COMMONWEALTH of VIRGINIA

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Chair Lucas, Chair Torian, Chair Favola, and Chair Rasoul:

Pursuant to § 2.2-3504 of the Code of Virginia (Information Technology Access Act), each executive branch agency submits an annual report to the General Assembly covering all information and communications technology (ICT) that does not conform with accessibility standards and is not excluded under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202.

In addition, the report is also to supply the estimated fiscal impact to bring such nonconforming ICT into compliance with applicable state and federal accessibility laws and regulations. The Virginia Department of Education (VDOE) consolidated state agency information with survey responses from the covered entities under our purview, interpreted for purposes of this report as the 131 public school divisions in the Commonwealth.

If you have any questions or require additional information, please do not hesitate to contact Holly Coy, Chief of Staff, at holly.m.coy@doe.virginia.gov.

Sincerely,

Jenna Conway
Superintendent of Public Instruction

Report on Digital Accessibility Compliance

§ 2.2-3504

November 1, 2026



PREFACE

Pursuant to § 2.2-3504 of the Code of Virginia (Information Technology Access Act), each executive branch agency submits an annual report to the General Assembly covering all information and communications technology (ICT) that does not conform with accessibility standards and is not excluded under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202.

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EXECUTIVE SUMMARY

The Virginia Department of Education (VDOE) prepared this report pursuant to § 2.2-3504 of the Code of Virginia, as amended by HB2541 (2025), which requires executive branch agencies to identify information and communications technology (ICT) that does not meet federal and state accessibility standards and provide annual fiscal impact estimates for bringing those technologies into compliance. These mandates strengthen statewide digital accessibility expectations and expand the responsibilities of covered entities to ensure equitable access for individuals with disabilities.

In response, VDOE has advanced a series of efforts to support VDOE's compliance with the law. The agency delivered targeted training to build foundational knowledge and practical skill sets, including sessions on legal requirements, accessible content creation, and the digital accessibility audit process. VDOE expanded its governance structure by adopting a Digital Accessibility Plan and Policy, establishing a complaint-tracking mechanism, creating a prioritization framework, and developing a comprehensive ICT inventory. The agency's main website continues to show measurable improvement following systematic remediation efforts and ongoing automated and manual testing.

VDOE also completed an internal ICT audit to establish a baseline of accessibility across agency systems. The results show a varied ecosystem, with many tools falling into "Pending Review" or "WCAG Alignment Mostly Achieved" status. Several high-impact platforms—including Virtual Virginia, GovDelivery, and the VDOE website—demonstrate progress but require continued remediation. Systems maintained by external vendors frequently provide Accessibility Conformance Reports or VPATs, though coordinated validation remains necessary. Large internal SharePoint environments house substantial volumes of documents that will require long-term remediation planning.

To understand the broader statewide landscape, VDOE administered a voluntary School Compliance Survey across all local school divisions. The survey revealed significant variation in readiness, fiscal capacity, tooling, and training. Many divisions reported difficulty quantifying noncompliant websites and documents due to decentralized content creation and the lack of accessible auditing tools. Cost estimates ranged widely, with smaller divisions citing modest expenses while larger divisions anticipate substantial remediation costs, including millions of dollars in staff time. Most divisions are in the early stages of training and compliance planning, and nearly all identified funding, statewide training, procurement guidance, auditing tools, and clearer expectations as critical needs. A recurring theme across divisions is that the scope and complexity of compliance represent a substantial unfunded mandate and meeting federal and state deadlines will require coordinated support.

Collectively, these findings highlight both the progress made and the extensive work ahead. VDOE has established foundational governance structures, initiated systemic improvements, and gathered statewide readiness data. Continued progress will rely on sustained remediation, expanded training, vendor coordination, and statewide supports that recognize the scale of the effort required. As implementation continues, the agency remains committed to transparency, accessibility, and partnership with school divisions to fulfill the requirements of the Information Technology Access Act and ensure equitable digital access for all Virginians.

OVERVIEW AND AUTHORITY

The Code of Virginia's Information Technology Access Act (ITAA), as amended by HB 2541 (Chapter 571, 2025 Acts of Assembly), introduces new reporting responsibilities for covered entities regarding digital technologies that fall outside required accessibility standards.

Key statutory source:

- **§ 2.2-3504. Exclusions to digital accessibility**
  "The head of any covered entity or his designee shall report to the appropriate executive branch agency any ICT that does 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. Each executive branch agency shall report annually to the General Assembly on such ICT and provide an estimate on the fiscal impact involved in bringing such technology into compliance with federal and state laws and regulations." [law.lis.virginia.gov]

Authority and Statutory Basis

Under the amended § 2.2-3504, the statute imposes the following mandates:

- **Identification & Reporting** – Covered entities must notify their respective executive branch agency of any information and communications technology (ICT) that fails to meet accessibility standards and is not categorically exempt under referenced federal regulations (28 C.F.R. § 35.201; 36 C.F.R. Part 1194, Appendix A, § E202).

- **Annual Reporting to General Assembly** – Executive branch agencies are required to annually report to the General Assembly on identified nonconforming ICT. Reports must include:

  1. An inventory of nonconforming ICT not covered by federal exceptions.

  2. A fiscal impact estimate to remediate the identified technologies to achieve compliance with state and federal accessibility laws.

These statutory provisions, effective as of July 1, 2025, establish the foundational requirements for this report. They ensure transparency and accountability in identifying accessibility gaps and estimating associated remediation costs—aligning with the Commonwealth's goal of equitable digital access for all Virginians

BACKGROUND & HISTORY

The ITAA has undergone steady refinement since its original enactment in 1999, when the Commonwealth first established basic requirements to ensure that information and communications technology used by government entities was accessible to individuals with disabilities. Subsequent updates in 2001 and again in 2020 expanded the framework and reaffirmed the expectation that state agencies identify digital technologies that do not meet accessibility standards and report those gaps annually to the General Assembly. These earlier versions of the ITAA focused largely on ensuring nonvisual access, particularly for individuals

who rely on assistive technologies such as screen readers or Braille displays. Over time, however, the rapid evolution of digital tools prompted the need for a more comprehensive and modernized approach.

In 2025, the General Assembly enacted HB2541, a significant modernization of the ITAA that updated definitions, expanded coverage, clarified responsibilities, and aligned state requirements with federal accessibility standards. HB2541 revised §§ 2.2-3500 through 2.2-3504 and added § 2.2-3505, greatly broadening the Act's focus to include accessibility for all persons with disabilities rather than centering solely on nonvisual access. The bill's findings language was rewritten to reflect the contemporary landscape of information and communications technology, acknowledging both the necessity of universal access and the long-term cost efficiency of procuring or developing accessible systems from the outset. HB2541 also strengthened procurement expectations by requiring accessibility clauses in ICT contracts and ensuring vendors provide documentation such as accessibility conformance reports and remediation roadmaps when needed. These revisions established clearer expectations for how agencies should evaluate, document, and address accessibility concerns, both in purchased technology and in systems developed internally.

One of the most notable changes introduced through HB2541 was the requirement for each covered entity to designate a digital accessibility coordinator responsible for developing and implementing accessibility policies, publishing contact information for reporting digital barriers, and overseeing procedures to receive and respond to complaints. HB2541 also established phased implementation deadlines to ensure manageable compliance across the Commonwealth. Larger entities and institutions of higher education must meet the updated requirements beginning April 24, 2026, while smaller entities and special districts follow on April 26, 2027. Executive branch agencies were directed to issue guidance by December 1, 2025, to help covered entities prioritize accessibility improvements and align their technology systems with Section 508, Section 255, and ADA standards. Together, these amendments reflect Virginia's ongoing commitment to building a modern digital infrastructure rooted in accessibility, transparency, and equitable participation for all residents.

SUMMARY OF COMPLIANCE AND FINDINGS

As the Commonwealth continues implementing the updated requirements of the Information Technology Access Act, this report provides an overview of how the agency is advancing toward full compliance with Chapter 571 and supporting covered entities in meeting the law's modernized digital accessibility standards.

