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**Information and Communications Technology  
Accessibility Act**

**Annual Report**

June 5, 2026



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## Executive Summary

Under the Information Technology Access Act, Va. Code § 2.2-3500 *et seq.*, each executive branch agency must report annually to the General Assembly on any Information and Communications Technology (ICT) that does not conform with accessibility, as defined therein, and that is not included in the exceptions found in 28 C.F.R § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E 202. Reporting agencies are required to provide an estimate of the fiscal impact involved to bring such technologies into compliance with federal and state laws and regulations. ELECT has reviewed, scanned, and analyzed the accessibility of its ICTs and the exceptions provided in federal and state law to complete the initial assessment. ELECT has identified eight ICTs that do not conform with accessibility, four of which meet the requirements for exceptions. The estimated fiscal impact to remediate the remaining four non-compliant ICTs into conformance is \$128,000. ELECT plans to integrate the remediation efforts into the ordinary course of development of the non-compliant systems.



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## Assessments and Compliance

### *Identifying ICTs*

“Information and Communications Technology” is defined in Va. Code § 2.2-3501 to mean “any website, application, or other product or service primarily intended to fulfill or enable the function of information processing and communication by electronic means, including transmission and display via the Internet.” ELECT identified ten ICTs in use. An additional ICT is currently under development.

### *Non-Compliant ICTs*

ELECT performed scans and reviews of its ICTs and determined the following are non-compliant: Virginia Elections Registration Information System (VERIS), Desktop Application for General Registrars (DAGR), Voter Activity Search, Secure Access Portal, Custom Membership Administration Portal (CMAP), Committee Electronic Tracking (COMET), Campaign Finance Management (CFM), and Campaign Finance Reports (CFR). COMET, CFM, and CFR are 3 applications that together constitute a comprehensive campaign finance system.

### *Exceptions*

ELECT performed additional analysis to determine whether any of the ten non-compliant ICTs met exceptions found in either 28 C.F.R § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E 202. Four systems and applications were determined to meet such exceptions, including VERIS and the 3 campaign finance applications: COMET, CFM, and CFR.

1. VERIS – Exceptions 36 C.F.R. Part 1194, Appendix A, §§ E 202.2 *Legacy ICT* and E 202.6 *Undue Burden or Fundamental Alteration*.

VERIS is a legacy ICT as defined in 36 C.F.R. Part 1194, Appendix A, § E 202.2 that was initially implemented in 2007 and heavily expanded and modified over the past 19 years, although the core code remains the same. Currently, ELECT is working to develop and implement a system to replace VERIS. This new system, SVRS, is expected to go live in calendar year 2027. To ensure VERIS conformance to accessibility would impose an undue burden on ELECT. The effort would require substantial planning and development, funding, and significant diversion of resources from the completion of the new system. When completed, the upcoming SVRS will conform to accessibility.

2. COMET, CFM, and CFR – Exceptions 36 C.F.R. Part 1194, Appendix A, §§ E 202.2 *Legacy ICT* and E 202.6 *Undue Burden or Fundamental Alteration*



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COMET and CFR are legacy ICTs as defined in 36 C.F.R. Part 1194, Appendix A, § E 202.2 that were developed in-house and implemented in 2012. CFM is also legacy ICT. CFM was developed and implemented in 2019 to work with COMET and provide additional system administration functionality. Due to CFM's age and inflexibility in the face of recent and anticipated legal requirements that would impact CFM, ELECT was directed by the General Assembly to develop a report recommending a plan to replace COMET, CFM, and CFR. The report recommended an internal Commonwealth of Virginia solution to be developed by ELECT with assistance from VITA and VITA approved vendors. Funds needed to complete the replacement were proposed. ELECT is awaiting a final, approved budget from the General Assembly. The replacement system will be designed to conform to accessibility as required.

To ensure COMET/CFM/CFR conformance to accessibility would require substantial planning and development, significant diversion of resources from completion of other projects and operational requirements, and funding.

*No Exceptions – Remediation Effort and Costs*

ELECT's analysis of whether non-compliant ICTs met exceptions found in 28 C.F.R § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E 202 determined that four applications did not meet such exceptions, including Desktop Application for General Registrars (DAGR), Voter Activity Search, Secure Access Portal, and Custom Membership Administration Portal (CMAP).

ELECT estimates the time and costs to remediate each of the non-compliant systems into conformance as required is:

	<u>% Compliant</u>	<u>Estimated Time</u>	<u>Estimated Cost</u>
DAGR	50%	480 hours	\$ 84,000
Voter Activity Search	50%	160 hours	\$ 17,600
Secure Access Portal	75%	80 hours	\$ 8,800
CMAP	25%	160 hours	\$ 17,600

Total: 880 Hours      Total: \$128,000

ELECT plans to remediate the non-compliant systems in the ordinary course of the agency IT development and implementation efforts.