



University of Pittsburgh
Electronic Information and Technology Accessibility Procedure
Procedure CS 26

Implementing Executive: Senior Vice Chancellor for Engagement
Responsible Unit: Office of Diversity and Inclusion
Category: Community Standard
Effective Date: March 4, 2020

I. Purpose

The Electronic Information and Technology Accessibility Procedure effectuates the standards for the accessibility of electronic information and technology (EIT) as established in the Electronic Information and Technology (EIT) Accessibility Policy.

II. Definitions

Please refer to the EIT Accessibility Policy (Policy CS 26) for definitions of the terms used in this Procedure.

III. Procedures

The Procedures below provide detail on:

- Implementation Plans (Section III. A.)
- Procurement (Section III. B.)
- Exceptions (Section III. C.)
- Reporting (Section III. D.)
- Noncompliance (Section III. E.)

A. Implementation Plan

All schools, departments and units (for purposes of this policy, the term “area” will be used when referring to these entities) are required to submit an [implementation plan](#) to the Office of Diversity and Inclusion (ODI). The implementation plan will allow areas to communicate individual decisions and strategies about how to best meet the requirements of the policy while providing ODI with a roadmap against which to measure annual progress.

While areas have discretion about prioritization, plans should ensure that all new EIT is accessible immediately and that existing Fundamental EIT is remediated within the time frame defined in the EIT Accessibility Guidelines.

B. Procurement

As set forth in the Policy, all procurement or purchasing contracts with EIT vendors must reflect the University's commitment to accessibility. To implement this directive, all Request for Proposals (RFPs) and contracts must include the following:

1. Required Contractual language

Contractual language stipulating the need for compliance with WCAG 2.1, or the most current version of WCAG, should be included in all EIT contracts. Contractual language, provided by the Office of University Counsel, can be obtained from Purchasing Services.

Even if the product is currently accessible, the contract must include language that assures continued accessibility as the product is updated.

When a contract is renewed for existing EIT, an accessibility compliance clause or addendum must be added to the contract.

2. Vendor Compliance Documentation

When purchasing or renewing EIT, the purchasing area should request written evidence from the vendor that their product or service conforms to each of the WCAG 2.1, or the most current version of WCAG, Level AA criteria.

Vendors may do so by submitting a [VPAT](#) (Voluntary Product Accessibility Template) in which they address each of the WCAG 2.1, or the most current version of WCAG, criteria or by completing the EIT Accessibility Checklist. The most reliable compliance documentation is completed by companies that specialize in evaluating the digital accessibility rather than by the vendor themselves.

Completed VPATs and/or EIT Accessibility Checklists will be held by Purchasing Services.

3. Compliance Decisions

Using compliance documentation as well as internal evaluations, areas will work with Purchasing Services, in consultation with key partners such as ODI, Disability Resources and Services (DRS), and Computing Services and Systems Development (CSSD) to determine if the EIT meets compliance standards.

For those products/services that meet some but not all WCAG 2.1, or the most current version of WCAG, criteria, it is recommended that a roadmap for compliance be included in the contract at no charge to the university. Vendors should at a minimum be willing to make a commitment to address their accessibility problems.

C. Exceptions

The policy allows for exceptions if any of the following circumstances are demonstrated.

- Where compliance is not technically possible or may require extraordinary measures due to the nature or intended use of the information resource, application or service. Lack of sufficient funding for any particular area of the University would not be considered as the sole reason for an exception.

- Where compliance would result in a fundamental alteration of the information resource, application, or service, and not satisfy the original intent.
- Where, in the case that information resources, applications and services that are procured through third party vendors or contractors; and that no alternative accessible products are available from other third-party vendors or contractors, procurement may be made of a non-compliant product.
- Where the product is not currently in compliance, but efforts are underway to fix the defects by a defined date.

To demonstrate that any of those circumstances exist, purchasers and developers of EIT must complete the [EIT Exceptions Form](#) and submit it to ODI for review.

ODI, in consultation with CSSD, Purchasing Services, and other relevant parties, will review the exception request and make a determination. Written decisions and rationale will be shared with requester. If the exception is granted, areas may move forward with purchasing the EIT product.

All exceptions contain an expiration date. When an exception has expired, owners of the EIT must provide evidence that the product/service is now accessible or request an additional exception.

D. Reporting

All areas are required to submit annual reports to ODI at the conclusion of each calendar year that details the efforts made to comply with the EIT Accessibility Policy. Annual reports will allow the University to assess its institutional progress and offer an opportunity for areas to report that year's accessibility improvements, response to complaints, as well as successful accessibility processes and supports.

E. Noncompliance

1. Complaints

It is strongly recommended that a link to the University's accessibility statement be placed on every University webpage. The statement provides the accessibility email address as well as the page where reports about accessibility barriers can be made.

All comments, suggestions, and complaints about accessibility issues sent to accessibility@pitt.edu will be reviewed by ODI, communicated to the relevant area, and addressed promptly by the area in consultation with ODI.

Reports made through the [online form](#) will also be reviewed and documented by ODI and communicated to the relevant area for prompt resolution.

If an exception has already been granted, the plan for equivalent access should be implemented.

If an exception had not previously been requested, the area must:

- a) correct the identified accessibility issues in a timely fashion; or
- b) identify a reasonable accommodation that provides equivalent access in a timely fashion and then submit an exception.

The area must report details of the resolution back to ODI.

2. Grievances

The University has adopted an internal grievance procedure for prompt and equitable resolution of complaints alleging any action prohibited by federal regulations implementing Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and the Americans with Disabilities Act, Amendment Act of 2008.

Issues that may warrant a grievance include, but are not limited to, a denial of a requested accommodation, the inadequacy of an accommodation, the inaccessibility of a program or activity due to disability, or discrimination or harassment based on disability.

Details about the internal grievance procedure can be found at the [Office of Diversity and Inclusion website](#).

3. Compliance Review and Remedies

An internal review will be conducted for several areas each year for compliance with the policy and progress toward each school or area's implementation plan. Further information can be found in the [Compliance Monitoring Process document](#).

The internal review process will conclude with a report and recommendations provided to the area. Remedies for non-compliant EIT include, but are not limited to, the requirement that the area repair or remediate the EIT, removal of the non-compliant EIT or requests for policy exceptions.

IV. Contact Information/Public Accessibility

This Procedure is posted under Community Standards on the [Office of Policy Development and Management's website](#).

Members of the University community are encouraged to contact [ODI](#) for assistance with understanding their obligations related to compliance.

V. Appendix – Related Authorities and Policies

[EIT Exceptions Form](#)

[EIT Accessibility Guidelines](#)

[Policy CS 26, Electronic Information Technology Accessibility](#)