In preparing this section, the agency gathered information from local school divisions through a statewide survey designed to measure readiness, identify gaps, and capture progress toward the statutory requirements. The results offer an emerging picture of how school divisions are adapting their policies, technology systems, procurement practices, and internal procedures to align with the expectations set forth in HB2541. This summary reflects both the agency's ongoing efforts to support compliance and the collective work of local school divisions as they integrate accessibility into everyday operations and long-term planning.

VDOE Compliance and Findings

Trainings

To support implementation of HB2541 and strengthen agencywide awareness of digital accessibility requirements, the Office of Creative Services delivered a series of targeted trainings designed to build both foundational understanding and practical skills.

The first session introduced staff to the core requirements of the Information Technology Access Act and ADA Title II, ensuring employees understood the legal framework guiding accessibility expectations.

The second training provided hands-on guidance for creating accessible materials, offering a top-ten checklist aligned with WCAG 2.1 Level AA and demonstrating how to apply accessible practices within the Microsoft Office suite and conduct basic PDF remediation in Adobe Acrobat.

The final session focused on the digital accessibility audit process, equipping staff with the methods and tools needed to conduct the ICT audit that informs this report. Resources from all sessions were made available for those who could not participate live, reflecting the agency's commitment to broad and equitable access to training.

VDOE Website

The Office of Creative Services continued advancing digital accessibility across its public web platforms through the implementation of a comprehensive set of policies, procedures, and documentation tools designed to support ongoing compliance with HB2541. Over the past year, the agency formalized several core governance resources, including the VDOE Digital Accessibility Plan, the VDOE Digital Accessibility Policy, a standardized complaint-tracking template, a prioritization plan to guide remediation efforts, documentation processes to record ICT accessibility status, and a complete ICT asset inventory. Together, these resources provide a framework that supports consistent accessibility practices and ensures that staff have clear guidance for both identifying and addressing barriers across the Department's digital ecosystem.

To supplement these policies, VDOE conducted hands-on and manual testing using tools such as Siteimprove, the WAVE toolbar, keyboard-only navigation checks, and NVDA screen reader evaluations. Since adopting the Web Modernization Plan and expanding access to agency Siteimprove accounts, automated testing has played a central role in identifying issues and monitoring progress. The Department's main website score has increased from 76.5 to 87.6 since Siteimprove's launch in 2023, reflecting improvements across Level A, Level AA, WAI-ARIA, and best-practice measures. Notably, the site's AA score rose from 83.7 to 92.2 following systematic updates, including the removal of empty headings, corrections to heading structure, clearer heading descriptions, and the elimination of obsolete or deprecated HTML elements. When accessibility barriers exceeded what VDOE staff could correct internally, tickets were submitted to the Department's website vendor to resolve issues requiring structural or technical adjustments.

System Upgrades

VDOE's Office of Technology has continued to strengthen the Department's digital accessibility infrastructure through targeted system upgrades aimed at improving compliance with HB2541. A major focus this year was the enhancement of Pentaho, the critical reporting tool used across the agency to generate data reports for internal and public use. By upgrading to a version capable of producing outputs aligned with WCAG 2.1 Level AA standards, the Department has taken an important step toward ensuring that its most frequently accessed reports meet modern accessibility expectations.

In addition to these improvements, the team expanded its efforts beyond reporting tools to modernize other key components of the agency's digital ecosystem. Staff worked closely with Microsoft's accessibility scanning tools to bring the Department's newest Power Platform applications into compliance, and similar remediation work is now underway across older applications to ensure consistent accessibility standards as systems evolve. The Office of Technology also advanced accessibility within its data visualization environment by improving the Power BI platform and developing fully compliant dashboards for internal use, with plans to make accessible dashboards publicly available as this work progresses.

Finally, the team initiated the development of a new, fully compliant front-end layout framework for emerging web applications. This framework is designed to meet WCAG 2.1 Level AA requirements and will serve as the standardized foundation for future applications, with long-term plans to transition existing systems into this modernized format. Collectively, these initiatives underscore the Department's broader commitment to evaluating and upgrading tools, identifying accessibility gaps, collaborating with vendors, and ensuring long-term alignment with the Information Technology Access Act.

Procurement Changes

The Office of Procurement continued its work to strengthen accessibility compliance by reviewing active contracts to determine whether Accessibility Conformance Reports (ACRs) or VPATs were included within the Terms and Conditions. This review, detailed in the appendices, focused on agency-managed contracts and did not include purchase orders issued through VITA state contracts, as those agreements are maintained and updated by VITA to incorporate the latest accessibility requirements. Moving forward, the office will follow standard procedures to ensure that contracts are updated at the time of renewal to reflect legislative changes introduced through HB2541, supporting long-term alignment between procurement practices and statewide digital accessibility standards.

Summary of Findings from ICT Audit

The agency conducted a comprehensive ICT audit to establish a clear baseline of all information and communication technology assets under its purview and subject to the requirements of the Information Technology Access Act. This process created agencywide awareness of the breadth of platforms, tools, and digital materials currently in use and offered valuable insight into where accessibility strengths and gaps exist. The audit results serve as foundational data that will guide the Department's continued movement toward full compliance with HB2541. In many cases,

staff have already begun updating documents, reviewing platforms, and addressing issues as they are identified, demonstrating ongoing attention to accessibility needs across offices.

A review of the audit data shows that most ICT assets fall into a "Pending Review" or "WCAG Alignment Mostly Achieved" category, with many systems maintained by external vendors providing ACRs or VPATs as part of their compliance documentation. For example, high-traffic systems such as the VDOE main website, GovDelivery, Virtual Virginia platforms, and Build-A-Table reporting tools all show documented progress toward WCAG alignment, though several ICT assets still require further remediation or structural updates to ensure full conformance. Vendor-maintained systems—such as assessment platforms, licensure systems, and large learning management tools—generally report accessibility documentation but still require coordinated review to validate compliance.

Additionally, several internal SharePoint environments contain large volumes of documents and will require sustained efforts over time due to their scale.

Overall, the audit confirms that the agency has a diverse digital ecosystem with varying levels of accessibility maturity, and the findings provide a roadmap for prioritizing remediation efforts based on risk, usage, and public impact.

School Compliance and Findings

The agency took a holistic picture approach of the accessibility compliance landscape in our local school divisions across Virginia. In efforts to report the non-compliant ICT and fiscal impacts, the Department asked questions that will inform how lawmakers could address the barriers in place for our local school divisions as they work towards their compliance.

Summary of Survey Results

The survey results provide a broad view of the digital accessibility across Virginia's school divisions and underscore the considerable variation in readiness, capacity, and resource needs as divisions work toward compliance. Across the responses, several clear trends emerge.

First, divisions of all sizes reported difficulty quantifying the number of non-conforming websites and applications. Many divisions stated they were still "in the discovery phase," had "not yet started," or were "unable to determine" the total number of non-compliant platforms without a comprehensive audit. Even among divisions that could provide estimates, the number of non-conforming resources ranged widely—from none, to a handful, to more than 1,000 staff-created Google Sites in larger divisions. Similarly, divisions struggled to quantify non-conforming documents, with many reporting that document creation is decentralized across schools and classrooms, making precise counts nearly impossible without dedicated auditing tools or staff.

Cost estimates varied dramatically, reflecting both differences in division size and differences in local digital ecosystems. Some divisions estimated minimal costs or noted that vendor platforms already included accessibility features, while others projected costs exceeding $100,000–$200,000 for content remediation, platform upgrades, or additional staffing. A number of divisions emphasized that staff time represents the largest and least visible cost driver, with one

division estimating millions of dollars in personnel time required for remediation efforts. Across the board, divisions commonly noted that cost estimates remain incomplete because they depend on pending audits, vendor responses, or the identification of tools capable of meeting WCAG 2.1 or WCAG 2.2 standards.

The survey also shows that most divisions are in the early stages of training and compliance planning. A small number reported training as “complete,” (4.34%) but the overwhelming majority described training as “in progress”(60.86%) or “not yet started”(30.43%) Several divisions emphasized the need for statewide training modules, role-specific guidance, and greater clarity on expectations for both instructional staff and administrators. Many divisions also noted uncertainty regarding compliance responsibilities for third-party platforms, indicating a need for clearer statewide procurement guidance and vendor accountability frameworks.

