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## **Information and Communications Technology Accessibility Report**

October 2026

### **Executive Summary**

Old Dominion University (ODU) submits this report under Va. Code § 2.2-3504. ODU remains committed to advancing digital accessibility compliance efforts in alignment with the revised federal implementation date.

To date, ODU has identified 20 systems or system groups with known accessibility gaps, and 29 additional systems or system groups requiring further evaluation or validation. The University continues to expand its ICT inventory and assess accessibility conformance through a phased approach that prioritizes high-impact systems and services. Given the breadth and complexity of the University's technology environment, these efforts require ongoing coordination, technical evaluation, and financial resources. As assessments and remediation planning progress, ODU will continue to refine its understanding of the associated fiscal impact and provide updated information in future reports.

### **Background**

Va. Code § 2.2-3504 requires each covered entity, including public institutions of higher education, to report any information and communications technology (ICT) that does not conform with accessibility and is not within an exception under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202. The report must include an estimate of the cost to bring that ICT into compliance.

Va. Code § 2.2-3501 defines accessibility as alignment with federal Section 508 standards, Section 255 guidelines, and 28 C.F.R. § 35.200, which adopts WCAG 2.1 Level AA. The U.S. Department of Justice has extended the compliance date in 28 C.F.R. § 35.200(b)(1) to April 26, 2027, for large public entities.

### **Assessment Methodology and Results**

ODU began its Digital Accessibility Initiative with a focus on high-impact, student-facing enterprise systems (Phase 1). For each Phase 1 system, ODU requested an Accessibility Conformance Report (VPAT) for the identified systems and, where a system was not fully conformant, a vendor remediation roadmap. ODU also used a third-party assessment of the odu.edu and ODUGlobal websites, a Siteimprove review of web PDFs, internal accessibility audits of the ODUMobile app and myODU portal, and YuJa analysis of Canvas course content.



ODU also engaged its divisions in identifying high-impact ICT systems and obtaining available vendor accessibility documentation. Division-reported information represents an initial inventory and is subject to further review and validation.

Assessment results reflect varying levels of evaluation, including independent assessments, vendor-reported conformance information, automated testing, and division self-reporting. Accordingly, the findings provide a preliminary institutional baseline to inform continued evaluation, remediation prioritization, and resource planning rather than a comprehensive determination of ICT accessibility conformance.

**Table 1. ICT Accessibility Assessment Summary**

| Assessment measure                           | ODU status / result            |
|----------------------------------------------|--------------------------------|
| Enterprise (Phase 1) systems reviewed        | 11 of 11                       |
| Division-reported systems                    | 62                             |
| ICT with known accessibility gaps            | 20 (6 enterprise, 14 division) |
| ICT not yet evaluated or validated           | 29 (5 enterprise, 24 division) |
| Division systems self-reported as conformant | 24 (pending validation)        |
| Nonconforming ICT subject to an exception    | Pending determination          |
| Total ICT inventory                          | Development ongoing            |

*Results reflect assessment and inventory activities conducted to date. System classifications and exception determinations may be refined as additional documentation, technical evaluations, and validation activities are completed.*

## Nonconforming ICT

The following ICT systems and content have identified or reported accessibility gaps. ODU has not formally claimed an applicable accessibility exception for the ICT identified below; however, additional validation and exception determinations remain ongoing, as appropriate.

**Table 2. Enterprise ICT Accessibility Findings and Remediation Status**

| Enterprise system                       | Current status                                           |
|-----------------------------------------|----------------------------------------------------------|
| odu.edu and ODUGlobal websites (Drupal) | Third-party assessment complete; remediation in progress |



| Enterprise system               | Current status                                                                               |
|---------------------------------|----------------------------------------------------------------------------------------------|
| PDF documents on ODU websites   | Siteimprove review complete; remediation in progress                                         |
| Affiliated and program websites | Sites identified; remediation in progress                                                    |
| Canvas LMS course content       | Accessible course templates and YuJa remediation tools deployed; content remediation started |
| ODUMobile app                   | Audit, remediation roadmap, and project plan complete                                        |
| myODU portal                    | Audit, remediation roadmap, and project plan complete                                        |

