

# Virginia Department of Accounts Annual Report on Digital Accessibility

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*For the reporting period ending October 1, 2026*

## Overview

This report intends to fulfill the annual requirement set forth in the Information Technology Access Act, requiring executive branch agencies to disclose nonconformant information and communications technology (ICT) and provide an estimate on the fiscal impact involved in bringing such technology into compliance.

The Information Technology Access Act defines accessibility by reference to federal Section 508 standards, Section 255 guidelines, and 28 C.F.R. § 35.200. The testing requirements to determine conformance, as established by 28 C.F.R. § 35.200, are found within the Web Content Accessibility Guidelines (WCAG) 2.1 standard, with Level AA compliance being established as the success criteria.

## Progress

Since spring of 2023, the Virginia Department of Accounts (DOA) has participated in VITA's Web Modernization program, an initiative established with the goal of improving digital accessibility for applications and content across the Commonwealth. Using the VITA supplied Siteimprove tool, DOA developers have made considerable improvements in accessibility for agency applications and websites. In May of 2026, the agency adopted an additional tool to evaluate the conformity of PDFs published to our public websites.

These automated tools can validate compliance for the majority of WCAG 2.1 Level AA controls. However, full compliance with WCAG 2.1 Level AA standards requires human evaluation to determine if a website, system, or file is fully accessible. Due to agency staffing constraints, a comprehensive evaluation of DOA ICT has not yet been performed.

To address the staffing deficiency, the agency is actively recruiting a Digital Content Specialist. This role will be designated as the Digital Accessibility Coordinator and will be charged with establishing a digital accessibility program for the agency under the oversight of agency leadership. As the digital accessibility program matures, and more nonconforming ICT is discovered, additional staffing and tooling funding may be required.

While DOA will continue to make progress towards full compliance, the total number of nonconforming ICT will likely rise in future years as discovery activities increase in scope and depth.

## Inventory of Nonconforming ICTs

The table below summarizes the areas of nonconformance for DOA's ICTs.

No exceptions for nonconforming ICTs have been identified at the time of this publication.

| Nonconforming ICT Category      | Description                                                                                                              | Findings of Nonconforming ICT Items                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DOA Public Website</b>       | This category includes the DOA public website and the files hosted on it.                                                | <p>Discovery performed.</p> <p>Siteimprove accessibility score of 96.1.</p> <p>We anticipate that some of the items identified may qualify for exceptions upon further review.</p> <p>Items</p> <ul style="list-style-type: none"> <li>- 60 pages</li> <li>- 949 PDFs</li> <li>- 375 Word files</li> <li>- 155 Excel files</li> <li>- 2 PowerPoint files</li> </ul> |
| <b>Cardinal Project Website</b> | This category includes the Cardinal project public website and the files hosted on it.                                   | <p>Discovery performed.</p> <p>Siteimprove accessibility score of 83.4.</p> <p>Items</p> <ul style="list-style-type: none"> <li>- 87 pages</li> <li>- 245 PDFs</li> </ul>                                                                                                                                                                                           |
| <b>Cardinal FIN/HCM</b>         | Cardinal is the Commonwealth's enterprise Financials and Human Capital Management system that runs on Oracle PeopleSoft. | <p>Limited discovery performed.</p> <p>Credentialed scans with Siteimprove have not been completed.</p> <p>Oracle provides accessibility certifications for our PeopleSoft modules, but testing of our implementation and customizations has not been performed.</p>                                                                                                |

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|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DOA Public Applications (ColdFusion*)</b>      | <p>These are public facing web applications supporting non-Cardinal business functions. The users of these applications include may vendors, universities, localities, and other state government organizations, but not citizens. These applications run on Adobe's ColdFusion platform.</p> <p>There are 16 applications in this category.</p> | <p>Limited discovery performed.</p> <p>Credentialed scans with Siteimprove have not been completed.</p> <p>DOA staff integrate WCAG 2.1 Level AA standards in the software development lifecycle, but formal accessibility certification has not been performed.</p> |
| <b>DOA Public Applications (Microsoft .NET)</b>   | <p>These are public facing web applications supporting non-Cardinal business functions. The users of these applications may include vendors, universities, localities, and other state government organizations, but not citizens. These applications run on Microsoft's .NET platform.</p> <p>There is one application in this category.</p>    | <p>Limited discovery performed.</p> <p>Credentialed scans with Siteimprove have not been completed.</p> <p>DOA staff integrate WCAG 2.1 Level AA standards in the software development lifecycle, but formal accessibility certification has not been performed.</p> |
| <b>DOA Internal Applications (ColdFusion*)</b>    | <p>These are DOA-only web applications supporting non-Cardinal business functions. These applications run on Adobe's ColdFusion platform.</p> <p>There are 11 applications in this category.</p>                                                                                                                                                 | <p>Limited discovery performed.</p> <p>Credentialed scans with Siteimprove have not been completed.</p> <p>DOA staff integrate WCAG 2.1 Level AA standards in the software development lifecycle, but formal accessibility certification has not been performed.</p> |
| <b>DOA Internal Applications (Microsoft .NET)</b> | <p>This category covers only one IT work tracking system running on the Microsoft .NET platform.</p>                                                                                                                                                                                                                                             | <p>Discovery not performed.</p>                                                                                                                                                                                                                                      |
| <b>SharePoint (Website)</b>                       | <p>This category includes the VITA provisioned SharePoint website and not the files hosted on it.</p>                                                                                                                                                                                                                                            | <p>Discovery not performed.</p>                                                                                                                                                                                                                                      |
| <b>SharePoint (Files)</b>                         | <p>This category distinguishes the files hosted on SharePoint from the rest of the platform.</p>                                                                                                                                                                                                                                                 | <p>Discovery not performed.</p>                                                                                                                                                                                                                                      |

\* DOA's ColdFusion applications are being migrated to Microsoft .NET with a conversion goal of May 2028. WCAG 2.1 Level AA compliance will be addressed during the conversion process for these applications. Nonconforming items found in ColdFusion applications will not be remediated unless an accessibility concern is reported by an impacted person.

### **Fiscal Impact**

A fiscal impact estimate cannot be determined at this time. As DOA's digital accessibility program matures, and more in-depth analysis is performed of DOA ICT, funding estimates for tooling and staffing will be identified and reported.