October 20, 2020

Binghamton University

Accessibility Action Plan

Prepared for the Office of the Provost

State University of New York

DRAFT October 20, 2020

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Binghamton University
Electronic Information Technology
Accessibility Action Plan

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This Electronic Information Technology (EIT) Accessibility Action Plan describes the strategy and operational details by which Binghamton University will implement necessary aspects of the SUNY Electronic and Information Technology (EIT) Accessibility Policy (6901)[1] as well as the University's own appended Electronic Information Technology Accessibility Policy.

As suggested by guidance received from the SUNY System Administration Office, we are incorporating the framework established at SUNY's College of Environmental Science and Forestry to develop a focus for units as they move forward with their efforts locally to build out our program. Consequently, our initial efforts to advance accessibility at the University will work towards enhancing conformance to standards in these areas:

- Websites and Software: Web Accessibility Standards (WAS)
- Digital Content: Digital Content Accessibility Standards (DCAS)
- Classroom Technology & Design: Classroom Accessibility Standards (CAS)
- Libraries: Library Accessibility Guidelines (LAG)
- Procurement: Procurement Accessibility Conformance Standards (PACS)

With the template, authority and responsibility for each element are identified, and then progress measured along the dimensions below. Our overall long-term objective is to transition from an accommodation model to an accessibility model for electronic information technology accessibility. We want to provide the necessary resources for all students in anticipation of their needs to the extent possible, rather than merely responding reactively to expressed needs.

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[1] SUNY Policy as recommended in the Final Report and Recommendations of the Electronic and Information Technology Accessibility Committee. Website https://www.suny.edu/sunypp/documents.cfm?doc_id=883 consulted May 28, 2020.

Action Plan Template Objectives:

- Awareness Raising
- Design
- Procurement
- Monitoring Compliance
- Training

With the template from ESF/SUNY, progress is then measured along a uni-dimensional (1-5) scale impregnated with the following significance:

1. No Activity - No action has been taken yet;
2. Planning - An approach to the action item is designed and/or meeting organization and preparation is underway
3. Developing - Substantive work is underway to complete the action item;
4. Operational - The campus has a standard practice. Procedures are consistent and formal;
5. Accomplished/Ongoing - The campus has an established practice that is regularly reviewed to reflect the managed practice.

Binghamton has begun the process of working through the templates. In Appendix I we provide our initial drafts of the Administration perspective on the five standard areas, complete as of the preparation of this report. As a large, complex and highly decentralized organization, however, it is necessary for us to consider multiple perspectives, and the fact that different units within our overall organization have different rates and modes of change. No single template can adequately express this variability. Moreover, while being accommodative may meet our legal obligations, in our opinion it almost always imposes barriers to equally effective alternative access, and we should be working towards a model that is more inclusively designed for learning for everyone independent of their cognitive, visual or audible abilities.

Ultimately, we view addressing accessibility opportunities as being essentially about equity, choice and commitment. Our purpose is to establish policies and procedures that address EIT accessibility in a systematic way and enable us to build a comprehensive digital technology program that is sustainable. To begin, we need to establish a structure and build a local community of practice, and then go forward to identify risks, determine where our greatest needs may be, and develop and undertake actions to address these needs and mitigate any risks. Put simply, through our accessibility action plan and the

development of our program, Binghamton University strives to promote ongoing, inclusive access to electronic information for all members of our community.

As a Carnegie R1 research institution with an extraordinarily strong undergraduate liberal arts program, Binghamton University thrives on its diversity of cultures across its many colleges and divisions. The University is decentralized, with seven colleges or schools, and multiple divisions within the central administration. Within just the academic units, the culture within each school is different, the change model within each school is different, and for meaningful change to occur, it is necessary to work through the schools rather than issuing forth mandates and expecting compliance. A cornerstone of our approach, therefore, will be to develop a strategy that enables a degree of autonomy at the implementation stage so different colleges, schools or divisions at the University will have some latitude in achieving the goals of the electronic information technology accessibility program.

What follows is an outline for developing our preliminary plan of action for the academic years 2020/2021 through 2022/2023. We have established a three-year planning cycle as a realistic time frame in which to make substantive progress. Along the way the plan will need to be evaluated regularly so that it can be modified and strengthened. This "closing the loop" assessment will allow our program to evolve in response to changing requirements, feedback and review of outcomes.

