Digital Accessibility for Texas and Texans

Governor's Committee on People with Disabilities

May 28, 2025

DIR — Texas Department of Information Resources

Transforming How
Texas Government
Serves Texans

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About GCPD

About GCPD The Governor's Committee on People with Disabilities (GCPD) has a mission to further opportunities for persons with disabilities to enjoy full and equal access to lives of independence, productivity, and self-determination.

GCPD recommends changes in disability policies and programs in the areas of accessibility, communication, criminal justice, education, emergency preparedness, employment, health, housing, transportation, and veterans. The committee also supports a network of committees on people with disabilities; issues awards to promote greater awareness and promotes compliance with disability related laws.

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General Information

- Chat is disabled in Zoom Webinar Mode. Please use the Q&A tool if you have questions for our presenters. Most questions will be answered near the end of the webinar.

- After the webinar, you will get an automated email from Zoom with a link to our GCPD page to access the webinar recording and other materials. The email will also include a survey where you can give your feedback.

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We'll discuss...

- The Great State of Texas
- Accessibility Policies in Texas
- State website accessibility
- Statewide Digital Accessibility Program
- Citizen experience

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The Great State of Texas

Texans with a Disability

3.7 million Texans have disability

10% of children under 18

51% age 18 to 64

38% over 65

31% are employed

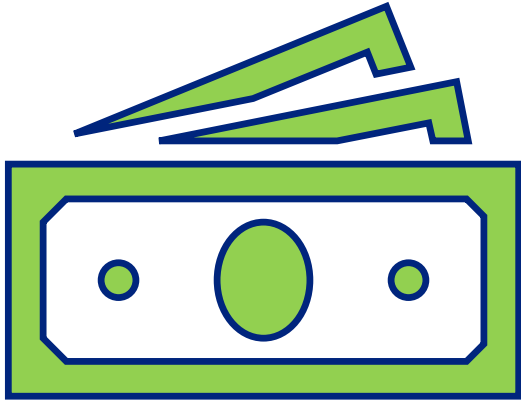30% of Texas veterans have a disability

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Why

Well-designed technology is a win for everyone, even abled people.

'Inclusive design is not only about ADA compliance. It also means we are creating an equal experience for all users regardless of ability or disability.'
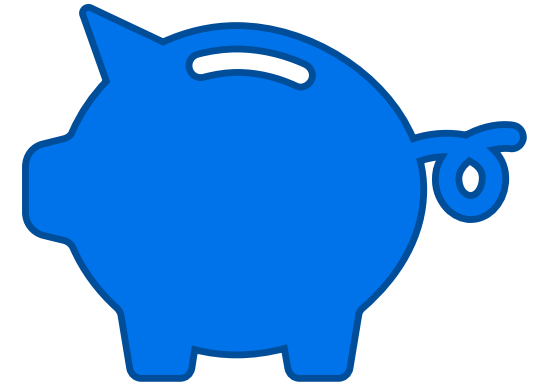
– Global Disability Inclusion

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Economic Benefits - Revenue

- Small business support
- Student programs and support increase enrollment
- Faculty talent

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Economic Benefits – Cost Reductions

- Employee time on rework
- On-time implementations
- Reduced re-procurements
- Avoid Litigation costs & PIR costs
- Reduced Risk

Social and Cultural

"Access v. Accommodation"

- Citizen Experience
- Independence & Privacy
- Flexibility
- Student success
- Employee support
- Community builder
- Increased Engagement

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Accessibility Policies in Texas Government

Compliance

Federal

- Americans with Disabilities Act (ADA) Title II
  - Website Accessibility Rule
- Section 508 of the 1998 Rehabilitation Act

Texas

- Texas Government Code 2054 DIR Requirements (subchapter M)
  - 89R HB 5195 (subchapter S) – Governor's review
- 1 TAC 206 Websites
- 1 TAC 213 Electronic and Information Resources

Industry

- Web Content Accessibility Guidelines (WCAG) Website Standards 2.1 AA
- Information Technology Industry (ITI) Council VPAT Standards

Americans with Disabilities Act (ADA)

- ADA standards apply broadly to society, commerce, and government.

- Web accessibility standard is now WCAG 2.1 AA
  - Websites and content
  - Web and Mobile applications
  - Document
  - Social Media
  - Password protected and third-party content

- The Department of Justice and private citizens enforce ADA compliance.

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Revised Section 508 of the Rehabilitation Act

- Section 508 is a set of regulations related to access to Government Information and Communication Technology and Electronic and Information Resources. The governing body is the US Access Board.

