

UNLV Accessibility Standards and Procedures

ADMINISTRATION

- A. The Executive Accessibility Advisory Board (Chaired by the ADA Coordinator and Technology Accessibility Coordinator and made up of key UNLV executives or their assigned representatives) is charged with determining funding and setting priorities per the UNLV accessibility plan. The Executive Accessibility Advisory Board (EAAB) will have final authority (as charged by the UNLV President or Provost), in consultation with the Office of the ADA coordinator and the Office of Accessibility Resources, to approve exceptions to the UNLV Accessibility Policy based on a determination that the action would result in a fundamental alteration or undue burden.
- B. The ADA Coordinator's Office, in concert with the Office of Accessibility Resources, consults with University colleges, schools, departments, programs or units; processes exceptions; and resolves complaints under the UNLV Accessibility Policy and Standards and Procedures.
- C. The Office of Accessibility Resources (OAR) provides UNLV program oversight for Information and Communication Technology (ICT) accessibility, implements, reviews, and provides technical assistance regarding the Accessibility Standards and Procedures; processes exceptions; guides and assists with ICT accessibility evaluations, training, writing remediation Alternate Access plans, consulting with vendors/internal developers, and filing exceptions as requested or necessary.
- D. Each University colleges, schools, departments, programs or units will designate, in a minimum, one Accessibility Liaison to partner with the Office of Accessibility Resources, and notify the Office of Accessibility Resources of the appointment or any change in the designee. The Accessibility Liaison, through a local structure, will implement the requirements of the UNLV Accessibility Policy. This structure must address the development, acquisition, and delivery of ICT and/or Instructional Materials under the provisions of the Accessibility Standards and Procedures.

RESPONSIBILITIES

Position or Office	Responsibilities
Accessibility Liaisons	<ol style="list-style-type: none">1. Understand and support implementation of the UNLV Accessibility Policy, Accessibility Standards and Procedures, and available accessibility assessment tools within their University colleges, schools, departments, programs or units.2. Develop and implement a local structure addressing the acquisition, development, and delivery of accessible Information and Communication Technology (ICT) as specified in the Accessibility Standards and Procedures.3. Help ensure that faculty, staff, and student employees who acquire, develop, and deliver ICT comply with

Position or Office	Responsibilities
	<p>UNLV Accessibility policy and Accessibility Standards and Procedures.</p> <ol style="list-style-type: none"> 4. Help ensure their University colleges, schools, departments, programs or units indicate a method of contact for difficulty in accessing ICT. 5. Submit an Annual Accessibility Report and Plan to the ADA Coordinator's Office for review and approval. 6. Complete annual accessibility training coordinated through the Office of Accessibility Resources. 7. Facilitate accessibility training and technical assistance for their University colleges, schools, departments, programs or units faculty, staff, and student employees who acquire, develop, and deliver ICT.
<p>Accessibility Resources' Office</p>	<ol style="list-style-type: none"> 1. Implement, review, and provide technical assistance to University colleges, schools, departments, programs or units on implementing the UNLV Accessibility Policy, Accessibility Standards and Procedures. 2. Guide product accessibility evaluations as requested or necessary. 3. Consult with the EAAB and ADA Coordinator's Office on exception requests. 4. Take and resolve complaints about ICT accessibility, in consultation with the ADA Coordinator's Office. 5. Evaluate ICT accessibility when complaints are received. 6. Partner with the ADA Coordinator's Office and NSHE constituents to determine accessibility training content, provide delivery of content, and track training completion institutionally. 7. Assist with accessibility evaluations of ICT, writing remediation and Alternate Access plans, and filing of exceptions for University colleges, schools, departments, programs or units. 8. Consult with vendors and internal developers to ensure assessment tools are meeting the needs of the university. 9. Effectively communicate accessibility requirements to University colleges, schools, departments, programs or units, helping to ensure all units are informed.
<p>ADA Coordinator's Office</p>	<ol style="list-style-type: none"> 1. Provide accessibility guidance to University colleges, schools, departments, programs or units. 2. Track, in coordination with the Office of Accessibility Resources, the accessibility Liaisons(s) for each