Binghamton University Accessibility Action Plan
July 1, 2020 – June 30, 2023
Final Plan December 31, 2020 Draft

Action Plan (AP) Item 1: Promulgate EIT Accessibility Policy
Binghamton University (BU) will promulgate its EIT Accessibility policy.

Progress to date:	The policy has been reviewed and approved by the Faculty Senate Executive Committee, the Faculty Senate and the Professional Staff Senate.
Next Steps:	Requires review and approval by Senior Officers Group+, Target Date October 31, 2020.

AP Item 2: Complete Action Plan and Deliver to SUNY
Binghamton University (BU) will complete its Action Plan and deliver it to SUNY by 12/31/2020.

Progress to Date:	Awaiting feedback from SUNY on draft Action Plan submitted 6/30/2020.

Next Steps:
   a. Incorporate any feedback from SUNY
   b. Review and secure approval by Campus Governance & Faculty Senate
   c. Review and secure approval by Professional Staff Senate
   d. Review and secure approval by Senior Administration

AP Item 3: Assess Implications of COVID-19 on Accessibility
Engage in conversations with faculty and others to identify:
   a. What did we learn? What worked, what didn't work?
   b. How can we change to better support accessibility needs in the online environment?
   c. Given a preponderance of online classes, what can we do to enhance our capacity to deliver courses that are accessible?

AP Item 4: Develop and reach consensus regarding EIT implementation strategy
BU is proposing a liaison model strategy to advance our EIT accessibility efforts, and will investigate curricular modifications as well

Strategic Vision for Liaison Model

a. Twenty-five Schools/Colleges and Units identified to potentially provide liaisons (see Appendix II)
b. Liaisons lead implementation efforts for their respective areas
c. Introduce Liaisons to Standards:
    i. Websites and Software: Web Accessibility Standards (WAS)
    ii. Digital Content: Digital Content Accessibility Standards (DCAS)
    iii. Classroom Technology & Design: Classroom Accessibility Standards (CAS)
    iv. Libraries: Library Accessibility Guidelines (LAG)
    v. Procurement: Procurement Accessibility Conformance Standards (PACS)
d. Introduce Liaisons to Planning Template:
    i. Authority and Responsibility
    ii. Awareness Raising
    iii. Design
    iv. Procurement
    v. Monitoring Compliance
    vi. Training
e. Liaisons work with colleagues in their units to identify where is the greatest need; where is the greatest risk?
f. Liaisons develop college/unit 3 yr. goals with resource estimates and annual assessment plan (due 2022 for 2023 – 2025)

Strategic Vision for Incorporating Aspects of Curriculum in EIT Accessibility Initiative

a. Meet with University Undergraduate Curriculum Committee to brainstorm regarding opportunities to use the undergraduate curriculum as a vehicle to advance Binghamton University as proactively supporting EIT accessibility
b. As applicable, develop proposals with UUCC and others for consideration – are there curriculum changes that make pedagogical sense given what we are trying to accomplish with our curriculum?
c. If so, work with Faculty Senate and Campus Leadership to modify curricular requirements to support use of electronic information technology in manner that conforms with University policy;

AP Item 5: Develop and implement Phase I Communication Strategy

BU will implement a strategy to raise awareness of EIT accessibility issues on campus.

Elements to be communicated include:

a. Background/History of this Initiative
b. Existence of Technology Accessibility Advisory Group, Electronic Information Technology Accessibility Officer (EITO) and the EIT policy and plan
c. Why this issue is important;
d. What the implications are of EIT accessibility;
e. Where assistance is available;

AP Item 6: Resource Acquisition

Over this period BU will seek to better understand the financial implications of this commitment. Specific actions may include:

a. Looking for commonalities across plans and for opportunities to economize.
b. Developing a University-wide understanding of the resource requirements for implementing this Program
c. Developing a University-wide 3-year budget necessary to meet objectives of college/unit plans

AP Item 7: Legacy EIT

BU will develop a plan for how to prioritize bringing legacy EIT into conformance.

