



COMMONWEALTH of VIRGINIA

Department of Corrections

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October 1, 2026

The Honorable Susan Clarke Schaar
Clerk of the Senate of Virginia
1000 Bank Street
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Clerk of the Virginia House of Delegates
1000 Bank Street
Richmond, Virginia 23219

TO THE GENERAL ASSEMBLY OF VIRGINIA:

Pursuant to Chapter § 2.2-3504 of the Code of Virginia, please see the enclosed report regarding information and communications technology that do not conform with accessibility and is not included in the exceptions found in 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202.

Please do not hesitate to contact me if I can be of any assistance as you review this information.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Walters", with a stylized flourish extending to the right.

Joseph W. Walters
Director

**Annual Report Regarding Information and Communications Technology That Do Not
Conform with Accessibility Pursuant to § 2.2-3504 of the Code of Virginia**



**Department of Corrections
Director Joseph W. Walters
October 1, 2026**

Preface

The Virginia Department of Corrections (the Department) is committed to creating an inclusive digital environment where everyone – employees, incarcerated individuals, victims, volunteers, and the public – can access information and services without barriers. Digital accessibility is both a legal requirement and an essential part of ensuring public safety, operational efficiency, and equitable access.

This annual report summarizes the Department's progress in improving accessibility across websites, internal systems, documents, multimedia, and daily communications. It outlines key challenges, areas for improvement, and ongoing modernization efforts for systems not originally built with accessibility in mind. The report also highlights cross-division collaboration – including information technology (IT), communications, procurement, and training – as the agency works toward compliance with Section 508 of the Information Technology Access Act and the internationally recognized Web Content Accessibility Guidelines.

Pursuant to § 2.2-3504 of the Code of Virginia, evaluating these complex digital infrastructures requires highly technical analysis and specialized IT terminology. By publishing this report, the Department demonstrates its transparency, shared accountability, and informed decision-making. It serves as both a record of progress and a roadmap for continued advancement.

Purpose

The purpose of this report is to fulfill the annual reporting requirements of § 2.2-3504 of the Code of Virginia by disclosing the current state of compliance within the Department's Information and Communications Technology (ICT) environment. Pursuant to the Virginia Information Technology Access Act (ITAA), this document identifies specific non-conforming digital assets including public websites, internal operational systems, legacy applications, and electronic communications. This report also outlines the definitive remediation steps required to achieve full alignment with state and federal accessibility standards. By detailing these known technological barriers, the report provides the General Assembly with a transparent assessment of the Department's operational vulnerabilities and associated compliance risks.

Further, this report provides a strategic, multi-year framework designed to systematically mitigate these non-conformance issues through targeted procurement protocols, rigorous system testing, and modernized governance. By documenting both institutional milestones and systemic deficiencies, this report serves as an analytical foundation for informed legislative decision-making, policy development, and future resource allocation. Ultimately, it establishes a measurable roadmap for transforming the Department's digital infrastructure into a legally compliant, fiscally accountable, and universally accessible environment.

Executive Summary

The Virginia Department of Corrections (the Department) is actively and systematically upgrading its Information and Communications Technology (ICT) infrastructure to ensure universal access for employees, incarcerated populations, victims, and the general public. This comprehensive modernization effort is driven by the mandate to achieve and maintain full compliance with state and federal legal standards, notably Title II of the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and the Virginia Information Technology Access Act (ITAA).

To satisfy both state and federal regulatory frameworks, the Department measures its digital asset compliance against the Web Content Accessibility Guidelines (WCAG) Level AA. In alignment with policies set by the Virginia Information Technologies Agency (VITA), these standards require all public-facing platforms, internal agency databases, digital workflows, and multimedia assets to be fully compatible with assistive technologies – such as screen readers and refreshable braille displays. Pursuant to state procurement rules, the Department continues to integrate strict accessibility conformance requirements into all new vendor contracts and third-party software acquisitions.

This report provides the General Assembly with a transparent evaluation of the Department's current compliance posture. It outlines the specific technical challenges associated with remediating legacy systems, details the strategic cross-division workflows established to mitigate legal and operational risks, and presents a structured roadmap for future resource allocation to ensure a universally accessible and legally compliant digital environment.

