ELECTRONIC AND INFORMATION TECHNOLOGY
ACCESSIBILITY POLICY

Category: Administration and Governance
Responsible Office: Equity, Diversity and Inclusion
Responsible Executive: President

Date Established: 10/16/2008
Date Last Updated: 5/11/2022

Summary

The University at Buffalo is committed to providing equal access to its services, programs and activities to everyone, including people with physical, sensory or cognitive impairments, with or without the use of assistive technology. The university requires electronic and information technology accessibility to meet this commitment.

Policy Statement

The University at Buffalo (UB, university) is committed to ensuring equal access to information that is presented electronically. As part of this commitment, digital content must be accessible to everyone, including individuals with physical, sensory or cognitive impairments, with or without the use of assistive technology.

Designation of Personnel

The university must designate an individual to serve as Electronic and Information Technology (EIT) Accessibility Officer. The EIT Accessibility Officer coordinates the university’s efforts to ensure accessible EIT and to remediate inaccessible digital content. Individual schools and administrative areas must designate one or more individuals to serve as Web Accessibility Liaisons to coordinate EIT accessibility efforts in their respective areas.

Applicable Standards

All EIT must conform to the requirements of the Accessibility Standards guidance document [insert link], except where doing so would impose a fundamental alteration or undue burden as established through the Exceptions section of this policy. This includes, but is not limited to, EIT that is created by UB or procured through vendors. It also includes external websites, services, and digital content required to access UB programs and activities. Accessibility standards include the following:

- Minimum standards developed by the State University of New York as follows:
  - Web Accessibility Standards
  - Digital Content Accessibility Standards
  - Classroom Accessibility Standards
  - Library Accessibility Guidelines
  - Procurement Accessibility Standards
- Web Content Accessibility Guidelines (WCAG)
• Standards for hardware accessibility (e.g., printer kiosks, ATMs, vending machines)

Archived Electronic and Digital Information

Archived electronic and digital content is not required to meet accessibility standards, but the university will provide an accessible version of archived web content or an equally effective, alternative means of accessing the content upon request. Individuals who wish to access inaccessible archived web content must contact Equity, Diversity and Inclusion (EDI). An EDI representative will process the request to access archived materials within five business days. EDI will either provide an accessible version of the archived materials or reasonable accommodations that will afford equally effective, alternative access to its content.

Exceptions

EDI serves as the President’s designee for considering exceptions to this policy. Limited exceptions may be granted by EDI in specific instances where compliance is not possible or would constitute an undue administrative or financial burden, or where it would create a fundamental alteration. Departments requesting an exception must provide equally effective, alternative access to ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits or services as their nondisabled peers. Exception requests must be accompanied by a written statement describing how the department will provide equally effective, alternative access.

Procurement

Any hardware, software, programs, or other EIT procured from vendors must be accessible when the information technology will be used by members of the university community to access university programs, services, or activities.

The university will review purchases and renewals of EIT in accordance with the Procurement Accessibility Review Process [insert link].

Complaints

Individuals who believe that there is a violation of this policy should contact EDI, which will investigate the complaint. An individual who files a complaint will be protected against retaliation.

Background

This policy is in accordance with federal and state laws, regulations, and policies requiring accessibility and equal access for individuals with disabilities. These laws and policies include the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and the New York State Human Rights Law.

Applicability

This policy:
• Applies to all university units
• Applies to all EIT, including online content, electronic documents, software, and hardware, whether created internally or procured through a vendor
• Expects that the university community will make reasonable efforts to ensure that EIT is accessible to everyone

This policy does not apply to individual webpages published by students, employees, or non-university organizations that are not hosted by the university and do not conduct university-related business. Individuals and organizations responsible for these webpages are encouraged to adopt the university’s accessibility standards.

Definitions

Accessible
Able to be used by all individuals, including individuals with disabilities, with or without assistive technology.

Archived Web Content
Web content that: (1) is at a minimum five years old; (2) is maintained exclusively for reference, research, or recordkeeping; (3) is not altered or updated after the date of archiving; and (4) is organized and stored in a dedicated area or areas clearly identified as being archived.

Assistive Technology
Any software or hardware that allows access to information or content for individuals with disabilities. Examples include special input devices (e.g., head or foot mouse, speech recognition), screen-reading software, and screen magnifiers.

