WILLIAM & MARY

Information and Communications Technology Accessibility Report

November 2026

1. Executive Summary

William & Mary submits this report pursuant to Virginia Code § 2.2-3504, which requires reporting on information and communications technology (ICT) accessibility and associated fiscal impacts. The university remains committed to advancing digital accessibility and providing equitable access to its technology, digital content, programs, and services in accordance with applicable state and federal requirements.

As part of its ongoing digital accessibility efforts, William & Mary categorized existing contracts according to usage, institutional scope, and potential impact on the university community in multiple tiers. Of these, 16 contracts were identified as Tier 1, representing high-priority systems based on their widespread use and importance to university operations. These systems are the primary focus of the current assessment.

The university's assessment process incorporates vendor-provided Accessibility Conformance Reports (ACRs) and accessibility risk evaluations to identify and prioritize potential accessibility barriers. Based on the documentation reviewed, none of the assessed systems have been conclusively categorized as nonconforming or noncompliant. However, certain systems have identified or reported accessibility gaps, with vendor remediation efforts, accessibility roadmaps, and additional evaluations ongoing.

Given the complexity of the university's technology environment and its reliance on third-party software providers, accessibility assessment and remediation planning remain ongoing. William & Mary continues to collaborate with vendors and institutional stakeholders to address identified barriers, evaluate remediation options, and determine the resources necessary to advance accessibility conformance.

2. Statutory Frame and Reporting Question

Virginia's 2025 amendments to the Information Technology Access Act (Chapter 571, HB 2541) established updated accessibility requirements for information and communications technology used by covered public entities, including institutions of higher education.

Virginia Code § 2.2-3504 requires reporting on ICT that does not conform with applicable accessibility requirements and is not covered by an exception under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202. The report must also provide an estimate of the fiscal impact associated with bringing such technology into compliance.

William & Mary's Digital Accessibility Policy applies to ICT used, developed, maintained, or procured by the university, including the Virginia Institute of Marine Science. The policy establishes accessibility

expectations aligned with applicable federal and state requirements and the Web Content Accessibility Guidelines (WCAG).

Contract and Procurement Requirements

William & Mary's Contract Form Addendum for Information Technology (CFA IT) contains contract provisions which establish requirements for vendor accessibility documentation and compliance with applicable accessibility laws.

3. ICT Accessibility Assessment Methodology

William & Mary has established a risk-based approach to evaluating ICT accessibility through its technology procurement and review processes.

Accessibility evaluations are primarily based on vendor-provided documentation, including Voluntary Product Accessibility Templates (VPATs) and Accessibility Conformance Reports (ACRs). These documents may be obtained through direct vendor communication, the CFA IT procurement process, or publicly available vendor websites and trust centers.

The university reviews and analyzes this documentation to evaluate reported accessibility conformance and identify potential barriers and follows up with vendors where clarification is needed.

William & Mary also conducts periodic follow-ups with vendors, including during contract renewal periods, to obtain updated documentation, review accessibility improvements, and monitor remediation progress. The university's established accessibility review process includes the following components:

Process element	Published W&M procedure
Evidence collection	Request or obtain VPAT/ACR; review vendor responses and available product documentation.
Risk assessment	Apply an internal accessibility risk matrix informed by scope, usage, VPAT findings, and input from relevant institutional stakeholders.
Approval pathways	Approve when criteria are met; conditionally approve where gaps and a roadmap exist; require an exemption when risk is too high or documentation is insufficient.
Monitoring	Check in with vendors on roadmap progress and updated accessibility documentation.

4. Fiscal Impact

Advancing ICT accessibility requires continued institutional investment in assessment, monitoring, remediation, technology resources, and personnel and staffing. William & Mary has invested in

enterprise tools and services that support accessibility across its websites, learning environments, digital documents, and communications.

These existing investments contribute to the university's ability to identify accessibility barriers, provide remediation guidance, and support continuous accessibility improvement.

Ongoing Institutional Investments & Expenditures for Digital Accessibility

System	Digital Accessibility-Related Purpose
Blackboard Ally	Accessibility evaluation of instructional content and provision of alternative formats for course materials.
Cascade CMS	Website content management and support for accessible university web content.
Acquia Web Governance (AWG)	Accessibility monitoring, evaluation, and identification of barriers for university websites.
Adobe Acrobat Pro	PDF accessibility evaluation and document remediation.
AI Media	Support for accessible multimedia content and communication access.
Site Improve	Evaluation and identification of barriers across university websites.
Total Annual Cost	**$100,863**

Additional Staffing and Resource Needs

As William & Mary expands its ICT accessibility evaluations, additional personnel resources may be necessary to support **comprehensive** technical assessments, vendor documentation reviews, ongoing monitoring, and remediation coordination.

Additional staffing for a specialized accessibility evaluation position may be considered, subject to institutional compensation review and position classification.

Vendor Remediation and Replacement Costs

While William & Mary can identify existing expenditures associated with accessibility tools and institutional resources, the full fiscal impact of remediating or replacing third-party ICT cannot currently be reliably estimated.

Remediation costs depend on several factors, including the number and complexity of accessibility barriers, vendor capabilities and remediation timelines, contractual obligations, the availability of accessible alternatives, and the technical or operational resources required to implement necessary changes. For enterprise systems supporting critical academic and administrative operations,

remediation or replacement may require substantial coordination, funding, and implementation planning. The costs of remediating external systems remain the responsibility of the respective vendors.

As accessibility evaluations and vendor remediation planning continue, William & Mary will further assess potential financial impacts and refine available estimates to inform institutional planning, resource allocation, funding requests and future reporting.

5. Conclusion

William & Mary remains committed to advancing digital accessibility through ongoing assessment, vendor engagement, remediation, and institutional collaboration.

Recognizing that accessibility conformance is an ongoing responsibility, the university will continue refining its ICT inventory, validating reported accessibility gaps, evaluating applicable exceptions, monitoring vendor remediation efforts, and assessing associated fiscal impacts. The university welcomes the opportunity to collaborate with peer institutions and other Commonwealth entities to pursue these goals as efficiently and cost-effectively as possible.

These efforts will support informed decision-making and continued progress toward an accessible digital environment for all members of the William & Mary community.