



OFFICE OF COMPLIANCE SERVICES
UVM.EDU/POLICIES

POLICY

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Title: Accessibility

Policy Statement

It is the policy of the University of Vermont (UVM) to comply with all U.S. laws and regulations relating to the provision of equal access to those with disabilities, and to provide reasonable and effective accommodations that enable qualified UVM students, employees and, where applicable, members of the public with disabilities, equal access to its programs, services, activities, and information. Specifically, UVM is required to adhere to Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794 (Section 504), the Americans with Disabilities Act of 1990, 42 U.S.C. 12131 (the ADA), as amended by the Americans with Disabilities Act Amendments Act of 2008, (the ADAAA), and applicable Vermont law.

Reason for the Policy

The creation and dissemination of knowledge is a defining characteristic of universities and is fundamental to the University of Vermont's vision, mission and goals. This Policy affirms the University's commitment to ensuring equal access to its programs, services, activities, and information for all its constituencies, in accordance with applicable law.

Applicability of the Policy

This policy applies to all members of the UVM community, including faculty, staff, University recognized groups and organizations, and non-affiliated persons present on campus.

Definitions

Disability: A physical or mental impairment that substantially limits one or more major life activities; a record of such an impairment; or being regarded as having such an impairment. A person may have a disability even if the effects of the disability are episodic or in remission. Temporary conditions may also be substantially limiting.

Equally Effective: means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability with substantially equivalent ease of use and within a reasonable period of time. The provision of information or services in an alternate format is allowed as long as the individual is afforded the same level of achievement in the most integrated setting appropriate to the person's needs. The end result

must be accomplished in a comparable time and with comparable effort on the part of the individual with a disability as compared to someone without a disability.

Information and Communication Technology (ICT): refers to technologies that provide access to information through telecommunications. It is similar to information technology (IT) but ICT focuses primarily on the communication aspects of technology that include, but are not limited to, the Internet and web sites, email and email attachments including PDF documents, wireless networks, telecommunication equipment, digital kiosks, portable devices, and other electronic communication mediums such as instant messaging, voice over IP (VoIP), video conferencing, web-based video services such as YouTube and UVM's video streaming service. It also includes electronic content utilized for courses such as electronic books and electronic book reading systems. If it is electronic and is intended to be accessed or used by an individual or is needed in order for an individual to access information, it is ICT.

Qualified Individual with a Disability: an individual with a disability who meets legitimate skill, experience, education or other requirements of an employment position they hold or seek or meets the academic requirements and technical standards of behavior and performance required of all students and can perform all essential functions with or without reasonable accommodation.

Reasonable Accommodation: any change or adjustment to an environment that permits a qualified individual with a disability or record of a disability to participate in, and enjoy the benefits of, a service, program, or activity of the University equal to those without disabilities.

Reasonable Accommodations cannot include:

- Accommodations that pose an undue administrative or financial burden on the University
- Accommodations that pose a direct threat to the health or safety of the employee, student or other individuals
- Removal of essential functions, creation of new jobs, or lower job standards
- Academic adjustments that lower or substantially alter the technical standards or essential academic requirements or elements of a program, course or curriculum
- Auxiliary aids or services for personal use, including, but not limited to, attendants, individually prescribed devices, readers for personal use or study, or other devices or services of a personal nature

Universal Design: The design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.

W3C Web Content Accessibility Guidelines (WCAG): Web Content Accessibility Guidelines (WCAG) is developed through the World Wide Web Consortium in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally.

Procedures

The University will take appropriate steps to ensure equally effective access to its programs, services, activities, and information to qualified persons with disabilities. The University will continually strive to meet the standards and guidelines considered best practice for accessibility, including the principal of universal design.

PROVISION OF REASONABLE ACCOMMODATIONS

Individuals with disabilities are responsible for requesting reasonable accommodations from the University. Individuals can request accommodations at any time, however, certain accommodations require advance notice. Learn more about the University's [Procedural Guidelines for Disability Accommodation for Employees and Applicants for Employment](#) and the [UOP Disability Certification, Accommodation and Support for Students](#). Additionally, non-affiliated persons present on campus should contact the University's ADA/504 Coordinator for further information.

INFORMATION TECHNOLOGY ACCESSIBILITY

The University has adopted federally recognized accessibility standards for information and communication technology (ICT), including WCAG 2.0 AA for web accessibility. Learn more about Procuring Accessible Information and Communication Technology (forthcoming).