**Table 3. Division-Reported ICT Accessibility Findings**

| Division-reported system                                                                                 | Reported status                                               |
|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Liaison centralized application services (BioMedCAS, CASPA, GradCAS, HAMPCAS, OTCAS, PostBacCAS, SOPHAS) | Partially conformant                                          |
| Liaison Enrollment Management Platform                                                                   | Partially conformant                                          |
| Hyland OnBase                                                                                            | Partially conformant                                          |
| MedHub eValue                                                                                            | Partially conformant; vendor will not pursue full conformance |
| Monday.com                                                                                               | Partially conformant; vendor engaged                          |
| TransLoc                                                                                                 | Not conformant; vendor roadmap provided                       |
| T2 Systems                                                                                               | Partially conformant                                          |
| Offstreet                                                                                                | Partially conformant; vendor roadmap provided                 |

ODU continues to expand its accessibility assessment and validation efforts across enterprise and division-reported systems. Current activities include further evaluation of MIDAS/Monarch Key and validation of vendor-provided Accessibility Conformance Reports (ACRs) for Salesforce CRM, Ellucian Banner, MachForms/Kuali, and Duo. An additional 24 division-reported systems

have been identified for further evaluation. These ongoing activities will inform accessibility determinations, remediation priorities, and associated resource planning.

## Exceptions

ODU has not claimed an applicable exception for the ICT identified in this report. The applicable exceptions are archived web content, certain preexisting electronic documents, unaffiliated third-party content, individualized password-protected documents, preexisting social media content, and certain legacy systems or cases of undue burden or fundamental alteration. As accessibility assessments and remediation planning progress, ODU will evaluate the applicability of relevant exceptions on a case-by-case basis.

## Fiscal Impact

Addressing digital accessibility requires ongoing institutional investment in technology assessments, remediation, software tools, training, and personnel resources. ODU has incurred expenditures associated with its initial accessibility assessment and remediation efforts, as summarized below.

**Table 4. Digital Accessibility Expenditures to Date**

| System                                                        | Cost to date |
|---------------------------------------------------------------|--------------|
| Third-party remediation of ODU websites (Allyant/Kwall)       | \$72,000     |
| Third-party remediation of website documents (SiteImprove)    | \$120,000    |
| Third-party remediation of website PDF documents (Commonlook) | \$13,200     |
| Third-party remediation of LMS documents (YuJa)               | \$32,815     |
| Internal development time for ODUMobile and myODU remediation | Unknown      |
| Total Reported Expenditures                                   | \$238,015    |

*Expenditures reflect reported external costs associated with accessibility initiatives. Internal personnel time and other unquantified institutional costs are not included.*

Additional financial commitments are anticipated as the University advances its accessibility initiatives, including:

- Continued accessibility assessment, monitoring and remediation tools;
- Faculty training and instructional design support for accessible course content;

- Remediations or replacement of vendor systems that do not achieve applicable accessibility standards; and
- Personnel resources to support ongoing accessibility governance, technical evaluation, vendor review, and remediation.

The fiscal impact of achieving accessibility conformance will depend on the scope and complexity of identified barriers, vendor remediation capabilities, available technical solutions, and the institutional resources required for implementation. Because accessibility evaluations, inventory development, and remediation planning remain ongoing, the University is not yet positioned to establish a reliable comprehensive estimate of remaining remediation costs.

As these efforts progress, ODU will continue to evaluate the fiscal impact associated with identified accessibility gaps and refine cost estimates to inform institutional planning and future reporting.

## **Conclusion**

ODU remains committed to advancing digital accessibility through ongoing assessment, remediation, and continuous improvement. Recognizing the complexity and evolving nature of its technology environment, the University continues to strengthen coordination across academic, administrative, compliance, and technology functions to support a sustainable, institution-wide approach to accessibility compliance.

As these efforts progress, ODU will continue to refine its ICT inventory, evaluate accessibility conformance and applicable exceptions, prioritize remediation activities, and assess associated fiscal impacts. These ongoing efforts will inform institutional planning, resource allocation, and future reporting.