Information and Communication Technology Accessibility Policy

Responsible Administrator: Vice Provost for Academic Programs
Responsible Office: Office of Accessibility Resources
Originally Issued: October 2019
Revision Date: NA

Statement of Purpose

The University of Nevada, Las Vegas (UNLV or University) is committed to providing equitable access to and supporting an information technology (IT), digital materials, services and the environments in which information is used that is accessible to all, including individuals with disabilities. The creation and dissemination of knowledge is a defining characteristic of universities and fundamental to UNLV’s mission of education, research, scholarship, creative activities, and clinical services.

To this end, UNLV seeks to deploy information technology that has been designed, developed, procured or acquired to be accessible to people with disabilities, including those who use assistive technologies, as required by Section 504 of the Rehabilitation Act of 1973 (Sec 504), the Americans with Disabilities Act of 1990, as amended (ADA), NSHE ICT Accessibility Policy and UNLV Accessibility Standards and Procedures. An accessible IT environment generally enhances usability for everyone. By supporting IT accessibility, the University helps ensure that as broad a population as possible is able to access, benefit from, and contribute to its programs and services.

The policy defines the terms, authority, responsibility, and procedural process for implementation.

Entities Affected by this Policy

Any University college, school, department, program or unit that utilizes Electronic Information, Communication and Technology that impacts students, employees and the public as it relates to University business and services. This includes individual faculty and staff who publish Web pages, distribute electronic documents (e.g., via email, SharePoint, Blackboard, etc.) and/or sign a contract with a vendor of electronic technology for the purpose of conducting University-related business and services.
Who Should Read this Policy

Any University college, school, department, program or unit that utilizes information and communications technology that impacts students, employees and the public as it relates to University business and services. This includes individual faculty and staff who publish web pages, distribute electronic documents (e.g., via email, Google Drive, SharePoint, Dropbox, WebCampus (Canvas), etc.), adopt and/or sign a contract with a vendor of information and communications technology for the purpose of conducting University-related business and services.

Policy

1. ICT Accessibility General Policy

The University seeks Information and Communication Technology (ICT) that is universal in design and accessible to all individuals, including individuals with disabilities. In the event this is technically infeasible or imposes undue burden, the University ensures an equally effective accessible alternative. All ICT must meet the UNLV Accessibility Standards and Procedures and implementation under the UNLV Five Phase Accessibility Plan.

2. ICT Accessibility Procurement Policy

All ICT procured or acquired must meet the applicable accessibility standards set forth in UNLV Accessibility Standards and Procedures. The detailed ICT Procurement Procedures are published on the UNLV Accessibility Standards and Procedures website.

3. Authority and Responsibility

The Office of the Vice Provost for Academic Programs (VPAP) oversees the implementation of and compliance with the ICT Accessibility Policy. The Office of Accessibility Resources, as the VPAP’s designee, shall coordinate those efforts. Technology accessibility is an institution-wide responsibility. Technology access for individuals with disabilities must provide comparable functionality, affordability, accuracy of content and timeliness of service delivery. Products and services must be usable by the greatest number of people including individuals with disabilities.

Each University college, school, department, program or unit, faculty member, and employee is responsible to ensure compliance with this policy, required to adhere to this policy’s corresponding standards and procedures, and, if notified of non-compliance, is required to remediate.

4. Scope

The ICT Accessibility Policy applies to all technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information employed in support of university business.

ICT includes, but is not limited to, the 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, instructional materials, student response systems ("clickers"), and equipment such as classroom podiums, copiers and fax machines. ICT
also includes, but is not limited to, telecommunications products (such as telephones), information kiosks, Automated Teller Machines (ATMs), transaction machines (such as payment terminals), computers, ancillary equipment, software, services (including support services), equipment maintained and services operated by third-party vendors, and related resources.

