

Information Technology Policy

Information Technology Digital Accessibility Policy

ITP Number ITP-ACC001	Effective Date March 16, 2006
Category Accessibility	Supersedes None
Contact RA-ITCentral@pa.gov	Scheduled Review January 2022

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 Disabilities, can access information and services provided by the Commonwealth of Pennsylvania.

2. Scope

This ITP applies to all offices, departments, boards, commissions and councils under the Governor's jurisdiction (collectively "agencies"). Agencies not under the Governor's jurisdiction are strongly encouraged to follow this ITP.

3. Definitions

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

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

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

3.4 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.

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

3.6 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 ten dimensions of an accessibility program and allow them to plan and work on improving the accessibility of Digital Content and Services year over year.

3.7 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 & PDF documents, training materials (e.g., online training materials, tests, online surveys), multimedia (video/audio), digital materials (e.g., documents, templates, forms, reports, surveys), 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 and copiers, scanners, peripheral equipment (e.g., keyboards, mice), kiosks and mobile phones;
- **Support documentation and services:** Training services, help desk or call center, automated self-service & technical support, and product informational materials.

3.8 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. This term does not include current, illegal use of or addiction to a controlled substance, as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. § 802.

3.9 Legacy Digital Content and Services: Digital Content and Services designed and implemented prior to the latest revision date of this policy (located at the bottom of this document).

3.10 New and Updated Digital Content and Services: Digital Content and Services designed and implemented after the latest revision date of this policy.

3.11 PDF/UA (PDF/Universal Accessibility): 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 Disabilities who use assistive technologies such as screen readers, screen magnifiers, joysticks, and other technologies to navigate and read electronic content. PDF/UA is included within the revised Section 508 Standards.

3.12 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 CIOs (NASCIO).

3.13 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.*

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

3.15 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.

3.16 Voluntary Product Accessibility Template® (VPAT): A VPAT is an industry accepted tool to measure a supplier's ability to demonstrate their product's (hardware, software (COTS, SaaS), electronic content and support documentation and services) support

for accessibility.

3.17 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.

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

4. Objective

The goal of this policy is to ensure that when an agency provides information through the web or through other information technologies such as mobile applications, and video and audio recordings, it is taking reasonable measures to ensure that persons with Disabilities can access, navigate, and otherwise obtain the same or equivalent information as persons without Disabilities.

5. Policy

a) Standards

Agencies shall provide access to Digital Content and Services by complying with the revised Section 508 Standards 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.

b) New and Updated Digital Content and Services

Agencies shall comply with the applicable standards set forth in Section 5a, of this policy.

c) 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 5a, 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.

d) 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.

e) Commonwealth's Accessibility Testing

All Digital Content and Services shall be tested to meet applicable standards set forth in Section 5a of this ITP.

f) Digital Accessibility Planning

Agencies, in collaboration with the Office for 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 your organization against the dimensions of a successful Digital Accessibility Program.	Six (6) months after the revision date of this policy; annually 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 by addressing the components of a successful accessibility program.	One year after the revision date of this policy; annual updates thereafter.

Additional reporting requirements will be determined as a part of the pilots planned in each IT Delivery Center.

6. Responsibilities

All Commonwealth Agencies shall:

- Create a plan to make internally developed/delivered agency Digital Content and Services accessible to individuals with Disabilities, consistent with any pertinent federal regulations, state regulations, and OIT policies and standards.
- Create a plan to make any contractual agreement for supplier developed/delivered agency Digital Content and Services adhere to any pertinent federal regulations, state regulations, and OIT policies and standards.
- Establish a mechanism for users to report Digital Accessibility issues or concerns.
- Respond to requests from individuals with Disabilities, 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 any 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
 - Understand that Digital Accessibility must be complied with as part of planning, designing, building, testing, maintaining and procurement activities as stated in this policy.
- Create a plan to make communication with employees and citizens with a Disability effective and inclusive. This includes, but is not limited to, accessible emails or videos and webinars with captions, audio descriptions and transcripts.
- Create a plan to run applicable tests on Digital Content and Services, to confirm compliance with this policy.

- 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 for supplier compliance with this policy.
- Include in solicitations for IT products, such as hardware, software (COTS), electronic content and support documentation and services, a requirement for a VPAT. If more than one product is included in the solicitation, each product must have a VPAT.
- Include in solicitations for IT purchases for products and professional/ technical services (such as creating websites and videos) a PDAA Assessment.
- Receive approval from the agency head and chief counsel prior to submitting a request for exemption from this policy.

The Office for Information Technology shall:

- Establish a plan for the appropriate testing of Digital Content and Services using the enterprise accessibility testing tools.
- 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 policy 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 compliance with this policy.
- Identify and implement supplier digital accessibility requirements for various types of procurements (Requests for Proposals, contractual agreements, etc.)
- Include in solicitations for IT products, such as hardware, software (COTS), electronic content and support documentation and services, a requirement for a VPAT. If more than one product is included in the solicitation, each product must have a VPAT.
- Include in solicitations for IT purchases for products and professional/technical services (such as creating websites and videos) a PDAA Assessment.

Commonwealth Agencies and the Office for Information Technology shall:

- Collaborate and plan appropriate investments to comply with this Policy.

Suppliers shall:

- Comply with the Accessibility Standards in Section 5a of this ITP for all provided products and services.
- Submit a completed VPAT for proposed/provided products and services in response to Requests for Proposals, IFBs, RFIs, RFEIs and any resulting contract.
 - Suppliers must use the most current version of the VPAT template
 - If VPATs are submitted, using an older version of the template, suppliers must also provide an explanation, as to why the most current version is not being used.

Upon review of the older version template, VPAT content, 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 template 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.
- For any known accessibility issue or WCAG success criteria, which the product or service either only partially meets, or does not meet, the supplier shall provide a road map setting forth the expected timeframe and release cycle that will resolve each accessibility issue.
- Provide additional required/requested information to document the accessibility of proposed/provided products 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

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 205.34 *Commonwealth of Pennsylvania Information Technology Acceptable Use Policy*
- Management Directive 205.25 *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*
- ITP-BUS002 *IT Investment Review Process*
- ITP-SFT000 *Systems Development Life Cycle (SDLC) Policy*
- ITP-SFT002 *Commonwealth of PA Design Standards*
- The Americans With Disabilities Act of 1990, (Pub. L. 101- 336, 104 Stat. 328) (ADA) 42 U.S.C. §12101 *et seq.*
- Sections 504 and 508 of the Rehabilitation Act of 1973, (Pub. L. 93–112, 87 Stat. 355) 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 - <https://www.w3.org/WAI/>

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 are to 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 is to be submitted via the enterprise IT policy waiver process. Refer to [ITP-BUS004 IT Waiver Review Process](#) for guidance.

The waiver request is to state why the Digital Accessibility Policy cannot be met. 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:

Version	Date	Purpose of Revision	Redline Link
Original	03/16/2006	Base Document	
Revision	11/18/2010	Moved product standards to new STD-ACC001B Rescinded OPD-ACC001B, OPD-ACC001D	
Revision	01/12/2018	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	
Revision	01/26/2021	Added definitions section Added industry standards Added responsibilities for OIT, Procurement and Vendors Updated Related ITPs/Other references Updated exemption language	Revised IT Policy Redline <01/26/2021>