Position or Office	Responsibilities
	<p>University colleges, schools, departments, programs or units.</p> <ol style="list-style-type: none"> 3. Grant exceptions to the UNLV Accessibility Policy and Accessibility Standards and Procedures through the Executive Accessibility Advisory Board as appropriate, in consultation with the Office of Accessibility Resources, Dean or VP of the requesting unit, and/or the appropriate academic oversight group. 4. Take and resolve complaints about ICT Accessibility, in consultation with the Office of Accessibility Resources. 5. Coordinate annual accessibility training with the Office of Accessibility Resources. 6. In consultation with the Office of Accessibility Resources, review and approve each University colleges, schools, departments, programs or units Annual Accessibility Report and Plan or assist in remedying any deficiencies.
<p>University colleges, schools, departments, programs or units</p>	<ol style="list-style-type: none"> 1. Designate one or more accessibility liaison(s), and notify the Office of Accessibility Resources who is responsible or if changes in designation occur. 2. Ensure all Information and Communication Technology are accessible and in compliance with the Accessibility Standards and Procedures whether acquired, developed, or delivered. 3. Make ICT accessible or provide an equally effective alternative within XX business days of a specific request. Make legacy and archived ICT accessible according to the procedures specified. 4. If applicable, request exceptions to this policy using the Request for Equally Effective Alternative Access Exception. 5. Respond within one business day to individuals who express difficulty accessing ICT and elevate a description of the response to the accessibility liaison, the ADA Coordinator's Office and the Office of Accessibility Resources. 6. Comply with any actions as determined necessary (as a result of a complaint) by the ADA Coordinator and/or the Office of Accessibility Resources.
<p>Faculty, staff, and student employees who acquire, develop, and/or deliver information and</p>	<ol style="list-style-type: none"> 1. Attend accessibility training per the Accessibility Standards and Procedures. 2. Understand and implement the UNLV Accessibility Policy and Accessibility Standards and Procedures.

Position or Office	Responsibilities
communications technology	<ol style="list-style-type: none"> 3. Inform, as applicable, unit decisions related to acquisition, development, and delivery of accessible information and communications technology. 4. Help ensure delivery of accessible ICT. 5. Respond to users encountering ICT accessibility barriers.

PROCEDURE

- I. General Accessibility
 - A. Each University college, school, department, program or unit must help ensure all ICTs and Instructional Materials are accessible and in compliance with the Accessibility Standards and Procedures whether acquired, developed, or delivered.
 - B. Each University colleges, schools, departments, programs or units must designate one or more accessibility liaison(s) with responsibility for helping ensure that the University colleges, schools, departments, programs or units are in compliance with UNLV Accessibility Policy and Accessibility Standards and Procedures, and must notify the Office of Accessibility Resources whenever a change in designee occurs.
 - C. Accessibility liaisons must help ensure that their respective University colleges, schools, departments, programs or units clearly indicate a method of contact for individuals with disabilities having difficulty accessing ICT.
 1. Suggested language: "If you have a disability and experience difficulty accessing this content, contact [insert name of responsible individual/position] at [contact information]."
 2. The contact information must be an email, electronic form, and/or phone number that puts the user in contact with the University colleges, schools, departments, programs or units individual responsible for evaluating the ICT and who should respond within one business day.
- II. Training
 - A. All University colleges, schools, departments, programs or units faculty, staff, and student employees who acquire, develop, or deliver ICT and Instructional Materials must complete accessibility training coordinated through the Office of Accessibility Resources.
 - B. Accessibility Liaisons will attend "Foundations of Accessibility" training and annual accessibility training thereafter coordinated through the Office of Accessibility Resources. Facilitate, in coordination with the Office of Accessibility Resources, accessibility training for their University colleges, schools, departments, programs or units faculty, staff, and student employees who acquire, develop, or deliver ICT.
- III. Reporting
 - A. By XX X of each year, each accessibility liaison must submit to the ADA Coordinator's Office for review and approval of an Annual Accessibility Report

and Plan for their University colleges, schools, departments, programs or units that must include:

1. A description of local controls for the acquisition, development, and delivery of accessible ICT and Instructional Material;
 2. An evaluation of the current accessibility of their ICT and Instructional Material;
 3. A description of the processes for:
 - a) Equally Effective Alternative access,
 - b) Removing identified barriers,
 - c) Current training, and
 - d) Training proposed for the upcoming year.
- B. The ADA Coordinator's Office will review and approve all such plans in consultation with the Office of Accessibility Resources and the University colleges, schools, departments, programs or units Accessibility Liaison to remedy any deficiencies.

IV. Procurement of ICTs from Third-Parties

- A. Each University colleges, schools, departments, programs or units shall implement the following procedures governing procurement, including acquisition, use or adoption, of ICT and Instructional Materials from third parties (e.g. vendors). The NSHE and UNLV accessibility policies require that:
1. The third party commits either to providing an ICT that meets the requirements set forth in the Accessibility Standards or details how the third party will support UNLV in providing equally effective alternate access for non-conforming ICT and Instructional Materials until the ICT is fully conformant as demonstrated in the third party's accessibility documentation; and
 2. Each University colleges, schools, departments, programs or units, when adopting or procuring ICT and Instructional Material, shall obtain,
 - a) A completed Accessibility Statement (including all section materials, i.e., VPAT).
 - b) A completed Accessibility Roadmap for non-conformant ICT and Instructional Material.
 3. The University colleges, schools, departments, programs or units Accessibility Liaison(s) review and evaluate each third party's most recent accessibility testing results. This review may be done in consultation with the Office of Accessibility Resources.

V. Responding to Accessibility Requests

- A. When an individual with a disability or a representative of such person contacts a University college, school, department, program or unit to express difficulty accessing an ICT, the University college, school, department, program or unit should respond to the individual within one business day and elevate a description of the response to the appropriate Accessibility Liaison, ADA Coordinator's office and the Office of Accessibility Resources.
- B. Current and archival ICT that are specifically requested to be made accessible by or on the behalf of an individual with a disability must be made

accessible or an equally effective alternative must be provided within XX business days.

