

**SYSTEM OF HIGHER EDUCATION
PROCEDURES AND GUIDELINES MANUAL**

CHAPTER 18

**INFORMATION AND COMMUNICATIONS TECHNOLOGY ACCESSIBILITY
FOR SYSTEM ADMINISTRATION**

Section 1. Information and Communications Technology (ICT) Accessibility (Effective June 25, 2018).....2

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1. Policy Statement

The Nevada System of Higher Education System Administration (“SA”) is committed to providing information and communications technology that has been developed, procured or utilized to be accessible to all, and in particular, to individuals with disabilities, including those who use assistive technologies. SA web pages, web applications, web content and website must either conform at a minimum with World Wide Web Consortium’s (W3C’s) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, or their content and functionality must be made available upon request in an equally effective and accessible alternative manner.

2. Scope of Policy

- a. This policy applies to Information and Communications Technology (ICT) that is developed, procured, or utilized by SA for SA programs, services or activities.
- b. Except as otherwise provided herein, this policy does not apply to ICT utilized and intended solely for internal SA operations, except to the extent accessibility is required for an individual with a disability.
- c. SA is not required to take any action that results in a fundamental alteration in the nature of a service, program, or activity or in undue financial or administrative burden pursuant to this policy, but must nevertheless ensure, to the maximum extent possible, that qualified individuals with disabilities receive the benefits or services provided by SA. The Chancellor, or any designee who has budgetary authority may approve exceptions to this policy based on a determination that the action would result in a fundamental alteration or undue burden.

3. Definitions

- a. **Accessible:**
Refers to the concept that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use.
- b. **Department Buyer:**
The department within the business unit that will be making the arrangement with the vendor.
- c. **Equally Effective Alternate Access:**
Refers to an alternative format, medium, or other aid that timely and accurately communicates the same content as does the original format or medium, and which is appropriate to an individual's disability. To provide equally effective alternate access, alternatives are not required to produce the identical result or level of achievement for individuals with and without disabilities, but must provide appropriate auxiliary aids and services as necessary to afford individuals with disabilities an equal opportunity to obtain the same result, gain the same benefit, or reach the same level of achievement, in the most integrated setting appropriate to their needs.

- d. ICT:
Information and Communications Technology (ICT) includes, but is not limited to, computer hardware and software, operating systems, computer or web-based information and applications, cellular and mobile apps, enterprise applications, learning management systems, telecommunication products, information kiosks and transaction machines, World Wide Web sites (including web pages, web applications, and web content), multimedia, and office equipment.
- e. Purchase Requestor:
Business unit making the request for ICT procurement.
- f. SA:
Nevada System of Higher Education System Administration (“SA”) refers to the following three business units: (1) System Computing Services (“SCS”), Chancellor’s Offices (sometimes referred to as “NSHE”), and Nevada System of Higher Education Sponsored Projects EPSCoR (“EPSCoR”).
- g. Service Owner:
Refers to the individual within a business unit who is responsible for accessibility of the ICT as identified by Client Services Management.
- h. VPAT:
A Voluntary Product Accessibility Template (VPAT) is a tool that enhances industry-customer communications on ICT product and service conformance with relevant accessibility standards and guidelines.

4. Policies and Procedures

- a. Identifying, reporting and addressing ICT that is not accessible to an individual with a disability.
 - i. Audits: SA shall conduct regular audits of SA sites to evaluate the accessibility of current on-line content and work diligently to achieve accessible access consistent with World Wide Web Consortium’s (W3C’s) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, or equally effective alternate access.
 - ii. Accessibility Notice: SA websites must contain a Notice to persons with disabilities regarding how to request access of on-line information or functionality that is inaccessible.
 - iii. Reporting Accessibility Issues: Concerns about accessibility and/or requests for accommodations may be sent to support@nshe.nevada.edu.
 - iv. Upon receiving notice of a concern relating to accessibility, Client Services Management will take the following steps:
 1. Respond by email, and/or any other medium that is practical under the circumstances, to the individual raising the accessibility issue;
 2. Open an accessibility case for tracking the issue;
 3. Conduct a review of the issue raised, which may include verification that an accessibility issue exists;
 4. Assign the issue to the appropriate Service Owner;

