



Information and Communications Technology
Accessibility Act
Annual Report on ICT Accessibility

October 23, 2026

This report has been prepared by George Mason's [Office of Access, Compliance, and Community](#) (OACC), c/o [Information Technology Services](#) (ITS), for the General Assembly in response to the

annual reporting requirement set forth in the [Commonwealth of Virginia's Information Technology Access Act \(ITAA\)](#), Va. Code § 2.2-3504.

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Overview

Enacted in 2025, HB2541 expanded Virginia's ITAA (Va. Code § 2.2-3500) to cover state agencies, public school divisions, public colleges and universities, and political subdivisions. Under the amended ITAA, each covered entity's head or designee must ensure that its information and communications technology (ICT) is accessible or adaptable, consistent with federal disability laws and guidelines, including [Section 508](#), [Section 255](#), and [28 C.F.R. § 35.200](#). "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."* The law also requires vendors to certify that their products conform to accessibility standards. Vendors who cannot provide this certification must submit the following to the covered entity:

1. Accessibility conformance report (ACRs)/Voluntary Product Accessibility Templates (VPATs), identifying where the technology fails to meet compliance standards, and
2. A product development timeline, identifying when the product(s) will be brought into compliance.

Additionally, an annual report must be submitted to the General Assembly identifying covered ICT that fails to meet applicable accessibility requirements and is not exempt under [28 C.F.R. § 35.201](#) or [36 C.F.R. Part 1194, Appendix A, § E202](#). This report fulfills that requirement by listing all relevant ICT and estimates regarding the fiscal impact of bringing that technology into compliance with federal and state requirements.

Identifying ICTs

During the reporting period, October 1, 2025 – September 30, 2026, George Mason's existing ICT accessibility infrastructure used three parallel review channels to identify, prioritize, and address accessibility needs across its digital platforms:

1. **ASRB Procurement Review Process** — 91 applications and software products submitted through the [Architectural Standards Review Board](#) (ASRB) as part of the technology procurement and renewal workflow.
2. **ATI Direct Manual Review Process** — 40 websites and software applications reviewed directly by [Assistive Technology Initiative](#) (ATI) staff in response to accommodation requests, proactive compliance audits, and departmental referrals. These reviews are conducted independently of the ASRB and capture ICTs already in use that were not subject to a current procurement action.
3. **Public-Facing Digital Content** - An additional inventory of public-facing digital content, including university-hosted PDF documents and media assets, was separately assessed.

ASRB Reviews by Quarter

Reporting Period	Applications Reviewed
Q4 2025 (October – December 2025)	23
Q1 2026 (January – March 2026)	24
Q2 2026 (April – June 2026)	26
Q3 2026 (July – September 2026)	18
Total	91

ATI Manual Reviews by Quarter

Reporting Period	Request Type	Cases Reviewed
Q4 2025 (October – December 2025)	Website compliance (6), accommodation-related (2)	8
Q1 2026 (January – March 2026)	Website compliance (4), distance education course (3)	7
Q2 2026 (April – June 2026)	Website compliance (6), accommodation-related (1)	7
Q3 2026 (July – September 2026)	Website compliance (11), accommodation-related (6), distance education course review (1)	18
Total		40

Note: At least 15 distinct websites or web-based applications were identified across all cases.

Non-Conforming ICTs

George Mason assessed all 131 ICTs (i.e., ASRB and ATI Manual Reviews) reviewed during the reporting period. For ICTs submitted through the ASRB, each was assigned an accessibility risk classification based on the probability of assistive technology (AT) user interaction and the severity of any identified issues. ATI manual reviews were tracked by review stage and request type. The high- and moderate-risk ICTs are reported below:

ASRB Risk Classifications (91 applications)

Risk Level	Count
High Risk	7
Moderate Risk	27
Low Risk	46
Inconclusive / Under Review	4
Incomplete (no review data)	7
Total	91

The following ICTs were assessed as **High Risk**, indicating a high probability of AT user interaction combined with moderate-to-high severity accessibility issues (e.g., unlabeled form fields, keyboard access issues), and did not fully conform to applicable accessibility standards at the time of review:

Application	Requesting Department	Review Completed
Tevera	CEHD Technology Support	December 2025
Social Recognition Platform	HR Operations	February 2026
Gamma App	Health Administration and Policy	March 2026
Canva Pro	College of Engineering and Computing – Dean's Office	March 2026
Media Education Database (Library)	Digital Strategies and Systems	May 2026
Canvas LMS	IDIA Operations	May 2026
NetLogo	Academic Affairs Administration	July 2026