APPENDIX I: Sample Template Entries

Web Accessibility Standards

Plan Element	Actions	Suggested Administrative Oversight	Resource/ Source for Resources	Outcome	Progress (1-5)	Status Description	Time Frame
Authority & Responsibility	Include in Policy	C&M	N/A	Create, monitor, and maintain accessible web publishing platform	5	Accessible web publishing templates have been created and are being continuously improved for University-wide web publishing.	Completed fall 2008
Awareness Raising	Communicate need for accessible content within CMS	C&M	C&M Web Team	Communicate with all website editors and offer regular training	5	Regular (monthly) user group meetings offer accessibility training	Ongoing since spring of 2009
Design	CMS-standardized accessible web publishing	C&M and TAAG	C&M Web Team, TAAG members,	All University Web stakeholders	3/4	There are still some Web publishers outside of the University	End of 2020

			and EIT Officer	adopt use of CMS		CMS who need to be migrated,	
Procurement	N/A						
Monitoring Compliance	1) Monitor all websites for compliance 2) Integrate mandatory use of University CMS into Policy	C&M, EIT officer	C&M staff, EIT officer	Continuous improvement of web accessibility.	4 3	Monitoring web accessibility status id ongoing using DubBot QA app. Compliance with use of Univ. CMS is ~ 90%	End of 2020
Training	Involve UCTD in Web accessibility training and promote Deque U resources	TAAG, EIT officer, C&M	UCTD and C&M staff	Broader competency in accessibility campus-wide	3/4	Currently C&M conducts accessibility training through the CMS users group. UCTD could expand their role and Deque U resources need promotion.	Mid 2020

Digital Content Accessibility Standards

Plan Element	Actions	Suggested Administrative Oversight	Resources/Source for Resources	Outcome	Progress	Status Description	Time Frame
Authority & Responsibility	Creation of a campus-wide digital content governance policy	Each department on campus is responsible for the content it creates	SUNY EIT listserv. Human resources. TAAG. CLT. ITS. EIT officer	Digital content produced on campus is accessible	2	Digital content produced on campus happens in every department. It is the responsibility of all departments to develop a culture of accessibility for this content. Each department will need to incorporate good design practices for EIT accessibility	Winter 2021?
Awareness Raising	Formal marketing campaign to all of campus regarding accessible digital content production	TAAG	Marketing, TAAG, Faculty Senate, Professional Senate	Campus community is notified of the importance and necessity of EIT digital content production	1	Since digital content is produced everywhere, a large-scale marketing campaign will be necessary to reach the entire campus community.	Winter 2021?
Design	The SUNY digital content accessibility standard is followed during campus digital content production	Each department on campus is responsible for the content it creates	CLT, TAAG, SSD, EdComm	Digital content produced on campus is accessible	2	Digital content produced on campus happens in every department. It is the responsibility of all departments to develop a culture of accessibility for this content. Each department will need to incorporate good design practices for EIT accessibility	Winter 2021?
Procurement	Digital content that is	Purchasing office	SUNY Central, ITS, TAAG, EIT officer	A formal process of	3	Vendors will provide VPAT and accessibility	Summer 2021

	purchased is weighed for EIT accessibility			weighing accessibility of digital content purchased		information regarding their products. Campus will weigh the accessibility of the product, then advise on purchase	
Monitoring Compliance	Establish a feedback structure for accessibility concerns.	EIT officer	SUNY EIT listserv. Human resources. TAAG. CLT. ITS. EIT officer	Instances of accessibility concerns are addressed in a timely manner	2	As with its production, digital content is consumed across campus by faculty, staff and students. Having a formalized response process when campus receives complaints will ensure a timely and positive outcome?	Winter 2021?
Training	Produce a knowledge base regarding EIT digital content accessibility	TAAG	UCTD, TAAG, CLT, ITS, SSD	Easy to use training tools for EIT digital content.	2	Producing a website, knowledge base, online classes, handouts, and videos regarding the production of EIT digital content.	Winter 2021?

Progress Weight 1 - No Activity 2 - Planning 3 - Developing 4 - Operational 5 - Accomplished / Ongoing

