



# UTAH VALLEY UNIVERSITY

## Policies and Procedures

<b>Proposed Policy Number and Title:</b> 452 Electronic and Information Technology Accessibility		
<b>Current Policy Number and Title:</b> 452 Electronic and Information Technology Accessibility		
<b>Approval Process*</b>		
<input checked="" type="checkbox"/> Regular	<input type="checkbox"/> Temporary	<input type="checkbox"/> Compliance Change
<input type="checkbox"/> New <input checked="" type="checkbox"/> Revision <input type="checkbox"/> Revision—Limited Scope <input type="checkbox"/> Deletion	<input type="checkbox"/> New <input type="checkbox"/> Revision <input type="checkbox"/> Revision—Limited Scope	<input type="checkbox"/> New <input type="checkbox"/> Revision—Limited Scope <input type="checkbox"/> Deletion
*See UVU Policy 101 <i>Policy Governing Policies</i> for process details.		

<b>Draft Number and Date:</b>	<u>Stage 3 Regular, April 17, 2025</u>
<b>President's Council Sponsor:</b>	<u>Christina Baum</u>
<b>Policy Steward:</b>	<u>Brett McKeachnie</u>

POLICY APPROVAL PROCESS DATES		
REGULAR	TEMPORARY	COMPLIANCE
<b>Drafting and Revision</b> Entrance Date: <u>4/25/2024</u>	<b>Drafting and Revision</b> Entrance Date: <u>N/A</u>	<b>President's Council Approval</b> Approval Date: <u>N/A</u>
<b>University Entities Review</b> Entrance Date: <u>2/13/2025</u> Close Feedback: <u>4/10/2025</u>	<b>Board of Trustees Review</b> Entrance Date: <u>N/A</u> Approval Date: <u>N/A</u>	<b>Board of Trustees Ratification</b> Ratification Date: <u>N/A</u>
<b>Board of Trustees Review</b> Entrance Date: <u>5/8/2025</u> Approval Date: _____		



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<b>POLICY TITLE</b>	Electronic and Information Technology Accessibility	<b>Policy Number</b>	452
<b>Section</b>	Facilities, Operations, and Information Technology	<b>Approval Date</b>	
<b>Subsection</b>	Information Technology	<b>Effective Date</b>	
<b>Responsible Office</b>	Office of the Vice President of Digital Transformation	<b>Last Review</b>	

#### 1.0 PURPOSE

1.1 Utah Valley University (UVU) is committed to providing access to higher education across various modalities, including technology-driven platforms. In pursuit of student success and achievement, as embodied in our educational mission, UVU extends this commitment to all students, faculty, staff, and visitors, including individuals with disabilities.

1.2 This policy establishes comprehensive accessibility standards for all electronic and information technology at UVU. These requirements align with federal and state statutes as well as industry standards and best practices, reinforcing our commitment to equitable access and usability across all platforms. By adhering to these requirements, UVU aims to create an inclusive digital environment that empowers every member of our community to engage fully and effectively.

#### 2.0 REFERENCES

2.1 *Section 504 of the Rehabilitation Act of 1973*, 29 U.S.C. § 794 (1973)

2.2 *Americans with Disabilities Act of 1990*, 42 U.S.C. § 12101 (1990) (as amended by Pub. L. No. 101-336, 104 stat. 327)

2.3 Utah Code § 53B-23 *Utah Instructional Materials for Students with a Disability Act*

2.4 UVU Policy 152 *Accommodations for Individuals with Disabilities*

2.5 UVU Policy 165 *Discrimination, Harassment, and Affirmative Action*

#### 3.0 DEFINITIONS

3.1 **Accessibility:** Individuals with disabilities can independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.



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**3.2 Electronic and information technology (EIT):** Information technology and any equipment or interconnected subsystem of equipment used in the creation, conversion, or duplication of data or information. Includes, but is not limited to, internet and intranet websites; content delivered in digital form; electronic books and electronic book reading systems; search engines and databases; learning management systems, classroom technology and multimedia; personal response systems ("clickers"); and office equipment such as classroom podiums, copiers, and fax machines. It also includes telecommunications products (such as telephones); information kiosks; transaction machines; computers; ancillary equipment; software; firmware and similar procedures; services (including support services); equipment maintained and services operated by third-party vendors; and related resources.