The following ICTs were assessed as **Moderate Risk**, indicating a moderate probability of AT user interaction and/or moderate severity accessibility issues identified during review:

Application	Requesting Department	Review Completed
Blueprint (Med Degree Prep)	Enlisted Medical Degree Prep Program	October 2025
HeyGen	Costello College of Business IT Support	October 2025
iSee Systems	Economics Department	November 2025
FanWorld	Sports Information	November 2025

ErezLife	University Libraries – Housing & Residential Life IT	December 2025
Virtual Coaching Platform	School of Nursing	January 2026
Flipsnack	Costello College of Business Marketing & Communications	January 2026
QuillBot	CPH Academic Affairs	February 2026
EasyChair License	ISEAI Center	February 2026
EGYM Fitness Equipment & Mobile App	Mason Recreation	February 2026
Concentration in Behavior Analysis Learning Modules	CEHD Technology Support	March 2026
EYARC Experience Platform	Accounting	April 2026
Digitalia Film Database	Digital Strategies and Systems	May 2026
Cursor Pro	Costello College of Business IT Support	May 2026
SCOPUS Database (Library)	Digital Strategies and Systems	May 2026
Gravity Forms	IBI Operations	June 2026
SciVal	Digital Strategies and Systems	June 2026
MOTU Digital Performer 11	VSGI State Research	July 2026
Autodesk	ITS Finance and Business Operations	July 2026
Packback	Information Sciences and Technology	July 2026
DaVinci	Film and Video Studies	July 2026
eCampus	ABS Finance and Admin	July 2026
Beehiiv	IBI Operations	August 2026
240 Tutoring	CEHD Technology Support	August 2026
Lucid Charts	ITS CRM Salesforce	August 2026
Fullglass Courseware	Criminology, Law & Society	September 2026
Fullglass Courseware	Communication	September 2026

ATI Manual Reviews (40 cases)

Review Stage	Count
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Service Request Completed	19
Service Request in Progress	10
Documenting Results	5
Assigned / Pending	6
Total	40

Of the 40 ICTs reviewed through the ATI's direct review process, 19 have been completed. Non-conformance issues include, but are not limited to, inaccessible third-party scheduling tools embedded in university web pages (e.g., Calendly, SignUpGenius), inaccessible campus kiosk interfaces, online training platforms with screen-reader incompatibilities, and course-embedded external tools with WCAG 2.1 AA barriers. Remaining cases are actively under review or pending final documentation.

Public-Facing Web Content

In addition to the ASRB and ATI manual reviews, George Mason conducted an audit of its public-facing websites and identified the following assets as non-conforming:

- Approximately 14,444 PDF documents on public-facing university websites do not conform to WCAG 2.1 Level AA standards. These include administrative publications, academic resources, CVs, program materials, and fillable forms.
- Approximately 5,169 media assets on public-facing university websites were identified as lacking adequate captioning, transcription, and/or audio description in conformance with applicable standards.

Exceptions

George Mason performed additional analysis to determine whether any non-conforming ICTs identified by the ASRB met exceptions found in 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E 202. A breakdown of those findings is listed below:

High Risk ICTs

- **Canvas LMS** – [Appendix A, § E202.6 Undue Burden or Fundamental Alteration; § E202.7 Best Meets](#)
 - Canvas is George Mason's enterprise learning management system (LMS), used across all colleges and departments for course delivery. While Canvas maintains an active ACR and has demonstrated commitment to meeting WCAG 2.1 Level AA compliance, the ATI identified persistent issues with specific interactive components, including third-party integrated tools and dynamic content

elements. Given the scope of Canvas's integration across the institution and its status as the only commercially viable LMS at enterprise scale that meets George Mason's educational and operational requirements, this ICT falls under Appendix A, §§ E202.6 and E202.7. Instructional accessibility is supported through Yuja Panorama's accessibility integration and by accessibility liaisons for each college and school, identified during this reporting period to facilitate training and support at the unit level. Faculty, staff, and students encountering accessibility barriers in Canvas are directed to the ATI for an individualized alternative access plan.