- Section 508 compliance provides accessibility for digitally published material within government agencies and entities.

- Section 508 is the only standard in the US that federal agencies must follow when they develop, procure, maintain or use electronic and information resources.

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[Texas Government Code 2054](#) (Subchapter M)

Requires access to electronic and information resources by individuals with disabilities and defines the following:

- Alignment with federal law
- Rule adoption
- Training and Outreach
- Policy making and processes for compliance
- Exceptions
- Exemptions
- Reporting Requirements

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Texas Administrative Code 206 - Websites

206.50	**State Agencies (subchapter B)**
206.70	**Institutions of Higher Education (subchapter C)**
a	Exceptions
b	Closed captioning for video
c	Alternatives for non-compliance
d	Accessibility Testing
e	Accessibility Policy
f	Adaptability
g	Establish compliance goals & measurements

Source: TAC 206 State Websites

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Texas Administrative Code 213 – Electronic and Information Resources

Agencies (subchapter B)	Institutions of Higher Education (subchapter C)	Accessibility Standards
§213.10	§213.30	Software Applications and Operating Systems
§213.11	§213.31	Telecommunications Products
§213.12	§213.32	Video and Multimedia
§213.13	§213.33	Hardware
§213.15	§213.35	Functional Performance Criteria
§213.16	§213.36	Support Documentation and Services
§213.17	§213.37	Compliance Exceptions and Exemptions
§213.18	§213.38	Procurements
§213.19	§213.39	Accessibility Training, Technical Assistance, and Job Descriptions
§213.20	§213.40	Accessibility Survey and Reporting Requirements
§213.21	§213.41	EIR Accessibility Policy and Coordinator
§213.22	§213.42	Holdover

Source: TAC 213 Electronic and Information Resources
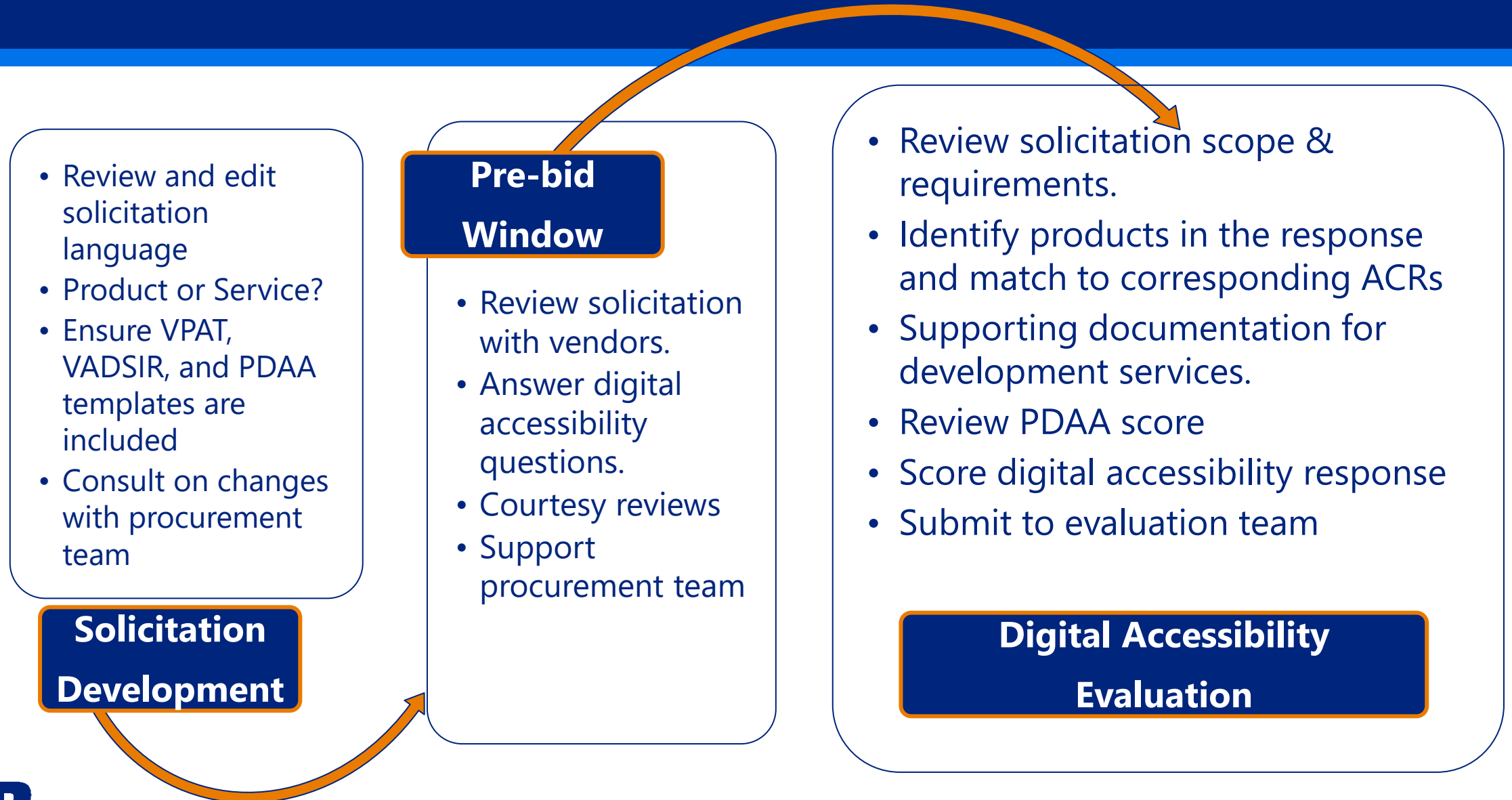
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Digital Accessibility Industry Standards