Electronic and Information Technology (EIT)
Information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. EIT includes, but is not limited to, information resources such as internet and intranet websites, content delivered in digital form, search engines and databases, learning management systems, classroom technologies; web, computer and mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

Equally Effective Alternative Access
An alternative format or medium that communicates the same information in as timely and effective a fashion as does the original format or medium. For interactive or service pages, equally effective means the end result is accomplished in a comparable time and with comparable effort on the part of the requestor. To provide equally effective alternative access, alternatives are not required to produce the identical result or level of achievement for persons with and without disabilities, but must afford persons with disabilities 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.

Fundamental Alteration
A change so significant that it affects the essential nature of the instruction, program, or activity provided.
Undue Administrative or Financial Burden
A significant disruption, expense, or difficulty posed by the provision of accessible information technology. When a department is concerned that the provision of accessible information technology will pose undue financial or administrative burdens, it must proceed according to the Exception procedure in this policy.

Web Accessibility Liaison
University personnel who have received training in web accessibility and serve as unit-level contacts to coordinate accessibility efforts in their respective areas.

Web and Digital Content
The textual, visual, or aural content that is encountered as part of the user experience on websites, applications, software, email, social media, etc. It may include, among other things, text, images, sounds, videos, and animations. For purposes of this policy, web content also includes forms and documents accessible through UB websites.

Web Content Accessibility Guidelines (WCAG)
A series of standards developed by the World Wide Web Consortium (W3C) that promotes usability and best practices to ensure web access for individuals with disabilities. WCAG provides a common definition for accessible content.

Responsibility

President, Provost, Vice Presidents, Deans, Directors, Department Heads
- Ensure that EIT in their areas complies with the university’s Accessibility Standards [link].
- Follow the university’s Procurement Accessibility Review Process [insert link] when purchasing EIT.
- Designate one or more Web Accessibility Liaisons.

Unit Web Leaders and Department Web Administrators
- Develop new and redesigned websites, forms, documents, videos, and other content on public-facing university websites that are accessible and conform to the university’s Accessibility Standards.
- Test websites for accessibility prior to their launch or significant modification.
- Test existing websites for accessibility, and ensure that inaccessible web/digital content, forms, documents, videos and other online content published prior to the date of this policy are remediated or replaced.
- Provide reasonable accommodations to individuals who request access to inaccessible archived web/digital content. This may include remediating inaccessible content or providing content in reasonably convenient and equally effective alternative accessible formats.
- Follow the university’s Procurement Accessibility Review Process [insert link] when purchasing EIT.
Instructional Designers
- Ensure that instructional materials are developed in conformance with the university’s Accessibility Standards.

Course Instructors
- Ensure that websites or applications used in course instruction meet the university’s Accessibility Standards.
- Follow the university’s Procurement Accessibility Review Process [insert link] when purchasing EIT.

Vice President and Chief Information Officer
- Design and plan for accessibility in information technology hardware, software, and systems, and remediate accessibility issues within these systems.
- Follow the university’s Procurement Accessibility Review Process [insert link] when purchasing EIT.

Director of Equity, Diversity and Inclusion
- Investigate complaints of non-compliance with this policy.
- Consider and determine exception requests.
- Consider exceptions as the President’s designee.
- Assist with identifying equally effective alternative means of access when granting exceptions.
- Manage the university’s Procurement Accessibility Review Process.

EIT Accessibility Officer
- Coordinate the university’s efforts to ensure accessible EIT and to remediate inaccessible digital content.
- Communicate EIT accessibility information, policies, and initiatives across university divisions and departments.
- Monitor compliance with standards.
- Collaborate with Web Accessibility Liaisons to ensure accessibility of digital content.
- Provide training and educational resources to university personnel.

Web Accessibility Liaisons
- Serve as unit-level contacts for the EIT Accessibility Officer.
- Coordinate accessibility efforts for their area.