- **Tevera** – Appendix A, § E202.6 Undue Burden or Fundamental Alteration
 - Tevera is a practicum and internship management platform required for students in CEHD practicum and internship courses. The vendor has committed to addressing specific identified issues, including button labeling and color contrast deficiencies, with a projected completion aligned to the platform's next major release cycle. In the interim, George Mason has established an alternative access plan through the ATI. Full conformance in the near term would substantially disrupt practicum placement workflows; accordingly, Tevera falls under Appendix A, § E202.6. The application is subject to accessibility re-review prior to contract renewal.
- **Social Recognition Platform (Incentive Services)** – No Exception Applied
 - A manual review of the vendor-provided sandbox environment identified significant accessibility barriers, including keyboard navigation failures, missing accessible labels on interactive elements, and non-conforming form elements. The vendor indicated that remediation would require additional payment from George Mason, a position the university does not accept, as accessibility compliance is a legal obligation of the vendor, not the institution. High-impact accessibility contract language has been included in contract negotiations, requiring the vendor to provide an ACR/VPAT and a projected remediation timeline. This ICT does not meet an applicable exception and is subject to ongoing remediation requirements or contract termination for cause.
- **Gamma App** – Appendix A, § E202.7 Best Meets
 - Gamma is an AI-powered presentation platform used in academic instruction. It provides partial conformance with WCAG 2.1 Level AA and is among the few commercially available tools that offer comparable functionality. The ATI determined that Gamma best meets applicable requirements among available alternatives. Alternative access support is available through the ATI.
- **Canva Pro** – Appendix A, § E202.7 Best Meets
 - Canva Pro is used across academic and administrative units for design and communications work. Canva maintains an active accessibility roadmap and has

demonstrated partial conformance with WCAG 2.1 AA. As one of the only commercially available design platforms at an enterprise scale that meets George Mason's business needs, Canva Pro best meets the applicable requirements. Alternative access support is available through the ATI.

- **Media Education Database (Library)** – Appendix A, § E202.6 Undue Burden or Fundamental Alteration
 - This library resource database presents accessibility barriers related to media player components and search interface elements. The vendor has been notified, and a remediation timeline is under negotiation. As an essential academic library resource with no accessible substitute, this ICT falls under Appendix A, § E202.6 pending vendor remediation.
- **NetLogo** – Appendix A, § E202.6 Undue Burden or Fundamental Alteration
 - NetLogo is a multi-agent programmable modeling environment used in academic coursework. Its graphical and dynamic modeling interface presents inherent accessibility challenges for screen-reader users, and no accessible equivalent exists for this type of specialized scientific modeling software. NetLogo falls under Appendix A, § E202.6; the ATI is working with Academic Affairs to develop alternative access strategies, including group-based engagement models.

Moderate Risk ICTs

Moderate Risk ICTs were reviewed and found to pose a manageable accessibility risk given the scope of use (i.e., specialized tools with limited user populations), the likelihood of AT user interaction, and available mitigation strategies (i.e., ATI, Disability Services). All units using Moderate Risk ICTs have been advised to:

- Retain standard accessibility language in all vendor contracts.
- Require vendors to provide or update their ACRs/VPATs.
- Contact the ATI if any user encounters an accessibility barrier to initiate an individualized alternative access plan.

University-Created and Public-Facing Digital Content

- **PDF Documents and Media Assets on Public-Facing Websites** – No Exception Applied
 - These digital resources do not meet an applicable exception and are subject to phased remediation efforts. George Mason is prioritizing remediation efforts based on public visibility, user impact, and individual accommodation requests.

Fiscal Impact Summary

George Mason's estimated cost to achieve and maintain compliance with applicable digital accessibility requirements includes both one-time remediation costs and annual operational costs.

One-Time Remediation Costs

PDF Document Remediation

Approximately 14,444 PDFs on public-facing university websites require accessibility remediation. Based on contractual rates for document remediation services:

Cost Factor	Low Estimate	High Estimate
Per-page remediation rate	\$1.25	\$2.75
Total pages	~153,253	~153,253
Estimated Total	\$191,566.25	\$421,445.75

Cost estimates assume PDF remediation will be outsourced to a third party. Estimates will also vary based on document complexity, tagging requirements, image alt-text needs, and reading order corrections. Simple single-page documents and complex multi-column technical publications fall at opposite ends of this range.

Captioning, Transcription, and Audio Description

Approximately 5,169 media assets on public-facing university websites require captioning, transcription, and/or audio description. Costs are estimated on a per-video-minute basis; average asset duration is estimated at 2-10 minutes depending on content type (e.g., social media, Mason Arts Amplified, GMU-TV):

Cost Factor	Low Estimate	High Estimate
Total media assets	5,169	5,169
Per-minute service rate	\$1.00	\$9.00
Estimated total video minutes	~10,338 (avg. 2 min/asset)	~51,690 (avg. 10 min/asset)
Estimated Total	\$10,338	\$465,210

The per-minute rates listed above represent existing contractual rates for higher education institutions in the Commonwealth of Virginia. George Mason has established accurate, synchronized, automatic captions as the baseline standard for all online courses and public-facing video content; where automatic captions meet accuracy and synchronization

requirements, no additional cost is incurred. The low estimate of \$1.00 per video minute reflects professional, human-generated captioning and transcription for content where automatic captions are insufficient. The high estimate of \$9.00 per video minute reflects the comprehensive cost of professional, human-generated captioning, full transcription, and human-generated audio description (AD) for complex or visually rich instructional content (e.g., on-screen demonstrations, graphics, or lab procedures). George Mason anticipates a tiered approach, including automatic captions for general online content, professional human captioning when accuracy is required, and full AD for high-impact, public-facing promotional media.