**3.3 Equally effective alternative access:** An alternative format, medium, or other aid in electronic and information technology that communicates the same content as the original format or medium. The alternative format must be accurate, created in a timely manner, and communicate the content in a way that is appropriate to an individual's disability.

**3.4 Fundamental alteration:** A change to a service, program, or activity that fundamentally alters an essential aspect of the service, program, or activity, including essential learning outcomes for academic courses or technology.

**3.5 Undue burden:** A proposed accommodation that causes significant financial or administrative burden to the University.

## 4.0 POLICY

### 4.1 Scope of Policy

**4.1.1** This policy applies to all university employees engaged in the development, maintenance, distribution, procurement, or licensing of electronic and information technology (EIT) on behalf of Utah Valley University. The intended users of this EIT include students, staff, faculty, and visitors.

**4.1.2** This policy applies to all University EIT.

**4.1.3** University employees are required to adhere to the University's accessible technology standards and procedures. These standards align with legal requirements imposed by federal and state laws, as well as recognized best practices. Detailed information regarding these standards and procedures can be accessed on the University's Accessible Tech website.

**4.1.4** Noncompliance with this policy may result in proportionate disciplinary action under the appropriate policy, which depending on the circumstances may include Policy 165 *Discrimination, Harassment, and Affirmative Action*, Policy 371 *Performance Management and*



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*Development for Full-Time Staff Employees, or Policy 649 Faculty Sanction and Dismissal for Cause.*

#### **4.2 Utah Valley University's Commitment to Accessibility**

**4.2.1** All UVU community members must adhere to accessible technology standards and procedures. When selecting, recommending, procuring, developing, implementing, and maintaining EIT, university employees should prioritize accessibility. If a necessary technology falls short of accessibility standards, exploring accessible alternatives is essential. In cases where no accessible alternative exists, employees may request exceptions under this policy (see section 5.1).

**4.2.2** To ensure equitable access, Utah Valley University ~~commits to providing~~ will provide appropriate auxiliary aids and services. These accommodations enable individuals with disabilities to achieve comparable results, benefits, and levels of achievement. The University's goal is to create an inclusive environment that aligns with the individual's needs while recognizing that identical outcomes for qualified individuals with disabilities are not mandatory. ~~Providing equally effective alternative access does not require fundamental alterations or undue financial and administrative burden.~~ Providing equally effective alternative access does not require the institution to fundamentally alter programs, courses, or jobs; nor does it require the university to make changes that would constitute an undue financial or administrative burden.

**4.2.3** In collaboration with subject matter experts, the Office of Accessibility Services (for students) or the Employee Accommodations Coordinator (for employees) shall assess and determine whether a fundamental alteration will be made. This process ensures that modifications do not compromise the essential nature of services, programs, courses, or activities.

**4.2.4** When evaluating undue burden, UVU considers all resources available to the University as a whole. Thorough documentation must accompany this assessment. The appropriate vice president, in consultation with the Office of General Counsel, makes the final determination regarding undue burden.

#### **4.3 Responsibility and Authority of EIT Accessibility Manager**

**4.3.1** The EIT Accessibility Manager assumes a critical role in ensuring accessibility across UVU's campus. The EIT Accessibility Manager is responsible for

**4.3.1.1** collaborating with the Office of General Counsel and relevant stakeholders and committees to develop, revise, and publish comprehensive EIT accessibility standards, best practices, and resources.



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89 **4.3.1.2** working closely with campus officials to facilitate training initiatives that disseminate  
90 knowledge and foster a culture of accessibility.

91 **4.3.1.3** conducting a thorough evaluation of all relevant technologies, both innovative and  
92 established, to ensure compliance with accessibility standards.

93 **4.3.1.4** promptly implementing a corrective action plan when internal testing or user reports  
94 identify accessibility barriers.

95 **4.3.1.5** ensuring that all requests for accessible instructional materials are processed through the  
96 Accessible Technology Center in compliance with Utah Code § 53B-23 *Utah Instructional*  
97 *Materials for Students with a Disability Act*. Standards and procedures for these requests are  
98 outlined on UVU's Accessible Tech website.