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Background

The Virginia Department of Corrections manages one of the largest and most operationally complex digital infrastructure ecosystems within the Commonwealth. The Department's Information and Communications Technology (ICT) portfolio encompasses not only public-facing web platforms and standard administrative databases, but also specialized, high-security offender management platforms, institutional facility networks, and vast repositories of enterprise cloud data. Over decades of operational growth, this digital environment has evolved into a highly complex matrix of modern commercial software, bespoke public safety applications, and deeply entrenched legacy systems that were engineered long before modern digital accessibility standards were established.

As the delivery of public services and correctional management has shifted to digital-first models, the operational imperative for comprehensive accessibility has accelerated. Federal and state mandates now require public entities to guarantee that all electronic interfaces and communications are fully navigable by individuals utilizing assistive technologies. For the Department, this regulatory field applies universally across all platforms, regardless of whether they are accessed by internal staff, external stakeholders, or incarcerated populations.

Over the past year, the Department transitioned from introductory assessment to active remediation by deploying automated accessibility monitoring tools, establishing formalized correction workflows, and initiating systemic document stabilization protocols. However, the agency continues to confront acute, long-term technical challenges. These include legacy architectures that are fundamentally incompatible with assistive software, vast archives of un-indexed scanned documents that lack essential metadata structures, and specialized administrative dashboards requiring complex interface overhauls. Managing these historical technology constraints while maintaining uninterrupted daily operations makes the modernization of the Department's ICT environment an ongoing, critical capital and operational priority.

Accessibility Report

Strengths of Current Accessibility

The Virginia Department of Corrections has made significant progress in making its digital systems easier for everyone to use, including people with disabilities. The Information Technology team has created simple training materials and is rolling out accessibility training for staff through our Learning Management System.

A major, recent improvement was replacing the Department's old, hard-to-use Virtual Library with a new Procedures site designed from the ground up to be user-friendly for people of all abilities. The Department is also updating all PDFs and forms to meet accessibility standards and building new internal applications that prioritize ease of use from the start.

The Board of Local and Regional Jails will launch a new, fully accessible website in 2027. The Department has added an accessibility barrier reporting form to the website and are planning new accessible websites for both the Department and the Virginia Parole Board. These efforts demonstrate the priority that accessibility be part of the agency's everyday culture.

This year, the Department will also modernize the "Intranet" – the agency's internal staff resource page – to ensure accessibility requirements. Once updated, it will be continuously checked by a tool to help maintain accessibility and address unforeseen issues.

Even with this progress, the Department still faces challenges, especially with older systems and content. While the agency works to repair outdated materials, improvements to policies, staff training, purchasing standards, and testing processes are being implemented to ensure long-term accessibility.

Much of the Department's work relies on well-known commercial software. These products come with documents called Voluntary Product Accessibility Templates (VPATs), which explain how well each tool meets accessibility standards. Although most of these programs include accessibility features, actual results depend on how the tools are configured and how staff create content.

The Department also uses large enterprise systems that sometimes require direct VPAT requests from vendors to verify accessibility. The greatest challenges occur in custom-built and older corrections systems which lack publicly available accessibility documentation and do not meet current standards. These older interfaces often present difficulties for screen reader users and those who rely on keyboard navigation.

Document accessibility remains an ongoing area of improvement. All active PDFs and forms must meet accessibility standards, and updates are progressing steadily. Older files produced by legacy systems often require manual remediation. Archiving rules help manage this workload by limiting required updates to materials that are still in use or formally requested. Operating Procedures and Forms, whether internal or public, must always remain compliant and continue to improve over time.

Email communication is another area with room for advancement. Some emails still include attachments or images that are not accessible. To address this, the Department plans to

expand staff training and transition to an enterprise email system that offers accessible templates and automated quality checks. Accessibility in standard Outlook communications – the Department’s current email system – will also improve through structured remediation efforts supported by training and resources.