5. In collaboration with the Service Owner, close the accessibility case by recording, in writing the resolution of the issue. If an accommodation requested by an individual is not granted, the rationale will be included in the written recording of the case closing.
 - v. Upon assignment of an issue by Client Services Management, the Service Owner will take the following steps:
 1. Work diligently to ensure the ICT is accessible, without undue delay. The preferred timeline for time-sensitive accessibility issues is two (2) business days. Where accessibility is not effectuated within two (2) business days, the concerned party raising the issue will be promptly notified in writing of the expected timeframe.
 2. Notify Client Services Management of the resolution of the issue with sufficient detail to allow Client Services Management to close the accessibility case.
 - vi. Where the Chancellor, or any designee who has budgetary authority, makes the determination that the requested action or accommodation would result in a fundamental alteration in the nature or a service, program or activity of SA, or undue financial or administrative burden, such action or accommodation is not required to be made by SA. Any such exception approved by the Chancellor or designee shall only be made after considering all resources available for use in the funding and operation of the service, program, or activity. If the Chancellor or designee approves such an exception, the Chancellor or designee must provide a written statement of the reasons for reaching that conclusion, including the cost of meeting the requirement, the available funding and other resources.
- b. Exceptions

Under certain circumstances, SA is not required to adhere to the provisions in this policy. Some examples include the following:

- i. Archived (i.e., content no longer in use but subject to records retention schedules) web pages and websites, unless specifically requested to be made accessible by an individual with a disability who has authorization to access the specified archived content. If such a request is made, SA must provide either access that complies at a minimum with WCAG 2.0 Level AA or equally effective alternate access for the individual with a disability;
- ii. Web pages and websites designed solely to conduct research or created for developmental or test-site purposes, unless specifically requested to be made accessible by an individual with a disability who has authorization to access those web pages or websites. If such a request is made, SA must provide either access that complies at a minimum with WCAG 2.0 Level AA or equally effective alternate access for the individual with a disability;
- iii. Electronic documents posted to SA websites and subdomains or within their web applications that meet all of the following requirements:
 - (a) The documents are of interest to a specific and limited audience (e.g., researchers in a particular academic discipline);
 - (b) The set of documents requiring remediation to conform at a minimum with WCAG 2.0 AA is voluminous (i.e., the total page count of the electronic documents that reside on a single web page exceeds 100 pages) or cannot be made accessible due to technical infeasibility; and

- (c) The documents are presented in such a way that individuals with disabilities are able to identify documents or sections of documents of particular interest and request remediation of those documents in accordance with procedures established by the institution.
- iv. Web pages, web applications, or web content that would result in a fundamental alteration in the nature of a service, program, or activity or in an undue financial or administrative burden to bring into compliance with WCAG 2.0 Level AA.

5. Procurement of ICT from Third-Parties

ICT acquisitions must follow the Purchasing Guidelines established by the Nevada System of Higher Education Business Center North (BCN) Purchasing Department. Additionally, when making ICT purchases or renewals, the purchase requestor or the department buyer must ensure a compliant [Voluntary Product Accessibility Template \(VPAT\)](#) or an acceptable alternative is attached to the P-Card, Request for Check paperwork or Requisition before the purchase can be paid/made.

When the purchase process includes a formal bid, BCN Purchasing Department will obtain the VPAT. Only vendors with a compliant VPAT or acceptable alternative will be evaluated and awarded the bid. The vendor must ensure all ICT conforms to the W3C's WCAG 2.0 Level AA. Vendors must submit a completed VPAT as part of the response/proposal. Vendors must declare if any portion of the proposed product under consideration does not fully conform to the W3C's WCAG 2.0 Level AA, the ways in which the proposed product is out of conformance and a remediation plan or acceptable alternative.

Any purchase of ICT that does not fully conform with the Benchmarks for Measuring Accessibility must be approved by the Chancellor.

6. Training

Web accessibility training is provided and/or facilitated by SA Client Services Management. Web accessibility training is required within 60 days of the date of hire and annually thereafter for the following individuals: content developers, webmasters, procurement officials, and all employees responsible for developing, loading, maintaining, or auditing web content and functionality. The training includes information about how to comply with the W3C's WCAG 2.0 Level AA. New content should be developed consistent with the W3C's WCAG 2.0 Level AA.

(Added 9/18)