Classroom Accessibility

Plan Element	Actions	Suggested Administrative Oversight	Resources / Source for Resources	Outcome	Progress	Status Description	Time Frame
Authority & Responsibility	Confirm Classroom "ownership" stakeholders.	EdComm	CLT, LEC, Faculty Senate	CBASM office as classroom "owners". EdComm will be space managers for the rooms	3	BU has a functional relationship on classroom "ownership" where CBASM coordinates room requests and EdComm coordinates all repair and service needs. Ensuring this relationship is identified in policy will allow for formal complaints to be addressed quickly	Dec, 2020
Awareness Raising	Regular presentations on "accessible classroom features"	SSD, CLT, EdComm, CBASM	SSD, CLT, EdTOA, EdComm, CBASM, UCTD	Accessible classroom feat are discussed at regular faculty presentation opportunities, and ment	4	Many offices perform these functions indirectly. A formal opportunity to	Dec. 2020

				in conjunction with other services		do presentations to faculty at ACET, CLT events, New faculty orientation, etc.... would be the last step	
Design	Develop formal classroom standards for the university that include accessible features as required by law / policy	EdComm	SUNY EIT Policy, ADA, 2010 Standard on accessible building standards	All existing classrooms brought up to new policy. All new classrooms designed for accessibility	4	New classrooms are built to accessible standards. BU campus continues to work through making legacy classrooms accessible	June 2021
Procurement	Ensure ongoing and secured funding source for classroom renovations	EdComm, ITS, Facilities	Binghamton Administration	Annual fund for classroom renovations	5	Binghamton maintains annual funding for classroom renovations. Accessibility features included	Completed
Monitoring Compliance	Perform classroom inventory annually	EdComm	SSD, CBASM	Test classroom accessibility features annually for functionality	5	EdComm performs an annual summer classroom inventory.	Completed (ongoing)

						Accessibility features are tested	
Training	Perform classroom training and tutorials on accessibility features	EdComm, UCTD, SSD	EdComm, UCTD, SSD, EdTOA	Perform training as requested on classroom accessibility features	5	Edcomm performs classroom training upon request for any user.	Completed (ongoing)

Progress Weight 1 - No Activity 2 - Planning 3 - Developing 4 - Operational 5 - Accomplished / Ongoing

Library Accessibility

Plan Element	Actions	Suggested Administrative Oversight	Resources/Source for Resources	Outcome	Progress	Status Description	Time Frame
Authority & Responsibility	Include accessibility guidelines in official libraries policy	Libraries administration	EIT Officer, TAAG, SSD, CLT, Other University Libraries	All operations of the libraries keep accessibility in mind	4	Most policies are currently in place	June 2021
Awareness Raising	Promote accessibility services available during policy rollout and in future communications	Libraries PR team	TAAG, CLT, SSD	Everyone is made aware of accessibility services offered by libraries	2	Will be a part of rollout being planned by TAAG	June 2021
Design	Rewriting collection development policy, Redesign Libraries website, content being reviewed for accessibility	Libraries administration, web team, collections	EIT Officer, C&M, ITS	Will ensure all current and future content available on Libraries website is available in an accessible format.	3	Main portion of Libraries website redesign has been completed. Review underway of "libguides" portion of site. Content development	December 2020

						policy being finalized	
Procurement	Include accessibility in new collection development policy and purchasing policy	Libraries Collections and Business Office team	Campus Procurement office, University Council	Accessibility compliance is ensured for all future vendors and partners	3	Collection development policy currently being finalized	December 2020
Monitoring Compliance	Ongoing audits to ensure accessibility compliance of web content and digital materials	Reader Services, Web Team, Library administration	EIT Officer, C&M, ITS, SSD, WCAG	Libraries website has several content creators, audit will ensure adherence to policy	3	Portions of website are being redesigned, all content currently undergoing audit,	July 2021
Training	Training offered to reader services staff, web content creators, procurement staff	Reader Services, Web Team, ProcuremenWeb Team, Procurement, Library administration	C&M, CLT, EIT officer	Ensures staff is knowledgeable about accessibility guidelines, WCAG, captioning, etc.	2/3	Training currently offered to new reader services staff, Training on web content will be offered after full review of libraries web content	July 2021

Progress Weight 1 - No Activity 2 - Planning 3 - Developing 4 - Operational 5 - Accomplished / Ongoing

Procurement Accessibility

Plan Element	Actions	Suggested Administrative Oversight	Resources/ Source for Resources	Outcome	Progress	Status Description	Time Frame
Authority & Responsibility	Identify responsible parties for development and maintenance of Procurement Policy's alignment with EIT Accessibility Policy and associated procedures	Legal Affairs, EIT Accessibility Officer, Procurement Office, ITS	Dedicated employees from admin oversight areas	Policy, Process, Procedures	5	In Progress	In place by 6/2020

