University of Pittsburgh EIT Accessibility Compliance Program

Overview
This compliance program is designed to allow the University to continuously improve and move closer to full inclusion. The key focus of the EIT Accessibility Compliance Program will be on identifying areas for improvement both within units and across the University as a whole. To best support this focus on improvement, continuous or regular monitoring by both individual units as well as ODI will comprise the bulk of the monitoring process. An internal review process is included as a more robust check on institutional compliance with the policy.

Continuous Monitoring

Unit Self-Monitoring
Units will be responsible for ongoing monitoring of their own EIT accessibility efforts. This process should provide a feedback loop to unit management regarding next steps and critical areas for focus to improve accessibility. Self-monitoring should be tied back to the goals and benchmarks outlined in each unit’s initial implementation plan.

As part of the unit self-monitoring process, units will utilize 3 main mechanisms:

1. **Checklists** – Checklists provided by ODI will provide a list of digital accessibility “must haves” that units can review when either reviewing existing or creating new course content, websites, web applications, etc.
2. **Automated Testing** – An automated accessibility testing tool has been procured for reviewing all university websites and the content contained within them. Scans should be run on a monthly basis to identify areas on their sites that do not meet accessibility standards. After each scan, an accessibility score will be provided for the site. This score can serve as a useful benchmarking tool.
3. **Complaints** – In addition to responding to any complaints about accessibility of EIT, units should use information from those complaints to identify similar areas of inaccessibility throughout their digital ecosystem.

In addition to serving as a feedback loop, the information gathered during self-monitoring will also inform an annual report from each unit about their accessibility efforts. Annual reports will include:

- **Accessibility Progress** – What progress has been made throughout the year towards the EIT accessibility goals laid out in the initial implementation plan?
- **Complaints and Response** – What complaints have been received and what follow up items resulted because of those complaints?
- **Processes and Supports** – What processes and supports has the unit put in place to aid staff and faculty in meeting accessibility standards?

**ODI Continuous-Monitoring**
ODI will engage in a similar monitoring process across the entire University to both identify areas of concern within individual units as well as identify trends and areas for improvement across the University.

ODI’s continuous monitoring process will utilize 3 main mechanisms:
1. **Automated Testing** – An automated accessibility testing tool has been procured for reviewing all university websites and the content contained within them. Scans will be run on a regular basis to identify areas on all University of Pittsburgh sites that do not meet accessibility standards. This data will be analyzed to identify both trends and concentrated accessibility issues across the university, which will in turn impact the supports and training targeted to units.

2. **Complaints** – In addition to documenting and facilitating the response to any complaints about accessibility of EIT, ODI will use information from those complaints to identify similar areas of inaccessibility throughout the University’s digital ecosystem.

3. **Exceptions** – As a part of the EIT Accessibility Policy and Procedure, requests for exceptions to the policy will all be submitted to ODI. Exceptions will serve as a way of identifying areas across the University where providing accessible solutions poses challenges.

In addition to providing a feedback mechanism for the University as whole, the continuous monitoring conducted by ODI will also be used to inform the internal review process.

**Internal Review**
An internal review will be conducted for several units each year. This process will provide a more robust check on institutional compliance with the policy.

Unit’s will be identified for internal review based on the following considerations:

- Accessibility progress
- Number of accessibility complaints received
- Time to complaint resolution
- Site traffic
- Size of site
- Amount of online course content

The internal review process will utilize 3 main mechanisms:

1. **Automated testing deep dive** – An automated accessibility testing tool has been procured for reviewing all university websites and the content contained within them. During the internal review process, scans will be run to identify areas on identified sites that do not meet accessibility standards, and historical data will be reviewed to understand growth and accessibility updates that have been made to the sites thus far.

2. **Manual testing sample** – Automated testing is only able to identify roughly forty percent of accessibility issues. Manual testing will be conducted to reveal additional accessibility barriers on identified sites.

3. **Process review** – Using NCDAE indicators as a guide, a review will be conducted of the processes and supports in place within the unit under review. The purpose of this process review is to identify systemic areas that could be improved to impact EIT accessibility.

The internal review process will conclude with a report and recommendations provided to the unit.