Contact Information

<table>
<thead>
<tr>
<th>Contact</th>
<th>Phone</th>
<th>Email</th>
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<tbody>
<tr>
<td>Equity, Diversity and Inclusion</td>
<td>716-645-2266</td>
<td><a href="mailto:diversity@buffalo.edu">diversity@buffalo.edu</a></td>
</tr>
<tr>
<td>UBIT Help Center</td>
<td>716-645-3542</td>
<td><a href="mailto:ubithelp@buffalo.edu">ubithelp@buffalo.edu</a></td>
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Related Information

University Links

Accessibility at UB
Discrimination and Harassment Policy
Electronic and Information Technology Accessibility Policy Guidance (revised document attached)
Equity, Diversity and Inclusion
Reasonable Accommodation Policy
UBIT Help Center

Related Links

Americans with Disabilities Act (ADA)
Disability Discrimination: Overview of the Laws
Information and Technical Assistance on the Americans with Disabilities Act - Accessible Technology
New York State Human Rights Law
State University of New York Electronic and Information Technology (EIT) Accessibility Policy, Document 6901
State University of New York Electronic and Information Technology Accessibility Standards: Implementation Guidance
- Web Accessibility Standards
- Digital Content Accessibility Standards
- Classroom Accessibility Standards
- Procurement Accessibility Conformance Standards
- Libraries Accessibility Guidelines

History

May 2022  Full review. Updated the policy to:
  - Change the title of the policy from Web Accessibility Policy to Electronic and Information Technology Accessibility Policy
  - Add the Designation of Personnel section
  - Remove references to a specific accessibility standard (i.e., WCAG 2.0) and replace it with references to the Accessibility Standards Guidance document
  - Remove references to specifics about the procurement process for EIT and replace it with references to the Procurement Accessibility Review guidance
  - Add a definition for Electronic and Information Technology and Web Accessibility Liaison
  - Remove the definition for Alternative Text, Screen Reader, Voluntary Product Accessibility Template (VPAT), and Web Accessibility Initiative – Accessible Rich Internet Applications Suite Guidelines (WAI-ARIA)
  - Add a responsibility for the President, Provost, Vice Presidents, Deans, Directors, and Department Heads to designate one or more Web Accessibility Liaisons
  - Add responsibilities for Web Accessibility Liaisons and the EIT Accessibility Officer
  - Change the title of the policy guidance document from Web Accessibility Policy
Guidance: Creating Accessible Content to Electronic and Information Technology Accessibility Policy Guidance; updated this Guidance

Presidential Approval

______________________________________
Satish K. Tripathi, President

Date
Electronic and Information Technology Accessibility Policy Guidance

This policy guidance provides information and recommendations for complying with UB’s EIT Accessibility Policy.

Recognizing that electronic and information technology (EIT) accessibility can be complicated, no single guidance document can completely address every related issue. This guidance document explains applicable standards and procedures at UB.

Background

The State University of New York and the University at Buffalo are strongly committed to diversity and inclusion. An essential part of inclusion, EIT accessibility helps ensure that individuals with disabilities have equal access to electronic and digital resources and content. Additionally, EIT accessibility is required by law. People with sensory, motor, cognitive or learning impairments may not be able to access digital content that is created or structured in certain ways. These individuals may use assistive technology, such as captioning, screen readers or other modifications, to access digital content. While assistive technology can be very effective in conveying online content, digital content designed without accessibility in mind may form barriers to access. Understanding common issues for individuals with impairments helps authors and developers appreciate the need for ensuring accessibility in EIT.

Visual Impairments

Individuals with visual impairments may use assistive technology such as screen readers to read the text on a webpage aloud or convert the text to Braille. It is valuable to understand how a screen reader user accesses digital content.

- Screen reader users usually navigate a page using their keyboard. A website that cannot be navigated solely with the use of a keyboard can pose a barrier to some users.
- Proper heading structure helps a screen reader user understand the page organization. They can quickly scan the headings on a page and skip to the content they want to read.
- Similarly, screen reader users may choose to listen to all of the links on a page and skip to a desired link. If a page includes generically labeled links (e.g., “click here,” “learn more” or “next”), the screen reader will read the generic labels without any context, providing no information about the link destinations.
- Screen readers cannot interpret images, so screen reader users rely on properly coded alternative text to provide the content of an image. Additionally, some incorrectly developed documents—particularly PDFs—may look like text but are actually images of text, making them inaccessible to screen reader users.

Visual impairments may also include:

- An inability to distinguish among colors. Therefore, websites that rely on color to convey meaning will be inaccessible.
- An inability to access information conveyed by video or through visual aids such as PowerPoint.
- The need to magnify or zoom in on text.
Cognitive and Learning Impairments

Users with cognitive and learning impairments may:

- have difficulty processing information on a webpage,
- become confused with complex website layouts or inconsistent navigational schemes, and
- have difficulty focusing on lengthy sections of text.

