Information Technology Access Act

Annual Report to the Virginia General Assembly

University of Virginia

November 2026

This report has been prepared by the Office of the Chief Accessibility Officer in Equal Opportunity and Civil Rights, for the General Assembly in response to the annual reporting requirement set forth in the Information Technology Access Act, Va. Code § 2.2-3504.

Executive Summary

The Information Technology Access Act, Code of Virginia §§ 2.2-3500- 3505 (ITAA), requires covered entities to report any Information and Communications Technology that does not conform with accessibility and is not included in the exceptions found in applicable federal regulations. Covered entities shall also provide an estimate on the fiscal impact involved in bringing such technology into compliance with federal and state laws and regulations. As a covered entity, the University of Virginia ("UVA" or "University") submits the following Annual Report.

Definitions

Conformance is Information and Communications Technology (ICT) meeting or exceeding the Web Content Accessibility Guidelines (WCAG) 2.1 AA as will be required by 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202.

Information and Communications Technology (ICT) is 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.

Overview

Regulations issued by the U.S. Department of Justice under Title II of the Americans with Disabilities Act (ADA), together with corresponding requirements from the U.S. Department of Health and Human Services and the ITAA , establish disability-related accessibility obligations across all aspects of the University's digital environment. Effective April 26, 2027, these regulations require digital content and services to conform to the Web Content Accessibility Guidelines (WCAG) 2.1 AA standard, with limited exceptions.

The Digital Accessibility Team within UVA's Office for Equal Opportunity and Civil Rights has reviewed 101 third-party software accessibility conformance reports and is in the process of reviewing an additional 120 reports of pre-existing software, nearly all of which were found to have some level of non-conformance. The University is developing a comprehensive process which integrates digital accessibility reviews into the procurement workflow. If technology is found to be out of conformance, the University collects a vendor-provided roadmap toward conformance, as well as an Equally Effective Alternative Access plan from the University point of contact to ensure that a comprehensive plan is in place for people with disabilities to benefit from the program or service for which the software is intended to provide. The University contact is expected to continue working with the vendor to ensure follow-through on the roadmap and remediation of the software.

Of note, while this report includes all known issues of non-conformance for different entities within the UVA system (i.e. Academic side, UVA at Wise, and UVA Health System), we are still working on integrating the UVA Health System data into the same monitoring systems for websites. Information for coursework within the learning management system and procurement are included in this report.

Resource Investment

Digital accessibility remains a resource-intensive institutional effort requiring sustained investment in personnel, training, technology, and remediation support. To date, funding has been used to:

- Acquire enterprise-wide accessibility tools, such as DubBot (websites), Equidox (PDFs), and UDOIT (Canvas), DesignPLUS and Citilabs.
- Develop training resources (e.g., 20+ asynchronous trainings available in Workday as well as in-person trainings delivered upon request). Also developed an outreach program, called the Digital Accessibility Liaisons Network to deliver communications and trainings on the ground level across the academic side of UVA.
- Increase the number of full-time personnel to address digital accessibility barriers.
- Create a Digital Accessibility Student Intern remediation team.
- Develop a proprietary system to manage digital accessibility reviews for the Procurement process.

The University has successfully completed the foundational phase of its digital accessibility initiative and is now transitioning into a long-term operational model focused on sustainable practices. The key priorities we have identified include:

- Complete and launch Digital Accessibility Review in Procurement Process: develop sustainable processes that integrate digital accessibility reviews into software procurement practices without creating significant delays.
- Develop a comprehensive University-Wide Digital Accessibility Strategic Plan that establishes long-term goals, responsibilities, key performance measures, and priorities across both the academic and health system sides.
- Adapt a Capability and Maturity Framework to the University's organizational structure and current state to position the University to measure progress, benchmark performance, identify gaps, prioritize investments across units, and sustain this work over time.
- Expand Training and Support: continue growing the Digital Accessibility expertise and personnel in various units across the university, as well as across the Digital Accessibility Liaison Network, increase outreach efforts, and deliver training programs that support faculty and staff to incorporate accessibility into everyday workflows.
- Advance Remediation Efforts: prioritize remediation of high-risk and high-impact content through the Digital Accessibility Student Interns.

Non-Conforming ICT

UVA inventoried the following known ICT within the University's digital environment: University websites, courses and course content in the University's learning management system (UVACanvas), and pre-existing software applications.

