VIRGINIA TECH



INFORMATION TECHNOLOGY ACCESS ACT REPORT

Virginia Polytechnic Institute and State University

I. Background

Virginia Polytechnic Institute and State University (“Virginia Tech”) submits this report pursuant to Va. Code § 2.2-3504. The report includes Information and Communication Technology (“ICT”) that do not conform with accessibility as defined in the Information Technology Access Act and is not included in the exceptions found in 28 CFR § 35.201 or 36CFR Part 1194, Appendix A, § E202.

II. Inventory Methodology

Information and Communication Technology (“ICT”) is defined as “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.” Va. Code § 2.2-3501. Definitions. Conformant with this definition and the use of ICT in associated regulations for Section 508 of the Rehabilitation Act, ICT includes but may not be limited to: websites; web, native, and mobile applications (apps); web content; software, whether web-based or desktop-based; software as a service (SaaS); and hardware that enable the functions of information processing or communication by electronic means, such as computers, peripheral equipment, and information kiosks.

Virginia Tech's ICT environment therefore encompasses a large and diverse collection of digital resources, including websites, web applications, electronic documents, learning technologies, enterprise systems, software, devices, and other technology-enabled services. Given the breadth of this definition and the size and complexity of Virginia Tech's operations, this report reflects a phased assessment of ICT categories for which inventory and accessibility review data were reasonably and timely available during the reporting period. The absence of a particular technology, system, or category of ICT from this report should not be interpreted as a determination that such ICT conforms with accessibility requirements or is excluded from future evaluation. Rather, the report represents the current scope of assessment activities, and additional ICT categories will be incorporated into future reporting cycles as inventory, assessment, and governance processes continue to mature.

A. Inventoried ICT

Virginia Tech inventoried known ICT within its digital ecosystem and grouped identified ICT by category for purposes of accessibility assessment and reporting.

1. Websites and Web Content: All websites within Virginia Tech's primary content management system (CMS) were added to a web crawler platform that performs automated accessibility scans. Additional websites and microsites not hosted within the CMS were identified and added through collaboration with Virginia Tech's web hosting team, extension offices, and individual units.
2. LMS Course Content: Canvas is Virginia Tech's primary learning management system (LMS) and contains course content used to deliver academic instruction. The LMS inventory consisted of courses active during the Fall 2026 semester.
3. Pre-existing Applications: Virginia Tech created a list of web, native, and mobile applications which existed in its digital ecosystem prior to April 2026. Developed by a working group comprising members with access to the procurement catalog and management software, the inventory includes more than 2,000 applications. Virginia Tech has begun prioritizing reviews and remediations based on audience size and critical functionality.
4. Procured ICT (April 24, 2026 - October 1, 2026): The Procurement Department maintains a record of ICT obtained through “Hokiemart,” Virginia Tech’s instance of the Jaggaer procurement platform. Consistent with a phased approach, select ICT is routed to accessibility testers in the digital accessibility compliance team for evaluation and review prior to purchase or acquisition. The procurement process is also consistent with Virginia Code § 2.2-3503.
5. ICT Identified Through Referral (April 24, 2026 - October 1, 2026): ICT acquired outside of Hokiemart may be referred to the digital accessibility compliance team for accessibility review. ICT identified through this process was documented and included in the inventory, where applicable. For the reporting cycle, all such referred ICT was a native, mobile, or web application.

B. ICT Types Not Included

Certain ICT categories were not included in the initial inventory cycle. Consistent with a phased assessment approach, Virginia Tech prioritized ICT categories with the broadest institutional reach and highest potential impact on users, including public web content, LMS content, and newly procured ICT. Virginia Tech also focused on ICT categories that were clearly in the scope and spirit of the law while awaiting further guidance and clarification on the scope of the reporting requirement. As a result, hardware, social media content, course content outside of Canvas, most desktop software, and most applications not obtained through Hokiemart were not included in the initial inventory. These categories will be considered in future assessment efforts.

C. Limitations

The inventories used for this assessment reflect the best information available at the time of review. Because ICT inventories are derived from evolving institutional records and data sources, additional ICT may exist that was not captured in this assessment.