99 **4.4 Responsibility and Authority of Digital Transformation, Marketing, and other**  
100 **Authorized Departments**

101 **4.4.1** Digital Transformation, Marketing, and other authorized university departments  
102 responsible for selecting and providing digital resources, whether for business or academic  
103 purposes, shall follow the established accessible technology standards and procedures. These  
104 standards apply throughout the lifecycle of software, systems, and equipment.

105 **4.4.2** In cases where achieving full accessibility is not immediately feasible, these university  
106 entities must obtain an approved exception under this policy (refer to section 5.1).

107 **4.5 Responsibility and Authority of University Colleges, Schools, Departments, Programs,**  
108 **and Units**

109 **4.5.1** University colleges, schools, departments, programs, and units are required to adhere to  
110 established accessible technology standards and procedures, which apply throughout the entire  
111 lifecycle of software, systems, and equipment. These university entities are responsible for

112 **4.5.1.1** ensuring that newly developed technology and digital documents align with accessibility  
113 requirements

114 **4.5.1.2** making informed choices that take accessibility into consideration when recommending  
115 or procuring technology solutions

116 **4.5.1.3** ensuring that licensed software and systems meet accessibility criteria

117 **4.5.1.4** designing and deploying technology solutions with accessibility in mind

118 **4.5.1.5** regularly assessing and updating existing media, content, and equipment/technology in  
119 departmentally owned/managed classrooms and labs for accessibility



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**4.5.2** In cases where achieving full accessibility is not feasible, colleges, schools, departments, programs, and units must obtain an approved exception under this policy (refer to section 5.1).

#### **4.6 Responsibility and Authority of Authorized Employees and University Entities**

**4.6.1** Authorized employees and university entities responsible for procuring or licensing EIT play a pivotal role in ensuring accessibility. To uphold the University's commitment, authorized employees and university entities must ensure that

**4.6.1.1** all EIT purchasing decisions align with the University's Accessible Tech website standards and procedures. These standards serve as the cornerstone for creating an inclusive digital environment.

**4.6.1.2** contract language regarding accessibility support and remediation, provided by the Office of General Counsel in consultation with the EIT Accessibility Manager, is explicitly incorporated into purchasing and licensing agreements.

**4.6.1.3** when achieving full accessibility is not practically feasible, the requesting department obtains an approved exception under this policy (refer to section 5.1).

#### **4.7 Responsibility and Authority of Faculty and Staff Members**

**4.7.1** Faculty and staff members are required to adhere to the accessible technology standards and procedures outlined on the University's Accessible Tech website throughout various stages of their work and are responsible for

**4.7.1.1** ensuring compliance with accessibility requirements and incorporating accessibility principles when developing, selecting, or implementing software, systems, and equipment

**4.7.1.2** adhering to established accessibility standards when creating or editing digital documents

**4.7.1.3** prioritizing accessibility when making recommendations for technology solutions

**4.7.1.4** ensuring their procurement decisions align with established standards

**4.7.2** Faculty are responsible for maintaining accessibility in instructional materials. This includes ensuring closed captioning for videos, transcribing audio content, and creating accessible documents, tables, charts, and images. If these are not feasible, faculty must obtain an approved exception under this policy to use or continue to use the technology (refer to section 5.1).

**4.7.2.1** staff are responsible for maintaining accessibility in software, systems, and equipment and ensuring that existing technology remains accessible and operational.



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**4.7.2.2** In cases where achieving full accessibility is not feasible, faculty and staff members must obtain an approved exception under this policy (refer to section 5.1).

#### **4.8 EIT Accessibility Committee: Ensuring Equitable Access**

**4.8.1** The University Accessibility Committee designates specific members to serve on the EIT Accessibility Committee. This Committee plays a pivotal role in ensuring compliance with accessibility standards across the institution.

**4.8.2** The responsibilities of the EIT Accessibility Committee include

**4.8.2.1** reviewing and approving EIT accessibility standards proposed by the EIT Accessibility Manager.

**4.8.2.2** conducting a critical review of requests for exceptions to this policy. The committee considers the unique circumstances and feasibility of achieving full accessibility.