The Information Technology Industry Council (ITIC) is the premier global advocate for technology, promoting public policies and industry standards that advance competition and innovation worldwide.

- Voluntary Product Accessibility Template (VPAT) – template for products with WCAG standards and success criteria for testing.
- The Accessibility Conformance Report (ACR) (completed VPAT) is the leading global reporting format for assisting buyers in determining accessibility.
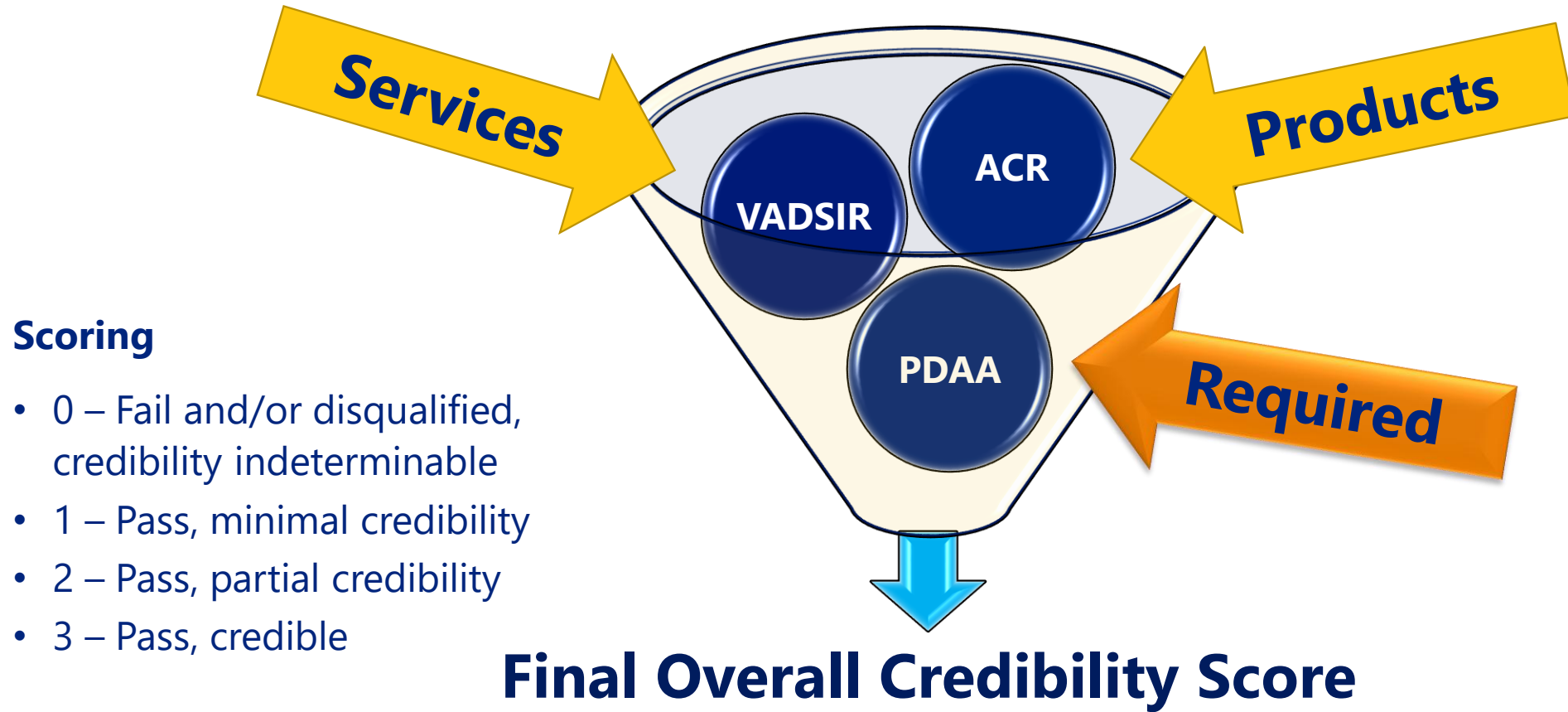
Web Content Accessibility Guidelines (WCAG) are the success criterion designed to apply broadly to current and future web technologies and products.