III. Assessment Methodology and Results

A. Web Content (excluding LMS content)

Due to the scale and dynamic nature of web content, all inventoried and identified web content were added to a web crawler platform and scanned using an automated testing tool. Web pages that were entirely exempt under one or more of the exceptions in 28 CFR § 35.201 or 36 CFR Part 1194, Appendix A, § E202 were excluded from testing. Some pages included in the assessment may have contained individual files, documents, or other content that qualified for an exception. Because automated testing was conducted at the page level, such content may be included in the assessment results.

Data

979 Websites and Applications are currently active within the platform.

- 151,373 pages have been scanned.
- 28,714 PDFs have been identified.

Overall score of 94%, indicating that, on average, each page has 1-2 types of accessibility problems flagged by an automated checker.

- 143,061 issues found across 81,602 pages.
- 27,079 PDFs were found to have accessibility issues on initial scan.
- A single issue is a single type of accessibility barrier; one issue may correlate to multiple instances of that barrier.

Caveats

The accessibility findings are limited to issues detectable through automated testing. Automated testing may flag accessible content as inaccessible, cannot identify all accessibility barriers, and cannot determine full conformance with WCAG 2.1 Level AA success criteria. Many accessibility requirements require manual inspection and testing, and additional issues may be present that are not reflected in these results.

Because no widely available PDF testing tool properly evaluates structural and usage criteria, the PDF analysis from this tool was not reported. Instead, it is used only to help prioritize PDFs for evaluation and remediation.

B. LMS Content

As of October 2026, Virginia Tech's Canvas Learning Management System (LMS) hosted approximately 4,442 active courses containing more than 380,000 files and 190,000 content items created through rich content editor, totaling over 570,000 assets. This number is not inclusive of all ICT contained within active courses for Fall 2026 and includes only those assets for which bulk inventorying is available. Due to the volume and dynamic nature of LMS content, Virginia Tech cannot determine the exact number of content items that are inaccessible and not otherwise exempt under applicable legal provisions. Virginia Tech has established resources and processes to help content owners identify and address accessibility barriers.

Furthermore, every video hosted in Virginia Tech’s video content management system (VCMS) receives automatic speech recognition (ASR) captions. Training is available to assist content owners in improving caption accuracy, and professional captioning and audio description services are available upon request.

C. Inventoried Pre-Existing Native, Mobile, and Web Apps

Of the more than 2,000 applications identified in the pre-existing inventory referenced in Section II.A, the following have undergone manual accessibility reviews by the digital accessibility compliance team:

- Twenty-five internally developed applications: Identified accessibility issues were documented and provided to the responsible internal stakeholders. All were at least partially remediated prior to April 2026.
- Eighty-four high risk third-party applications: Through Virginia Tech's formal procurement accessibility review process, identified accessibility issues were documented and provided to vendors. Vendors remediated or committed to remediate key accessibility barriers.

No exclusions were applied to any of the reviewed ICT.

D. Procured ICT Post-April 2026

Between April and October 2026, 16 high-risk third-party ICT products have gone through Virginia Tech's formal procurement accessibility review process. Vendors have remediated or committed to remediate key accessibility barriers. No exclusions were applied to the reviewed ICT.

E. Internally Developed Native, Mobile, and Web Apps Post-April 2026

Between April and October 2026, 13 internally developed applications were manually reviewed, documented, and at least partially remediated. No exclusions were applied to the reviewed ICT.



IV. Application of Exceptions to Section III Content

No ICT reported in Sections III was excluded from reporting based on the following exceptions:

- 28 CFR 35.201 (c)
- 28 CFR 35.201 (d)
- 28 CFR 35.201 (e)
- 36 CFR Part 1194, Appendix A, § E202.3
- 36 CFR Part 1194, Appendix A, § E202.4
- 36 CFR Part 1194, Appendix A, § E202.2
- 36 CFR Part 1194, Appendix A, § E202.5

Some content included in Section III.A and III.B may be eligible for exclusion under 28 CFR 35.201 (a) or 28 CFR 35.201 (b). However, much of the content included in the LMS and web content inventories are currently used to access Virginia Tech's program, services, or activities and are thereby ineligible for exclusion under these criteria.