1. Websites: The University utilizes DubBot as its centralized web crawler tool to assess website accessibility. the University is scanning nearly 400,000 webpages on a weekly basis, with more being added as they are identified.
    a. DubBot Data
        i. Pages Scanned: 399,031

ii. Number of Errors: 521,848 issues across 236,347 pages with an average of 1.3 issues per page. Of note, 128,371 of these were considered minor WCAG issues, which are given less weight in the total score given by DubBot.
iii. Total Accessibility Score: 93%
iv. PDFs with known issues: 11,828 out of 16,214

2. Course Content: UDOIT is the automated course accessibility scanning tool in UVACanvas, the University's primary learning management system.
    a. UDOIT Data
        i. Number of Courses: 4,194
        ii. Number of Errors: 102,919
        iii. Course accessibility score: 80%
        iv. PDFs with known issues in UVACanvas: 129,626
        v. Videos with known caption issues in LMS: 8,261
    b. The University uses a number of repositories for video/audio content, as well as a variety of tools for automatically captioning content through vendors approved through the Virginia Association of State College and University Purchasing Professionals (VASCUPP) cooperative contracts. Reports were compiled for the total number of minutes of content that did not have captions and/or audio description files associated with them within these repositories. The reported number of minutes below is broad, and not necessarily representative of content that is being actively used. The University will work with these vendors to refine the data to see which of the videos are covered under the ITAA, or if some of them fall into an allowable exception.
        i. Kaltura: 1,346,472 minutes
        ii. Panopto: 1,882,598 minutes
        iii. Canvas Studio: 664,830 minutes
3. Pre-existing software applications: Please see *Appendix A* for information on non-conforming ICT, as well as information about the Temporary Exceptions process, which includes gathering vendor-provided roadmaps consistent with the ITAA, Code § 2.2-3503. The University is also collecting Equally Effective Alternative Access Plans to ensure that people with disabilities have full access to the University's programs, services, and activities while non-conforming ICT is being brought up to conformance.

Fiscal Impact

With respect to preexisting, non-confirming third party software, the fiscal impact is currently unknown. To facilitate future reporting, cost estimation has been incorporated into the digital accessibility review process for procurement. Fiscal impact estimates will be included in subsequent annual reports as this information is collected.

Estimating the fiscal impact of digital accessibility remediation is difficult because most costs are attributable to employee time rather than centralized expenditures. Website and course content are maintained by distributed content owners across the organization, making remediation efforts decentralized and difficult to track or aggregate. As a result, while direct costs for tools or support may be estimated, the primary cost of accessibility compliance is embedded in existing employee responsibilities and cannot be readily quantified. Below is the University's best-faith effort to estimate these costs for FY27 and beyond.

AREA	LOW ESTIMATE	HIGH ESTIMATE
Dedicated Centralized Personnel (recurring)	$554,000	$554,000
Software (Remediation and Testing) (recurring)	$336,000	$336,000
ASR Captioning/AI Audio Descriptions (recurring)	~$350,000	~$350,000
PDF Remediation for University Websites (one-time) 11,828 PDFs, estimated 2-10 pages per asset at an average cost of $2/page	$47,312	$236,560
PDF Remediation for UVACanvas (one-time) 129,626 PDFs, estimated 2-10 pages per asset at an average cost of $2/page	$518,504	$2,592,520
Total	**$1,805,816**	**$4,069,080**

Appendix A – Third Party ICT List

Product Name	Reviewed for Digital Accessibility	Temporary Exemption w/ Roadmap and Equally Effective Alternative Access Plan
12Twenty	Yes	Needs at Renewal
Adobe Acrobat Pro	In Process	
Adobe Creative Cloud	In Process	
Adobe Express	In Process	
Adobe Illustrator	In Process	
Adobe InDesign	In Process	
Adobe Photoshop	In Process	
Adobe Premiere Pro	In Process	
Airtable	Yes	Yes - Approval Needed
America To-go	Yes	Needs at Renewal
Anthology	Yes	Needs at Renewal
Anthology Blackboard	In Process	
aPlus+	Yes	
Apple iOS / iPadOS	No	Needs at Renewal
Apple iPad	No	Needs at Renewal
Apple iPhone	No	Needs at Renewal
Apple Mac hardware (MacBook, iMac, Mac mini, etc.)	No	Needs at Renewal
Apple macOS	No	Needs at Renewal
ArchiveIt	Yes	Yes - Temporary Exception Granted
Archivematica	Yes	Yes - Temporary Exception Granted
Articulate Reach 360	In Process	
Articulate Rise 360	In Process	
Articulate Storyline 360	In Process	
Asana	Yes	In Process
Asana	Yes	Yes - Temporary Exception Granted
Atlassian	Yes	Needs at Renewal
Axana	Yes	Needs at Renewal
BigPulse	Yes	Needs at Renewal
BitCurator	Yes	Yes - Temporary Exception Granted
Bitly	In Process	
Bluebeam Revu	In Process	

