

UCR Information Technology Accessibility Policy Program (ITAPP)

I. INTRODUCTION AND SCOPE

The mission and values of the UC require the adoption, deployment, development, and procurement of Information Technology (IT) that is Accessible. To ensure the UC upholds these obligations, [University Policy IMT-1300](#) requires each campus to adopt an IT Accessibility Policy Program (ITAPP), processes, and standards, in accordance with the Policy and the law. This is UCR Riverside's ITAPP, and it is designed to be read together with the Policy. Capitalized terms used and not defined in this document have the definitions provided in the Policy.

All IT covered by this Program must meet the Accessibility Standard, including IT behind a firewall or authentication.

This Program applies broadly to all IT and Electronic Hardware UCR develops, procures, provides or makes available, or otherwise requires the use of in the provision of its services, programs, and activities. This Program also applies to Emerging Technologies.

This ITAPP addresses the different functional needs of the academic, administrative, clinical (UCR Health), research, and student areas, including decentralized academic and research activities.

A. Accessibility Requirements

1. **Accessibility Standard:** The Accessibility Standard for the UC is [Web Content Accessibility Guidelines \(WCAG\) 2.1](#) at level AA success criteria. IT at UCR must comply with this Accessibility Standard by April 26, 2027. Units are encouraged, but not required, to adopt updated WCAG standards beyond WCAG 2.1 at level AA.
2. **Accessibility of Electronic Hardware and/or Emerging Technologies.** UCR must ensure its use of Electronic Hardware and/or Emerging Technologies in offering a service, program, or activity does not discriminate against individuals with a Disability.

B. IT Accessibility Policy Program Effective Date

Implementation of the UCR ITAPP will begin by January 1, 2026.

II. UCR PLAN

A. Delegation of Responsibilities

The Chancellor at UCR has designated the following ITAPP oversight responsibilities.

1. **Policy Program Coordination:** The Associate Provost shall oversee the development and implementation of UCR's ITAPP, ensure UCR's compliance with Accessibility Standard, coordinate any committee(s) established in furtherance of UCR's ITAPP, and promote Policy and Accessibility awareness.
2. **Exceptions Approval:** The Associate Provost (for academic exceptions) and the Associate Chancellor (for administrative exceptions) with consultation from the Office of Legal Affairs (OLA) and ITS, will review requests for exception to the Accessibility Standard, review extensions to exceptions, review Equally Effective Alternative

Accommodation Plans (EEAAPs), and review resolutions to complaints regarding IT Accessibility barriers. They will consult with personnel (listed below) for an Accessibility Consultation to determine compliance with the Accessibility Standard and the impact of an exception on individuals with disabilities.

3. **Exceptions Coordination:** The Office of Compliance will provide an annual report of exceptions, extensions, and EEAAPs and their respective status to the Associate Provost.
4. **Accessibility Consultation:** The Vice Chancellor for Diversity, Equity and Inclusion (VCDEI) will coordinate sharing subject matter expertise in IT Accessibility (including Accessibility Standard requirements and the impact of exceptions and/or Inaccessible IT on individuals with Disabilities) to individual(s) responsible for Exceptions Approval. These subject matter experts will include staff from Information Technology Solutions, University Communications, Environmental Health & Safety (Disability Management for faculty/staff), ADA/504 Coordinator, and the Student Disability Resource Center (students). The Chancellor's Advisory Committee on Disability Inclusion (CACDI), which is chaired by the VCDEI and includes many of the same personnel, is another consultative body.
5. **Course Content Program Coordination:** The Associate Provost shall oversee the development and implementation of UCR's Accessible Course Content Program, ensure compliance of UCR's course content with Accessibility Standard, coordinate advisory committee(s), and oversee tools for the creation and maintenance of Accessible course content. Provide training courses on the topics of IT Accessibility, Reasonable Accommodations, Disability awareness, and creation of Accessible course content.