**4.8.2.3** collaborating during the review process for exceptions with the department head or designated representative from the relevant academic unit. This ensures a comprehensive assessment that balances accessibility requirements with practical considerations.

## **5.0 PROCEDURES**

### **5.1 Request for Exceptions**

**5.1.1** University departments, faculty, and staff seeking exceptions to this policy must submit a formal request to the EIT Accessibility Committee. These requests typically arise when aligning existing EIT with accessibility standards poses challenges. The process involves the following considerations:

**5.1.2 Availability of Accessible Alternatives.** An exception may be warranted if there is no accessible technology currently available that will meet the same academic or business requirements.

**5.1.3 Technical Feasibility.** If making specific EIT fully accessible is not technically feasible, a request for an exception is essential.

**5.1.4 Fundamental Alteration.** An exception may be warranted if implementing accessibility fundamentally alters a course, program, service, or activity.



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**5.1.5 Financial or Administrative Burden.** When achieving full accessibility creates an undue financial or administrative burden, an exception request is appropriate. Those making the determination shall do so in consultation with the appropriate vice president and The Office of General Counsel.

**5.2** When reviewing exception requests, the EIT Accessibility Committee verifies that the requesting party has

**5.2.1** explored accessible alternatives. The absence of accessible alternatives should be accurately documented after exploring all available options.

**5.2.2** consulted with relevant entities. The party requesting the exception must demonstrate that they conducted a thorough assessment This includes determining whether fundamental alteration, undue burden, or technical infeasibility applies.

**5.3** demonstrated a critical business or course purpose. The committee assesses whether a valid, well-supported argument exists that the technology in question is critical to business operations or course objectives, and an accessible alternative that would equally (or more effectively) achieve the business purpose is not reasonably available.

**5.3.1** developed equally effective alternative access plan (EEAAP). When applying for an exception, the requesting party must develop an EEAAP that ensures equally effective alternative access conveys the same information as the original format, while maintaining timeliness, relevance, and similar ease of use.

## **5.4 Grievance Procedures**

**5.4.1** Users encountering inaccessible EIT are encouraged to report such issues promptly. The following avenues are available for reporting:

**5.4.1.1 Accessibility Barrier Report Form.** An official *Accessibility Barrier Report Form* is [accessible-available](#) from the footer of the UVU web page. Users can utilize this form to submit detailed reports regarding EIT barriers.

**5.4.1.2 EIT Accessibility Manager.** Users may contact the EIT Accessibility Manager for assistance or to report issues.

**5.4.1.3 Office of Accessibility Services.** Users may contact the Office of Accessibility Services to report EIT accessibility barriers. Upon receipt of these reports, the Office of Accessibility Services must refer the reporting individual to the *Accessibility Barrier Report Form* or the EIT Accessibility Manager.

**5.4.1.4 Employee Accommodations Coordinator.** The Employee Accommodations Coordinator is another point of contact for reporting accessibility concerns related to EIT. Upon





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211 receipt of these reports, the Employee Accommodations Coordinator must refer the individual  
212 reporting via the *Accessibility Barrier Report Form* or to the EIT Accessibility Manager.

213 **5.4.2** Individuals who believe they have been denied appropriate accommodations, including  
214 appropriate auxiliary aids and services or access to campus technology, may file a formal  
215 grievance under Policy 152 *Accommodations for Individuals with Disabilities*. Individuals who  
216 believe they have been discriminated against on the basis of disability, may file a complaint  
217 under Policy 165 *Discrimination, Harassment, and Affirmative Action*. By adhering to this  
218 policy, UVU promotes equal and nondiscriminatory educational opportunities.

POLICY HISTORY		
<b>Date of Last Formal Review:</b> <a href="#">Click here to enter a date.</a>		
<b>Due Date of Next Review:</b> <a href="#">Click here to enter a date.</a>		
Date of Last Action	Action Taken	Authorizing Entity
June 18, 2019	Regular, new policy approved.	UVU Board of Trustees
	Revised policy approved via regular policy process.	UVU Board of Trustees



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<b>POLICY TITLE</b>	Electronic and Information Technology Accessibility	<b>Policy Number</b>	452
<b>Section</b>	Facilities, Operations, and Information Technology	<b>Approval Date</b>	June 18, 2019
<b>Subsection</b>	Information Technology	<b>Effective Date</b>	June 18, 2019
<b>Responsible Office</b>	Office of the Vice President of Finance and Administration		

#### 1.0 PURPOSE

1 Utah Valley University is committed to providing access to higher education through a variety of modalities, including the use of technology. To advance student success and inclusion, the University provides this access to all enrolled students, faculty, staff, and visitors, including individuals with disabilities. This policy establishes accessibility requirements for all electronic and information technology at Utah Valley University, in accordance with federal statute.