Plan Element	Actions	Suggested Administrative Oversight	Resources/ Source for Resources	Outcome	Progress	Status Description	Time Frame
Awareness Raising	Document and Distribute Policy, Process and Procedure	EIT Team, Procurement Office with help from ITS	Procurement/IT Staff member	Newsletter, Listserv creation, or list of existing Listserv options to reach a large audience	5	In progress	In place by 6/2020
Design							
Procurement	All EIT Products that use the procurement process must be vetted for Accessibility	Designated EIT Accessibility Officer, Procurement, ITS, EIT "Team"	Dedicated procurement and ITS staff member. Additional members as a "team" is created	Develop process and procedures, as well as a workflow for approvals All contract, RFP, and PO language needs to be changed to include these procedures	5	In progress	In place by 6/2020

Plan Element	Actions	Suggested Administrative Oversight	Resources/ Source for Resources	Outcome	Progress	Status Description	Time Frame
Monitoring Compliance	EIT Review and Exception Forms created Roadmap creation process. Process when vendors are not in compliance	ITS, Designated EIT Accessibility Officer, Procurement	ITS, Procurement staff, Accessibility Officer as needed	Forms made available via Accessibility landing page, ITS and Procurement website	5		In place 6/2020

Plan Element	Actions	Suggested Administrative Oversight	Resources/ Source for Resources	Outcome	Progress	Status Description	Time Frame
Training	Training on process and procedures Make documents available for Training Center	Training Center, EIT Team as part of larger plan		Accessibility trainings offered	5	In progress	Ongoing as needed

Progress Weight 1 - No Activity 2 - Planning 3 - Developing 4 - Operational 5 - Accomplished / Ongoing

Appendix II: Accessible Electronic Information Technology Liaison Group Roster (Offices)

Preliminary List

Division of Academic Affairs
Division of Advancement
Department of Athletics
Division of Diversity, Equity and Inclusion
Division of Operations
Information Technology Services
Division of Research
Division of Student Affairs
Binghamton University Foundation

Harpur College of Arts & Sciences
College of Community & Public Affairs
Decker College of Nursing and Health Sciences
School of Management
School of Pharmacy & Pharmaceutical Sciences
Watson School of Engineering & Applied Science
Graduate School
University Libraries

Office of Budget and Business Affairs (includes student accounts)
Purchasing Department
Center for Learning & Teaching
Office of Communications and Marketing
Office of Undergraduate Education & Enrollment Management (Includes admissions, financial aid and student records)
Other Academic Affairs Units

Campus Governance Leaders
Professional Staff Senate

These units will each appoint a liaison who will be responsible for spearheading the EIT initiative for their area. The appointee should be a senior level person respected by the faculty and with the capacity to get things done.

DRAFT 3.0 May 19, 2020

Binghamton University Electronic and Information Technology (EIT) Accessibility Policy [1]

Applicability
This policy applies to University websites, applications, and other digital content created or provided by the University and its agents or affiliates.

Summary
Binghamton University is committed to promoting and providing an inclusive and welcoming digital environment. SUNY's increased reliance on technology across operations, student support services, and instruction necessarily drives a need to ensure that individuals with disabilities have equitable access to electronic information resources. This policy addresses accessibility in the development, procurement, and use of electronic and information technologies.

Policy
The delivery of digital and web-based information is increasingly central to carrying out the University's mission. The University is committed to ensuring that all are able to access, benefit from, and contribute to the University's broad array of academic, administrative, and research programs, services, and activities. As such, Binghamton University will make electronic information such as websites, digital course materials and library electronic resources accessible. In accordance with the University's mission and federal and state laws, ensuring equal and effective access to electronic and information technologies developed, procured and used by the University is the responsibility of all University administrators, faculty, and staff.

In accordance with this commitment, and with the knowledge that accessible digital content generally enhances usability for everyone, this Policy is established to improve the user experience.

Accessibility Standards
For the purposes of this policy, Binghamton University will use Standards recommended in the SUNY May 2019 Final Report and Recommendations of the SUNY Electronic & Information Technology Accessibility Committee. Binghamton University will also be mindful of and monitor changes to The Worldwide Web Consortium's Web Content Accessibility Guidelines version 2.1[3], Level AA Conformance (WCAG 2.1 Level AA) and its successor documents (WCAG Silver).