UCR has formed an advisory committee (Digital Accessibility Advisory Committee) to support the development and implementation of this ITAPP. The committee members represent a broad range of Workforce Members and are able to address academic, administrative, healthcare, legal, research, student, and technological concerns.

B. Programmatic Elements

1. Accessible Procurement Program

a. UC Terms and Conditions

As of the effective date of the IMT-1300 Policy which governs this Program, all agreements and/or renewals of IT procured and/or acquired by UCR must use the standard "Accessibility" clause, located in the UC's Terms and Conditions, or a substantially similar clause if the agreement and/or renewal does not use the UC's Terms and Conditions. Any agreement or renewal must require the supplier's goods and/or services meet the Accessibility Standard, unless an approved exception has been granted in accordance with the exception process defined below. For all IT agreements and/or renewals, UCR will strive to include the indemnification language from the standard "Accessibility" clause.

b. UC Procurement Accessibility Questionnaire

To assist in evaluating IT goods and services for Accessibility, UCR will ask suppliers to complete the [UC Procurement Accessibility Questionnaire \(pdf\)](#) to describe its compliance with the Accessibility Standard or provide a Voluntary Product Accessibility Template (VPAT), Accessibility Conformance Report (ACR), and/or Higher Education Community Vendor Assessment Toolkit (HECVAT) to describe its compliance with the Accessibility Standard.

c. Evaluating Goods and Services for Accessibility

Before entering into an agreement or renewal with a supplier, UCR ITS and Procurement will verify that the supplier has documentation of meeting the Accessibility Standard (e.g., testing environment, proof of concept, recent example of work product).

2. Accessible Course Content Program

UCR's Accessible Course Content Program is designed to ensure that courses, digital instructional materials, and online training to the UC Community is Accessible. Any instructional/training content that is known to be inaccessible, must be reviewed and may be used only with exceptional approval. The Accessible Course Content Program includes:

- a. Specialized training on creating Accessible course content and remediation support;
- b. Training resources on IT Accessibility, Reasonable Accommodations, and Disability awareness for all Workforce Members who create content;
- c. An Accessibility tool integrated with the LMS that evaluates all uploaded content for Accessibility;
- d. A subcommittee (part of the Digital Accessibility Advisory Committee), led by the Associate Provost that consists of a broad range of Workforce Members (e.g., faculty, IT Accessibility specialists, instructional designers, LMS administrators, student representatives, and student and staff Disability services);
- e. Direction to the campuswide complaint process to report digital Accessibility barriers;
- f. Where applicable, agreement between UCR and UC Online outlining responsibility for ensuring UC Online course content is Accessible and developing EEAAPs as needed; and
- g. A prioritization plan to include the Accessibility evaluation and remediation of the following:
 - i. New courses;
 - ii. Pre-existing courses that have been Materially Altered;
 - iii. High-volume gateway courses;
 - iv. General Education (GE) courses;
 - v. Courses with a high number of individuals with disabilities who receive Reasonable Accommodations (in conjunction with the types and impacts of accommodations required); and
 - vi. Fully online courses.

3. Accessible Software/Web Development Program

UCR has an Accessible Software/Web Development Program to ensure that technical staff and content editors procure and/or develop IT that meets the Accessibility Standard. As part of this program, technical staff and content editors:

- a. Complete role-appropriate training that covers up-to-date standards and practices for developing Accessible IT;
- b. Ensure that all procured and/or developed IT meets the Accessibility Standard;
- c. Remediate existing, Inaccessible IT per the prioritization plan, in consultation with the Digital Accessibility Advisory Committee;
- d. As a best practice, test their work with individuals with Disabilities.

For situations where software/web development services are procured, see Accessible Procurement Program above.

4. Prioritization Plan

UCR has developed a plan to prioritize the remediation of existing Inaccessible IT to the Accessibility Standard, considering local needs, practices, and available resources. Site owners are expected to use provided tools and platforms to assess their sites and make determinations about deletion, archiving, and remediation. For IT to be remediated, we prioritize those that...

