



POLICY TITLE	Electronic and Information Technology Accessibility	Policy Number	452
Section	Facilities, Operations, and Information Technology	Approval Date	June 18, 2025
Subsection	Information Technology	Effective Date	June 18, 2025
Responsible Office	Office of the Vice President of Digital Transformation	Last Review	June 18, 2025

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.



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*



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 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 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.

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



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

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

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

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

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

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

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

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

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

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

4.5.1.3 ensuring that licensed software and systems meet accessibility criteria

4.5.1.4 designing and deploying technology solutions with accessibility in mind

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

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.

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.

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

5.4.2 Individuals who believe they have been denied appropriate accommodations, including appropriate auxiliary aids and services or access to campus technology, may file a formal



UTAH VALLEY UNIVERSITY

Policies and Procedures

grievance under Policy 152 *Accommodations for Individuals with Disabilities*. Individuals who believe they have been discriminated against on the basis of disability, may file a complaint under Policy 165 *Discrimination, Harassment, and Affirmative Action*. By adhering to this policy, UVU promotes equal and nondiscriminatory educational opportunities.

POLICY HISTORY		
Date of Last Formal Review: June 18, 2025		
Due Date of Next Review: June 18, 2030		
Date of Last Action	Action Taken	Authorizing Entity
June 18, 2019	Regular, new policy approved.	UVU Board of Trustees
June 18, 2025	Revised policy approved via regular policy process.	UVU Board of Trustees