Finally, divisions consistently requested additional support in the form of statewide auditing tools, accessible templates, funding for remediation and staffing, clearer guidance on exemptions, and structured training resources. The recurring theme across responses is that divisions understand their obligations and are actively working toward compliance, but the scope of required remediation—especially in document review, staff-created content, and third-party applications—cannot be met without substantial support, dedicated funding, and uniform statewide guidance.

APPENDIX A: VDOE ICT AUDIT

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
Virginia Assessment Parent Portal	Vendor	Yes	Pending Review	High
Understand Scoring	Vendor	Yes	Pending Review	High
TestNav Virginia	Vendor	Yes	Pending Review	High
PearsonAccessnext	Vendor	Yes	Pending Review	High
Training PearsonAccessnext	Vendor	Yes	Pending Review	High
DOE-WestEd-External	Both	Unknown	Pending Review	Low
DOE-Local Alternative Assessment Committee-External	VDOE	Unknown	Pending Review	Low
SCH External Virginia Program	Vendor	Yes	Pending Review	Medium
VDOE Assessment/History and Social Science Group: Using State-Developed Performance Tasks (RESOURCE HUB)	VDOE	Unknown	Pending Review	High
VDOE Desk Review Group for Local Alternative Assessments and Balanced Assessment Plans	VDOE	Unknown	Pending Review	Low
WIDA ASSESS	Vendor	Unknown	Pending Review	High
Data Recognition Corporation (DRC) INSIGHT	Vendor	Unknown	Pending Review	High
Distributed Item Review (DIR)	Vendor	Unknown	Pending Review	High
ABBI	Vendor	Unknown	Pending Review	Medium
TM-DOE-Office-of-School-Quality-Team	VDOE	Unknown	Pending Review	Medium
TM-DOE-Office-of-School-Quality-Division-Artifacts-External	VDOE	Unknown	Pending Review	Low
TM-DOE-Implementation-and-Improvement-Science-External	VDOE	Unknown	Pending Review	Low
VDOE: The Office of School Improvement (2026-27)	Vendor	Unknown	Pending Review	High
VDOE Charting the Course (RESOURCE HUB)	Vendor	Unknown	Pending Review	Low
OSQ Internal Professional Development (2026-27)	Vendor	Unknown	Pending Review	Low
VQB5	Both	Yes	WCAG Alignment Partially Achieved	High
Virginia Literacy Partnerships	Vendor	Unknown	Pending Review	
Virginia Infant & Toddler Specialist Network	Vendor	Unknown	Pending Review	
Virginia Child Care Provider Scholarship Program	Vendor	Unknown	Pending Review	
VAConnects Resources	Vendor	Unknown	Pending Review	
VAConnects for Kids (LinkB5/VKRP/PALS)	Vendor	Unknown	Pending Review	
VAConnects for Kids	Vendor	Unknown	Pending Review	
VA PASS Infosite – VA PASS Infosite	Vendor	Unknown	Pending Review	
PD Essentials - preparing Virginia's early childhood professional development providers	Vendor	Unknown	Pending Review	

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
Kinder Systems	Vendor	Unknown	Pending Review	
Hyland Perceptive	Vendor	Unknown	Pending Review	
Everbridge	Vendor	Unknown	Pending Review	
ChildCareVA	Both	Yes	WCAG Alignment Partially Achieved	High
Childcare Licensing / Dolphin	Vendor	Unknown	Pending Review	
Childcare Licensing / Dolphin Reports	Vendor	Unknown	Pending Review	
ChildCare Aware of Virginia	Vendor	Unknown	Pending Review	
LEADS | Leadership in Effective And Developmentally-appropriate Services in Virginia ECSE	Vendor	Unknown	Pending Review	
All-OCCHS SharePoint	Vendor	Unknown	Pending Review	Medium
OCCHS Enforcement - External SharePoint	Vendor	Unknown	Pending Review	
VDOE X Account	Both	No	WCAG Alignment Mostly Achieved	Medium
VDOE LinkTree	Both	No	WCAG Alignment Mostly Achieved	Medium
VDOE Linkedin Account	Both	No	WCAG Alignment Mostly Achieved	Medium
VDOE Facebook Account	Both	No	WCAG Alignment Mostly Achieved	Medium
Virginia Public School Division Superintendents	Both	No	Updates in Progress	Medium
Virginia Public School Division Staff	Both	No	Updates in Progress	Medium
Virginia Department of Education Website	Both	Yes	WCAG Alignment Mostly Achieved	High
VDOE YouTube Account	VDOE	Yes	WCAG Alignment Mostly Achieved	Medium
VDOE Intranet: Office of Communications	VDOE	Yes	WCAG Alignment Mostly Achieved	Medium
VDOE Flickr Account	Both	No	Review in Progress	Low

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
Sharepoint: Virginia Education Update	VDOE	Yes	WCAG Alignment Mostly Achieved	Medium
School Listing – A-Z by School Name	Both	No	Pending Review	Medium
School Listing – A-Z by Division	Both	No	Pending Review	Medium
GovDelivery	Both	Yes	WCAG Alignment Mostly Achieved	High
VDOE FOIA Portal	Both	Unknown	WCAG Alignment Mostly Achieved	Medium
VDOE Instagram Account	Both	Unknown	WCAG Alignment Mostly Achieved	Medium
Hootsuite Account	Both	Unknown	WCAG Alignment Mostly Achieved	Medium
SharePoint: VBOE Meeting External	VDOE	Unknown	Pending Review	Medium
Virginia State & Local Civic Education Module	VDOE	Unknown	Pending Review	
VDOE Search for a [Teaching] License	Both	Unknown	Pending Review	
VALO | Virginia Licensure Online	Both	Unknown	WCAG Alignment Mostly Achieved	
System Automation_MLO My License Office	Both	Unknown	Pending Review	
Cultural Competency Training Module	VDOE	Unknown	Pending Review	
Virginia STEM Ecosystem Website	Both	Unknown	WCAG Alignment Mostly Achieved	
Virginia Governor's World Language Academies	VDOE	Unknown	WCAG Alignment Partially Achieved	Low
Partners for Safe Teen Driving	VDOE	Unknown	WCAG Alignment Mostly Achieved	
Mathematics Capstone Course		Unknown	Pending Review	
Virginia Education Wizard	Vendor	Unknown	WCAG Alignment Mostly Achieved	
Virginia Career View	Vendor	Unknown	WCAG Alignment	

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
			Mostly Achieved	
Sharepoint-Instruction	VDOE	Unknown	WCAG Alignment Mostly Achieved	
Sharepoint-Advanced Learning Internal	VDOE	Unknown	WCAG Alignment Mostly Achieved	
Sharepoint-Advanced Learning External	VDOE	Unknown	WCAG Alignment Mostly Achieved	
Sharepoint-STEM	VDOE	Unknown	Pending Review	
Sharepoint-Teaching and Learning External	VDOE	Unknown	WCAG Alignment Mostly Achieved	
Office of Student Services Application Portal	Vendor	Unknown	Pending Review	
TM-DOE-Office of English	VDOE	Unknown	Pending Review	
DOE-E04 Virginia Literacy Act Workgroup-External	VDOE	Unknown	Pending Review	
DOE-2024 English Textbook Committee Review-External	VDOE	Unknown	Pending Review	
TM-DOE-VDOE 2017 English Standards of Learning Revision-External	VDOE	Unknown	Pending Review	
DOE-2024 Mathematics Textbook Review Committee-External	VDOE	Unknown	Pending Review	
DOE-2023 Mathematics Standards of Learning Implementation-External	VDOE	Unknown	Pending Review	
TM-DOE-Mathematics	VDOE	Unknown	Pending Review	
TM-DOE-Science-Team-Collaboration	VDOE	Unknown	Pending Review	
NYSC	Vendor	Unknown	Pending Review	
Sharepoint - Licensure	VDOE	Unknown	Pending Review	
Sharepoint - Teacher Education	VDOE	Unknown	Pending Review	
Oracle	Both	Unknown	Pending Review	
EZ Reports	Vendor	Unknown	Pending Review	
Procurement Contract Management Portal	VDOE	Unknown	Pending Review	
Sharepoint: Budget & Finance	VDOE	Unknown	Pending Review	
VDOE Intranet: Office of Cybersecurity & Risk Management	VDOE	Unknown	Pending Review	
Sharepoint: Employee Engagement	VDOE	No	Review in Progress	Medium
VDOE Intranet: Human Resoures	VDOE	Unknown	Review in Progress	Medium
Sharepoint: OETCI	VDOE	Yes	WCAG Alignment	Low