- a. Are for public consumption;
- b. UC Community members are required to use;
- c. Have large numbers of known users with disabilities;
- d. Have critical features with known Accessibility defects;
- e. Receive high traffic, based on page view reports
- f. Do not include conformance with the Accessibility Standard in the contract; and
- g. Are undergoing a Material Alteration.

5. Disability Access and Awareness Training Program

To meet ongoing Accessibility needs, UCR ITS is developing a Disability Access and Awareness Training Program. The relevant information and links for general disability information and training will all be included on a central landing page: accessibility.ucr.edu. Specific resources and training information about digital accessibility is available through slide decks, campus-specific and general training courses, and easy-to-use resource and tip lists on the digital accessibility website.

Additionally, within two years of the effective date of the UC-wide policy, the UC Vice President for Information Technology Services and CIO will designate individuals to provide a basic online Accessibility training on IT Accessibility no longer than one hour in length. Workforce Members who create or manage electronic content will be required to complete the training when hired and every two years thereafter.

6. Exception Process

Conformance with the Accessibility Standard may not always be feasible. UCR may approve an exception to the Accessibility Standard for procured and/or developed IT¹

¹ Definition of “Information Technology” from the UC Policy: “Information Technology (IT): A range of technologies to acquire, create, display, process, and share information. These tools and resources include, but are not limited to:

1. The internet (e.g., websites, web applications, emails, online surveys, social media, webcasting, and all content delivered in digital format);
 2. Software, including Software as a Service;
 3. A Learning Management Systems (LMS), including instructional software and LTIs (learning tools interoperability), and content that faculty and other educational teams provide or make available, e-courses, edtech;
 4. Recorded broadcasting technologies (including podcasts and/or video livestreams);
 5. Mobile applications; and
 6. Electronic documents (e.g., Box Docs, Excel spreadsheets, Google Docs, Google Sheets, Google Slides, portable document format files (PDFs), PowerPoint presentations, Word documents).
- IT excludes the following:

through the following process.

a. Approving and Extending Exceptions

Exception requests require the completion of an [online exception request form](#), signed and submitted by the department/unit head of the department that would like to procure or has developed the Inaccessible IT. It must include the following components:

- i. Include a description of the IT including its use and which members of the UCR Community will interact with the IT.
- ii. Briefly outline the reasons for reaching the conclusion that an exception is warranted.
- iii. List the names and titles of individuals consulted during the exception process.
- iv. Affirm that, to the best of the signatory's knowledge, the following is true:
 - (a) A meaningful consultation of individuals with relevant subject matter expertise was conducted, including:
 - (i) An Accessibility Consultation with individual(s) who have relevant Accessibility technical expertise and knowledge of legal requirements;
 - (ii) Those responsible for exceptions approval as defined above (either Associate Provost or Associate Chancellor); and
 - (iii) ITS
 - (b) When considering the whole of UCR's resources, there is not the ability or resources to develop similar Accessible IT;
 - (c) At the time of review, no supplier can provide the IT in an Accessible manner;
 - (d) Any delay in deploying the IT would have a significant adverse impact on UCR; and
 - (e) UCR has prepared a remediation plan and approved an EEAAP (see b and c, below) to provide individuals with disabilities an alternative means to access and/or use the IT.

Only the individual(s) responsible for Exceptions Approval, or their Designee, has the authority to approve exceptions. An exception request is not approved until the individual(s) responsible for Exceptions Approval has signed the requesting department's written statement.

Initial exceptions are limited to a duration of two years from the date the exception

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1. Content posted by any third party unless the content is posted or made available by a Location due to the third party's contractual, licensing, or other arrangements with the University;
 2. Archived Content;
 3. Electronic documents (word processing, presentation, PDF, or spreadsheet files) posted or made available before April 26, 2027, that are not currently being used to apply for, access, or participate in UC services, programs, or activities;
 4. Individualized, password-protected, or otherwise secured electronic documents (word processing, presentation, PDF, or spreadsheet files) about a specific individual, their property, or their account; and
 5. UC social media posts that were posted before April 26, 2027."

was granted. Throughout the initial two-year exception period, the individual(s) responsible for Exceptions Coordination, or their Designee, must regularly communicate with the department that was granted an exception to ensure there is meaningful progress toward making the excepted IT Accessible. For the duration of the Location's use of the Inaccessible IT, the Location must go through the exception process every two years.