Hearing Impairments

Users with hearing impairments rely on synchronized captions on videos and transcripts of audio files to understand the content on a page.

Physical or Motor Impairments

Users may not be able to operate a mouse, making keyboard or alternative input navigation essential. They may also need more time to complete tasks on a webpage and/or larger clickable target areas.

Accessibility Standards

The World Wide Web Consortium (W3C) has established accessibility guidelines through its Web Accessibility Initiative (WAI). The WAI’s Web Content Accessibility Guidelines (WCAG) are widely considered the international standard in ensuring accessible electronic content.

The university recognizes that adoption of the WCAG 2.1 AA standards is critical to increasing EIT accessibility. We are in the process of transitioning compliance to this level and expect to be completed by March 2023.

WCAG 2.1 focuses on four user-centered principles of accessibility:

- Perceivable
- Operable
- Understandable
- Robust

WCAG 2.1 includes all success criteria from 2.0, with 17 additional success criteria that address mobile accessibility, as well as practices to promote accessibility for people with low vision and people with cognitive and learning disabilities.

The guidelines include, but are not limited to, the following requirements:

- Provide alternative text for any non-text content when necessary to convey meaning (e.g., images, graphs).
- Provide captions or transcripts for all audio or video content.
- Make all functionality available through the use of a keyboard.
- Ensure color is not used to convey meaning.
- Make text readable and understandable.
- Help users avoid and correct mistakes.

For additional information about WCAG, please see the following websites:
Resources for Meeting Accessibility Standards

UB’s Content Management System (UBCMS) includes accessibility features that help authors create and maintain accessible websites. For example, the UBCMS requires authors to add alternative text to images. The UBCMS also makes it easy for authors to organize content with headings and bullet points, which not only benefits individuals with disabilities but makes websites easier to navigate for everyone. Still, the UBCMS does not prevent a user from inadvertently uploading an inaccessible document/file (PDF, Word, PPT, etc.), writing generic link text, creating unhelpful or inaccurate alternative text, or posting a video without captions. Website owners and authors must be intentional in planning for accessibility when creating or revising web content.

The Accessibility at UB website provides assistance in understanding and creating accessible content. You can obtain detailed information and instructions in each of the following areas:

- Guidance on [website accessibility](#).
- Guidance on ensuring that Microsoft Office documents and PDFs can be accessed with a screen reader and are easily usable.
- Information about creating accessible [audio and video material](#), including [resources for captioning](#) videos.
- Steps to take when you wish to procure EIT products/services.

Building and maintaining accessible websites takes time, guidance and resources. Compliance with the EIT Accessibility Policy requires a combination of individual effort, area-level assistance and centralized expertise and resources. UB’s resources in this area include:

- A university-wide license for Siteimprove, an automated tool that scans websites, identifies accessibility issues and provides information about how to fix these issues. Siteimprove also identifies broken links and misspellings. While manual testing is also necessary to ensure website accessibility, Siteimprove can flag many issues automatically.
- An electronic and information technology accessibility officer in the Office of Equity, Diversity and Inclusion.
- Unit web accessibility liaisons with the expertise to create accessible websites and remediate basic accessibility issues.
- A Digital Accessibility Advisory Committee that provides oversight and guidance on policy and campus-wide accessibility efforts. The committee includes representatives from high-level administrative offices and decanal units including, UB Information Technology, Office of the Vice President and Chief Information Officer, University Communications, University Libraries, Faculty Affairs, Accessibility Resources.
- A central web management website that provides resources on using the UBCMS to create and maintain accessible websites.
- Access to PDF remediation services (e.g., SUNY AbleDocs, etc.) at reasonable costs.
• Ability to use Blackboard A11y in UB Learns to enhance the usability and accessibility of course materials.

Course Accommodations

UB’s Office of Accessibility Resources will provide assistance with academic adjustments and auxiliary aids that are necessary for students with disabilities to have equal access to course materials. While public-facing videos, webpages and other electronic information must be accessible, information that is not public and that is provided solely to a class must be made accessible when a student with an impairment enrolls in the class and requires accessible content. Accessibility Resources can caption videos and provide other auxiliary aids to assist students and instructors in ensuring equal access to the course materials. Instructors are encouraged to enable auto-captioning in Panopto (although this is imperfect and requires manual review and editing).