#### 2.0 REFERENCES

2.1 Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.

2.2 Americans with Disabilities Act of 1990, 42 U.S.C. Chapter 126 (amended 2008)

2.3 [Policy 152 Accommodations for Individuals with Disabilities](#)

2.4 [Policy 165 Discrimination, Harassment, and Affirmative Action](#)

#### 3.0 DEFINITIONS

**3.1 Accessible:** Individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.

**3.2 Electronic and Information Technology (EIT):** Information technology and any equipment or interconnected subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, internet and intranet websites; content delivered in digital form; electronic books and electronic book reading systems; search engines and databases; learning management systems; classroom technology and multimedia; personal response systems ("clickers"); and office equipment such as classroom podiums, copiers, and fax machines. It also includes telecommunications products (such as telephones); information kiosks; transaction machines; computers; ancillary equipment; software; firmware and similar



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procedures; services (including support services); equipment maintained and services operated by third-party vendors; and related resources.

**3.3 Equally effective alternative access:** An alternative format, medium, or other aid in electronic and information technology that communicates the same content as the original format or medium. The alternative format must be accurate, created in a timely manner, and communicate the content in a way that is appropriate to an individual's disability.

**3.4 Fundamental alteration:** A change to a service, program, or activity that fundamentally alters the nature of the service, program, or activity, including academic courses or technology.

**3.5 Undue burden:** A proposed accommodation that causes significant financial or administrative burden.

## 4.0 POLICY

### 4.1 Scope of Policy

**4.2** This policy applies to all university employees involved in electronic and information technology produced, maintained, distributed, purchased, and/or licensed by employees on behalf of Utah Valley University for use by students, staff, faculty, and visitors. University employees will adhere to the University's accessible technology standards and procedures that reflect legal obligations imposed by federal and state law and recognized best practices. These standards and procedures can be found on the University's Accessible Tech website.

### 4.3 Policy Statement

**4.4** To provide equally effective alternative access, the University shall provide appropriate auxiliary aids and services as necessary to afford individuals with disabilities an equal opportunity to obtain the same result, gain the same benefit, or reach the same level of achievement, in the most integrated setting appropriate to the individual's needs. This does not require the University to ensure that qualified individuals with disabilities achieve the identical result or level of achievement as individuals without disabilities. Nor does equally effective alternative access require the University to take any action that results in (1) a fundamental alteration in the nature of a service, program, course, or activity or (2) undue financial and administrative burden.

**4.5** Determination of a fundamental alteration shall be made only by the Office of Accessibility Services for students or the ADA Coordinator for employees in consultation with a relevant subject matter expert.



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~~4.6 A determination of undue burden must consider all available resources and should be carefully weighed and documented. Therefore, a final determination of undue burden should be made only by the appropriate vice president in consultation with the Office of General Counsel.~~

~~4.7 All members of the UVU community shall follow the accessible technology standards and procedures when creating, selecting, recommending, procuring and/or licensing, developing, implementing, and maintaining electronic and information technologies. If a technology that is necessary to meet university needs does not meet accessibility standards, university employees should consider available accessible alternatives. If an accessible alternative is not available, university employees may request an exception in accordance with this policy (see section 5.1).~~

~~4.8 When an individual with a disability makes a request for reasonable accommodation, staff, faculty, colleges, schools, departments, programs, and units must follow Policy 152 *Accommodations for Individuals with Disabilities* and EIT accessibility standards (found on the Accessible Tech website).~~