- Follows the **POUR** principles: Perceivable, Operable, Understandable, and Robust
- For websites and applications
- Automated and human evaluation testing
- Current versions: 2.1 AA, 2.2 AA

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Accessible Procurement Lifecycle

Solicitation Development

- Review and edit solicitation language
- Product or Service?
- Ensure VPAT, VADSIR, and PDAA templates are included
- Consult on changes with procurement team

Pre-bid Window

- Review solicitation with vendors.
- Answer digital accessibility questions.
- Courtesy reviews
- Support procurement team

Digital Accessibility Evaluation

- Review solicitation scope & requirements.
- Identify products in the response and match to corresponding ACRs
- Supporting documentation for development services.
- Review PDAA score
- Score digital accessibility response
- Submit to evaluation team

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Complete Digital Accessibility Procurement Review

Services **Products**

VADSIR ACR

PDAA **Required**

Scoring

- 0 – Fail and/or disqualified, credibility indeterminable
- 1 – Pass, minimal credibility
- 2 – Pass, partial credibility
- 3 – Pass, credible

Final Overall Credibility Score
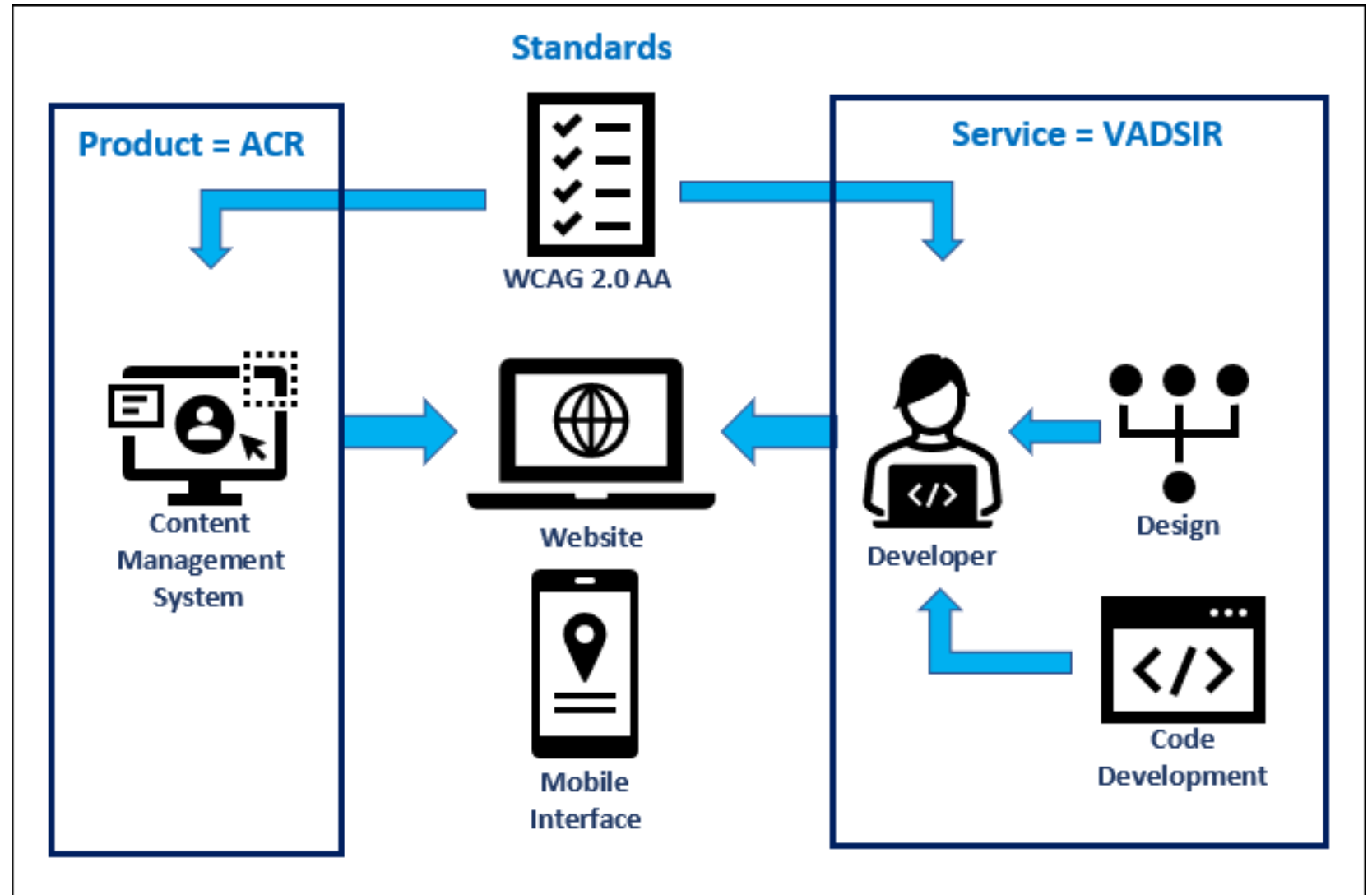
Website Accessibility

