

## Digital Accessibility Policy

**Effective Date:**  
November 12, 2025

**Category:**  
Accessibility

**Scheduled Review:**  
November 2026

### 1. Authority

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

### 2. Document Control

This document replaces, in its entirety, the *Digital Accessibility Policy*, dated July 29, 2025.

### 3. Purpose

This Information Technology Policy (ITP) provides guidance ensuring that all Commonwealth digital content and services are digitally accessible. This policy outlines best practices for planning, designing, building, testing, maintaining, and procuring accessible technology. The goal is to ensure that residents, visitors, Commonwealth employees, and anyone interacting with Pennsylvania's digital resources, including individuals with disabilities, can access information and services without barriers.

### 4. 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.

### 5. Policy

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

#### 5.1 Standards

Agencies shall provide access to digital content and services (internally built or through contractual, licensed, or other arrangements) that comply with current Section 508 Standards (Revised) and the Web Content Accessibility Guidelines (WCAG). Agency digital content and services must at a minimum meet WCAG 2.1, Levels A and AA, but are encouraged to meet the current version of WCAG, levels A, AA, and AAA.

Additionally, agencies shall adhere to the standards as identified in the *Digital Accessibility Standard*.

## 5.2 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 information in an accessible format.

## 5.3 Exceptions

The following content is exempt from being compliant with the current version of WCAG, levels A, AA, and AAA:

- Archived Web Content;
- Preexisting Conventional Electronic Documents;
- Content posted by a third-party, unless the third-party is posting on behalf of the Commonwealth or on a Commonwealth platform;
- 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.
- Commonwealth social media posts that are posted before April 24, 2026.

## 5.4 Accessibility Testing and Reporting Requirements

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).

## 5.5 Responsibilities

### 5.5.1 Agencies

All Commonwealth agencies are accountable for their digital content and applications meeting standards and shall:

- Prioritize digital content and applications as the owner and financially responsible party;
- Support all costs for accessibility testing and remediation;
- Collaborate with Commonwealth IT staff and vendors on testing, remediation, validation, training, and status reporting;
- Ensure procurement contracts mandate third-party vendors to deliver products that conform to the WCAG 2.1 levels A and AA, ensuring digital accessibility compliance.

### 5.5.2 Office of Accessibility

The Office of Administration, Office for Information Technology, Office of Accessibility is responsible for overseeing accessibility compliance by providing tools, training, governance communication, compliance tracking, and consolidated reporting while supporting IT DCs in developing and executing remediation workplans and removing roadblocks, and shall:

- Provide the necessary information, templates, training, and tools to support the IT DCs development of an application roadmap by content and/or application, including:
  - Accessibility compliance requirements and testing frequency.

- Access to tools and training.
- Ongoing testing and remediation plans.
- Provide clear and consistent communication about program goals related to accessibility audits and product testing for remediation;
- Track accessibility compliance maturity through the Commonwealth approved reporting tool and status updates;
- Communicate governance and business owner decisions that impact remediation efforts; and
- Review and consolidate the agency system remediation status and plan for overall reporting to executive stakeholders.

### **5.5.3 Delivery Centers**

The Office of Administration, Office for Information Technology Commonwealth IT staff are responsible for reviewing digital content and applications, assisting agencies with remediation planning, conducting accessibility testing and validation, and collaborating with stakeholders to document compliance efforts and recommend system improvements, and shall:

- Review digital content and applications and provide prioritized portfolio with the Office of Accessibility;
- In collaboration with agency portfolio managers, plan, deliver and report product testing and remediation activities through Commonwealth approved tools;
- Perform Accessibility testing and validation using Commonwealth approved tools;
- Work with vendors to coordinate their digital accessibility testing and validation through the Commonwealth approved testing tools;
- Create a process for accountability to review and/or evaluate accessibility testing results and recommend system/product improvements to agencies that align with conformance policies;
- Collaborate with the agency, Office of Accessibility, and other stakeholders, as needed, to document current and future-state artifacts, including any gap analysis; and
- Provide clear communications of technical and functional aspects, challenges, risks, and benefits of the accessibility conformance to remediate or modernize agency digital content and applications.

### **5.5.4 Service Organizations**

Service Organizations shall:

- Make all existing digital content and services accessible as set forth in Section 5.1;
- Submit an Accessibility Conformance Report (ACR) 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 explain 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 (Policy Driven Adoption for Accessibility (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); and
- Promptly fix accessibility noncompliance issues that are reported to them.

## 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
Revision	07/29/2025	Reworded the purpose statement. Removed the distinction between new and legacy content (will all be handled the same). Removed the details of the accessibility testing toolkit and replaced with a reference to the Digital Accessibility Knowledge Repository, where information on accessibility testing can be found. Removed requirements for Accessibility Roadmap, Maturity Assessment, and Progress Reports. Separated agency and commonwealth IT staff responsibilities.
Revision	11/12/2025	Added reference to new <i>Digital Accessibility Standard</i> . Updated link to new <i>Digital Accessibility Knowledge Repository</i> .