Bongo	Yes	Needs at Renewal
Bongo Learn	Yes	Yes - Temporary Exception Granted
Caduceus International Publishing	Yes	Needs at Renewal
Calendly	In Process	
Canva	In Process	
Canvas	Yes	Needs at Renewal
Canvas Catalog	Yes	Needs at Renewal
Canvas Commons	Yes	Needs at Renewal
Canvas Teacher	Yes	Needs at Renewal
CATME	In Process	
CB Travel	Yes	Needs at Renewal
ChartIQ	Yes	Needs at Renewal
Checkroom	Yes	Needs at Renewal
Circle In	Yes	Yes - Temporary Exception Granted
Circlein App	Yes	Needs at Renewal
Cisco Slido	In Process	
Claude.ai	Yes	Needs at Renewal
Coached	Yes	Needs at Renewal
CrowdStrike	In Process	
CrowdStrike Falcon	In Process	
Digication	Yes	Needs at Renewal
Digital Archivist Resource Tool (DART)	Yes	Yes - Temporary Exception Granted
Dimensions (Digital Science)	In Process	
Dmarcian	In Process	
Docusign	Yes	Needs at Renewal
DubBot	Yes	Needs at Renewal
DuoCircle AutoSPF	In Process	
EBSCO	In Process	
ECGsource	Yes	Yes - Temporary Exception Granted
eComply360	Yes	Yes - Temporary Exception Granted
Economoist	Yes	Needs at Renewal
Emerald Insight	In Process	
Encompass	Yes	Needs at Renewal
EndNote	In Process	
Esri ArcGIS	In Process	
Exceptional	Yes	Needs at Renewal
Extempore	In Process	
FeedbackFruits	Yes	Needs at Renewal

Flipsnack	Yes	Needs at Renewal
Forensic Recovery of Evidence Device (FRED) Forensic Workstation	Yes	Yes - Temporary Exception Granted
Fortinet FortiManager	In Process	
Freshservice	In Process	
Freshworks Device42	In Process	
Geneious Prime	In Process	
Genio Notes	Yes	Needs at Renewal
Geosystems Education Suite - Leica	Yes	Yes - Temporary Exception Granted
GitHub	In Process	
Glean Mobile	Yes	Needs at Renewal
Google Calendar	In Process	
Google Classroom	In Process	
Google Docs	In Process	
Google Drive	In Process	
Google Forms	In Process	
Google Gemini	In Process	
Google Gmail	In Process	
Google Meet	In Process	
Google NotebookLM	In Process	
Google Sheets	In Process	
Google Slides	In Process	
Google Workspace	In Process	
GraphPad Prism	In Process	
Grasple	Yes	Needs at Renewal
H5P	In Process	
Huron	Yes	Needs at Renewal
Hypothesis	In Process	
iClicker	In Process	
Issuu	In Process	
Jaggar	Yes	Needs at Renewal
JetBrains IntelliJ IDEA	In Process	
JetBrains PyCharm	In Process	
JetBrains WebStorm	In Process	
Jotform	In Process	
JSTOR	In Process	
Kahoot	In Process	
Kajeet	Yes	Needs at Renewal
Kryoflux	Yes	Yes - Temporary Exception Granted
LibGuides	Yes	Needs at Renewal

