

Virginia Department of Taxation

Report on Digital Accessibility

Overview

Federal disability-accessibility requirements applicable to information and communications technology (ICT) derive primarily from [the Americans with Disabilities Act \(ADA\) Title II](#), Section 508 of the Rehabilitation Act, and Section 255 of the Communications Act. In 2024, the U.S. Department of Justice (DOJ) issued a Title II regulation, [28 C.F.R. § 35.200](#), establishing technical accessibility requirements for state and local government web content and mobile applications based on the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. In April 2026, DOJ [extended the federal compliance deadlines](#) to April 26, 2027, for governments serving populations of 50,000 or more and to April 26, 2028, for smaller governments and special districts.

Enacted in 2025, [HB2541](#) substantially updated Virginia's Information Technology Access Act to establish a broader digital-accessibility framework covering state agencies, public school divisions, public institutions of higher education, and political subdivisions. The law defines accessibility by reference to federal Section 508 standards, Section 255 guidelines, and 28 C.F.R. § 35.200, and requires covered entities to ensure that ICT provides individuals with disabilities equivalent access to that provided to individuals without disabilities. The law also establishes responsibilities for digital-accessibility policies and coordinators, public reporting of accessibility barriers, and accessibility requirements in technology procurement, including vendor certifications and Vendor Accessibility Roadmaps when deficiencies are identified.

This report fulfills the annual requirement set forth in [HB2541](#) that executive branch agencies identify ICT that does not conform to applicable digital-accessibility requirements and is not subject to the exceptions found in [28 C.F.R. § 35.201](#) or [36 C.F.R. Part 1194, Appendix A, § E202](#). It also provides an estimate of the fiscal impact associated with bringing such technology into compliance with applicable federal and state laws and regulations.

Progress Summary to Date

Since HB2541 became law, the Virginia Department of Taxation ("Virginia Tax") has identified, prioritized, and begun to remediate accessibility needs across our digital platforms. Virginia Tax formed an accessibility working group to track and prioritize areas of non-compliance across the agency.

Since HB2541 became law, Virginia Tax has:

- ▶ Reached a compliance score of 84% on the agency's public-facing website (tax.virginia.gov). In total, Virginia Tax has addressed over 860,000 items across approximately 950 pages on the agency's public-facing website, representing 33 accessibility issues.
- ▶ Updated the agency's brand color palette and logo to meet accessibility requirements.
- ▶ Updated 59 fillable PDF forms and instructions that were previously non-compliant.
- ▶ Published compliant Taxable Year 2026 forms and instructions on the agency's [Early Release Forms](#) webpage.

- ▶ Redesigned agencywide internal training and external-facing educational resources to meet digital accessibility standards.
- ▶ Worked with the internal Procurement team to ensure compliance with contractual requirements.
- ▶ Rolled out a new Online Services platform for business taxpayers that meets digital accessibility requirements.
- ▶ Created a process for using the agency's Taxpayer Rights Advocate office to manage incoming digital accessibility requests.
- ▶ Created accessible Word and PowerPoint templates for employees to use when producing new documents that will be posted on digital platforms.

The agency working group meets weekly to track progress toward remedying outstanding accessibility issues across the agency's internal and external digital platforms.

Inventory of Nonconforming ICTs

The table below summarizes the areas of nonconformance across Virginia Tax's internal and external digital channels as it relates to the digital accessibility standards defined and described in [HB2541](#). Virginia Tax is prioritizing web resources that have the highest taxpayer impact. If there is an accommodation request for a non-compliant PDF, the agency will prioritize that resource.

Nonconforming ICT Category	Notes / Description	Number of Nonconforming Items
Fillable PDF Tax Forms and Instructions for Prior Year Income Taxes, Nonannual Business Taxes, and Miscellaneous Taxes	Public-facing documents that are accessed less frequently than current year annual tax forms and instructions. This category includes: 1) Prior Year Fillable PDF Forms and Instructions for Taxable Years 2023-2025 (348 nonconforming documents) 2) Nonannual Business and Miscellaneous Tax Forms and Instructions (148 nonconforming documents)	496
PDF Documents on Older Tax Agency Rules and Procedures (TARP) Website (https://www.tax.virginia.gov/tarp/locality)	PDF Procedures, Forms, and User Guides for Localities/Set-off Agencies. Most of these documents will be migrated to a new SharePoint hub and will meet accessibility requirements.	Approximately 75
PDF Documents on SharePoint Online Site for Employees*	Nonconforming PDF documents for employee use on SharePoint Online. The PDF templates have been updated to be accessible. PDFs will use these new templates as content revisions occur.	819 on employee intranet

Nonconforming ICT Category	Notes / Description	Number of Nonconforming Items
	*This estimate reflects agency-wide policies, procedures, forms, and help documents in widely accessed digital repositories.	
PDF Documents on SharePoint Online Site for Localities	Nonconforming PDF documents for locality use on the Localities SharePoint hub. The PDF templates have been updated to be accessible. PDFs will use these new templates as content revisions occur.	169 on Localities hub
Agency Website (tax.virginia.gov)	The agency is working through approximately 9 outstanding accessibility issues on the Virginia Tax website identified by a SiteImprove scan. Of these, 6 will require developer assistance.	238 pages (9 global issues that impact those pages)
Web Applications	The agency is continuing to prepare and analyze public-facing web applications using the SiteImprove tool to identify accessibility issues; these issues require developer assistance to correct. The agency is also continuing to prepare internal-facing applications for SiteImprove analysis. For most of these applications, these preparation steps require developer hours to convert dynamic, authenticated application pages to static versions that can be accessed by SiteImprove.	14 public-facing web applications totaling 842 pages; 45 unique issues identified to date. 9 internal web applications totaling 167 pages; SiteImprove analysis has not yet been conducted.
Office-specific Internal Training Modules	Internal training on processes and procedures developed by specific offices within the agency.	Approximately 15

Fiscal Impact Summary

Two new salaried positions and one contractor position are needed to support web content development and quality management activities so that accessibility requirements can be met for current nonconforming ICT and maintained in the annual updates related to tax forms as well as other legislative mandates requiring ICT changes. The estimated annual cost for the two full-time positions is \$216,000, including salaries and benefits; the estimated one-time cost for the contractor position is \$200,000.