

Information Technology Policy

Digital Accessibility Policy

Number

ITP-ACC001

Effective Date

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Category

Accessibility

Supersedes

None

Contact

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1. Purpose

This Information Technology Policy (ITP) establishes guidance for planning, designing, building, testing, maintaining, and procuring [accessible](#) Digital Content and Services so that citizens and employees, including those with a Disability, can access Commonwealth of Pennsylvania information and services.

2. Scope

This ITP applies to all offices, departments, boards, commissions, and councils under the Governor’s jurisdiction and to those independent agencies using Commonwealth Enterprise IT systems (collectively “agencies”).

Third-party vendors, licensors, contractors, or suppliers (collectively "suppliers") shall meet the policy requirements of this ITP, which are applicable to the Digital Content and Services that they provide to the Commonwealth.

3. Definitions

Accessibility Conformance Report (ACR): A completed Voluntary Product Accessibility Template® (VPAT) that details a digital product’s (software, hardware, electronic content, and support documentation) level of conformance with digital accessibility standards.

Archived Digital Content: Digital Content that is no longer actively available to end-users but is still subject to a record retention schedule.

Assistive Technology (AT): Any item, piece of equipment, software program, or product that is used to increase, maintain, or improve the functional capabilities of people with a Disability. Examples include: keyboards, pointing devices, screen reader software, educational

software, eye-gaze and head trackers, speech recognition software, screen magnifiers, joysticks, etc.

Authors: People who produce digital content, including but not limited to web developers, designers, writers, etc.

Authoring Tools: Software and services that Authors use to produce digital content, including but not limited to content management tools.

Authoring Tool Accessibility Guidelines (ATAG): ATAG are an industry-recognized standard published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C) that addresses Authoring Tools. ATAG includes three levels of conformance: A, AA, and AAA.

Digital Accessibility: Digital Accessibility is providing Digital Content and Services that can be used by any user, including those with a visual, auditory, motor, speech or cognitive Disability.

Digital Accessibility Maturity Assessment: A tool for measuring the degree of maturity attained in implementing and managing Digital Accessibility. The assessment will help people in agencies understand the dimensions of an accessibility program and allow them to plan and work to improve the accessibility of Digital Content and Services year over year.

Digital Content and Services: The delivery of information and services to end-users via data, voice, or video technologies, which includes but is not limited to:

- **Electronic content:** Websites and web-based materials (Internet & Intranet), Microsoft Office (Word, Excel, PowerPoint), Adobe InDesign and portable document format (PDF) documents, training materials (e.g., online training materials, tests, online surveys), multimedia (video/audio, MP4), social media, blogs, digital materials (e.g., documents, templates, forms, reports, surveys), graphics, GIFs, Computer Aided Design and Drafting (CADD) files, email, maps and infographics, electronic emergency notifications, and subscription services (e.g., news feeds, alert services, professional journals);
- **Software:** Web, desktop, server, and mobile client applications, Authoring Tools, associated infrastructure, and service offerings (Software as a Service (SaaS), Platform as a Service (PaaS), Infrastructure as a Service (IaaS));
- **Hardware:** Computers, laptops, servers, tablets, printers, copiers, scanners, peripheral equipment (e.g., keyboards, mice), kiosks, and mobile phones;
- **Support documentation and services:** Training, consulting, advisory services, help desk or call center, automated self-service and technical support, and product informational materials.

Disability (with respect to an individual):

1. A physical or mental impairment that substantially limits one or more major life activities of an individual.

2. A record of such an impairment; or
3. Being regarded as having such an impairment.

For exemptions to the term Disability see [Management Directive 205.25 Amended, Disability-Related Employment Policy](#).

Legacy Digital Content and Services: Digital Content and Services designed and implemented prior to January 26, 2021.

New and Updated Digital Content and Services: Digital Content and Services designed and implemented after January 26, 2021.

Portable Document Format (PDF)/Universal Accessibility (UA): PDF/UA is a technical specification intended for developers implementing PDF writing and processing software. PDF/UA provides definitive terms and requirements for accessibility in PDF documents and applications. For those equipped with appropriate software, conformance with PDF/UA ensures accessibility for people with a Disability who use assistive technologies to navigate and read electronic content. PDF/UA is included within the Section 508 Standards (Revised).

Policy Driven Adoption for Accessibility (PDAA): PDAA is the integration of digital content and services accessibility governance into Commonwealth policies. The PDAA methodology was created by a work group of the National Association of State Chief Information Officers (NASCIO).