- C. For ICT materials, equally effective means that it communicates the same information with a comparable level of accuracy.
- D. For ICT services, equally effective means that the end result (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requestor.
- E. Archived ICTs do not have to be converted to meet the Accessibility Standards unless specifically requested by or on the behalf of an individual with a disability. When requested, the ICT in archive status must be provided in an effective accessible format in a timely manner. Timeliness is generally within XX business days, but the University college, school, department, program or unit may consider the context, type, and volume of information or service requested in consultation with the ADA Coordinator and/or the Office of Accessibility Resources.
- F. Upon specific request for access by or on the behalf of an individual with a disability, ICTs in archive status containing administrative or academic information, official records, and similar information must be prioritized and made available promptly and in a format that provides effective access.

V. Exceptions

- A. When compliance is not technically possible or may require extraordinary measures due to the nature of the ICT, University colleges, schools, departments, programs or units may request an exception.
- B. Exceptions to this policy may be granted by the ADA Coordinator's Office, in consultation with the Office of Accessibility resources, Dean or VP of the requesting unit, and/or the relevant academic oversight group (e.g. unit curriculum committee, Faculty Senate) when appropriate and final decision resides with the Executive Accessibility Advisory Board.
 - 1. Requests for such exceptions must follow the Alternative Access Plan form.
 - 2. Requests for such exceptions should be initiated as soon as product information, design plans, evaluations, or user feedback indicates a significant conflict with the accessibility standards. This may be at any point in the ICT life cycle, including prior to, during, or after acquisition, development, or delivery.
 - 3. University colleges, schools, departments, programs or units must have an Alternate Access Plan exception before acquiring, developing, or delivering ICT that do not meet the UNLV Accessibility Standards.

VI. Complaints

- A. If an individual with a disability is dissatisfied with any University college, school, department, program or unit response to an accessibility request or other performance under the UNLV Accessibility Policy and/or Accessibility Standards and Procedures they may file a complaint with the ADA Coordinator. If such a complaint is received by a University college, school, department, program or unit, the complaint must be forwarded to the ADA Coordinator within one business day.

1. Within two business days of receiving a complaint, the ADA Coordinator's Office will notify the individual with a disability or their representative that their complaint has been received and answer any questions about the complaint process.
2. Within 10 business days of receiving a complaint, the Office of Accessibility Resources will:
 - a) Conduct, or cause to be conducted, an evaluation of the ICT, or any alternatives provided by the University college, school, department, program or unit in question; or
 - b) Notify the individual with a disability or their representative of the need for additional time to conduct an evaluation.
- B. Once the evaluation has been completed, in consultation with the Office of Accessibility Resources, the ADA Coordinator will determine what action, if any, is needed.
- C. The ADA Coordinator's Office will inform the individual of the outcome of their complaint and the University colleges, schools, departments, programs or units of any actions they must take to comply with this policy.

ACCESSIBILITY STANDARDS

All ICT will meet the following W3C guidelines as applicable:

- Section 508 Final Rule Information and Communication Technology (ICT) Standards and Guidelines
- Web Content Accessibility Guidelines (WCAG) 2.1 A and AA has been accepted throughout the web industry and is used by the US Department of Education, US Department of Justice and Federal Courts as providing for full and equal access minimally in accordance with federal law;
- The following standards when applicable
 - WAI-ARIA 1.2 for web content;
 - UAAG 2.0 for web browsers, media players, and assistive technologies;
 - ATAG 2.0 for software used to create web content;
 - EPub Accessibility Guidelines 1.0 for EPublications, i.e., textbooks, journals, and interactive applications.

Specific Vetted Guidance

1. Captions required:
 - a. All new course developments.
 - b. Subject matter expert (SME) self-generated content (such as Panopto)
 - c. Will be reused in future courses.
2. Captioning required due to a Disability Resource Center (DRC) request for a student in the course.
 - a. Requires at the same time captions as the item is made available to the entire class:
 - b. When there is a DRC request, instructors are not allowed to make audiovisual materials available to students without captioning. In other words, "publish first, captioning next" is not allowed.

- c. In the event that the responsible party chooses not to follow this guideline, send an email to the appropriate DRC representative. They will be responsible for educating and bringing the party into compliance.
3. Captions not required:
 - a. SME self-generated content (such as Panopto); AND
 - b. This content is for a current running course; AND
 - c. No DRC request; AND
 - d. Will not be reused in future courses.
4. Who pays for captioning?
 - a. Department decides and pays for the non-DRC request captioning.

RELATED DOCUMENTS

- [UNLV Five Phase Accessibility Plan Doc](#)
- [UNLV Five Phase Accessibility Plan Map](#)
- [NSHE's Policy for Information and Communications Technology Accessibility](#)

Procurement/Adoption Documents

- [Accessibility Statement](#)
- [Accessibility Roadmap](#)
- [Alternate Access Plan](#)