SERVICE AND ASSISTANCE ANIMALS

The University recognizes the need of certain persons with disabilities to have service animals on-campus or assistance animals in University housing under certain circumstances. Learn more about the [Service and Emotional Support Animal Procedure](#).

BUILT ENVIRONMENTS

The University's physical campus is maintained by Planning, Design and Construction (PDC). PDC is guided by the 2010 ADA Standards for Accessible Design and otherwise applicable building codes in their service and product delivery.

NOTICE OF INACCESSIBLE PROGRAMS, SERVICES, ACTIVITIES, OR INFORMATION

For questions regarding accessibility or to notify the University about programs, services, activities, or information that are currently inaccessible, contact the University's [ADA/504 Coordinator](#). The ADA/504 Coordinator will inform appropriate resources on campus of the reported accessibility barrier.

POLICY OF NONDISCRIMINATION ON THE BASIS OF DISABILITY

The Rehabilitation Act and the ADA require that no qualified person shall, solely by reason of disability, be denied access to, participation in, or the benefits of, any program or activity operated by the University. Each qualified person shall receive the reasonable accommodations needed to ensure equal access to employment, educational opportunities, programs, and activities in the most integrated setting feasible. Complaints of discrimination based on disability may be filed in the Office of Equal Opportunity. Learn more about the University's [Equal Opportunity in Education Programs](#) and [Equal Employment Opportunity/Affirmative Action](#) policy statements, and the University's [Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints](#) procedure.

Additional Public Agencies Enforcing Federal and State Laws Prohibiting Disability-Based Discrimination

U.S. Equal Employment Opportunity Commission

Employees or applicants for employment seeking further information or guidance on the application of the ADA to the University and the information outlined in this Policy may also contact the U.S. Equal Employment Opportunity Commission.

Employees or applicants for employment who believe their rights under the ADA have been violated may file a complaint with either the EEOC's Boston Office (serving Vermont) or National Headquarters:

U.S. Equal Employment Opportunity Commission – Boston Area Office
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
Website: <http://www.eeoc.gov/>
Telephone: (800) 669-4000

U.S. Equal Employment Opportunity Commission - Headquarters
131 M Street, NE
Washington, DC 20507
Website: <http://www.eeoc.gov/>
Telephone: (202) 663-4900 / (TTY) (202) 663-4494

Vermont Attorney General's Office, Civil Rights Unit

Employees may also contact the Vermont Attorney General's Office to request an investigation of disability based discrimination:

Vermont Attorney General's Office
Civil Rights Unit
109 State Street
Montpelier, VT 05609-1001
Website: <https://ago.vermont.gov/divisions/civil-rights>
Telephone: (888) 745-9195; (802) 828-3657

Contacts

Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):	
Title(s)/Department(s):	Contact Information:
For Employee and Visitor Accessibility:	accessibility@uvm.edu
For Student Accessibility:	access@uvm.edu
For Complaints of Discrimination:	Office of Equal Opportunity

Forms/Flowcharts/Diagrams

- None

Related Documents/Policies

- [Disability Certification, Accommodation and Support for Students Procedure](#)
- [Equal Employment Opportunity/Affirmative Action Policy Statement](#)
- [Equal Opportunity in Educational Programs and Activities and Non-Harassment Policy Statement](#)
- [Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints](#)

- [Procedural Guidelines for Disability Accommodation for Employees and Applicants for Employment](#)
- Procuring Accessible Information and Communication Technology (ICT) Operating Procedure [Forthcoming]
- [Service and Emotional Support Animals Procedure](#)

Regulatory References/Citations

In the event that federal or state law promulgated or enacted in the future provides greater protections to persons with disabilities than the current standards and guidelines, the University will adhere to the law.

- [Section 504 of the Rehabilitation Act of 1973](#)
- [Title II of the Americans with Disabilities Act](#)
- [Title I of the Americans with Disabilities Act \(Employment\)](#)
- [Vermont Fair Employment Practices Statute](#)
- [Vermont Public Accommodations Law](#)

Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

About This Policy

Responsible Official:	Chief Human Resource Officer	Approval Authority:	President
Policy Number:	V. 7.14.1	Effective Date:	February 5, 2021
Revision History:	V. 7.14.1/V. 4.32.1 effective February 5, 2021. Responsible official officially changed from the Vice President for Finance and Administration to the Chief Human Resource Officer October 3, 2022		

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