

Virginia Commonwealth's Attorneys' Services Council

Annual Report on Digital Accessibility

For the reporting period ending October 1, 2026

Overview

This report is submitted by CASC pursuant to the annual requirement that executive branch agencies required to report to the General Assembly pursuant to the provisions of § 2.2-3504 of the Code of Virginia, the Information Technology Access Act. This act requires 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 § 508 standards, § 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.

Introduction

Commonwealth's Attorneys' Services Council

The Commonwealth's Attorneys' Services Council (CASC) is the Virginia state agency responsible for providing training, education and services for Virginia's prosecutors. The 120 elected Commonwealth's Attorneys and their Assistants statewide depend upon CASC sponsored training programs to meet their annual mandatory continuing legal education requirements (MCLE) as established by the Virginia State Bar.

CASC provides over 30 training programs per year. Additionally, CASC provides to all prosecutors across the state access to briefs, legal memoranda, court forms, training outlines, information about expert witnesses, and weekly updates from the Virginia Court of Appeals, Virginia Supreme Court, Fourth Circuit Court of Appeals and the U.S. Supreme Court. CASC also provides legislative and appellate updates for both prosecutors and law enforcement statewide, including to DCJS for statewide use by law enforcement training academies.

CASC's governing council is comprised of six officers and sixteen Commonwealth's Attorneys representing each of Virginia's congressional districts. CASC staff includes a director, four full-time staff attorneys, two part-time program specialists and a fiscal director. The Council offices are located at the Marshall-Wythe School of Law at the

College of William & Mary in Williamsburg, Virginia. CASC is part of the Public Safety Secretariat of the Executive Branch.

Commonwealth's Attorneys' Services Council Website

The only CASC IT asset that falls within the scope of this mandate is CASC's website, www.cas.state.va.us. Since spring of 2023, CASC 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, CASC's contractor, Sitevision, and its developers have made considerable improvements in accessibility for CASC's website, www.cas.state.va.us.

CASC's website, <https://www.cas.state.va.us/>, is primarily designed as a tool for Virginia's prosecutors to access information about upcoming training events and meetings that involve CASC and Virginia prosecutors. It has almost no resources designed for or targeting the general public, as CASC is not an agency that provides services to the general public. CASC's website consists of its homepage, internal pages, training calendars, attorney search, employment listings, and linked documents.

The relevant WCAG requirements include:

- 1.3.1: Information and Relationships
- 2.1.1: Keyboard
- 2.4.3: Focus Order
- 3.3.2: Labels or Instructions
- 4.1.2: Name, Role, Value
- 4.1.3: Status Messages

CASC does not have any nonconforming ICTs that it has identified at the time of this publication.

CASC has conducted an internal WCAG assessment, examining HTML and accessibility semantics, along with testing of keyboard navigation, screen-reader behavior, color contrast, and interactive controls. In particular, CASC examined the following below resources; these pages represent several major website functions. They are not necessarily an exhaustive inventory of every URL on the site, but each entry contains a description of the page, the actual website, and the basic issues relevant to this inquiry that CASC examined:

Homepage <https://www.cas.state.va.us/>: Link descriptions, heading structure, images, navigation

The homepage contains three prominent sections:

- Training & Events
- Attorney Locator
- Employment

Under WCAG 2.4.4, if each link's context is correctly associated with its corresponding heading, it satisfies the requirement. The [Employment](<https://www.cas.state.va.us/employment/>) page contains a jurisdiction map with an instruction to click to enlarge it. The applicable requirement is: WCAG 1.1.1 — Non-text Content, Level A. If the map conveys meaningful information, users who cannot see it must have an accessible way to obtain the equivalent information. This page contains meaningful alternative text and a text-based jurisdiction directory. Ultimately, however, the map is purely decorative and all relevant information is already available in accessible text.

Training and events <https://www.cas.state.va.us/events/>: Search controls, date navigation, keyboard accessibility.

AND

Monthly calendar | <https://www.cas.state.va.us/events/month/>: Calendar semantics, screen-reader navigation, event information.

AND

Daily calendar <https://www.cas.state.va.us/events/today/>: Date controls, status announcements, focus behavior.

AND

Individual training announcements (*Various pages*): Heading structure, registration links.

The site implements alternative calendar views so that users can choose List, Month, and Day views, and provides more usable ways to access training schedules. CASC's site implements written event descriptions, so that individual training announcements generally include dates, locations, and explanatory text in a text-based format.