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
			Mostly Achieved	
Sharepoint: Virtual Learning	VDOE	Yes	WCAG Alignment Mostly Achieved	Low
Virtual Virginia Professional Learning Courses & Workshops for Educators	Vendor	Yes	WCAG Alignment Mostly Achieved	Low
Virtual Virginia	Vendor	Yes	WCAG Alignment Mostly Achieved	Low
GoOpenVA	Vendor	Yes	WCAG Alignment Mostly Achieved	Low
eMediaVA	Vendor	Yes	WCAG Alignment Mostly Achieved	Low
CTE Trailblazers	Vendor		Pending Review	
CTE Resource Center	Vendor		Pending Review	
Zoom	Vendor	Yes	WCAG Alignment Mostly Achieved	
Zendesk	Vendor	Yes	WCAG Alignment Mostly Achieved	
Xacta360	Vendor		Pending Review	
WorkOtter	Vendor		Pending Review	
Virginia School Quality Profiles	Both	Unknown	Pending Review	High
VDOE Intranet: Office of Technology & System Development	VDOE		Pending Review	
VDOE Intranet: DOE Solutions Center	VDOE		Pending Review	
Tableau	Vendor	Yes	WCAG Alignment Mostly Achieved	Medium
SSWS Query Tool: Approved Multidivision Online Providers (AMOP)	VDOE		Pending Review	
SSWS Application: Instruction Committee Appl Processing System (ICAPS)	VDOE		Pending Review	
SSWS Application: Career & Technical Education Application Processing System (CTEAPS)	VDOE		Pending Review	
SSWS Application: Assessment Committee Application Process (ACAPS)	VDOE		Pending Review	

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
Splunk	Vendor		Pending Review	
Single Sign-On Web Systems	VDOE		Pending Review	
School Division Ledger and EDI Deposit Reports	VDOE		Pending Review	
SBAR Build-A-Table	VDOE		Pending Review	High
Safe Schools Information Resource (SSIR)	VDOE		Pending Review	
Qualtrics	Vendor	Yes	WCAG Alignment Mostly Achieved	Medium
Public Postsecondary Education Reports	VDOE	Unknown	Pending Review	Low
Power Platform Development	VDOE		Pending Review	
Positions and Exits Build-A-Table	VDOE		Pending Review	High
Nutrition and Physical Activity Best Practices (NPABP)	Vendor		Pending Review	
Microsoft Forms	Vendor		Pending Review	
Microsoft 365	Vendor	Yes	WCAG Alignment Mostly Achieved	
Gifted Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
Fall Membership Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
December 1 Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
Credential Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
Cohort Graduation Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
BOLDPlanning	Vendor		Pending Review	
Black Kite	Vendor		Pending Review	
Annual Statewide Assessment Result Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High
Annual Dropouts Build-A-Table	VDOE		WCAG Alignment Mostly Achieved	High

Product Name	Maintenance Responsibility	ACR or VPAT	Status	Remediation Priority
Adobe Creative Cloud-Adobe Sign	Vendor	Yes	WCAG Alignment Mostly Achieved	
1Password	Vendor	No	WCAG Alignment Mostly Achieved	
VDOE Intranet Homepage	VDOE		Pending Review	
EL Assessment Resources	VDOE		Pending Review	
Granicus Websites & CMS	Both	Unknown	Review in progress	High
Canvas	VDOE	Unknown	Review in progress	High
SNPWeb	Both	No	Pending Review	Medium
School Nutrition Google Calendar	VDOE	No	Pending Review	Low
Office of School Nutrition Programs Reach 360 login	Both	No	Review in Progress	Low
Office of School and Community Nutrition Programs X Account	VDOE	No	Pending Review	Medium
Office of School and Community Nutrition Programs Instagram	VDOE	No	Pending Review	Medium
Office of School and Community Nutrition Programs Facebook	VDOE	No	Pending Review	Medium
SharePoint: TM-DOE-SCNP General	VDOE	No	Pending Review	Medium
SharePoint: TM-DOE-SCNP Training and Special Initiatives	VDOE	No	Pending Review	Medium
SharePoint: TM-DOE-SCNP Community Nutrition Programs	VDOE	No	Pending Review	Medium
SharePoint: TM-DOE-SCNP School Nutrition Programs	VDOE	No	Pending Review	Medium
SharePoint: DOE-Farm to School and Directors' Conference-External	VDOE	No	Pending Review	Medium
SharePoint: DOE-SCNP-Videos-External	VDOE	No	Pending Review	Low
SharePoint: DOE-SCNP Social Media	VDOE	No	Pending Review	Low
SSWS Application: Neighborhood Assistance Program	VDOE	No	Pending Review	
SSWS Application: Education Improvement Scholarship Tax Credit Program	VDOE		Pending Review	
Virginia IEP	Vendor	report submitted to VDOE 5.27.2026	WCAG Alignment Mostly Achieved	Medium
SESS Monitoring Tool	Vendor	VPAT	Review in Progress	Medium
Special Education and Student Services X Account	VDOE		WCAG Alignment Mostly Achieved	Low

APPENDIX B: VDOE PROCUREMENT CONTRACT REVIEW

eVA CTR#	VDOE Contract #	Contract Title	Contractor	Remaining Options	Current Term (End)	Method	HB2541 Compliant Notes
CTR019321-4	DOE-2016-6-RFPSNP	Web-Based System for Administration of Federal and State School Nutrition Program	EMS LINQ INC	0	9/30/2026	RFP	Expiring this Month
CTR046403	201-26-037	Everbridge Personal Safety Device	Everbridge Inc	0	10/29/2026	SS	Under review
CTR036169	REQ1426631	Lexia Aspire Professional Learning 2-year Participant LicenseProduct Code 392315	Lexia Learning Systems LLC	0	10/31/2026	SS	Under review
CTR046593	201-24-001	Web-Based Electronic Transcript Services: K-12	Instructure, Inc. (formerly Parchment LLC)	4	12/9/2026	RFP	Under review
CTR049248	201-25-016	Access to our college & career exploration platform (Pathful)	Pathful, Inc.	0	12/31/2026	SS	Under review
	REQ2041462	HMG Data Services (Hootsuite Online Service Premium Plan)	HMG Data Services L.L.C.	0	4/9/2027	PO	Need to add Core Ts&Cs.
CTR041338	201-ESEA-25-002	21st CCLC Data Collection System (EZ Reports)	ThomasKelly Software Associates	3	6/25/2027	RFP	Under review
CTR044850	201-25-005	Certiport Practice Test Site License 2026-2027	NCS Pearson Inc Certiport Business Group	0	6/30/2027	SS	Under review
CTR036239	DOE-2016-5-RFPSEPI	Statewide IEP System	Public Consulting Group, Inc.	0	6/30/2027	RFP	Under review
CTR001095	RFP-PR9151296-2021	Web-based monitoring tool to support the Office of Special Education and Student Services (SESS)	LEADER SERVICES	5	6/30/2027	RFP	Under review
CTR036203-1	RFP-REQ638568-2023	Open Education Resource (OER) Platform (GoOpenVA)	Institute for the Study of Knowledge Man (ISKME)	1	6/30/2027	RFP	Under review
CTR054989	201-25-013	Automotive Curriculum and Assessment Tool	Electude USA LLC	0	7/27/2027	RFP	Under review
CTR036156	47QTCA18D0081	SAS EVAAS Solution including Web Reporting, Training, Research and Development	EXECUTIVE INFORMATION SYSTEMS LLC	0	8/14/2027	GSA	Under review

eVA CTR#	VDOE Contract #	Contract Title	Contractor	Remaining Options	Current Term (End)	Method	HB2541 Compliant Notes
	REQ2199462	Articulate 360 + Reach 360 (Online e learning platform subscription)	Articulate Global LLC	0	9/15/2027	PO	Need to add Core Ts&Cs.
CTR018360	092705-300N-018	Virginia Statewide Student Assessment Program (SOL)	NCS Pearson Inc Certiport Business Group	0	12/31/2027	RFP	Under review
	REQ2006517	Heartland to provide SAAS-Mosaic Software as a Service	Heartland Payment Solutions	0	1/31/2028	PO	Need to add Core Ts&Cs.
CTR052651	201-26-072	Professional Learning Partner Guide (PLPG)	Rivet Education	0	5/28/2028	SS	Includes latest Core Ts&Cs.
CTR028328	RFP-REQ798815-2023	Subsidy Attendance Tracking System	KinderSystems, Inc	5	9/26/2029	RFP	Under review

APPENDIX C: LOCAL SCHOOL DIVISION DIGITAL ACCESSIBILITY SURVEY

Albemarle County

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	A list is being compiled in order to audit our sites to see what accessibility standards still need to be addressed. We do not have a definitive number at this time.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	30 days
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	A list of documents that fail to conform with accessibility standards is being updated but will not be completed until the audit of our sites has been completed.

Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	30 days
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Is there a VDOE subscription service or application that school divisions can use to audit platforms? Are there certain industry standard applications that are considered compliant by the VDOE/the state? Ex. PowerSchool. If so, can VDOE provide list to school divisions?

Alexandria

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	An assessment is in progress. ACPS is currently conducting an inventory of all public-facing websites and applications and verifying vendor compliance documentation. As part of this effort, the division has identified its learning management system, content management system (CMS), student information system and two-way communication platforms as priority systems for accessibility review and can confirm that they are compliant with WCAG 2.2 accessibility standards. ACPS is conducting a comprehensive assessment and inventory

	of more than 100 websites, applications and digital platforms across the division and actively working with vendors to obtain documentation affirming conformance with WCAG 2.2 AA accessibility standards. We have requested that vendors provide accessibility compliance information and associated cost estimates to ACPS. We can provide actual numbers received and state that we have a process in place for any remaining cost estimates to be updated as vendor responses are received.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	For the main division and school websites, managed by the Finalsite WMS, ACPS is currently evaluating a website accessibility solution estimated at approximately $9,500 annually, which would provide a PDF accessibility overlay that makes PDF documents on the division and school websites more accessible by providing an HTML version that is readable, searchable, listenable and translatable. Additional costs for website and application accessibility are still being determined and may include accessibility auditing tools, software licensing, platform enhancements, vendor remediation and staff time required to support compliance with WCAG 2.2 AA standards. ACPS is currently conducting a comprehensive assessment and inventory of more than 100 websites, applications and digital platforms while working with vendors to verify accessibility features, obtain WCAG 2.2 AA conformance documentation, and identify any remediation needs and associated costs.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	ACPS anticipates providing a more comprehensive cost estimate by September 2026, following the completion of its divisionwide accessibility assessment and receipt of additional vendor responses. For the main division and school websites, managed through the Finalsite CMS, ACPS is currently evaluating a website accessibility solution estimated at approximately $9,500 annually. The solution would provide a PDF accessibility overlay that makes PDF documents on the division and school websites more accessible by offering an HTML version that is readable, searchable, compatible with screen readers and translatable. Additional cost estimates for other websites, applications, and digital platforms will be finalized as vendor accessibility documentation and remediation estimates are received.

How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	ACPS is currently conducting a division-wide inventory and assessment of digital documents to determine: which documents remain active, which qualify for federal exceptions, which require remediation, and the associated costs and priorities.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	ACPS is currently evaluating a website accessibility solution estimated at approximately $9,500 annually, which would provide a PDF accessibility overlay that makes PDF documents on the division and school websites more accessible by providing an HTML version that is readable, searchable, listenable and translatable. Additional staffing and remediation costs are still being determined.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	ACPS anticipates providing a more comprehensive cost this fall, following the completion of its divisionwide accessibility assessment and receipt of additional vendor responses.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	ACPS has already provided a comprehensive presentation on WCAG 2.2 AA accessibility requirements to division chiefs, senior leadership and school principals. The division is currently developing training as part of Back-to-School professional learning, in August 2026. Training will be provided to web editors and public relations liaisons using the Finalsite CMS accessibility training modules, along with guidance on creating and maintaining accessible digital content to support ongoing WCAG 2.2 AA compliance. ACPS would benefit from dedicated funding for accessibility remediation, accessibility auditing tools, and technical assistance to evaluate third-party vendor compliance. Additional staff capacity is also needed to support ongoing website remediation,

	staff training, compliance monitoring and coordination with software vendors.

Bedford County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	At this time, none, but that is because we have limited information on our websites at the division and school level due to accessibility management issues. We have purchased DocAccess to allow for anything to be uploaded, and then DocAccess will ensure it is compliant with accessibility needs.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	First-year access to DocAccess is $9,100, and for each year after, it is $9,500 to continue using it
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	

Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	First-year access to DocAccess is $9,100, and for each year after, it is $9,500 to continue using it
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Future funding to support platform accessibility compliance for schools

Buckingham County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Our school website is currently in the process of conforming with accessibility standards. We would benefit from a program that checks the entire site to determine areas of need.

Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Training is the greatest need along with a program or platform to evaluate and provide support with making the necessary changes. Not sure of the cost of this at this time.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	When we receive additional guidance and tools available, we can then provide a better cost estimate.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We do not have an accurate count at this time, but have been making progress towards full conformity.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on	Not yet started

training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We need support for training, funding, and auditing platforms.

Buena Vista

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We have identified at least 25 with numerous additional from 3rd party vendors.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	So far, we have spent(or plan to spend shortly) an estimated $15000. This is for new website, adobe acrobat pro and google tools.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	We continue working day to day to locate resources to help remediate and monitor accessibility.
How many documents fail to conform with accessibility standards	We believe there are more than 10,000 documents, PDFs, videos, etc that fail to meet accessibility standards at this time.

and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We believe a full time staff member would be needed to remediate and maintain current and future documents. We estimate this cost to be $100,000 when includy salry and benfits. We have not checked into outside remediation assisstance but believe that cost would be at least $10000-$15000 per year.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	We continue to identify additional costs as we work daily to identify and monitor our documents, etc.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We are in need of support in all areas of the gigantic undertaking. We need resources to help us identify outside companies that can help us. We also need help with funding the tools and manpower needed. We could also use training for staff on what accessibility looks like and how to create materials that are compliant.

Campbell County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by	CCPS has consolidated all official division and school websites within our software product Finalsite, which we use to monitor webmaster and content compliance. Our primary concern is monitoring Google Sites created independently by staff. We currently have approximately 892 Google Sites, making it

federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	difficult to identify, manage, and ensure compliance for sites that may still be active.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We plan to engage a company such as Apptegy or Grackle to conduct a professional accessibility audit. State funding to support audits and remediation would be extremely helpful. We estimate that $20,000–$40,000 per division would provide meaningful support. There is also an ongoing personnel cost associated with monitoring digital content and keeping up with accessibility requirements.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	Reaching out to companies this fall to explore available tools, obtain audit quotes, and report findings and estimated costs to VDOE would provide school divisions with a reasonable timeline.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We have been intentional in monitoring our division and school websites, as well as social media, for compliance. However, assessing digital content created by instructional staff is much more difficult. Determining the level of compliance across staff-created content is difficult to quantify without the assistance of a professional audit.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	A professional audit is needed first to quantify . To cover all content created over the years by instructional staff would be a major project that could easily be 100s of hours
If unable to provide the cost estimate for document remediation, when will the division be	After an audit mid Fall is a reasonable timeline.

able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	State training is needed to help with awareness and coaching all staff that creates digital content. Funding is needed to help with professional audits, software, and personal to manage compliance monitoring. Training and information on available audit / platforms is needed for divisional decision makers.