PDAA Assessment: A tool that the Commonwealth provides to suppliers to demonstrate the extent to which the supplier's organization has implemented accessibility best practices into their operations to support the accessibility of their Digital Content and Services.

Section 508 Standards (Revised): A final rule, published in January of 2017, updating accessibility requirements for information and communication technology (ICT) covered by Section 508 of the Rehabilitation Act of 1973, 29

U.S.C. § 701 *et seq.*

User Agents: User Agents include browsers, browser extensions, media players, readers, and other applications that render web content.

User Agent Accessibility Guidelines (UAAG): UAAG are an industry-recognized standard published by the WAI of the W3C that addresses User Agents. UAAG includes three levels of conformance: A, AA, and AAA.

Voluntary Product Accessibility Template[®] (VPAT): A VPAT is an industry accepted template created by the [Information Technology Industry Council \(ITI\)](#) that, when completed, details a digital product's level of conformance with digital accessibility standards.

Web Content Accessibility Guidelines (WCAG): WCAG are an industry-recognized standard published by the WAI of the W3C that addresses digital content. WCAG includes three levels of conformance: A, AA, and AAA.

4. Objective

The goal of this ITP is to ensure that when an agency provides information through Digital Content and Services, it is taking reasonable measures to ensure that persons with a Disability can access, navigate, and otherwise obtain the same or equivalent information as persons without a Disability.

5. Policy

5.1 Standards

Agencies shall provide access to Digital Content and Services by complying with the Section 508 Standards (Revised) and the current version of WCAG. WCAG Levels A and AA are required, and level AAA is encouraged.

Agencies shall procure or use Content Management Systems (CMS) that meet the current version of the W3C's ATAG.

Agencies shall procure or use User Agents that meet the current version of the W3C's UAAG.

5.2 New and Updated Digital Content and Services

Agencies shall comply with the applicable standards set forth in Section 5.1, of this ITP.

5.3 Legacy Digital Content and Services

Agencies shall create a plan to update Legacy Digital Content and Services to comply with the applicable standards set forth in Section 5.1, of this ITP, or the content shall otherwise be made available in an accessible format, and in a timely manner, to any individual requesting access.

Each agency shall establish its own priorities and timetables for updating Legacy Digital Content and Services, or plan for its transition to archival status or its removal.

5.4 Archived Digital Content

Archived Digital Content shall be made available in an accessible format to any individual eligible for, and requiring access to, such content. The agency responsible for the maintenance of the Archived Digital Content shall be responsible for providing the Digital Content in an accessible format.

5.5 Commonwealth's Accessibility Testing

All Digital Content and Services shall be tested to meet applicable standards set forth in Section 5.1 of this ITP.

5.6 Digital Accessibility Planning

Agencies, in collaboration with the Office of Administration, Office for Information

Technology (OIT), shall follow the timeline below to achieve accessible Digital Content and Services. Agencies shall maintain and make available to OIT; including the Commonwealth’s Chief Accessibility Officer, documentation showing the completion of these items.

Deliverable	Due Date
Digital Accessibility Maturity Assessment – Assess the Digital Accessibility maturity of your agency and the organizations and programs within your agency.	To be completed annually. Next due on 7/26/2023; annual updates thereafter.
Accessibility Roadmap - Based on the results of the assessment, create a multi-year plan to continually improve the accessibility of your Digital Content and Services. Roadmaps must include: <ul style="list-style-type: none"> • Prioritized list of applications and websites • Accessibility training plan 	1/26/2023; annual updates thereafter.
Progress Reports – Provide a report showing progress in the accessibility of your agency’s prioritized list of applications and websites.	On a Quarterly Basis: By March 31 st , June 30 th , September 30 th and December 31 st each year.

Additional reporting requirements will be determined as the Commonwealth’s accessibility program matures.