Website Introduction

- Websites are the first customer contact and, in most cases, will be the biggest digital accessibility risk. Thousands of accessibility lawsuits occur each year and continue to rise.

- The objectives of state policies and practices are to manage website development projects efficiently ultimately improving the citizen experience, simplify transactions, and reduce risk.

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Web Dev Procurements

A website development procurement includes development services which requires that vendors provide a Vendor Accessibility Development Services Request (VADSIR) form.

There may be products included in the procurement which can include a content management system, applications for graphics and fonts, and hosting environments. Vendors are required to complete a VPAT (version 2.4+) and submit the accessibility conformance report (ACR) for each product.

Standards

Product = ACR

Service = VADSIR

WCAG 2.0 AA

Content Management System

Website

Mobile Interface

Developer

Design

Code Development

Web Project Best Practices

- Clearly define scope for site and page design. Digital accessibility requirements should be included in the scope, requirements, and development sprints.

- Ensure the team understands digital accessibility requirements, testing needs, and who is responsible for remediating defects.

- Risk assessment should be done early and monitored throughout the project. A risk is assessed by the probability of occurring and the impact of that risk.

- Development iterations should include quality assurance (QA) with the technical team (iterative accessibility testing).

- Later iterations should include user testing (UAT) with the business team (final accessibility and usability testing).

- Management of scope, budget, and timeline is critical. Changes to any of these should be documented and approved by the project sponsor and addressed with vendor.

- MVPs...complete testing and remediation before launch

Website Governance

- Develop an accessible agency style guide to ensure consistency and compliance with accessible colors, fonts, size, etc.

- Develop an agency web content governance plan that defines who has access to CMS for publishing and editing, how website changes will be processed and approved, agency branding to ensure proper messaging, standards for compliance, and readability of content.

- Web content management for changes (new pages to simple edits) and retention management for content and files.

- Internal monitoring and tracking system for changes.

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Statewide Digital Accessibility Program Stakeholders

✓ Customers

- Texas State Agencies
- Institutions of Higher Education
- Local government
- Junior Colleges
- Other states

✓ Vendors

✓ Functional Roles

- Accessibility SMEs
- General Counsel
- Governance, Risk, and Compliance
- Information Resource Managers
- Web Admins and developers
- Leadership
- Procurement
- Project Management
- Policy Makers

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Statewide Digital Accessibility Program

Statewide Leadership

- Agencies/IHEs/local gov.
- Research/Best Practices
- Rule Review and Updates
- Cooperative Contracts Evaluations

Compliance

- Website Scanning
- Required Accessibility Survey (IRDR)
- Exceptions/Exemptions
- Ensure all Agencies have an officer

Education and Outreach

- Academy Courses
- Individualized training
- Vendor Outreach
- Tools and Resources
- Conferences
- Monthly Statewide Coffee Chat
- Weekly office hour
- Community of Collaboration

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Citizen Experience

How the Citizen can help

- Notify the agency if you need help.

- Be patient. It may take a few days to fix something or provide an alternative.

- For public events, let the agency know if you need an accommodation.

- Students should seek out services early.

- Citizens can volunteer to test for agencies, especially assistive technology users.

- Get involved: Public comments, Tech luncheons, Digital Accessibility mailing list

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Thank You

Marie Cohan,
Statewide Digital Accessibility Officer
DIR Chief Experience Office

statewideaccessibility@dir.texas.gov

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