Charles City County

Question	Response
Select your school division size:	**Less than 10,000 students**
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	**0**
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	**$0.00**
If unable to provide the cost estimate for website and application remediation, when will	

the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	**0**
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	**$0.00**
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	**Training In Progress**
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	**Auditing platforms and additional funding**

Charlotte County

Question	Response
Select your school division size:	Less than 10,000 students

How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	0
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	0

If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training Complete
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Nothing needed at this time.

Chesterfield County

Question	Response
Select your school division size:	More than 50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	CCPS has identified at least 11 supported applications whose available accessibility documentation includes one or more WCAG 2.1 or 2.2 Level AA criteria designated as "Partially Supports" or "Does Not Support." This represents the division's currently known minimum rather than a comprehensive count. These include Google Sites, the division-supported platform currently available for the employee intranet, which has known system-level accessibility shortcomings; and several Finance and Food and Nutrition Services applications for which vendor conformance information or potential upgrades are under review, but may be covered by exception D . Accessibility limitations within vendor-provided platforms generally require action by the vendors and cannot be corrected through individual CCPS configurations. Additional platforms are being evaluated. All official division and school websites are monitored through Siteimprove as part of an initiative of the Virginia Information Technologies Agency. Their combined accessibility score

	averages approximately 85–88 out of 100. Identified issues are addressed on an ongoing basis, but the Siteimprove score does not translate into a definitive number of websites that fail to conform. The curriculum portal is reviewed annually for the accessibility of its digital resources, and the Operations Division has not identified any internally developed applications known to be nonconforming. Diligent Community platform, which is used to conduct school board business, meets accessibility requirements.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	CCPS cannot currently provide a comprehensive division-wide cost estimate for bringing all identified websites and applications into conformance. Preliminary annual accessibility-related costs identified by individual divisions and departments within Chesterfield County Public Schools total approximately $103,097–$373,097, consisting of: $73,097 annually for temporary staffing to conduct continuous compliance checks of division-provided K–12 curriculum course resources. An estimated $30,000–$300,000 annually for a potential replacement of the Google Sites-based employee intranet, depending on the platform, licensing model, number of users, and required features. The intranet estimate is a preliminary planning range rather than a confirmed cost for an accessible replacement. A platform is available near the lower end of the range, but its accessibility has not been sufficiently evaluated to determine whether it would meet applicable standards. Additional one-time costs may be required for implementation, content migration, configuration, accessibility testing and remediation. Costs for addressing accessibility limitations in other applications have not yet been determined. Accessibility improvements for applications used by Operations and other organizational divisions would primarily depend on vendor updates, software upgrades, future replacement projects, or accessibility requirements incorporated into future procurements. Operations does not currently anticipate significant internal development costs. The Division of School Leadership and Student Support Services has not identified any specific costs at this time, though additional needs may be determined as evaluations progress. Therefore, the $103,097–$373,097 annual range represents only the costs currently identified. Additional licensing, replacement, implementation, vendor, testing, and remediation costs may be

	identified as platform evaluations and procurement processes are completed.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	CCPS cannot currently provide a single date by which a comprehensive division-wide cost estimate will be available. Additional estimates will be developed on a rolling basis as vendors complete accessibility reviews, provide information about planned software updates and remediation options, and respond to procurement processes. Cost estimates for the OSP/SFO school payment systems remain pending vendor and procurement review. A more reliable estimate for replacing the Google Sites-based employee intranet will be available after the request-for-proposals process planned during the current budget year evaluates potential platforms for functionality and accessibility conformance and identifies associated licensing, implementation, migration, and remediation costs. Estimates for Operations applications will be developed as software vendors complete accessibility reviews and future upgrade, replacement, or procurement efforts identify any required accessibility enhancements and associated costs. Therefore, a more complete divisionwide estimate will be available after these vendor reviews and procurement processes are completed.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	At least 2 documents have been identified that require accessibility updates. These are older Human Resources documents that remain available to users and are expected to be updated by late August 2026. This represents a known minimum rather than a comprehensive divisionwide count. Finance has identified additional older documents that require review and updating, but a count is not currently available. The School Activity Funds Manual is being updated with the goal of achieving accessibility compliance by the beginning of the school year. Other older Finance documents, including materials created before the current accessibility-review process was implemented for Workday job aids in March 2026, also require evaluation. The school division has established accessibility-review processes for newly created or posted documents that originate in the Google platform. The Division of Teaching and Learning checks documents posted beginning in April 2026 using division-provided accessibility tools. The Division of School Leadership and Student Support Services began using division accessibility tools in April 2026 and continues to review all

	documents for accessibility; nevertheless, the division has not yet updated all internal documents produced by this department before April 2026 to achieve full accessibility compliance. Communications and Community Engagement has not identified nonconforming documents among the widely distributed documents it has produced since January 2026 under its current accessibility-review process. Documents created by the Communications and Community Engagement Division that cannot be remediated internally are sent for professional remediation before digital distribution, and documents submitted by other organizational divisions for website publication must be provided in an accessible format. Because a divisionwide inventory of older, currently available documents has not been completed and the applicability of federal exceptions has not been determined for each document, CCPS cannot currently provide a definitive comprehensive count beyond the 2 documents specifically identified, plus the additional uncounted documents under review within Finance.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	CCPS has identified preliminary document-accessibility costs totaling approximately $96,890–$104,390. This estimate includes: $73,097 annually for 1,955 hours of temporary staffing within the Division of Teaching and Learning to support ongoing accessibility review and remediation of K–12 curriculum portal resources. $173.64 to remediate 2 older Human Resources documents that remain in use or available for reference. This work is expected to be completed before the beginning of the school year. Approximately $23,000–$30,500 in currently identified needs within the Division of Communications and Community Engagement. This preliminary estimate includes: $14,000–$21,000 for 10–15 PDF-remediation licenses at approximately $1,400 per user. Approximately $1,000 for foundational document-remediation training for 10 employees. Approximately $3,000 for specialized Adobe accessibility training for the division's graphic designer. Approximately $5,000–$5,500 for professional remediation of about 10 documents annually, including one larger document. Professional remediation costs vary based on a document's length, design and complexity. Current estimates for divisionwide external-facing booklet publications range from

	approximately $450–$500 for an average document to approximately $950 for a larger annual document. The Division of School Leadership and Student Support Services does not have a cost estimate at this time. Costs also have not been determined for the older Finance documents identified as requiring review or updating. The $96,890–$104,390 range represents known costs. It combines ongoing annual staffing and professional-remediation expenses with initial training, licensing and one-time remediation costs. Additional costs may be identified as older documents are inventoried, staff begin using the remediation tools, and more advanced training or professional support needs are determined.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	CCPS cannot currently provide a single date by which a comprehensive divisionwide document-remediation cost estimate will be available. The Division of Teaching and Learning and Human Resources and Talent Management have provided estimates for their currently identified needs. Communications and Community Engagement has identified preliminary costs but will be able to develop a more complete estimate after employees complete initial remediation training and the division evaluates how the training and available tools apply to the volume and complexity of documents produced through its regular work. Cost estimates and timelines have not yet been provided for the additional older documents identified by Finance or for potential document-remediation needs within the Division of School Leadership and Student Support Services. Therefore, a more complete divisionwide estimate will be available as organizational divisions complete document inventories and reviews, evaluate staff capacity and remediation tools, and identify materials requiring professional remediation. The information currently available does not support establishing a definitive completion date.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress

What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	PER #10–Training in progress—The school division has additional information for this questions, but space was not allocated to answer. *** PER #11– CCPS needs a combination of staffing, training, evaluation and remediation tools, ongoing auditing platforms, professional services, and funding for technology upgrades or replacements to support continued accessibility compliance. Identified needs include: Staffing: The Division of Teaching and Learning needs approximately $73,097 annually for temporary employee funding to conduct continuous accessibility reviews of K–12 curriculum resources available through the division curriculum portal. Training: Employees need foundational and role-specific training to understand and apply accessibility requirements within their responsibilities. Identified needs include document-evaluation and remediation training, specialized Adobe accessibility training, web-accessibility training, and additional advanced training based on employees' roles and needs. Evaluation and remediation tools: Continued access to tools for evaluating and remediating documents is needed, including Grackle tools for Google Docs, Sheets and Slides and PDF-remediation licenses for employees who produce internal- and external-facing documents. Website monitoring: CCPS needs continued access to Siteimprove or a comparable platform for ongoing accessibility auditing of official division and school websites. Professional services: Funding is needed for professional remediation of complex documents that cannot be remediated internally and for potential contracted accessibility evaluation, testing and remediation associated with implementing or replacing technology platforms. Technology platforms: Funding may be needed to upgrade or replace platforms that cannot meet accessibility requirements through existing configurations or vendor updates. This includes a potential replacement for the Google Sites-based employee intranet, preliminarily estimated at $30,000–$300,000 annually. Additional implementation, migration, configuration, testing and remediation costs may also be required. Any purchase or implementation will depend on the availability of sufficient funding. General technology funding: The Division of Technology has identified a broader need for funding to support accessibility compliance, although specific purposes and cost estimates have

	not yet been provided. For Communications and Community Engagement, currently identified costs for document tools, foundational and specialized training, web-accessibility training and professional remediation of approximately 10 documents total approximately $24,500–$32,000. This does not include the employee intranet platform, additional professional remediation, contracted implementation or migration services, or advanced training that may later be identified. These figures, along with Teaching and Learning's identified annual staffing cost, represent only currently known needs. They should not be interpreted as a comprehensive divisionwide estimate because several organizational divisions have not yet identified the full staffing, training, platform, professional-service or funding resources required to support ongoing accessibility compliance.

Colonial Beach

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	3
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	10,000

If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	75
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	7500
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We need training, funding, and auditing platforms.

Culpeper County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	With regards to the division website, we have been under an OCR accessibility resolution since March 2024, and since that time, have put in a tremendous amount of work to ensure that our website, and all things posted on the website are in compliance. Given that website content is constantly changing, we continue to work to ensure that what is added is accessible. Our resolution case has recently successfully been closed, but work is ongoing to ensure that we continue to meet accessiblity requirements. With regards to other applications, they are still under review at this time.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	For the website, accessible features are part of the platform, and that is already in place. Other applications, cost estimate is unknown at this time
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	This work is in progress.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Unknown. We have worked with the OCR over the last 2 years to ensure that documents posted on our website conform with accessibility standards, and we passed their check, but we continue to evaluate digital documents to ensure that they are all compliant.

Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Unknown at this time. In addition to remediating existing documents, training will be required for staff on the accessibility requirements. This is in process, but not complete.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Unknown.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Training, funding, and easy to use auditing tools could be extremely helpful to us in supporting accessibilty compliance.

Cumberland County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	At this time, we do not know of any sites that fail to conform. However, we are reviewing an offer by a third-party provider to assist us in identifying and rectifying any issues that may arise.

Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We have an estimated cost of $13,000 to implement a program for digital accessibility requirements. We are also seeking a provider to assist us with document remediation for websites, etc. That price is not yet available.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	We hope to have a quote for document remediation soon.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We are unsure at this time. We have been remediating some documents as we revise webpages and create new documents.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We are aniticipating an estimate to be $50,000 or more to engage someone with just ADA website compliance
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	I have reached out for a quote with a remediation company.
As you are working on your compliance, where is your division on	Training In Progress

training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Funding is a major need for a small school division. Also, platform suggestions would be appreciated.

Danville

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	The majority of digital applications used are compliant with accessibility standards, including our website platform, including our website and app provider Finalsite, newsletter software Smore, and digital flyerboard Peachjar. In addition, district staff work to ensure that content shared via these platforms, as well as on social media, meet accessibility standards.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	To have additional accessibility features implemented on both our website and Peachjar would cost an additional estimated $12,450 per year.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	

How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Currently, there are approximately 288 digital documents failing to conform with accessibility standards, specifically on our division website.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	It would cost approximately $1,200 in hours for staff to remediate documents currently on our website.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Our division would benefit from training so that division staff and school staff can be very clear on the expectations and guidelines, as well as funding or additional resources that help the division maintain compliance, especially on websites.

Fauquier County

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with	FCPS public-facing websites currently conform to established accessibility guidelines and are not known to be noncompliant with applicable accessibility standards.

accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Documents and content within applications such as Schoology are currently undergoing accessibility review and remediation. As this work is ongoing, a final count of any nonconforming content within those applications has not yet been determined.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	At this time, FCPS does not anticipate costs associated with implementing accessibility features on its public-facing websites, as those sites already meet established accessibility requirements. For applications such as Schoology, the estimated cost to provide accessibility enhancement tools and features is approximately $36,000 annually in licensing fees. Additional costs for content remediation, staff training, or development services have not been identified at this time and would be evaluated as needed to ensure ongoing compliance with applicable accessibility standards.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	The number of documents that do not conform to accessibility standards and are not covered is currently unknown. FCPS does not maintain a comprehensive inventory of all instructional and operational documents created, maintained, and used by teachers and staff on a daily basis. As a result, the division is unable to provide an exact count of nonconforming documents at this time. Ongoing efforts to review and remediate digital content are being conducted to improve accessibility and support compliance with applicable standards.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	The cost to remediate documents and improve accessibility compliance will vary depending on the tools selected and the volume of content requiring remediation. Current estimated annual costs include: ClearLinks accessibility tools: approximately $20 per staff member per year. Based on current staffing levels, the estimated annual cost would be approximately $25,000. Adobe Acrobat Pro: approximately $200 per user per year for

	staff responsible for creating and remediating PDF documents. Grackle Docs (Google Workspace accessibility remediation tool): approximately $2,500 annually for division-wide licensing. In addition to software licensing costs, staff time required to review, remediate, and maintain accessible documents may represent a significant ongoing expense. These labor costs have not yet been quantified and would depend on the number and complexity of documents requiring remediation.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	To support and sustain accessibility compliance efforts, the division would benefit from additional resources in several key areas: Additional funding to support accessibility initiatives, including software licensing, document remediation, website and application enhancements, and ongoing compliance activities. Statewide guidance and standardized training on accessibility requirements, best practices, and compliance expectations to ensure consistent implementation across divisions. Access to accessibility auditing and monitoring platforms to identify, track, and remediate accessibility issues in websites, applications, and digital content. Dedicated accessibility personnel, such as an Accessibility Compliance Officer or Coordinator, to oversee compliance efforts, manage audits, provide staff support, monitor regulations, and coordinate remediation activities. Ongoing professional development for teachers, staff, and content creators to ensure accessibility is incorporated into documents, instructional materials, websites, and applications from the outset. These resources would help establish a sustainable accessibility

	program and support continued compliance with applicable accessibility standards and regulations.

Floyd County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Approximately 5 websites.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We are not sure at this time what the cost estimate would be.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	Within the next 2 month.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	The exact number is unknown but there are multiple documents.

Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We are not sure at this time what the cost estimate would be.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Within the next 2 month.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Additional training, funding, and assessment/auditing of the platforms.

Fluvanna County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Yet to be determined

Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$0
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Yet to be determined
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$0
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on	Training In Progress

training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	

Galax

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	4 websites
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$20,000
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards	2,000

and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$20,000
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Funding, Auditing Platforms

Gloucester County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under	0

28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	0
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	

As you are working on your compliance, where is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Apptegy provides backend safeguards to ensure overall accessibility. Staff are trained during onboarding in the webmaster role.

Goochland County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We are still in the discovery phase of our compliance. None of our school websites or division site is fully accessible yet, and we are working with vendors to determine application compliance. We would like to request some clarity on who is responsible for third party application compliance remediation.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We do not have a cost estimate.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	When we know the full scope and complexity of the systems involved. We will meet with our vendors to determine the scope.

How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We are still in the discovery phase of our compliance.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We do not have a full estimate of costs or scope of the remediation efforts yet.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	When we know the full scope and complexity of the systems involved.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Training, funding, auditing of platforms, clarity of action needed to be compliant.

Halifax County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with	2 in-house application for IT service & maintenance management fail to conform with accessibility standards.

accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Replacement cost is unknown.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	January 2027
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	0
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	0
If unable to provide the cost estimate for document remediation, when will the division be	

able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Continued training.