Across all initiatives, the Department’s progress reflects a strong commitment to building digital tools that work effectively for everyone. With continued updates to all aspects of our information technology areas, the agency is moving toward a more inclusive and user-friendly digital environment. Ongoing collaboration, training, and thoughtful planning will further strengthen accessibility across all systems and services.

Challenges to Accessibility

The agency continues to discover accessibility barriers within its older electronic files, systems, and digital materials that were created using outdated technology, formats, or standards. Examples of this include older PDF documents that remain untagged and some memorandums that exist only as scanned images, offering no readable text. Across various materials, alternative text is frequently missing, heading structures are inconsistent, and tables are often created in ways that make them inaccessible to assistive technologies. Several documents suffer from poor color contrast and lack proper language settings, which can hinder comprehension for screen-reader users. In some cases, the reading order is incorrect, causing information to be conveyed out of sequence. Additionally, videos produced in previous years do not include captions or transcripts, and many documents were published without undergoing any accessibility validation. These issues collectively highlight the need for ongoing remediation and improved practices in future content creation.

Accessibility Improvement Strategy

Given the size and complexity of the Department’s digital environment, accessibility remediation will be conducted through a phased, risk-based approach. The work will begin with public-facing websites, then move to public-facing applications, followed by public-facing documents and downloadable forms.

After these steps, the focus will shift to high-use digital services that support both external and internal interactions. Once those areas have been addressed, attention will turn to internal employee applications. The final phase of remediation will concentrate on materials created using outdated, inaccessible technology such as internal documents and archived materials.

This structured progression ensures that the highest-impact public resources are improved first, while building a sustainable, long-term accessibility program that reaches all digital assets over time.

Accessibility cannot be validated through automated testing alone. The Department will implement a comprehensive testing strategy combining automated scanning with manual evaluation to ensure digital content is usable by individuals with disabilities.

Automated Testing

Automated testing should be incorporated into routine quality assurance processes using approved accessibility evaluation tools to identify common issues such as missing alternative text, color contrast deficiencies, heading structure errors, missing document tags, form labeling issues, broken accessibility metadata, and keyboard navigation issues detectable through automated analysis.

By integrating these tools into regular workflows, the Department can efficiently uncover many of the most common accessibility defects that might otherwise go unnoticed. However, while automated testing provides valuable speed and consistency, it does not identify every usability issue, making it an important but not standalone component of a comprehensive accessibility strategy.

Website Accessibility Monitoring

The Department uses a tool called Siteimprove to help keep its websites accessible to all who use them. Siteimprove regularly checks all four of the Department's public websites: the Virginia Department of Corrections, the Virginia Parole Board, the Board of Local and Regional Jails, and Virginia Correctional Enterprises.

This tool automatically looks for common problems such as broken links, hard-to-read text, spelling mistakes, and issues that make the websites difficult for people with disabilities to use. It also reviews PDFs to make sure they meet federal accessibility requirements.

When Siteimprove finds issues, the Department's technology staff review the issues and prioritize what needs to be fixed. These automatic checks help the Department find many problems, but the Department cannot rely on an automated tool alone. As a result, trained staff conduct hands-on reviews.

To make it easier for the public to report accessibility issues, the Department created an Accessibility Barrier Reporting Form on its website. This provides users with a way to report any accessibility issues they encounter – such as difficulties navigating a webpage or accessing a document. Once a report is submitted, the Digital Experience and Engagement Unit reviews the concern and takes appropriate action to resolve it.

Manual Accessibility Testing

Manual testing is an important step in ensuring digital content can be used by everyone, including people who rely on assistive tools such as screen readers or keyboard-only navigation. Unlike automated testing, manual testing allows reviewers to interact with the content directly to confirm that it works smoothly in real-world use.

During a manual review, Department staff checks whether all parts of a page can be reached and used with just a keyboard, whether the information appears in a clear and logical order, and whether visual cues are easy to see. They also ensure forms can be completed without difficulty, tables present information clearly, links explain their purpose, and pages adjust properly when text is enlarged or viewed on different screen sizes. Reviewers also confirm that the language used is plain, clear, and easy to understand.

