

Office of Children's Services

Digital Accessibility Annual Report

October 1, 2026

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. The Office of Children's Services (OCS) has reviewed, scanned, and analyzed the accessibility of its ICTs and the exceptions provided in federal and state law to complete the initial assessment. OCS identified two ICTs that do not meet accessibility requirements, one of which qualifies for an exception. The estimated fiscal impact to remediate the remaining non-compliant ICTs into conformance is \$125,000. OCS plans to integrate remediation efforts by contracting with a private provider and using funds from an accessibility grant administered by the Virginia Department of Social Services (VDSS).

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.” OCS identified eleven (11) ICTs in use.

Non-Compliant ICTs

OCS scanned and reviewed its ICTs and determined the following are non-compliant: the Child and Adolescent Needs and Strengths Online Assessment (CANVaS) and 19 training modules in the Commonwealth of Virginia Learning Center.

Exceptions

OCS performed additional analysis to determine whether any of the two 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 and CANVaS was determined to meet such exceptions.

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

CANVaS is a legacy ICT as defined in 36 C.F.R. Part 1194, Appendix A, § E 202.2 that was initially implemented in 2009 and expanded and modified over the past 17 years, although the core code remains the same. Currently, the CANVaS system is not considered to be public-facing content, as it is a portal where CSA case managers complete the Child and Adolescent Needs and Strengths Assessment (CANS), which is an assessment required by the Code of Virginia and the policies of the State Executive Council on Children’s Services (SEC) to access child-specific CSA funding for services. Ensuring CANVaS conformance to accessibility would impose an undue burden on OCS. The effort would require substantial planning and development, funding, and potentially policy changes.

Non-Exempt Remediation Effort and Costs

OCS' 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 19 of the agency's training modules on the Commonwealth of Virginia's Learning Center do not meet the criteria for General Exceptions as listed in §E202.

OCS estimates the time and costs to remediate each of the non-compliant trainings into conformance as required are:

Course #	Course Name	Time	Cost
CSA 11	CSA for New LDSS Staff – Big Picture (Module 1)	20 hours	\$7,500
CSA 12	CSA for New LDSS Staff – FAPT Functions (Module 2)	20 hours	\$7,500
CSA 13	CSA for New LDSS Staff – Eligibility for CSA (Module 3)	20 hours	\$7,500
CSA 14	CSA for New LDSS Staff – Accessing Funding (Module 4)	20 hours	\$7,500
CSA 15	CSA for New LDSS Staff – Miscellaneous Topics (Module 5)	20 hours	\$7,500
CSA 16	Case Manager Training for Non-DSS Case Managers	10 hours	\$3,250
CSA 17	CSA Basics for FAPT Members	7 hours	\$3,000
CSA 20	Special Education Wraparound Funding Under the CSA	15 hours	\$5,250
CSA 31	CPMT Training – Big Picture (Module 1)	15 hours	\$5,250
CSA 32	CPMT Training – CPMT & FAPT Roles & Responsibilities (Module 2)	15 hours	\$5,250
CSA 33	CPMT Training – Funding and Eligibility (Module 3)	15 hours	\$5,250
CSA 34	CPMT Training – Can CSA Pay? (Module 4)	15 hours	\$5,250
CSA 35	CPMT Training – Utilization Review (Module 5)	15 hours	\$5,250
CSA 36	CPMT Training – Audit	25 hours	\$9,250
CSA 40	CSA Fiscal Overview	25 hours	\$9,250
CSA 41	CSA Continuous Quality Improvement	25 hours	\$9,250
CSA 43	CSA Parental Agreements	20 hours	\$7,500
CSA 44	CSA FAPT and CPMT Parent Representative Training	25 hours	\$9,250
CSA 50	CSA Information Technology Security Course	15 hours	\$5,250
Total:		342 hours	\$125,000

OCS plans to remediate the non-compliant trainings through a contracted provider funded through accessibility grant funds administered by VDSS. OCS intends to have this work completed by June 30, 2027, assuming prompt approval of the grant application.