Upon receipt of the exceptions approval form, the exceptions approvers will consult with the relevant parties in Compliance, ADA, OLA, and/or ITS and respond with a decision or request for further information within 14 calendar days.

b. Equally Effective Alternative Accommodation Plan (EEAAP)

Exceptions do not relieve us of our obligations to make IT compliant with the Accessibility Standard. When there is a known Accessibility barrier, the responsible department must create and implement EEAAPs in a prompt and equitable manner.

EEAAPs provide immediate, temporary access to IT while the remediation plan is executed; EEAAPs are not a primary or long-term mechanism to provide Accessible IT.

An EEAAP should indicate the following information:

- i. The Reasonable Accommodation(s) (e.g., alternative format) the Department will furnish to provide the UCR Community member(s) access to that specific IT or information;
- ii. Instructions for using the Reasonable Accommodation (i.e., department contact and/or website linking to alternative format PDFs); and
- iii. Confirmed source of the funding to cover the costs of Reasonable Accommodation under the EEAAP.
- iv. Name of responsible party

If the EEAAP created is in response to a UCR Community member's² request for Accessible IT, UCR's ADA Coordinator will consult with the requesting individual to determine the most appropriate Reasonable Accommodation.

UCR will use the EEAAP available on the IT Accessibility Policy Resources website, which will be used systemwide.

c. Remediation Plan

Part of the Exception Process includes a remediation plan to bring the Inaccessible IT into compliance with the Accessibility Standard.

A remediation plan must include:

- i. Approval of the individual fulfilling the objective of Exceptions Approval;
- ii. A detailed scope of the Accessibility barriers that will be addressed;

² All individuals who participate in or use UC services, programs or activities, or otherwise consume UC IT content.

- iii. A timeline with specific dates of deliverables not to exceed the duration of the exception;
- iv. A plan to test and validate that the fixes meet the Accessibility Standard; and
- v. The ongoing responsible party

If, for any reason, IT cannot be made Accessible upon request within a timely manner, the ADA/504 Coordinator or their Designee, must notify the UCR Community member of:

- i. General reason for the delay;
- ii. Estimate of how long it will take to complete the remediation; and
- iii. Information regarding UCR's [complaint process](#).

d. Cost

If UCR procures or acquires Inaccessible IT, the cost of an EEAAP will not be passed on to the individual requesting a Reasonable Accommodation (in alignment with [staff](#), [faculty](#), and [student](#) policies).

7. Reporting and Complaint Process

Individuals with disabilities may [request remediation of Inaccessible IT](#), [report Accessibility issues](#), and/or [file complaints regarding Inaccessible IT](#). Reports received are reviewed by the Office of Civil Rights and the ADA/504 Coordinator, and others with subject-matter expertise and who are not responsible for the Inaccessible IT. Proposed resolution of reports will be reviewed by the Associate Provost, for reports relating to academic IT, and the Chancellor's Office, for reports relating to administrative IT, prior to being finalized.

UCR strives to address complaints promptly and equitably and communicate to the complainant in a timely manner about the status of any resolution.

8. Progress Monitoring

Each UC Location must provide an annual report to the Vice President for Information Technology Services and CIO. At UCR, the Digital Accessibility Advisory Committee and ITS will lead this process, using the systemwide report template, which is available on the IT Accessibility Policy Resources website, to ensure consistency of processes across the system.

III. APPROVAL AND REVISION HISTORY

This ITAPP was approved by Chancellor Jack Hu on January 22, 2026, effective January 31, 2026. Amended ITAPP was approved July 31, 2026. This is the second version.



S. Jack Hu, Ph.D.
Chancellor