

Information and Communications Technology Accessibility Act

Annual Report

October 1, 2026

Under the Information Technology Access Act, Va. Code § 2.2-3500 et seq., each executive branch agency must report annually to the General Assembly on any Information and Communications Technology (ICT) that does not conform with accessibility, as defined therein, and that is not included in the exceptions found in 28 C.F.R § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E 202. Reporting agencies are required to provide an estimate of the fiscal impact involved in bringing such technologies into compliance with federal and state laws and regulations. Radford University has reviewed, scanned, and analyzed the accessibility of its ICTs and the exceptions provided in federal and state law to complete the initial assessment. Radford University has identified four ICTs that do not conform with accessibility.

Identifying ICTs

“Information and Communications Technology” is defined in Va. Code § 2.2-3501 to mean “any website, application, or other product or service primarily intended to fulfill or enable the function of information processing and Communication by electronic means, including transmission and display via the Internet.” Radford University identified thirty-three ICTs in use.

Non-Compliant ICTs

Radford University performed reviews of its ICTs and determined the following are noncompliant: Ellucian’s Banner Self Service, Raiser’s Edge, Hawkes Courseware, Clarivate, CBORD, Anaplan, Advocate, Meta, Instagram, X, TikTok, University created video content.

Exceptions

Radford University performed additional analysis to determine whether any of the nine non-compliant ICTs met exceptions found in either 28 C.F.R § 35.201 or 36 C.F.R. Part 1194,

Appendix A, § E 202. All nine systems and applications were determined to meet such exceptions.

Ellucian's Banner Self Service, Raiser's Edge, Hawkes Courseware, Clarivate, CBORD, Anaplan, and Advocate are hosted systems that are in a continued state of alteration but have not indicated complete conformity in all aspects of their applications, including partial conformity due to screen readers inability to translate menus and nonconformity due to color alterations within the applications code. Radford University has determined these ICTs fall under Appendix A, E202.6 *Undue Burden or Fundamental Alteration*. Where an agency determines in accordance with E202.6 that conformance to requirements in the Revised 508 Standards would impose an undue burden or would result in a fundamental alteration in the nature of the ICT, conformance shall be required only to the extent that it does not impose an undue burden, or result in a fundamental alteration in the nature of the ICT. In response, Radford University follows Appendix A, §§ E 202.7.2 *Alternative Means*, providing alternative access to systems through the Center for Accessibility Services where individualized support is delivered on a need basis .

Social Media platforms Instagram including, Meta, TikTok, and X provide alternate text and guidelines on video and image use for accessible content. However, these platforms do not facilitate the use of audio descriptions for video. Following Appendix A, §§ E202.7 *Best Meets*. Radford University has established these ICTs conform to one or more requirements in the Revised 508 Standards and due to the nature of these platforms' offerings, they are the only commercially available platforms meeting business needs.

Remediation Costs

University created video content for marketing and educational use that are not archived exceeds 667 hours of media. An estimated cost of \$1.40 per minute, at minimum, the cost of adding audio descriptions would be \$56,000.