tree](#)

[UIUC IT Accessibility](#)

[UIC Digital Accessibility](#)

[UIS Digital Resource Accessibility Policy](#)

[Web Content Accessibility Guidelines \(WCAG\) 2.2](#)

[Section 508 of the Rehabilitation Act of 1973, as amended](#)

[Illinois Information Technology Accessibility Act \(IITAA\)](#)