



Virginia Community College System Information and Communications Technology Accessibility Act

Annual Report to the General Assembly
Va. Code § 2.2-3504

Purpose

Va. Code § 2.2-3504 requires the head of a covered entity or a designee to report information and communications technology (ICT) that does not conform with accessibility and is not covered by the exceptions in 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202, together with an estimate of the fiscal impact of bringing that technology into compliance. The Virginia Community College System (VCCS) is a covered entity under Va. Code § 2.2-3501. This report is submitted under § 2.2-3504.

Summary

VCCS has established a systematic process for evaluating the accessibility of the enterprise software it uses, and that process is producing results: 413 software records inventoried, 354 identified as requiring an Accessibility Conformance Report (ACR), and 340 of those ACRs now on file. VCCS has not yet identified ICT that is nonconforming and not covered by an exception. That reflects where the assessment stands, not a conclusion that the work is finished. Discovery is continuing, including at the colleges, and VCCS expects the number of items it reports to change as that work expands.

Assessment to Date

VCCS Information Technology Services maintains an inventory of enterprise software used across the System Office, Shared Services Center and the 23 colleges, and this report combines that inventory with the ACRs collected by the Shared Services Center. For each record, VCCS determines whether an Accessibility Conformance Report (ACR) is required and obtains one from the vendor. Results to date:

Measure	Count
Enterprise software records inventoried and evaluated for ACR applicability	413
Products determined to require an ACR	354
ACRs on file for those products	340
Products determined not to require an ACR	59
Additional ACRs on file for products not requiring one	37
Total ACRs on file	377

VCCS has an ACR on file for 340 of the 354 products that require one and is following up with vendors on the remaining 14.

Scope of this assessment: This inventory covers enterprise software managed through the System Office and shared across the System, together with the ACRs the Shared Services Center has collected, which include some titles used at individual colleges. It does not yet include every title in use at the 23 colleges. Colleges also acquire and manage their own software, build applications in-house and maintain their own public websites. VCCS is extending its discovery to these areas and expects that work to identify additional ICT to evaluate.

What an ACR shows: An ACR on file documents a vendor's own assessment of its product. It does not by itself establish that the product conforms. VCCS is reviewing these reports to determine conformance and will report any nonconforming ICT as that review identifies it.

Work in Progress

VCCS has three lines of work under way:

- Conformance review. Reviewing the ACRs on file to determine whether each product conforms, partially conforms or does not conform.
- Expanded discovery. Identifying software, in-house applications and websites used at the colleges that are not yet in the enterprise inventory and bringing them into the same evaluation process.
- Obtaining ACRs from vendors that have not yet supplied one and refreshing reports that are out of date.

Over the past 16 months, VCCS has built a system-wide structure to help the 23 colleges bring their digital content and technology into compliance. VCCS developed a comprehensive plan, the Accessibility Framework Document, and shared it with every college. VCCS held on-site accessibility training days at each college and about 50 webinars. It also engaged an accessibility specialist who has met with faculty and staff to provide direct support and continues to hold one-on-one sessions. To support remediation, VCCS purchased UDOIT and TidyUp for Canvas, Grackle for Google, and SiteImprove for websites.

VCCS expects to report on the results of the conformance review, together with the results of expanded discovery, in its next annual report.

Nonconforming ICT

At the time of this report, VCCS has not identified ICT that does not conform with accessibility and is not covered by an exception. Because the conformance review and expanded discovery described above are not complete, VCCS expects the number of identified items to change, and to increase as the review expands in scope and depth.

Exceptions

VCCS has not claimed an exception under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202 for any ICT currently. Any exception VCCS later relies on will be documented, including its basis, before it is reported.

Fiscal Impact

Estimated fiscal impact of bringing nonconforming ICT into compliance: not yet determinable, because the assessment that identifies the work is not complete. For any nonconforming ICT it identifies, VCCS will estimate the cost of vendor remediation, internal staff effort, testing, replacement where remediation is not feasible, and alternative access, and will include that estimate in its next annual report.

Accessibility Governance

VCCS procurement of ICT is subject to the accessibility requirements of Va. Code § 2.2-3503, including vendor certification of accessibility and, where a vendor cannot certify, an Accessibility Conformance Report and Vendor Accessibility Roadmap. VCCS has incorporated the Commonwealth's accessibility contract language into its procurement templates.