Screen reader testing is another key part of this process. Testers check that the screen reader

reads information in the correct order, allows users to move through headings and page sections easily, announces tables clearly, describes form fields accurately, and provides meaningful descriptions for images, links, lists, and interactive features.

In addition, testers verify that error messages and alerts are easy to find, understand, and respond to. This includes websites, PDFs, Microsoft Office documents, online forms, training materials, and any public communication.

All accessibility testing must be completed before anything is posted on the Department's public websites. Regular follow-up reviews are also necessary to maintain accessibility over time and ensure that all users continue to have an easy and inclusive experience.

Vendor Accessibility Requirements

The Department requires all vendors to provide accessibility information when submitting digital products or services for purchase. This helps identify and reduce potential accessibility problems before the technology reaches staff or the public.

As part of this process, software vendors must provide a current Voluntary Product Accessibility Template (VPAT) or Accessibility Conformance Report (ACR). These documents explain how well their products meet established accessibility standards, including WCAG 2.1 Level AA and Section 508. When available, vendors should include results from independent accessibility testing to give an additional level of assurance. Vendors are also asked to share their plans for addressing any known accessibility gaps and to provide contact information for staff who can assist with accessibility-related questions or support.

By requiring accessibility documentation as a routine part of procurement, the Department reinforces its commitment to selecting digital tools that are usable, inclusive, and compliant with legal and regulatory requirements.

Website Modernization Strategy

The websites for the Virginia Department of Corrections, the Virginia Parole Board, and the Board of Local and Regional Jails are scheduled to be redesigned and updated within the next year. Accessibility will be built into every stage of this work, from planning and design through development, testing, and final launch.

As these websites are modernized, the Department will prioritize an accessibility-first approach, ensuring compliance with WCAG 2.1 AA standards. The updated sites will also feature improved navigation, be fully usable on mobile devices, use plain and easy-to-understand language, and include accessible videos and other multimedia content.

Internal Application Accessibility Initiative

The Department will review the accessibility of its internal applications. These reviews will include the tools employees use every day, including internal web applications, workflow systems, business software, digital forms, dashboards, and shared document libraries.

Future SharePoint Migration

The Department plans to move its current internal employee resource page to Microsoft SharePoint. This transition will significantly improve accessibility for employees by using SharePoint's modern accessibility tools, standardized templates, and strong content management features. After the migration, the Department also intends to expand its use of Siteimprove to include the new SharePoint environment. This will allow automated accessibility monitoring for internal content in addition to public websites.

The expected benefits of this migration include stronger accessibility compliance, consistent page templates, more accessible document libraries, improved oversight, easier content updates, and better support for assistive technologies.

Planned Enhancements

Email Service Provider

To improve consistency and accessibility of mass communications, the Department will evaluate the implementation of an enterprise email service provider that supports accessible email design and distribution.

Recommended Capabilities

The selected email service provider should support accessible HTML email templates aligned with WCAG 2.1 AA, generate responsive email content for desktop and mobile devices, support semantic headings and accessible structure, support alternative text for images, produce accessible buttons and hyperlinks, generate plain-text versions of email communications, support subscriber management and reporting, and integrate into accessibility quality assurance workflows.

Benefits

An enterprise email service provider would improve consistency across public communications, support accessibility compliance, reduce legal risk, standardize accessible email templates, and improve communication with individuals using assistive technology.

Remediate Scanned Memorandums

The Department will discontinue publishing scanned image-only memorandums and replace them with accessible digital documents in three phases:

Phase One	Phase Two	Phase Three
Inventory all scanned memorandums and prioritize them by business need and public access.	Image-only PDFs will be converted using OCR, documents will be recreated using accessible Word templates where needed and published as tagged PDFs or accessible HTML.	The Department would require accessible templates for all new memorandums, eliminate image-only document publishing, and implement accessibility review before publication.

Accessibility Education Strategy

Creating accessible content at its source is the most effective long-term compliance strategy. The Department will implement required training for the Department's administrative personnel. A comprehensive training site has already been created for use at the Virginia Department of Corrections.