Combined One-Time Remediation Estimate

Scenario	Estimated Cost Range
PDF Remediation	\$191,566.25 – \$421,445.75
Media Captioning / Audio Description	\$10,338 – \$465,210
Combined Total	\$201,904.25 – \$886,655.75

Annual Ongoing Costs

Since George Mason does not develop any third-party assets acquired through the purchasing and procurement process, the costs of bringing these products into compliance with accessibility standards cannot be accurately estimated. The institution's costs are more accurately reflected in the cost estimates for dedicated accessibility staffing and ongoing remediation support services (e.g., captioning, document remediation, accommodation support, training).

Cost Category	Description	Annual Cost
Panorama for Canvas (LMS Accessibility)	Ongoing annual cost for Mason's existing Panorama integration within Canvas, which supports course-level accessibility monitoring, reporting, and improvement across academic units.	\$90,000
DubBot Web Governance Solution (Web Accessibility Monitoring & Remediation)	Annual costs for web accessibility scanning, developer-level remediation support, and accessibility auditing of university websites.	\$20,000

Accessibility Remediation Support Services	Costs associated with disability accommodation support, alternative access plan development, and remediation of front-facing web resources, including contractor and service costs not captured under staffing.	\$100,000
Dedicated Accessibility Staffing	Salaries, benefits, and operational costs for 4 full-time and 1 part-time professional staff in the ATI, responsible for ICT accessibility review, ASRB coordination, vendor engagement, accommodation support, in-house remediation support, and compliance monitoring.	\$570,000
Total Annual Ongoing Cost		\$780,000

Total Estimated Fiscal Impact

Cost Category	Low Estimate	High Estimate
PDF Remediation (One-Time)	\$191,566.25	\$421,455.75
Media Captioning/AD (One-Time)	\$10,338	\$465,210
Panorama for Canvas (Recurring)	\$90,000	\$90,000
DubBot Web Governance (Recurring)	\$20,000	\$20,000
Remediation Support Services (Recurring)	\$100,000	\$100,000
Staffing (Recurring)	\$570,000	\$570,000
Total (One-Time + Recurring)	\$981,904.25	\$1,666,665.75

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This report is submitted pursuant to Va. Code § 2.2-3504. Questions regarding this report may be directed to the Office of Access, Compliance, and Community.

Appendix A

Abbreviations and Terms Used

Abbreviation	Full Term or Meaning
AA	Level AA conformance under the Web Content Accessibility Guidelines (WCAG)
ABS	Auxiliary and Business Services
ACR/ACRs	Accessibility Conformance Report/Reports
AD	Audio description
AI	Artificial intelligence
ASRB	Architectural Standards Review Board
AT	Assistive technology
ATI	Assistive Technology Initiative
CEHD	College of Education and Human Development
C.F.R.	Code of Federal Regulations
CRM	Customer relationship management
CV/CVs	Curriculum vitae/Curricula vitae
EYARC	Ernst & Young Foundation Academic Resource Center
GMU	George Mason University
GMU-TV	George Mason University Television
HB2541	House Bill 2541, referenced in the report as the 2025 legislation expanding Virginia's Information Technology Access Act
HR	Human resources
IBI	Institute for Biohealth Innovation
ICT/ICTs	Information and communications technology/technologies

IDIA	Institute for Digital Innovation
ISEAI	Infrastructure Security in the Era of AI; used in the name Center for Infrastructure Security in the Era of AI
IT	Information technology
ITAA	Commonwealth of Virginia’s Information Technology Access Act
ITS	Information Technology Services
LMS	Learning management system
MOTU	Mark of the Unicorn; the vendor name associated with Digital Performer
OACC	Office of Access, Compliance, and Community
PDF/PDFs	Portable Document Format/documents in that format
Q1–Q4	First through fourth calendar quarters: January–March, April–June, July–September, and October–December, respectively
Va. Code	Code of Virginia
VPAT/VPATs	Voluntary Product Accessibility Template/Templates
VSGI	Virginia Serious Game Institute
WCAG	Web Content Accessibility Guidelines