Applicability of the Policy

UB’s EIT Accessibility Policy applies to all university digital content including:

• Classroom and teaching technologies
• Content and learning management systems
• Desktop, mobile and cloud-based applications created either internally or made available through third-party vendors
• Digital signs
• Electronic documents
• Email
• Instructional materials
• Library resources
• Social media
• Video and audio content
• Websites (public facing and internal)

Testing Websites, Web Content, Applications

When creating or editing websites, web content, applications, etc., take the time to test for accessibility during development and prior to launch. Identify the essential tasks that a user would complete on the website and perform both manual and automated testing for each one.

Automated testing

• Run automated tests on individual pages of websites and applications. These tools may include Siteimprove, WAVE browser extension, axe DevTools Chrome browser extension, Accessibility Insights, etc.
• Please note: Automated testing only identifies a small percentage of accessibility issues on your site.

Manual testing

• Confirm that all images have meaningful alternative text and that purely decorative images have null alt text.
• Use Adobe Acrobat DC’s Accessibility Checker and Read Out Loud feature to check all PDFs for accessibility. Keep in mind that using the accessibility checker and/or the read out loud feature does not mean your PDF is fully accessible. All medium- and high-impact PDFs should be remediated using services provided by AbleDocs.

• Confirm that all videos include synchronized captioning. Captioning benefits not only individuals with impairments, but also people who do not have or do not want to use speakers.

• Ensure that you can tab through the content to access the links on the page. If so, your page will not rely on using a mouse, which promotes accessibility. Also check to see that when you tab, the order of movement of the cursor makes sense. If your cursor jumps from one area of the page to another without a logical sequence, this will be confusing to visitors using assistive technology.

• Ensure that color alone is not used to convey meaning.

• Ensure color contrast is sufficient.

• Confirm that the content on a webpage can be magnified to 200% without losing content or functionality.

• Confirm that users can bypass redundant navigation links.

Any technology you procure from vendors must also meet accessibility requirements. (See Procuring Technology for detailed information.)

Archived Digital Content

UB has some digital content that may no longer be needed or used to access current university programs, services or activities, but may have historical impact. As stated in the EIT Accessibility Policy, archived content at least five years old is not required to meet web accessibility standards, but the university is required to provide equally effective alternative access to the content upon request. Some examples of archived content include:

• Previous Undergraduate Catalogs
• Meeting minutes

Email

EIT accessibility requirements also apply to email content to ensure that people with disabilities have equally effective and timely access to information in email and attachments. Whether you are sending a plain text email or creating a branded email with a tool like Mailchimp, accessibility standards apply.

Be sure to:

• Utilize accessibility features available in your email tool/program.
• Use a descriptive subject line.
• Use proper heading structure.
• Correctly format lists as lists.
• Use sufficient color contrast.
• Include alternative text on images and avoiding using images of text.
• Write meaningful link text.
• Make sure all attached documents (e.g., PDF, Word, PPT, etc.) are accessible.
• Ensure that any resources you link to are accessible.

Social Media

When using social media for university services, programs and activities, utilize the accessibility features available in each platform.

• Facebook accessibility features.
• Twitter accessibility support for images.
• Instagram: adding alternative text to images.

In addition, follow these best practices in social media content:

• Add alternative text to images and animated GIFs.
• Caption videos or embed captions onto video where auto-generated captions are inaccurate or not available.
• Use CamelCase hashtags to improve readability (e.g., #ThisIsCamelCase).
• Limit use of emojis.
• Include descriptions of gifs, memes and other visual content either in alternative text, in the body of the post, in a comment directly below the post or in a link to accessible content.
• Don’t use special fonts.
• Don’t use special characters to create images.

Procuring Technology

UB’s EIT procurement process helps ensure that products/services purchased by the university meet accessibility standards and align with our institutional values of equity and inclusion. EIT purchased through vendors must be accessible to all individuals, including individuals with disabilities, when they are used to access university programs, services and activities. In order to meet the university’s commitment and obligation to provide accessible EIT, vendors are required to explain how their products/services are accessible and provide supporting documentation.

The university’s EIT procurement process includes several levels of assessment and review.