Commonwealth of Virginia Learning Center

The Department will develop a mandatory Digital Accessibility learning module within the Commonwealth of Virginia Learning Center. The course will be required for all employees who create or publish digital content, include interactive demonstrations and practical exercises, cover accessibility requirements and agency standards, include a graded assessment, track course completion, and provide annual recertification. Completion records will be monitored to ensure agency-wide compliance and reinforce accountability.

Personnel Recommendations

The Department would be required to establish several full-time positions to sustain an enterprise accessibility program. There are no full-time positions that could be converted for this purpose; therefore, it would require the establishment and funding of the following positions:

Title	Pay Band	Salary Range	Responsibilities
Digital Accessibility Coordinator	6	\$88,000 – \$98,000	Program management, policy enforcement, and cross-agency coordination
Accessibility Specialist	5	\$72,000 – \$82,000	Support general compliance evaluations, workflow integrations, and accessibility support
Accessibility Training Specialist	4	\$58,000 – \$68,000	Staff curricula, instructional design, and educational material updates
Accessibility Document Remediation Specialists	4	\$52,000 – \$62,000	PDF, form, and archival document conversion and tagging
Accessibility Quality Assurance Tester	4	\$55,000 – \$65,000	Conduct assistive technology testing, software validation, and bug reporting
TOTAL FISCAL IMPACT: \$325,000 – \$375,000			

Fiscal Impacts of Infrastructure

To achieve full digital compliance and ensure our public services are accessible to all community members, the Department will need to procure a suite of specialized accessibility software and platforms. Specifically, the Department requires an enterprise mass-messaging system like GovDelivery Communication Cloud to securely deliver accessible email and text communications to large audiences, which carries an estimated annual cost between \$12,500 and \$50,000 or more depending on our messaging volume.

Additionally, the Department would require several user-based software licenses to execute compliance testing and document updates:

- a. Manual screen-readers – ranging from about \$200 to \$1,200 per seat – to simulate how individuals with visual impairments experience the Department's digital services
- b. Automated code-scanning tools – ranging from free services to \$720 per seat – to efficiently flag ongoing website barriers
- c. Document remediation programs – ranging from \$220 to \$1,000 per seat – to ensure all downloadable PDFs meet legal reading order and color contrast standards

Three-Year Roadmap

Year One

The Department will complete its ICT inventory, establish governance, launch training, hire key accessibility staff, begin manual testing, require VPATs during procurement, and launch an Accessibility Barrier Reporting form for all Department responsible websites.

Year Two

The Department will complete remediation of high-priority content, expand accessibility testing, standardize accessible templates and workflows, and evaluate and implement an accessible email service provider.

Year Three

The Department will aim to achieve sustainable WCAG 2.1 AA compliance across digital assets, conduct annual independent accessibility audits, and transition from reactive remediation to accessibility-by-design.

Success Measures

Success will be demonstrated when 100% of new digital content meets WCAG 2.1 Level AA before publication, 100% of technology procurements include a current VPAT/ACR, and 100% of content creators complete annual accessibility training through the Virginia Learning Center.

Additional measures include the elimination of newly published scanned memorandums, the incorporation of manual accessibility testing into the quality assurance process, and annual accessibility audits that show measurable improvements in compliance and user experience.

Conclusion

Achieving sustained digital accessibility compliance requires an enduring, enterprise-wide strategy that seamlessly integrates statutory governance, specialized staff training, and rigorous procurement oversight. By combining automated monitoring systems with targeted manual testing, the Department is establishing a reliable infrastructure to systematically eliminate technological barriers across its massive digital network.

Maintaining this progress while mitigating the Department's legal and operational exposure fundamentally depends on stable, continued investment. Prioritizing resource allocation for dedicated compliance personnel, standardized technical workflows, and continuous agency education ensures that the Department not only satisfies its current mandates under § 2.2-3504 of the Code of Virginia and federal law, but also builds a resilient digital environment capable of adapting to future technological changes. Ultimately, these efforts safeguard public resources, reinforce institutional transparency, and uphold the Commonwealth's commitment to providing equitable digital access to all citizens.