Loom	In Process	
LSEG	Yes	Needs at Renewal
Mantra Health	Yes	Needs at Renewal
Marketing Cloud	Yes	Needs at Renewal
Medicat	Yes	Needs at Renewal
Mentimeter	In Process	
MetLife	Yes	In Process
Microsoft Azure	In Process	
Microsoft Copilot	In Process	
Microsoft Excel	In Process	
Microsoft Exchange	In Process	
Microsoft Forms	In Process	
Microsoft Intune	In Process	
Microsoft OneDrive	In Process	
Microsoft OneNote	In Process	
Microsoft Outlook	In Process	
Microsoft Power Apps	In Process	
Microsoft Power Automate	In Process	
Microsoft PowerPoint	In Process	
Microsoft Project	In Process	
Microsoft SharePoint	In Process	
Microsoft Teams	In Process	
Microsoft Visio	In Process	
Microsoft Visual Studio	In Process	
Microsoft Word	In Process	
Miro	Yes	Needs at Renewal
Monsido	Yes	Needs at Renewal
Mplus	In Process	
Myeducator	Yes	Needs at Renewal
MyEducator	Yes	Yes - Temporary Exception Granted
namecoach	Yes	Needs at Renewal
NI LabVIEW	In Process	
noScribe	Yes	Needs at Renewal
Okta / Auth0	In Process	
OnceHub	Yes	Needs at Renewal
Oracle EPM	In Process	
Oracle Hyperion	In Process	
Oracle PeopleSoft	In Process	
Oracle PeopleTools	In Process	
Oxygen XML	In Process	
Paciolan	Yes	Needs at Renewal

Parallels	In Process	
Phenom	Yes	Needs at Renewal
Pitchbook	Yes	Needs at Renewal
Playlab	Yes	Needs at Renewal
Popetech	Yes	Needs at Renewal
Posit / RStudio	In Process	
Posit Connect	In Process	
Posit Package Manager	In Process	
Posit Shinyapps.io	In Process	
Posit Workbench	In Process	
Progress Kendo UI	In Process	
Progress Telerik	In Process	
QR Code Generator	In Process	
Qualtrics	Yes	Needs at Renewal
Quest KACE	In Process	
Quest Toad	In Process	
Respondus	Yes	Needs at Renewal
Salesforce	Yes	Needs at Renewal
Salesforce Education Cloud	In Process	
Salesforce Heroku	In Process	
Salesforce Sales Cloud	In Process	
Salesforce Service Cloud	In Process	
Schedule Scout	Yes	Needs at Renewal
ScreenSteps admin user interface	Yes	Yes - Temporary Exception Granted
ScreenSteps Desktop Editor	Yes	Yes - Temporary Exception Granted
ScreenSteps public user-facing knowledgebase	Yes	Yes - Temporary Exception Granted
Seatgen	Yes	Needs at Renewal
Seismic	Yes	Needs at Renewal
SensusAccess	In Process	
sfsdf	Yes	Yes - Temporary Exception Granted
Simple Syllabus	Yes	Needs at Renewal
SirsiDynix	In Process	
Siteimprove	Yes	Needs at Renewal
Skilly	Yes	Needs at Renewal
Skilly AI	Yes	Yes - Temporary Exception Granted
Slack	Yes	Needs at Renewal
Smartsheet	In Process	
SolidWorks	In Process	

Sound Cloud	Yes	Needs at Renewal
Spare Labs	Yes	Needs at Renewal
Spare Rider App	Yes	Yes - Temporary Exception Granted
Sprout Social	Yes	Needs at Renewal
Sprout Social	Yes	Yes - Temporary Exception Granted
Stata	In Process	
Stellic	Yes	Needs at Renewal
Syncfusion	In Process	
Talkio.ai	Yes	Needs at Renewal
Talkio.ai	Yes	Yes - Temporary Exception Granted
TechSmith Camtasia	In Process	
TechSmith Snagit	In Process	
Tenable	In Process	
TeraCopy Pro	Yes	Yes - Temporary Exception Granted
TerraDotta	Yes	Needs at Renewal
Textbooks and resources from MyEducator.com	Yes	Yes - Temporary Exception Granted
Texthelp EquatIO	In Process	
Transloc	Yes	Needs at Renewal
Turnitin Gradescope	In Process	
Unifyed	Yes	Needs at Renewal
VanDyke SecureCRT	In Process	
VanDyke SecureFX	In Process	
VanDyke VShell	In Process	
Virtual Compliance Portal	Yes	Needs at Renewal
Visix AxisTV	In Process	
Vista Higher Learning	Yes	Needs at Renewal
VMware NSX	In Process	
VMware vSphere	In Process	
VoiceThread	In Process	
Wharton Research Data Services - WRDS	Yes	Needs at Renewal
WhenToWork	In Process	
Wolfram Mathematica	In Process	
Zoom	Yes	Needs at Renewal
Zotero	In Process	