6. Responsibilities

6.1 All Commonwealth Agencies shall:

- Create a plan to make internally developed or delivered agency Digital Content and Services accessible to individuals with a Disability.
- Create a plan to make any contractual agreements with suppliers for developed or delivered agency Digital Content and Services accessible to individuals with a Disability.
- Collaborate with OA/OIT to plan appropriate investments to make Digital Content and Services accessible.
- Establish a mechanism for users to report Digital Accessibility issues or concerns with Agency Digital Content and Services

- Respond to requests from individuals with a Disability, to make agency Digital Content and Services available in an accessible, alternative format, or provide an effective accommodation, within a reasonable time-period, that is consistent with pertinent federal or state regulations.
- Identify agency personnel, involved in planning, designing, building, testing, maintaining, and procuring Digital Content and Services so they:
 - Receive appropriate and regular accessibility training, consistent with their assigned roles; and
 - Recognize the need to include Digital Accessibility as part of planning, designing, building, testing, maintaining and procuring Digital Content and Services.
- Create a plan to make agency communication by the agency with employees and citizens with a Disability effective and inclusive.
- Create a plan to run applicable accessibility tests on Digital Content and Services using the enterprise accessibility testing toolkit outlined in STD-ACC001a, *Standards for Accessibility Testing* (Commonwealth Access Only), to confirm that Digital Content and Services are accessible.
- Identify and implement supplier Digital Accessibility requirements for various types of procurements (Requests for Proposals, contractual agreements, etc.)
- Revise Information Technology Requests for Proposals, contracts, and other procurement mechanisms to include the standards and requirements of this ITP so that suppliers are on notice of their need to make Digital Content and Services they provide the Commonwealth (agency) accessible.
- Procure Digital Content and Services that comply with, or best meets, the applicable standards set forth in Section 5.1.
- Include in solicitations for IT products, such as hardware, software (Commercial Off the Shelf (COTS)), electronic content, and support documentation and services, a requirement for an ACR. If more than one product is included in the solicitation, each product must have an ACR.
- Include in solicitations for IT purchases for products and professional or technical services a PDAA Assessment.
- Receive approval from the agency head and an analysis of the legal risks from chief counsel prior to submitting a request for exemption from this ITP.

6.2 Office of Administration, Office for Information Technology shall:

- Collaborate with Agencies to plan appropriate investments to make Digital Content and Services accessible.

- Establish a plan for the appropriate testing of Digital Content and Services using the enterprise accessibility testing toolkit outlined in STD-ACC001a, *Standards for Accessibility Testing* (Commonwealth Access Only).
- Identify OIT personnel involved in planning, designing, building, testing, maintaining, and procuring Digital Content and Services so they receive appropriate and regular accessibility training, consistent with their assigned roles.
- Integrate accessibility standards as defined in this ITP throughout all stages of the software development life cycle (e.g. initiate, plan, implement, sustain) for OIT developed Digital Content and Services.
- Promote education and awareness of Digital Accessibility to Commonwealth employees.
- Create a plan to run applicable tests on Digital Content and Services, to confirm accessibility.
- Identify and implement supplier Digital Accessibility requirements for various types of procurements.
- Include in solicitations for IT products, such as hardware, software (COTS), electronic content, support documentation, and services, a requirement for an ACR. If more than one product is included in the solicitation, each product must have an ACR.
- Include in solicitations for IT purchases for products and professional or technical services a PDAA Assessment.

6.3 Suppliers shall:

- Make all provided Digital Content and Services accessible.
- Submit ACR(s) for proposed or provided Digital Content and Services in response to Requests for Proposals (RFPs), Invitation for Bids (IFBs), Request for Information (RFI), Requests for Expression of Interest (RFEIs) and any resulting contract against all applicable standards outlined in Section 5.1.
 - Suppliers must use the most current version of the VPAT.
 - If ACRs are submitted, using an older version of the VPAT, suppliers must also provide an explanation, as to why the most current version is not being used. Upon review of the older version template, ACR, and the explanation provided, agencies may require suppliers to provide additional information for items listed on the new VPAT that are missing from the old template.
 - The VPAT should be filled out in its entirety and include testing methodology, conformance level, and remarks for any partially supported or non-supported level.
- Submit other artifacts (PDAA Assessment, Accessibility Testing Plans, Accessibility Issue Reports, Accessibility Roadmaps, etc.) when requested and as required by the contract.

- For any known accessibility issue or WCAG success criteria, which the Digital Content and Service either only partially meets, or does not meet, the supplier shall:
 - Provide a roadmap setting forth the expected timeframe and release cycle that will resolve each accessibility issue; or
 - Detail how the supplier will support the agency in providing equally effective alternate access for non-conforming Digital Content and Services.
- Provide additional required or requested information to document the accessibility of proposed or provided Digital Content and Services (for example, when responding to Requests for Proposals, and/or as part of contractual agreements).
- Promptly fix accessibility noncompliance issues that are reported to them.