~~4.9 Responsibility and Authority of University Personnel and Entities~~

~~4.10 The Electronic and Information Technology (EIT) Accessibility Coordinator is responsible for developing, revising, and publishing campus EIT accessibility standards, best practices, and resources, including training, in collaboration with the Office of General Counsel and other appropriate review boards and campus officials. The EIT Accessibility Coordinator shall also establish, implement, monitor, and document assessment of new technologies for compliance with accessibility requirements and implement a corrective action plan.~~

~~4.11 IT, Marketing, and any other university department authorized to select and provide IT resources for business or academic purposes will follow the accessible technology standards and procedures when creating, selecting, recommending, procuring and/or licensing, developing, implementing, and maintaining software, systems, and equipment. University technology systems include, but are not limited to, content management systems, learning management systems, online conferencing systems, software and applications, hardware, audio/video equipment, and other IT resources. If it is not feasible to make EIT accessible, these university entities must obtain an approved exception to this policy (see section 5.1).~~

~~4.12 Colleges, schools, departments, programs, and units shall follow the accessible technology standards and procedures when creating, selecting, recommending, procuring and/or licensing, developing, implementing, and maintaining software, systems and equipment. These activities may include, but are not limited to, purchasing and producing accessible EIT and updating existing media, content, systems, and departmentally owned/managed classrooms and labs. If it is not feasible to make EIT accessible, these~~



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university entities must obtain an approved exception to this policy (see section 5.1).

~~4.13 Employees and university entities authorized to procure and/or license EIT shall ensure these purchasing decisions comply with Accessible Technology Standards and Procedures. They should also ensure when feasible that contract language regarding accessibility and remediation, provided by the EIT Accessibility Coordinator, is included in purchasing and/or licensing agreements. If it is not feasible to make EIT purchases accessible, the requesting department must obtain an approved exception to this policy (see section 5.1).~~

~~4.14 Faculty must follow the accessible technology standards and procedures found on the University's Accessible Tech website when creating, selecting, recommending, procuring and/or licensing, developing, implementing, and maintaining software, systems and equipment. This includes, but is not limited to, activities such as selecting textbooks (including digital textbooks and supplemental materials), and creating, distributing, and presenting instructional materials such as closed captioned videos, transcribed audio, and accessible documents, tables, charts, and images. If it is not feasible to make specific EIT accessible, faculty must obtain an approved exception to this policy (see section 5.1).~~

~~4.15 Staff must follow the accessible technology standards and procedures found on the University's Accessible Tech website, when creating, selecting, recommending, procuring and/or licensing, developing, implementing, and maintaining software, systems and equipment. If it is not feasible to make specific EIT accessible, staff must obtain an approved exception to this policy (see section 5.1).~~

#### **4.16 EIT Accessibility Board**

~~4.17 Designated members of the University Accessibility Committee will serve as the EIT Accessibility Review Board. This review board will review and approve EIT accessibility standards proposed by the EIT Accessibility Coordinator, review requests for exception to this policy, and approve or deny standards and exception requests, as appropriate. When reviewing requests for exception to EIT accessibility policy and/or standards, the review committee will include the department head or designee from the relevant department or unit.~~

## **5.0 PROCEDURES**

### **5.5 5.1 Exceptions**

**5.5.1** University departments, faculty, and staff should submit a request for an exception to this policy to the EIT Accessibility Review Board if attempting to conform EIT to accessibility standards (see Accessible Tech website)



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~~5.5.1.1 Fundamentally alters a course, program, service, or activity;~~

~~5.5.1.2 Creates an undue financial or administrative burden, as determined by the appropriate vice president in consultation with The Office of General Counsel; or~~

~~5.5.1.3 Is not technically feasible.~~

~~5.5.2 When reviewing requests for exception to accessibility standards, the EIT Accessibility Review Board will seek to verify that the party requesting the exception:~~

~~5.5.2.1 Ensured that the appropriate entity made a determination of fundamental alteration, undue burden, or technical infeasibility;~~

~~5.5.2.2 Explored all accessible alternatives and accurately determined they are unavailable;~~

~~5.5.2.3 Assessed and determined whether there is a valid, well-supported argument that the technology in question is critical to business operations or course purpose; and~~

~~5.5.2.4 Developed an equally effective alternative access plan (EEAAP).~~

~~5.1.2.5 When an exception is granted, identify equally effective alternative access that communicates the same information in as timely a manner as the original format.~~