Some web content and LMS content, especially content related to STEM fields, may meet exclusion criteria under 36 CFR Part 1194, Appendix A, § E202.6 and/or 36 CFR Part 1194, Appendix A, § E202.7.

V. Fiscal Impact

Because Virginia Tech's ICT ecosystem is vast and dynamic, achieving and maintaining conformance requires both remediation of existing accessibility barriers and prevention of new barriers as content and technologies are created, modified, acquired, implemented, maintained, and distributed. Responsibility for these activities is shared across Virginia Tech, requiring widespread awareness, training, tools, and support for employees who create, maintain, remediate, select, procure, implement, or otherwise manage ICT.

This section represents a good-faith estimate of the cost of achieving and maintaining compliance for identified nonconforming ICT within the noted limitations.

A. Web and LMS Content

The cost of bringing web and LMS content into conformance is difficult to estimate because responsibility for creating, maintaining, and remediating content is distributed among content owners across Virginia Tech. In many cases, accessibility remediation is performed by content owners as part of their regular job responsibilities using accessibility tools, training, and support resources provided by Virginia Tech.

Virginia Tech currently invests approximately $790,000-$865,000 annually in accessibility related tools, services, training, automatic/ASR captioning, professional captioning, audio description, and professional PDF remediation. Many of these accessibility-related costs are ongoing operational investments, supporting both remediation of existing accessibility barriers and prevention of new barriers through the creation and maintenance of accessible ICT.

Limitations

The funding for vendor-provided PDF remediation ($100,000) is not sufficient to bring all inaccessible, non-exempt PDFs into conformance. Consistent with a phased approach, Virginia Tech is prioritizing high impact documents while educating employees on how to engage in remediation and how to replace PDFs with alternative, more accessible formats when appropriate.

Furthermore, the estimate does not capture personnel costs. Currently, Virginia Tech annually invests in 5.5 FTE whose primary responsibilities include promoting universal design in learning (UDL) and best practices for creating accessible education materials (AEM). As part of these responsibilities, they also assist employees in using the resources listed above. Their cost as well as at the FTE cost of employees who use these tools to remediate and create accessible materials are not included in the estimate.

B. Unaccounted for ICT

At this time, it is unknown the cost of fully identifying all ICT in use across Virginia Tech. Additional clarification and guidance on the IT Access Act and the reporting expectations will help inform future estimates.

C. Applications Inventory

The estimated cost of evaluating the applications identified in the pre-existing application inventory which have not yet been reviewed is over $1.5 million.

Because accessibility evaluations and exclusion determinations have not been completed for the majority of inventoried applications, Virginia Tech cannot currently estimate the cost of remediation for non-exempt ICT.

D. Digital Accessibility Compliance Team

In addition to the costs identified above, Virginia Tech invests over $450,000 annually in personnel comprising the digital accessibility compliance team within the Office for Civil Rights Compliance and Prevention Education. These personnel conduct accessibility evaluations, support remediation efforts, review ICT acquired through procurement processes, provide accessibility consultation and training, and assist departments in addressing identified accessibility barriers. While not direct remediation expenditures, these personnel costs are a necessary component of bringing ICT into conformance because they support the identification, evaluation, re-testing, prioritization, and remediation of accessibility barriers across Virginia Tech.

E. Combined Estimate

Cost Category	Estimated Minimum Cost
Web & LMS accessibility tools, training, services, and remediation support	$790,000 - $865,000
Evaluation of inventoried applications	$1,500,000+
Digital Accessibility Compliance Team Personnel	$450,000+
Estimated Total	**$2,740,000 – 2,815,000+**

The estimated fiscal impact of approximately $2.5 million-$3.0 million is incomplete. This estimate reflects only the minimum identified investment needed to evaluate inventoried applications, support remediation of non-exempt web and LMS content, and provide institution-wide accessibility support services.

Due to the size of the ICT environment, evolving inventories, and the number of applications and content items that have not yet undergone accessibility review, Virginia Tech cannot estimate the total fiscal impact of bringing all nonconformant and non-exempt ICT into conformance.

VI. Contact Information

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