7. Related ITPs/Other References

Definitions of associated terms of this policy are published on the Office of Administration's public portal: <http://www.oa.pa.gov/Policies/Pages/Glossary.aspx>

Commonwealth policies, including Executive Orders, Management Directives, and IT Policies are published on the Office of Administration's public portal:

<http://www.oa.pa.gov/Policies/Pages/default.aspx>

- [Executive Order 2019-04, Establishing a "Citizen-First" Government and Promoting Customer Service Transformation](#)
- [Executive Order 2016-04, Equal Employment Opportunity](#)
- [Executive Order 2016-03, Establishing "Employment First" Policy and Increasing Competitive Integrated Employment for Pennsylvanians with a Disability](#)
- [Executive Order 2002-5, Disability-Related Policy](#)
- [Management Directive 205.25 Amended, Disability-Related Employment Policy](#)
- [Management Directive 205.26, The Americans With Disabilities Act of 1990, Title II, Subtitle A, Nondiscrimination in State and Local Government Services](#)
- [Management Directive 205.34 Amended, Commonwealth of Pennsylvania Information Technology Acceptable Use Policy](#)
- [ITP-BUS002, IT Investment Review Process](#)
- [ITP-SFT000, Systems Development Life Cycle \(SDLC\) Policy](#)
- [ITP-SFT002, Commonwealth of PA Design Standards](#)

- [ITP-SEC040, Computing Services Provided by Service Organizations](#)
- *ODP-SEC040a, Risk Assessment and Acknowledgment*
- *STD-ACC001a, Standards for Accessibility Testing (Commonwealth Access Only)*
- *The Americans With Disabilities Act of 1990, (ADA) 42 U.S.C. §§ 12101 et seq.*
- *Sections 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 701 et seq.*
- *The Pennsylvania Human Resources Act (PHRA), 43 P.S. §§ 951-963*
- [World Wide Web Consortium \(W3C\) Web Accessibility Initiative](#)

8. Authority

[Executive Order 2016-06, Enterprise Information Technology Governance](#)

9. Publication Version Control

It is the [Authorized User](#)'s responsibility to ensure they have the latest version of this publication, which appears on <https://itcentral.pa.gov> for Commonwealth personnel and on the Office of Administration public portal: <http://www.oa.pa.gov/Policies/Pages/default.aspx>. Questions regarding this publication shall be directed to RA-ITCentral@pa.gov.

10. Exemption from this Policy

In the event an agency chooses to seek an exemption from the guidance within this ITP, a request for a policy waiver shall be submitted via the enterprise IT policy waiver process. Refer to [ITP-BUS004, IT Policy Waiver Review Process](#) for guidance.

The waiver request shall state why the Digital Accessibility Policy cannot be met and include a completed *OPD-SEC040a, Risk Assessment and Acknowledgement*. Details are required about the plan to bring the Digital Content and Services into compliance and the accommodations or workarounds that will be used to provide the Digital Content and Services in an accessible format while the waiver is valid.

This chart contains a history of this publication's revisions. Redline documents detail the revisions and are available to CWOPA users only.

Version	Date	Purpose of Revision	Redline Link
Original	03/16/2006	Base Document	N/A
Revision	11/18/2010	<ul style="list-style-type: none"> • Moved product standards to new STD-ACC001B • Rescinded OPD-ACC001B, OPD-ACC001D 	N/A

Version	Date	Purpose of Revision	Redline Link
Revision	01/12/2018	<ul style="list-style-type: none"> • Reformat to new ITP layout • Revised ITP Title • Expanded policy to cover other technologies • Added Accessibility Timeframe Table • Added Federal Law/Mandate requirements • Rescinded OPD-ACC001A, STD-ACC001B, OPD-ACC001C 	N/A
Revision	01/26/2021	<ul style="list-style-type: none"> • Added definitions section • Added industry standards • Added responsibilities for OIT, Procurement and Suppliers • Updated Related ITPs/Other references • Updated exemption language 	N/A
Revision	02/07/2023	<ul style="list-style-type: none"> • Added reference to Standards Document STD-ACC001a outlining the Accessibility Testing toolkit • Updated the definition of digital content and services. • Added an agency requirement regarding procuring products and services that best meet the accessibility standards. • Added a supplier requirement to support the agency in providing equally effective alternate access for non-conforming digital content and services. • Added definition for accessibility conformance report and updated the definition for VPAT. • Added third party information to scope section. • Added reference to OPD-SEC040a Risk Assessment and Acknowledgement. • Included feedback from OA, DGS & GO Legal, IT, EEO & DGS Procurement. 	Revised IT Policy Redline <02/07/2023>