## 5.2 Grievances

~~5.2.1 Users who find existing EIT inaccessible may report the issue to the Office of Accessibility Services, the ADA Coordinator, the EIT Accessibility Coordinator, or submit a report through the *Accessibility Barrier Report Form*, which can be accessed from the footer of the UVU web page.~~

~~5.2.2 Individuals who believe they have been denied appropriate accommodations, including appropriate auxiliary aids and services or access to campus technology, may file a grievance in accordance with Policy 152 *Accommodations for Individuals with Disabilities*. This policy supports Policy 165 *Discrimination, Harassment, and Affirmative Action*, and assists employees with providing equal and nondiscriminatory educational opportunities. Noncompliance with this policy, therefore, may lead to noncompliance with Policy 165 and disciplinary action under Policy 165, up to and including termination.~~

POLICY HISTORY		
June 18, 2019	Regular, new policy approved.	UVU Board of Trustees



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#### POLICY 452 EXECUTIVE SUMMARY

**Policy Number and Title:** 452 Electronic Information and Technology

<b>Date:</b>	April 1, 2024
<b>Sponsor:</b>	Christina Baum
<b>Steward(s):</b>	Brett McKeachnie
<b>Policy Process:</b>	Regular
<b>Policy Action:</b>	Revision
<b>Policy Office Editor:</b>	Cara O'Sullivan
<b>Embedded Attorney:</b>	James Duncan

**Issues/Concerns (including fiscal, legal, and compliance impact):**

This policy update does not require any substantive changes to the purpose nor intent of this policy. Revisions are intended to clarify some policy points and to make the policy more readable and accessible.

**Suggested Changes:**

Revisions will (1) update the status and function of University Accessibility Committee and (2) cast the policy language into a more readable format and more accessible language.

**Requested Approval from President's Council:** Entrance to Stage 1

**Proposed Drafting Committee:** Laura Lewis, Brett McKeachnie, James Duncan, David Frame

**Target Date for Stage 1 Draft to Enter Stage 2:** 8/19/2024

**Target Date for Board of Trustees Review:** 10/31/2024



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### EQUITY ASSESSMENT COMMITTEE (EAC) FORM

**Policy Number and Title:** 452 Electronic and Information Technology Accessibility

**Sponsor:** Christina Baum  
**Steward(s):** Brett McKeachnie  
**EAC Review:** March 6, 2025  
**Owner Review:**

**UVU Scope (Groups Impacted):**

Adult learners	Pregnancy, pregnancy-related conditions
Age (40+)	Race and ethnicity
Color	Religion, spirituality, and worldviews
First-generation student status	Sex, gender identity, and gender expression
Individuals with apparent or non-apparent disabilities	Sexual orientation
National origin and citizenship status	Socioeconomic status
	Veteran status (including uniformed military status)

*Note: This form is for internal use only by the EAC and policy owners (sponsors, stewards, and coordinators). This form captures general equity concerns and those that impact the specific groups listed. This form will accompany the Stage 2 draft.*

Section	Groups Impacted	General Equity	Equity Concern	Recommendation	Policy Owner Proposed Solution
			No issues.		





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SUMMARY OF COMMENTS (STAGE 2)			
<b>Policy Number and Title:</b> 452 Electronic and Information Technology Accessibility			
<b>Sponsor:</b> Christina Baum			
<b>Steward(s):</b> Brett McKeachnie			
<b>UVUSA</b>	<b>Academic Affairs</b>	<b>Faculty Senate</b>	<b>PACE</b>
Date	Date	Date	Date
Presented: _____	Presented: <u>3/13/2025</u>	Presented: _____	Presented: <u>2/18/2025</u>

*Note: Indicate with X whether the comment is editorial (grammar, punctuation, sentence structure) or is a substance comment (content, procedure, etc.)*

Campus Entity	Policy Section	Editorial Comment	Substance Comment	Concern	Sponsor/Steward Response
PACE	3.1		X	Should “substantially equivalent ease of use” be defined?	No, because the requirement varies for each situation, and defining it removes flexibility needed. It is an expert’s subjective judgement, based on the need and individuals being served.
PACE	4.1.3 / 4.1.4		X	Especially where this policy could be tied to personnel action, consider what steps you can take as a centralized office to better train, enforce, and integrate the Accessible Technology standards and	Thank you. Both the EIT Accessibility Office and the University Accessibility Committee are constantly looking for opportunities and methods to make the campus community aware of these



