

## Digital Accessibility Policy

**Effective Date:**  
January 6, 2025

**Category:**  
Accessibility

**Scheduled Review:**  
March 31, 2026

**Supersedes:**  
ITP-ACC001

### 1. Authority

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

### 2. Purpose

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

### 3. Scope

This policy applies to all offices, departments, boards, commissions, and councils under the Governor's jurisdiction and any other entity connecting to the Commonwealth Network (hereinafter referred to as "agencies").

Third-party vendors, licensors, contractors, or suppliers shall meet the policy requirements of this policy as outlined herein.

### 4. Policy

For definitions found within this document, refer to the [IT Policy Glossary](#).

#### 4.1 Standards

Agencies shall provide access to Digital Content and Services (internally built or through contractual, licensing or other arrangements) that comply with Section 508 Standards (Revised) and the Web Content Accessibility Guidelines (WCAG). The minimum requirement is WCAG 2.1, Levels A and AA. The current version of WCAG, levels A, AA, and AAA are encouraged.

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

Agencies shall procure or use User Agents that meet the current version of the W3C's User Agent Accessibility Guidelines (UAAG).

#### **4.2 New and Updated Digital Content and Services**

Agencies shall comply with the applicable standards set forth in Section 4.1, of this ITP for New and Updated Digital Content and Services.

#### **4.3 Legacy Digital Content and Services**

Agencies shall update Legacy Digital Content and Services to comply with the applicable standards set forth herein 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.

#### **4.4 Archived Web Content**

Archived Web 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 Web Content shall be responsible for providing the Digital Content in an accessible format.

#### **4.5 Exceptions**

The following content is exempt from being compliant with WCAG 2.1, Level A and AA standards:

- Archived Web Content
- Preexisting Conventional Electronic Documents.
- Content posted by a Third-Party, unless the third-party is posting due to contractual, licensing, or other arrangements with the Commonwealth.
- Individualized, password-protected or otherwise secured conventional electronic documents. Conventional electronic documents that are:
  - About a specific individual, their property, or their account; and
  - Password-protected or otherwise secured.
- Preexisting social media posts. Commonwealth social media posts that were posted before April 24, 2026.

#### **4.6 Commonwealth's Accessibility Testing**

All responsible parties outlined in Section 4.8 of this ITP shall test all of their Digital Content and Services to meet applicable standards set forth in Section 4.1 of this ITP.

#### 4.7 Digital Accessibility Planning

Agencies, in collaboration with the Office of Administration, 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
<p>Digital Accessibility Maturity Assessment – Assess the Digital Accessibility maturity of your agency and the organizations and programs within your agency.</p>	<p>Due annually on July 26th of each year</p>
<p>Digital 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.</p> <p>Roadmaps must include:</p> <ul style="list-style-type: none"> <li>• Prioritized list of applications and websites</li> <li>• Accessibility training plan</li> </ul>	<p>Due annually on January 26th of each year</p>
<p>Progress Reports – Provide a report showing progress in the accessibility of your agency’s prioritized list of applications and websites.</p>	<p>Websites managed in a content management tool are due on a Quarterly Basis by:</p> <ul style="list-style-type: none"> <li>• March 31st</li> <li>• June 30th</li> <li>• September 30th</li> <li>• December 31st</li> </ul> <p>Applications:</p> <ul style="list-style-type: none"> <li>• Due with each new version or update.</li> </ul>

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

## 4.8 Responsibilities

All Commonwealth Agencies shall:

- Make existing internally developed or delivered agency Digital Content and Services accessible to individuals with a Disability by April 24, 2026.
- Ensure that existing Digital Content and Services developed or delivered by a supplier are accessible to individuals with a Disability by April 24, 2026.
- 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.
- Provide a conforming alternate version where it is not possible to make web or mobile app content directly accessible due to technical or legal limitations.
- 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
  - Include Digital Accessibility as part of planning, designing, building, testing, maintaining and procuring Digital Content and Services.
- Make agency communication with residents, visitors, and Commonwealth employees, or anyone interacting with Commonwealth Digital Content and Services with a Disability effective and inclusive.
- Run applicable accessibility tests on Digital Content and Services using the enterprise accessibility testing toolkit outlined in section 5 of this policy, 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 solicitations, contracts, and other procurement documents to include the standards and requirements of this ITP so that Service Organizations are on notice of the requirement to make Digital Content and Services they provide to the Commonwealth accessible.
- Procure Digital Content and Services that comply with, or best meets, the applicable standards set forth in Section 4.1.

- 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 Service Organizations to provide an Accessibility Conformance Report (ACR). If more than one product is included in the solicitation, an ACR must be provided for each product.
- Include in solicitations for IT products and professional or technical services a requirement for Service Organizations to provide a Policy Driven Adoption for Accessibility (PDAA) Assessment.
- Receive approval from the agency head and an analysis of the legal risks from the agency chief counsel prior to submitting a request for exemption from this ITP.

Office of Administration, Office for Information Technology shall:

- Collaborate with Agencies to plan appropriate investments to make Digital Content and Services accessible by April 24, 2026.
- Establish and implement a plan for the appropriate testing of Digital Content and Services using the enterprise accessibility testing toolkit outlined in section 5 of this policy.
- 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 to comply with, or best meets, the applicable standards set forth in Section 4.1.
- 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.
- Run applicable tests on Digital Content and Services, to confirm accessibility.
- Identify and implement Service Organizations Digital Accessibility requirements for various types of solicitations.
- 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 of products and professional or technical services a PDAA Assessment.