The University will:

- Adhere to the SUNY Electronic Information Technology Accessibility Guidelines;

- Establish a campus Electronic Information Technology (EIT)[2] accessibility action plan that will regularly be assessed and updated;

- Develop, acquire, purchase, host, and/or use to the extent technically feasible, web pages, websites, hardware and software products and services that are accessible to persons with disabilities;

- Communicate this Policy to all members of the University community, particularly those in roles responsible for developing, selecting, purchasing, or maintaining electronic content, applications, and technologies.

Implementation of the Policy

Senior University leadership will designate an Electronic Information Technology Accessibility Officer (EITO) responsible for the establishment of a campus accessibility action plan. The EITO will be responsible for issuing, updating, and enforcing any requirements, standards or guidelines that support this Policy. It will be the responsibility of the EITO or their designate(s) to:

- Establish policies and procedures that support our shared institutional intention to provide accessible online environments;

- Develop strategies to incorporate accessibility into the creation, purchase and use of electronic information resources;

- Develop plans, assign roles and responsibilities and implement procedures to execute strategies to achieve policy compliance;

- Coordinate the creation of communication plans to promote and support the campus-wide EIT accessibility program;

- Coordinate the development and delivery of training programs for campus personnel who create, purchase, use and maintain EIT;

- Collaborate with Purchasing and other campus departments to ensure the acquisition of accessible EIT products and services;

- Continually monitor and assess Binghamton University's EIT Program and develop and implement warranted modifications.

Compliance

Upon a written complaint by an individual who is unable to access specific University-provided content, either the requested content must be remediated to conform to the Standards, or the requested content must be made available in an alternative format in a timely manner. Note: the unit responsible for the creation and maintenance of the content on the specific website is responsible for making it accessible or providing an alternative.

In cases where conformance with the Standards is not technically feasible or may represent an undue burden to the University, the reasons must meet the criteria for

exceptions under the law and shall be determined at the sole discretion of the EIT Accessibility Officer.

The Electronic Information Technology Accessibility Officer, working with the Technology Accessibility Advisory Group, may require that some or all non-conforming portions of a University website be brought into conformance by designated staff or suppliers. Binghamton University Information Technology Services or Office of Communications & Marketing may be asked to remove non-conforming websites or electronic information from the Binghamton domain registry until they can be brought into conformance, or require a unit cease using a particular third-party service provider until the provider's product or service is in conformance.

The University shall set up and maintain exceptions procedures to provide equally effective alternate access to non-conforming electronic and information technologies, and will develop priorities for bringing existing legacy EIT into conformance.

The Technology Accessibility Advisory Group (TAAG)

Senior University Leadership has established the Technology Accessibility Advisory Group (TAAG) to advise and make recommendations to the EITO, including on the development of a prioritization schedule for improving accessibility on certain existing University websites or electronic content. (i.e., priority shall be given to the most highly trafficked sites and to those that contain core institutional information.) The TAAG, at the direction of and in coordination with the EITO shall periodically review this Policy, its associated procedures, and the governance model and, as appropriate, recommend changes. The review will help ensure that the Policy continues to align with the University's mission, including its commitment to accessibility.

Related Policies
- Binghamton University's current accessibility statement (linked at the bottom of every binghamton.edu page)
- Discrimination Complaint Procedure
- Purchasing and Contracting (Procurement)

Related Links
- SUNY Accessibility Website

External Links
- Americans with Disabilities Act of 1990, As Amended
- Rehabilitation Act of 1973 – Section 508
- New York State Enterprise IT Policy – NYS-P008-005
- Web Content Accessibility Guidelines (WCAG) 2.0

Adopted: *tbd*

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[1] Based in part on Harvard University Digital Accessibility Policy, [Harvard University Digital Accessibility Policy](#) consulted February 25, 2020.

[2] Electronic and information technologies (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 the internet and intranet websites, content delivered in digital form, search engines and databases, learning management systems, management information systems, classroom technologies; web, computer, and mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

[3] Exceptions: In certain cases, meeting the accessibility standards required by these guidelines may not be feasible due to an undue burden or doing so would result in a fundamental alteration. Such assertions may only be made by the president or designee who has budgetary authority after considering all resources available for use, and must be accompanied by a written statement of the reasons why. These difficulties do not relieve University programs or services from meeting EIT accessibility obligations. Equally Effective Alternative Access must be provided upon request.

Equally Effective Alternate Access: The alternative format communicates the same information in as timely a fashion as does the original Web page. For interactive applications and hardware devices, "equally effective" means that the user action (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requester.