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				<p>procedures.</p> <p>Most staff do not know what these requirements are.</p>	<p>standards and requirements. There are new trainings and communications forthcoming as part of an updated compliance roadmap.</p>
PACE	4.2.1		X	<p>“UVU community” includes students, who are not held to the same standards as employees. Should not use UVU community in this context.</p>	<p>All UVU community members are held to the same federal requirements for ensuring accessibility, when “selecting, recommending, procuring...” EIT for use at UVU, whether or not they are students.</p>
PACE	4.2.1 / 4.2.2 / 4.2.3 / 4.2.4		X	<p>These sections are a bit hard to understand, and I think it is because 4.2.1 is written as a requirement. 4.2.2 is aspirational. The end of 4.2.2 and then 4.2.3 and 4.2.4 go into specific “how to” language of who is responsible for evaluating a request and that process. 4.2.3 and 4.2.4 also don’t use the actual phrase “accommodation request,” which adds to the confusion. “Shall assess” “When evaluating undue burden”, etc. Rather than “shall assess accommodation requests, or “when evaluating accommodation requests for undue burden”</p> <p>Consider making a different section and</p>	<p>Section 4.2 is titled “Utah Valley University’s Commitment to Accessibility”, and is not related to the process of requesting accommodations, nor about specific procedures. These are covered in section 5.1.</p> <p>4.2.2 Discusses reasons we may not make auxiliary aids or services (accommodations) available to an individual with a disability; undue burden or fundamental alteration.</p> <p>4.2.3 Defines who has the authority to make a determination that an accommodation would be fundamental alteration.</p>



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				clearly identifying the section as “Accommodation Requests.” Could also reduce information here and instead reference more of Policy 152.	<p>4.2.4 defines who has the authority to make a final determination of undue burden.</p> <p>4.2.2 has been altered to replace “commits to providing” with “will provide”.</p> <p>We could move the content in sections 4.2.2 - 4.2.4 to section 5.1, which would simplify 4.2 a bit, but we have chosen to leave it as is to avoid complicating 5.1 and because we feel these sub-sections are policy statements, not procedural.</p>
PACE	4.2.2	X		Final sentence is confusing due to “Providing equally”. It looks like it is intended to be a qualifying statement such as “Only if”, but the way it is written makes it seem like a verb instead.	“Equally effective alternative access” is an accessibility industry term, defined in 3.3, and used here appropriately. To avoid confusion 4.2.2 has been changed to “Providing equally effective alternative access does not require the institution to fundamentally alter programs, courses, or jobs; nor does it require the university to make changes that would constitute an undue financial or administrative burden.”



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PACE	4.4.1 / 4.5.1 / 4.7.1	X		Consider rewording. Section both 4.1.3 and 4.2.1 already states that EVERYONE has to follow the accessible technology standards and procedures.	These sections are intended to point out role specific responsibilities of the named departments or groups, not the general responsibilities applicable to everyone. 4.1.3 and 4.2.1 apply to everyone.
PACE	5.4.1.1	X		Consider changing the word “accessible” when mentioning how the report form can be found. Confusing given the nature of the word Accessible / Accessibility in this policy.	5.4.1.1 has been altered to replace “accessible” with “available”.
UVUSA	Overall		x	Appreciate application to federal guidelines	If asking for us to state specific guidelines in the policy, both Federal and State regulations are stated in the References section (2.0). If you’re referring to the Web Content Accessibility Guidelines being specifically indicated in the policy, that has not been done for two reasons. One, they are defined as the standard in both Federal regulations referenced in the policy. Two, they are constantly being updated with new versions released. We have refrained from stating specific versions so that we do not have to revise policy every time they change. The WCAG guidelines are provided to UVU faculty, staff, and students on the



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					Accessible Tech website ( <a href="http://uvu.edu/accessibletech">uvu.edu/accessibletech</a> ).
Faculty Senate				No comments.	
AAC				No comments.	