Step One: Intake

The purpose of the intake step is to gather information about the nature and purpose of the product and determine the impact the product will have on university programs, services and activities.

Before you make any EIT purchase or renewal (regardless of cost or scope of usage), you must complete one of these two forms (along with their associated steps, including submitting a VPAT/ACR as required):

• Web-based Services and Software Under $50,000 Pre-Purchase Form
• Web-based Services and Software Over $50,000 Pre-Purchase Form

Impact is categorized as:
<table>
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<tr>
<th>Impact</th>
<th>Scope</th>
<th>Usage</th>
<th>Examples</th>
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<tbody>
<tr>
<td>Low</td>
<td>EIT is not part of an essential program, service or activity.</td>
<td>• Low number of users—small, controlled group of users. • Single instance intended for individual use. • Not public facing.</td>
<td>• Departmental internal project management tool.</td>
</tr>
<tr>
<td>Medium</td>
<td>EIT is not essential but limits access to a program or service.</td>
<td>• Moderate number of users. • Used by an individual department or school, but not used across the university.</td>
<td>• EIT used for a single course but not required for degree completion.</td>
</tr>
<tr>
<td>High</td>
<td>EIT is part of an essential program, service or activity. The product is core to the business of the university.</td>
<td>• High number of users. • Enterprise-wide, mission critical, student-related. • Public facing or publicly available.</td>
<td>• Student information system. • Course registration system.</td>
</tr>
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If you have a question about the impact level of your desired EIT, please contact EDI for assistance.

**Step Two: Evaluation**

The purpose of the evaluation step is to assess the accessibility of the product and determine if it meets accessibility requirements. Testing proceeds as follows:

<table>
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<th>Impact</th>
<th>Evaluation/Testing</th>
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<tr>
<td>Low</td>
<td>• EDI review is not necessary; little to no testing performed. • Department is responsible for providing reasonable accommodations for individuals with disabilities who may not be able to access the product. (See the <a href="#">Reasonable Accommodation Policy</a>.)</td>
</tr>
<tr>
<td>Medium</td>
<td>EDI or the departmental web accessibility liaison reviews the vendor’s VPAT/ACR and performs basic manual and automated testing to certify the product’s accessibility.</td>
</tr>
<tr>
<td>High</td>
<td>EDI reviews the vendor’s VPAT/ACR and performs in-depth testing that includes full manual and automated testing of all key pages, user journeys and top task completion.</td>
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</table>

After evaluation, EDI grants decisions as follow:

- Full approval: The acquisition may proceed.
- Conditional approval: Identified issues must be addressed by the vendor in the remediation period and the department must provide an Equally Effective Alternative Access Plan (EEAAP).
- Denial: The department must submit an exception request to proceed.

Regardless of approval status, all medium- and high-impact EIT must have an EEAAP that includes a contact person and a description of how the department/unit will provide accommodations if someone with a disability needs access to the product. (See the complete [EEAAP requirements](#).)
Additionally, all EIT must have a prominent, easy-to-find accessibility statement and information about how an individual can receive accommodations.

**Step Three (for denials only): Exception Request**

The purpose of the exception request is to determine if the product qualifies for an exception from the EIT accessibility policy. Limited exceptions may be granted in specific instances where compliance is not possible or would constitute undue administrative or financial burdens or where it would create a fundamental alteration. Departments requesting an exception must provide an EEAAP to ensure that, to the maximum extent possible, individuals with disabilities receive the same benefits or services as their nondisabled peers.

**Accommodations and Alternative Access**

An Equally Effective Alternative Access Plan (EEAAP) is required for all medium- or high-impact EIT, regardless of approval status. Even with products/services that are reviewed and deemed accessible, the user experience may change based on product updates, updates to browsers or operating systems that interface with the product, or the user’s hardware, software or settings. An EEAAP details how individuals with disabilities who have difficulty using the EIT will be provided timely and effective access to the services, information and programs provided by the EIT. Please note that an EEAAP is not a substitute for accessibility and should be reviewed regularly.

The EEAAP must include the following:

- Description of any accessibility barriers in the EIT.
- Description of the person(s) or group(s) that will be affected by this issue.
- Outline of the accommodation that will be provided.
- Detail of how the alternative access will be provided.
- Description of how the available accommodation will be communicated.
- Contact information for the person(s) responsible for providing the accommodation.
- A timeframe for implementing the accessible alternative.
- The steps the vendor is taking to address accessibility issues in the product.