5. Procedures and Guidelines

The Office of Accessibility Resources is responsible to maintain the UNLV Five Phase Accessibility Plan and its implementation through the UNLV Accessibility Standards and Procedures. All newly created, procured, deployed or otherwise acquired ICT must comply with the UNLV Accessibility Standards and Procedures and implementation under the UNLV Five Phase Accessibility Plan. All existing ICT must be brought into compliance with the UNLV Five Phase Accessibility Plan as determined in the annual University college, school, department, program or unit accessibility plan following the UNLV Accessibility Standards and Procedures.

The Office of Accessibility Resources may establish subcommittees and working groups responsible for subsections of the UNLV Five Phase Accessibility Plan.

6. The Office of Accessibility Resources must:

   a. In collaboration with the ADA Coordinator, provide an annual report of progress of the University’s, college’s, school’s, department’s, program’s or unit’s accessibility plan, subcommittees, working groups and compliance statistics to the Office of the Vice Provost for Academic Programs.
   b. Establish and maintain the UNLV Accessibility Standards and Procedures.
   c. In collaboration with the ADA Coordinator, review the ICT Accessibility Policy and submit revisions via the Vice Provost for Academic Programs as needed.

7. Instructional Materials

All instructional materials and tools (i.e., video, images, documents, mobile applications, student response systems ("clickers"), etc.) are required to be accessible. All third-party content (i.e. publisher content, linked materials, etc.) used in a course must be accessible and is the responsibility of the department or faculty member providing the materials.

All faculty and staff are required to use university approved learning management systems (LMS), video servers, instructional tools (such as the plagiarism detection tool), student response systems ("clickers"), etc. for all instructional activities.

Procedures for accessing the accessibility of instructional materials and tools and the use of University approved systems and tools can be found on the UNLV Accessibility Standards and Procedures website.

8. Websites and Web Content

All websites, web pages, web-based applications, and social media published or hosted by the University or otherwise used to conduct official university academic and business activities must
be in compliance with the ICT Accessibility Policy and must meet accessibility standards as published in the UNLV Accessibility Standards and Procedures. This includes, but is not limited to, University websites, academic division websites, departmental websites, student organization websites, faculty/staff websites, and externally hosted sites and content provided for official university business or instruction. Personal or faculty websites, are not to be used for the dissemination of any instructional materials or content nor to conduct official university academic or business activities.

Official university websites must contain a link to the Web Accessibility webpage describing UNLV’s Commitment to Accessibility and the method to report barriers and/or to receive an equally effective accessible format.

9. Exceptions

In some instances, ICT may be either not covered by this policy or eligible for exception from this policy when approved by the Executive Accessibility Advisory Board as defined in the Exception section of the UNLV Accessibility Standards and Procedures. Situations may include undue burden and fundamental alteration as identified in the exception section of the UNLV Accessibility Standards and Procedures and are evaluated on an individual basis.

**Related Documents**

Accessibility Standards and Procedures are available on the UNLV Accessibility Standards and Procedures website.

**Contacts**

Office of Accessibility Resources, 702-895-3808
Office of Equal Employment and Title IX, 702-895-4055

**Definitions**

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 time-frame as individuals without disabilities, with substantially equivalent ease of use.

Information and Communication Technology (ICT). All technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information employed in support of the University's Mission and Core Themes. ICT includes, but is not limited to, the 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, instructional materials, student response systems (“clickers”), and equipment such as classroom podiums, copiers and fax machines. ICT includes telecommunications products (such as telephones), information kiosks, Automated Teller Machines (ATMs), 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.

Technically infeasible - If something has little likelihood of being accessible because there is no existing software and/or hardware solution to provide the same level of access to all persons it is technically infeasible.

Undue burden - Compliance is a financial hardship, or is significantly difficult in that it may
require extraordinary measures due to the nature or intent of the Information and Communication Technology. Financial hardship is determined within the context of the entire University budget.

Equally effective accessible alternative - The alternative(s) must afford disabled persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.