The monthly view contains a large calendar grid with multiple events, date links, repeated event summaries, and navigation controls. The daily and list views provide alternative presentations in text format as well. This is one of the website's more complicated interactive components. The principal requirements that apply here are WCAG 1.3.1 (Info and Relationships), 2.1.1 (Keyboard), 2.4.3 (Focus Order), 2.4.7 (Focus Visible), 1.4.10 (Reflow), and 4.1.2 (Name, Role, Value). In particular, someone using a keyboard or screen reader is able to locate a date, determine which events occur on that date, open an event, and return to the site without encountering a barrier. The calendar view is a convenience feature, but it is not necessary to access the data.

Attorney directory <https://www.cas.state.va.us/attorney-search/>: Form labels, results announcements, hidden dialog controls.

The [Attorney Search](<https://www.cas.state.va.us/attorney-search/>) page allows users to search by county, independent city, first name, and last name. Its retrieved content shows descriptive text adjacent to each input.

Employment opportunities: <https://www.cas.state.va.us/employment/>: Navigation, map alternatives, document accessibility.

The employment form was created in October 2024 and posted in December 2024. Consequently, it satisfies the initial timing requirement for a preexisting conventional electronic document, because it predates the compliance deadline. This form is a document that may only be used by pre-approved employees of Virginia Commonwealth's Attorneys' offices, and is not a form designed for use by the general public.

General Features Implemented by CASC

CASC's website has several accessibility features installed, many of which CASC added during the 2023 improvement project. The pages include a "skip to content" link, which supports WCAG 2.4.1, Bypass Blocks. The site has descriptive page headings, for example, the pages such as Attorney Search and Employment have identifiable page titles, which helps users understand page purpose. Lastly, the site implements text-based search controls. For example, the attorney locator presents fields for county, city, and attorney names, which provides a potentially accessible alternative to navigating a map.

Funding Compliance

§ 2.2-3504 also directs CASC to provide an estimate on the fiscal impact involved in bringing such technology into compliance with federal and state laws and regulations.

CASC has done its best to comply with this investigation and the statutory requirements of the Digital Accessibility Act, but it should be noted that CASC only has 6 full-time employees and lacks any full-time administrative staff. CASC has requested funding for a full-time Program Specialist/Administrative Assistant for several years, but the General Assembly has denied that request each time CASC has made the request.

The lack of a full time administrative staff member at CASC has made daily operations increasingly difficult since the General Assembly cut that position in 2010. The number of training programs conducted by CASC has increased substantially since the 2010-2012 mandatory budget cuts, from a dozen or fewer trainings to now over thirty trainings per year, along with multiple webinars and other resource trainings. In the past twenty years, the number of prosecutors in Virginia has more than doubled. Since the 2010–2012 mandatory budget reductions, CASC’s training volume and operational complexity have increased substantially, but administrative capacity has not.

CASC needs additional administrative assistance to meet the demands of the increased workload, including this digital accessibility project. Currently, CASC’s website is maintained by a part-time administrative assistant whose duties also include a significant portion of CASC’s other administrative duties. Without dedicated administrative support, CASC faces an elevated risk of noncompliance. Many processes are time-sensitive and documentation-heavy. Delays or errors create avoidable audit exposure, payment issues with vendors, contracting problems, and disruptions to training delivery.

In addition, CASC is facing an impending retirement of its fiscal director in the next 24-48 months. CASC’s fiscal director has the institutional knowledge of decades of service to CASC, which CASC will lose very soon. Without a full-time administrative assistant to work alongside CASC’s fiscal director for the coming two years, CASC will lose that institutional knowledge, and its mission will be severely damaged in the future.

The shortage of administrative employees in the agency has resulted in the agency head and staff attorneys being unable to deliver legal work and instead being responsible for administrative and IT duties, such as this inquiry, that are not consistent with their job descriptions, education and skill level. Staff attorneys and the agency head are currently handling tasks such as travel voucher processing, website maintenance, basic data entry, answering the main office phone line, and serving as de facto IT support. In short, CASC is

paying professional-level salaries for clerical and technical work because there is no funded administrative position to perform it.

Restoring one full-time administrative assistant would permit CASC to complete its review of its compliance with the Digital Accessibility Act and is a cost-effective, risk-reducing solution that protects compliance, improves operational continuity, and returns attorneys and leadership to mission-critical work.

Conclusion

CASC is always looking for ways to improve how it delivers services to Virginia's 120 prosecutor offices throughout the Commonwealth. CASC welcomed the assistance that VITA offered in 2023 as part of its website modernization, and is thankful to its state-contracted partner, Sitevision, for implementing that modernization. CASC will continue to work to modernize its site for digital accessibility in the future.

Respectfully Submitted

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