Digital Accessibility: Procurement Process of Non-Compliant ICT

Request for Exemption from the Regulations

Date Prepared: mm/dd/yyy

Process Owners

Office of Materiel Management, Information Technology Services, Office of Digital Accessibility

Process Purpose

Information and Communication Technology (ICT) includes information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception or broadcast of data or information.

Required by the Virginia Information Technologies Agency (VITA) and University Policy, all ICT implemented by the University, regardless of the procurement method used, must meet the applicable accessibility standards of Section 508 of the Rehabilitation Act of 1973, as amended to include the Web Content Accessibility Guidelines 2.0 (WCAG 2.0), Level AA.

Process Inputs

All new ICT are routed through the 1) University Technology Vetting Committee which includes a thorough review of the vendor provided 2) Voluntary Product Accessibility Template (VPAT) by the Digital Accessibility Program Manager.

A VPAT, when completed correctly and thoroughly, becomes an Accessibility Conformance Report (ACR). This is a statement of good faith from the vendor that assists IT Services in identifying ICT products and services that meet the accessibility standards set forth by the VITA and the University.

The vendor is also requested to provide 3) a fully functional copy of the ICT for evaluation by the Digital Accessibility Program Manager.

Process Scope

When an ICT does not meet the accessibility, standards set forth by the VITA and the University but is deemed necessary to the core function of an academic program or administrative initiative, the purchaser must make a Request for Exemption from the Regulations to the CIO.

The following data from the Request for Exemption from the Regulations will be evaluated

- User Audience
- Number of Users

and then assigned a numerical value that corresponds with the chart below. The total of these two data will determine the Impact on Risk Value.

Values Used in Computing Impact on Risk

(Note: According to the CDC, 1 in 4 adults in the U.S. have some type of disability.)

User Audience

Students = 3

Faculty / Staff = 2

Number of Users (Based on the CDC information referenced...1 in 4...started with 1-8 then added 8.)

1 - 8 = 1

9 - 16 = 2

17 - 24 = 3

> 24 = 4

Impact Value = User Audience + Number of Users

High = 7 - 9

Moderate = 4 - 6

Low = 3

Once Impact on Risk Value is calculated, the CIO will either accept or deny the Request for Exemption from the Regulations. That decision will then be shared with the Director of Office of Materiel Management and the Digital Accessibility Program Manager.

Impact on Risk Calculation

Students	Faculty / Staff	# of Users		Impact Level
✓	✓	>24		**9 = High**

Audience Key: Students = 3 Faculty / Staff = 2

# of Users Key: 1-8 = 1, 9-16 = 2, 17-24 = 3, >24 = 4 Impact Level Key:

High = 7-9 Moderate = 4-6 Low = 3