**VPAT Accessibility Conformance Report**

In order to begin assessing the accessibility of a product, the university requires that vendors submit a completed [Voluntary Product Accessibility Template](#) (VPAT®), also known as an Accessibility Conformance Report (ACR), or comparable documentation. The VPAT 2.0+ is a standard reporting form used to provide an analysis of a product’s conformance to accessibility standards—WCAG 2.1, Section 508 and European Standard EN 301 549.

Most vendors are familiar with the VPAT requirement and will furnish a VPAT upon request. The VPAT should be completed in its entirety and include testing procedures, conformance level and detailed comments about any partially- or non-supported level according to the WCAG 2.1 AA success criteria. In place of a VPAT, vendors may produce alternative documentation establishing the product has been reviewed for accessibility by an independent, credible and knowledgeable service using appropriate standards and testing.
If a vendor refuses to provide a VPAT or similar documentation, this is a strong indication that the company has not considered accessibility in its product design. The department should explore alternative products/services.

In some instances, no vendor offers an accessible product for a particular service. If this is the case, contact EDI for assistance.

Please note that the VPAT/ACR is just one component of the EIT accessibility review.

Controlled Web Content
The university provides digital content for students and employees that is not public facing (e.g., online training courses for employees, course materials for students and online information systems). This information must be accessible when it is required to access university services, programs or activities. However, in some situations, creating accessible content is not feasible. For example, if a department creates video recordings of every single class and uploads them, captioning each one regardless of whether any registered students require this may be impractical and unwarranted. If a student who requires captioned videos due to an impairment enrolls in a course where lecture recordings are offered to students, or if the department chooses to make the lecture videos public, the content then must be captioned in a timely manner to provide equal access to the materials.

In general, creating accessible content benefits a wide audience and is strongly encouraged regardless of possible legal risk.

Examples:

- A course instructor provides videos of their lectures for students to review. In order to access these videos, students must be registered in the instructor’s course. There is no general requirement to caption the videos. However, instructors are encouraged to enable auto-captioning in Panopto (although this is imperfect and requires manual review and editing). If a student with a hearing impairment enrolls in the course and requires access to the videos, the university will be required to ensure the videos are captioned. The instructor must refer the student to Accessibility Resources. Accessibility Resources will ensure that the lecture videos are captioned because the student requires this as an auxiliary aid to participate in the course.

- An employee with a visual impairment registers for an online training course through UB EDGE. The course is offered through a vendor and is not accessible with the use of a screen reader. The department offering the training course must work with the vendor to attempt to resolve the accessibility issues. If the accessibility issues cannot be immediately resolved, the department must work with the vendor to provide a transcript of the course or provide other equally effective means of accessing the course content.

External Web Content
Individuals with sensory, motor, cognitive and learning impairments must be able to access electronic materials when necessary to access university services, programs or activities. This includes content owned and controlled by UB, whether or not the content was created by UB or a third-party vendor.

In some cases, UB instructors or departments may refer students to external websites for course instruction or services. It is important to verify that external websites are accessible if people must rely on its contents to access UB programs and activities. If pre-existing programs and information cannot be
made readily accessible, the university must ensure that a student or employee is provided with equally effective alternative access to the program or activity.

Examples:

- An instructor uses an external publisher’s online learning tools as part of course instruction. Students must complete homework assignments on the publisher’s website and can use the publisher’s online study guide. A student with a visual impairment informs the instructor that she cannot access the homework posted on the website with her screen reader. The instructor contacts the publisher and receives confirmation that while some of the publisher’s website is accessible, the homework assignments are not. The instructor must provide the student with an equally effective means of completing homework assignments for credit in order to give the student a comparable way of learning the material and earning credit for homework.

- A department uses an external vendor to process ticket orders for university events. The department learns that the vendor’s website is not fully accessible, but the vendor has a toll-free telephone number to call for ticket orders available during certain hours. The department must work with the vendor to remedy the accessibility concerns. The toll-free telephone number does not provide equally effective access because, unlike the website, it has limited hours of availability.

For More Information

Contact the Office of Equity, Diversity and Inclusion (EDI) at ub-webaccess@buffalo.edu or at 716-645-2266 if you have questions or need more information.