

Information Technology Policy

Digital Accessibility Policy

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ITP-ACC001

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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 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.

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

Archived Web Content: Web Content that:

- Was created before April 24, 2026, reproduces paper documents created before April 24, 2026, or reproduces paper documents or the contents of other physical media created before April 24, 2026;
- Is retained exclusively for reference, research, or recordkeeping;

- Is not altered or updated after the date of archiving; and
- Is organized and stored in a dedicated area or areas clearly identified as being archived.

Conventional Electronic Documents: Web content or content in mobile apps that are in the following electronic file formats: portable document formats (PDF), word processor file formats, presentation file formats, spreadsheet file formats, layout design file formats, etc.

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), Mobile Apps, Conventional Electronic Documents, 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, official agency communications, 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, scientific/specialized equipment, office equipment, telecommunications equipment, 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.

Kiosks: A self-service transaction machine at a physical location for the independent use of individuals in Commonwealth programs or activities.

Mobile Applications (Apps): Software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.

Preexisting Conventional Electronic Documents: Conventional Electronic Documents that are available as part of the Commonwealth's Web Content or Mobile Apps before April 24, 2026, unless such documents are currently used to apply for, gain access to, or participate in Commonwealth services, programs, or activities.

Social Media: Websites and applications like X (Twitter), LinkedIn, Instagram, YouTube, and Facebook that allow people to communicate and share information, pictures, videos, etc. on the internet.

User Agents: Any software that retrieves and presents web content for users. Examples include browsers, browser extensions, media players, and readers.

Web Content: The information and sensory experience to be communicated to the user by means of a User Agent, including code or markup that defines the content's structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents.

4. Objective

The objective of this ITP is to ensure that agency Digital Content and Services are accessible to individuals with a [Disability](#) in the same manner as they are available to individuals without a Disability.

5. Policy

5.1 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 \(UAAG\)](#).

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 for [New and Updated Digital Content and Services](#).

5.3 Legacy Digital Content and Services

Agencies shall 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 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.

5.5 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.

5.6 Commonwealth's Accessibility Testing

All responsible parties outlined in Section 6 of this ITP shall test all of their Digital Content and Services to meet applicable standards set forth in Section 5.1 of this ITP.

5.7 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
<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"> • Prioritized list of applications and websites • Digital Accessibility training plan 	<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"> • March 31st • June 30th • September 30th • December 31st <p>Applications:</p> <ul style="list-style-type: none"> • Due with each new version or update.

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

6. Responsibilities

6.1 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 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 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 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 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.

6.2 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 STD-ACC001a, *Standards for Accessibility Testing* (Commonwealth Access Only).
- 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 5.1.
- 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.

6.3 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 5.1.
 - 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.

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 2024-01, Hire, Improve, Recruit, Empower Committee](#)
- Executive Order 2023-08 – Bolstering Service Delivery through a Digital Experience Strategy
- [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, Design Standards](#)
- [ITP-SEC040, Computing Services Provided by Service Organizations](#)
- *ODP-SEC040a, Risk Assessment and Acknowledgment (Commonwealth Access Only)*
- [STD-ACC001a, Standards for Accessibility Testing \(Commonwealth Access Only\)](#)
- *The Pennsylvania Human Resources Act, 43 P.S. §§ 951 et. seq.*
- [World Wide Web Consortium \(W3C\) Web Accessibility Initiative](#)
- [Nondiscrimination on the Basis of Disability in State and Local Government Services, 28 C.F.R. §§ 35.101 et. seq.](#)
- [Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance, 45 C.F.R. §§ 84.1 et. seq.](#)
- *The Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq.*
- *Sections 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 701 et seq.*

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.

Noncompliance with Section 5.1 of this ITP is only permissible where the agency can show that compliance would fundamentally alter the service, program, or activity of the agency or would result in undue financial and administrative burdens.

The decision that compliance would result in such alteration or burdens must be made by the head of the agency or their designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion.

If compliance with Section 5.1 of this ITP would result in such an alteration or such burdens, an agency shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the agency to the maximum extent possible.

The waiver request shall state why the requirements of this ITP will not 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 conformance with Section 5.1 of this ITP 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.

The agency shall prepare a written statement from the agency head or designee of the reasons for not conforming with Section 5.1 of this ITP by 4/24/2026 after considering all resources available for use in funding and operation of the service, program or activity.

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
Revision	01/12/2018	<ul style="list-style-type: none"> Reformatted 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

Version	Date	Purpose of Revision	Redline Link
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. 	N/A
Revision	11/27/2024	<p>Made updates based on the DOJ & HHS Final Rules:</p> <ul style="list-style-type: none"> • Made definitions match the rule. • Included a minimum legal standard requirement. • Added the new date. • Changed from plan to implement. • Included exceptions. • Added references to the final rules • Replaced definitions that already exist in the glossary with links and linked the first instance of each term (except where updates were being made to the definition) 	Revised IT Policy Redline <11/27/2024>