

# System-wide Electronic Information Technology Accessibility Implementation Guidelines August 2021

## Purpose

The purpose of the U of I System Implementation Guidelines is to provide specific information in support of the U of I System Policy Guide to help the three universities and the system offices establish and enhance their own implementation plans for electronic and information technology (EIT) accessibility. Procedures must pragmatically, and with due diligence, address accessibility compliance at each university and the system offices in a way that demonstrably shows our commitment to full accessibility compliance. Individuals employed by the U of I System have a responsibility to ensure accessibility compliance; however, the U of I System bears the responsibility of providing adequate training and avenues of support that allow those individuals to successfully create, maintain and deliver accessible electronic information at each university and the system offices.

## 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. An individual with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability.

**Electronic and Information Technology (EIT)** refers to any 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. EIT also refers to “Information and Computing Technology” as that term is used in the requirements of Section 508 of the Rehabilitation Act.

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

**EIT Business Owner** refers to the individual or campus unit responsible for the creation and upkeep of the EIT and any related content.

**EIT Accessibility Exception Process** refers to the process by which an accessibility exception request must be made and approved for a given EIT.

**Decision Tree** refers to the process to facilitate individuals and units within the University of Illinois System in determining if an EIT accessibility exception request is needed for a given EIT.

**Resources** refers to, but not inclusive of, financial support and human resources.

## Compliance Structure

Each of the universities and the system offices should have a compliance structure that is appropriate for their university and system offices that will support the U of I System Policy Guide. Each university and system offices must provide resources to help ensure compliance. In addition, there will be a system-wide committee that will have representatives from the ADA offices from all three universities and system offices. Additional members will be added as needed.

Each of the universities and the system offices should review and update the regulatory terminology when updating the EIT accessibility policy and implementation guidelines. For example, EIT is referred to as “Information and Computing Technology (ICT)” in the revised Section 508 standards.

The system-wide committee is responsible for:

- collaborating with universities and system offices regarding EIT risk that impacts the entire University of Illinois System
- collaborating with universities and system offices to identify gaps across the system
- advocating for resources or financial support needed for compliance, accessibility, and inclusion
- collaborating and looking for areas of efficiencies
- supporting and partnering with ADA coordinators, who ensure EIT compliance, accessibility, and inclusion

## Compliance Monitoring

Each of the universities and system offices should put together a process to monitor compliance which should include but not be limited to:

- compiling a complete list of EIT which includes vended and in-house developed EIT. Minimum information that should be track on each EIT:
  - EIT name
  - description of EIT
  - Version of EIT
  - EIT Owner/Email
  - Type of EIT (vended or in-house developed)
    - If Vended -Date of Contract Expiration
    - If Vended - Ongoing remediation with vendor (Yes or No)
  - Audience (public, students, staff, faculty, multiple university, or system offices impact)
  - EIT test status (yes, no, or unknown)
  - Accessibility rating (unknown, not accessible, somewhat accessible, mostly accessible, accessible)
  - Risk level (high, medium, low)
  - Last review date
- providing risk score card to evaluate risk to the University of Illinois System. This score card will be used by units that have individuals who support EIT as well as the ADA groups to help identify and focus on high-risk EIT. An [example score card](#) is available as a starting point.
- providing mechanism to track compliance (e.g., spreadsheet, database)
- providing a mechanism to report accessibility issues to the business owners of the EIT (e.g., link on all websites for users to report accessibility issues)
- providing self-review process for demonstrating continuous improvement of accessibility

compliance over a 5-year period. An [example self-review survey](#) is available as a starting point that could be part of the process.

### Training

Each university and system offices should be intentional in establishing a training program such as:

- mandatory role-based accessibility training for employees that use or distribute EIT
- mandatory training should include information about the accessibility policy and procedures for their respective university or system offices
- [catalog of digital accessibility resources](#) for training opportunities are available as a starting point
- establish mechanism for sharing training resources between universities and system offices to save duplication of work

### Exception Process

Each university and system offices should establish an exception process to review and approve accessibility exceptions for EIT. A decision tree should be established for individuals and units. Creating a web form to help guide individuals through the exception process would be beneficial.

Be aware that federal and state law requires:

- EIT to be accessible and conform with current federal and state statutes or the selection of the EIT that is most accessible from among available choices with partial accessibility
- the availability of the method of equally effective alternative access must be made known to users. A communication plan should be part of the equally effective alternative access plan.

The ADA coordinators from each university and system offices will notify the system-wide accessibility review committee of any EIT that has a high risk to the University of Illinois System.

### Procurement

Each of the universities and the system offices should:

- establish a business process improvement plan for managing accessibility for vended solutions which should include a timeline for the implementation of the plan
- develop a process to build in accessibility standards to purchase or renew EIT. Some areas to consider:
  - prioritize purchases for review that are \$100,000 or greater since they may have a broader user base
  - applications targeted for student use should be a high priority for review
  - software with low or no cost can also be high risk and should consider intended scope of use (e.g., open source)
  - work with appropriate procurement offices to improve the business process for small software purchases
  - review and update language for accessibility statements with appropriate procurement offices before purchase of EIT
  - review existing contracts during renewals or initial negotiations for accessibility statements and contact vendors with accessibility issues
  - vendor accessibility claims should be verified
  - vendors should agree contractually to be responsive to accessibility issues raised by

the university and should commit to a mutually agreed upon timeframe for corrections

- have vendor answer questions during procurement process and demonstrate accessibility of product. Sample vendor questions can be used as a starting point.