Service Organizations shall:

- Make all existing Digital Content and Services accessible by April 24, 2026.
- Submit ACR(s) for proposed or provided Digital Content and Services in response to

solicitations and any resulting contract against all applicable standards outlined in Section 4.1

- Suppliers must use the most current version of the Voluntary Product Accessibility Template® (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 solicitations, and as part of contractual agreements).
- Promptly fix accessibility noncompliance issues that are reported to them.

## 5. Standards for Accessibility Testing

The tables below outline the Commonwealth's accessibility testing toolkit. For [information on accessing and using the accessibility testing toolkit](#), go to the Digital Accessibility Knowledge Repository or contact [RA-OAAccessibility@pa.gov](mailto:RA-OAAccessibility@pa.gov).

### 5.1 Accessibility Management Platform (AMP)

AMP covers automated and manual accessibility testing.

- Automated testing captures about 25-30% of the issues.
- Manual testing is needed to capture the remaining issues that can be tested against digital accessibility standards.

A description of the [accessibility tools available in AMP](#) along with how to access and use the toolkit is located on the Accessibility Center of Excellence's website.

The Commonwealth has two instances of AMP:

- The basic instance of AMP

- The Federal Risk and Authorization Management Program (fedRAMP) instance of AMP

FedRAMP AMP offers enhanced security and authorization standards and ***MUST BE*** used when testing any application or service that utilizes Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) information.

CJIS information relates to any information that can be used to match an individual to criminal history information. This includes arrest records and associated information as well as personally identifiable information (PII) including FBI and State Identification Numbers (SID) that can be associated with a criminal record.

For the Commonwealth’s purposes, CJIS information is defined by the Pennsylvania State Police CLEAN administrative section. Questions for CLEAN administration may be directed to [ra-CLEAN@pa.gov](mailto:ra-CLEAN@pa.gov).

### **5.1.1 Guidelines for using the Basic Instance**

- a) Pre-Production scans and reports should be leveraged within the tool and identified as “Sandbox” prior to Production deployments to determine conformance scores and to complete issue identification and remediation to meet IT standards.
- b) Production scans and reports should be leveraged and identified as “Production” within the tool to use as the basis of your policy compliance scores and issue reporting for your digital content and services.

### **5.1.2 Guidelines for using the FedRAMP Instance**

- a) Lower-level environments should be used for scanning by the FedRAMP instance of AMP.
- b) If a system or environment includes CJIS information, mock data should be used when scanning records. Permission from PSP CLEAN administration ([ra-clean@pa.gov](mailto:ra-clean@pa.gov)) is required prior to any scanning of any system or environment where CJIS information is utilized – even when CJIS information is mocked up or otherwise avoided.
- c) The fedRAMP instance of AMP must be used when scanning any system or environment that captures CJIS information, even if the CJIS information in the system is mocked-up or otherwise avoided.
- d) To conform with Publication 1075, the fedRAMP instance of AMP must be used when scanning any system or environment that captures Internal Revenue Service (IRS) information, even if the IRS information in the system is mocked-up or otherwise avoided.

AMP Instance	Available Tools in the AMP Toolkit
Basic AMP	Access Academy Access Analytics Access Assistant Access Continuum Accessible Color Picker Color Contrast Checker Continuum Explorer Continuum SDK Manual Testing Wizard
FedRAMP AMP	Access Assistant Access Continuum Accessible Color Picker Color Contrast Checker Continuum Explorer Continuum SDK Manual Testing Wizard

## 5.2 Additional Testing Tools

To fully perform accessibility testing, assistive technologies should also be used.

Type of Accessibility Testing	Tool
Automated	JAWS Inspect
Assistive Technologies	Fusion: <ul style="list-style-type: none"> <li>• JAWS (screen reader)</li> <li>• ZoomText (magnifier)</li> <li>• The combined product</li> </ul>

A description of these tools along with how to access and use them is available on the Accessibility Center of Excellence's website:

- [JAWS Inspect \(sharepoint.com\)](#)
- [Fusion \(JAWS & Zoom Text\) \(sharepoint.com\)](#)

## 5.3 Testing Maturity

There are five types of accessibility testing considered when determining the maturity of a team's testing methodology:

- Automated Testing (AMP, JAWS Inspect)
- Manual Testing (Manual testing wizard in AMP)
- Assistive Technology Testing using JAWS (screen reader)
- Assistive Technology Testing using ZoomText (magnifier)



- Testing is done by people with disabilities (example: screen reader users)

Stage of Maturity	Type of Testing
Stage 5: Optimized	Using five types of accessibility testing
Stage 4: Managed	Using four types of accessibility testing
Stage 3: Aligned	Using three types of accessibility testing
Stage 2: Repeatable	Using two types of accessibility testing
Stage 1: Initial	Using one type of accessibility testing

The type of testing done on a website or application shall be included in the quarterly Progress Reports.

#### 5.4 Compliance Scores

The goal at launch is a 98% conformance score with all high and medium issues resolved. A plan to address outstanding issues shall be included in the appropriate Digital Accessibility Roadmap.

#### 6. Contact

Questions or comments may be directed via email to [OA, IT Policy](#).

#### 7. Exception from Policy

In the event an agency chooses to seek an exception from this policy, a request for a policy exception shall be submitted via the IT Policy Governance Process. Refer to *IT Policy Governance Policy* for guidance.

#### 8. Revision History

This chart contains a history of this publication’s revisions. Redline documents outline the revisions and are available to Commonwealth users only during the drafting process.

Version	Date	Purpose of Revision
Original	01/06/2025	Base Document