Hampton

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Hampton City Schools is unable to provide an accurate numerical response at this time due to the significant volume of website pages and applications maintained across the school division. We are taking proactive steps to improve digital accessibility by running accessibility checkers to our public websites, purchasing accessibility tools, and providing staff training on accessibility requirements. In addition, Hampton City Schools is currently migrating both the division website and all school websites to a new platform designed to better support accessibility standards.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Approximately $24,000 annually and that only includes website cost.
If unable to provide the cost estimate for website and application remediation, when will	See answer above.

the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Hampton City Schools is unable to provide an accurate numerical response at this time due to the significant volume of digital documents maintained across the division. The division is taking proactive steps to improve the accessibility of digital documents by purchasing accessibility tools to evaluate and remediate PDF documents.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Approximate cost for tools is $28,000 annually for software. This does not include the cost for staff time to remediate.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	See answer above.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Hampton City Schools is committed to meeting its digital accessibility obligations and has made significant investments to improve accessibility across the division. At the same time, we recognize that the scope of these requirements presents considerable operational and financial challenges for school divisions, particularly given the vast amount of digital content that must be evaluated and remediated. As these mandates were implemented without dedicated funding, we encourage the Virginia Department of Education to continue advocating on behalf of school divisions with the General Assembly and federal partners to help secure the resources, funding, guidance, and support necessary for successful implementation. Such collaboration will help ensure that compliance expectations are

	achievable while allowing divisions to continue prioritizing high-quality educational services for students.

Hanover County

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We continue our work in evaluating our websites and platforms. We contract with a vendor to help ensure accessibility on our division website. Of the tools that have been evaluated to-date, three are considered high-risk (less than 70% compliant), four are considered medium-risk (between 70-89% compliant), and six are considered low-risk (greater than 90% compliant).
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Independent of the significant time that has been invested to date (160 hours of leadership training, 128 hours dedicated by our Instructional Technology coaches, and more than 140 hours by the division-level team tasked with overseeing implementation), we have paid $2,916 for the Grackle website accessibility scanner for all employees and approximately $200 in printing costs associated with digital accessibility posters printed (2) for each school. When considering the nearly 1,700 instructional staff (Administrators, Teachers, Instructional Assistants, and Division Instructional Leaders only), it is safe to say our division will collectively spend a tremendous amount of time remediating or recreating resources to reach compliance. For example, if all of the aforementioned staff members only spend five hours each month completing this work, that would total approximately 8,500 hours each month until the end of this school year. If that conservative estimate remains consistent throughout the year, 10 months of this work would result in 85,000 hours – well over $4 million.
If unable to provide the cost estimate for website and application remediation, when will	The cost provided in the previous response was calculated based on current expenditures and hourly rate projections. We will be able to provide additional costs as future efforts to remediate are supported and additional resources are identified.

the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	It is difficult to determine the exact number of documents not covered by federal exemptions as this would require a review of every single digital resource that supports nearly 17,000 students and ~3,000 employees. Instead, our division has taken the approach to review resources as they are used in the current year. As resources are identified, they will be checked for compliance and remediated as needed.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	This too is nearly impossible to determine as variables are widely inconsistent in our division. Some teachers and content areas require heavy use of digital resources while others require less. This means some staff members will spend a significant amount of time reviewing and remediating while others will spend less. However, HCPS has already begun to educate and train all staff in digital accessibility practices and will continue to support this work throughout the school year. As mentioned in a previous section, the cost of staff time and material resources is estimated to cost the division well over $4 million.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Unless an expectation to specifically track all of the time spent in digital accessibility remediation, the division will only be able to provide estimated amounts of time and cost for this work. However, it is safe to say that all staff will spend 3-4 hours in training and many more hours applying and reviewing accessibility guidelines to their work.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	- More specific communication in what compliance means for all types of products. - Provide specific guidance documents and plain language interpretation of the legal code (What does it look like in application? Are their exemptions?) - Provide financial support to school divisions to defray the cost of additional hours required for implementation.

Henry County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	7
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$11,500
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	36%
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools	$9,600

that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	funding

Hopewell

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	I am not really sure, we would have to partner with a third party to evaluate. To my knowledge, all of our sites meet these standards. All of our sites are hosted on third party vendor platforms, so we would not be responsible for adjusting accessibility. We would have to partner with the hosted vendor to address these needs.
Provide a cost estimate to have accessible features implemented in the websites and applications	I would have no idea where to start to give you an estimate for this cost. None of the sites or applications that we use are Hopewell division, they are all hosted by outside parties.

(ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	Unsure at this time.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Unsure at this time.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Unsure at this time.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	We wouldn't know the cost until we are able to determine what gaps need to be addressed.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started

What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Funding to investigate which gaps need to be addressed and then time to get with each third party vendor to map out any issues that were discovered.

Isle of Wight County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	IWCS is committed to making our digital content accessible and meeting state and federal requirements. However, the amount of content covered, including websites, documents, presentations, Board materials, learning platforms, internal resources, and third-party applications, is significant and changes every day. Finding, reviewing, and fixing all content will require considerable staff time, training, tools, and funding. IWCS encourages VDOE to provide clear guidance, statewide training and tools, and dedicated funding to help school divisions meet these requirements. We also encourage VDOE to advocate for realistic timelines and expectations that recognize the limited staff and resources available to school divisions.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by	IWCS is committed to making our digital content accessible and meeting state and federal requirements. However, the amount of content covered, including websites, documents, presentations, Board materials, learning platforms, internal resources, and

federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	third-party applications, is significant and changes every day. Finding, reviewing, and fixing all content will require considerable staff time, training, tools, and funding. IWCS encourages VDOE to provide clear guidance, statewide training and tools, and dedicated funding to help school divisions meet these requirements. We also encourage VDOE to advocate for realistic timelines and expectations that recognize the limited staff and resources available to school divisions.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Unsure
As you are working on your compliance, where is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	

King George County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with	3-5 We are working on adding accessibility features to existing platforms and migrating away from inaccessible platforms

accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$15,000 for new platforms, adding accessibility features
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We spent all of last year working on documents for the website and still have about 20 that are not fully accessible.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$8,000 in contracted staff time, $4,000 in third party service to remediate documents
If unable to provide the cost estimate for document remediation, when will the division be	

able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	- Documents from VDOE intended for parent communication should come accessible. For example: Safe storage of weapons and medication (HB201) FAFSA (HB1095), Course Registration Deadlines (SB817),Diabetes Information (HB1301) - Support for finance documents and reports to export in a compliant manner for public viewing - VDOE approved textbooks and curriculum should be required to have digital components meet accessibility standards - Create training modules for all staff separate from PIO training - Provide extensive training for PDF mitigation - Funding for positions and/or contracted services to address accessible documents and accessibility compliance - Funding for platforms and tools to create accessible information - Funding for training

Lee County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	All LCPS Websites are being transitioned to being compliant with accessibility standards.
Provide a cost estimate to have accessible features	$18,000+

implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Unknown
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Unknown
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Within the year
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress

What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	All of the above

Lexington

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	None that we are aware of
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	This is a guesstimate, but it is extremely expensive to add this feature to the org website alone. So, my best guess is $60,000 annually
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36	None that we are aware of

C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We do not know, as the cost of even having the website audited is prohibitively ex[pensive for our district
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Not sure, unless the state provides funding or grant opportunities to fund this
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	training, funding and auditing platforms

Loudoun County

Question	Response
Select your school division size:	More than 50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194,	Our division website, lcps.org, conforms with accessibility standards. LCPS is in the process of reviewing other applications for accessibility.

Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$28,000 for BrandPro to support the website design through Apptegy. This cost does not include the human capital behind the work.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Recently published or still-active documents on the website conform to accessibility standards.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$113,700 for YuJa Panorama that will be used divisionwide by staff to remediate documents to conform with accessibility standards. Additional costs have been incurred to provide staff training on building and remediating accessible materials.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	This is an ongoing effort, as a division of our size has countless documents created each day. Division-level employees are creating templates and resources to support. We are also considering hiring one or two employees to support this ongoing effort divisionwide.
As you are working on your compliance, where	Training In Progress

is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We need the support of higher education programs so that new teachers come to us knowing how to create accessible materials. We also need time and patience as we work through hundreds of thousands of documents generated by a division of our size. Recommendations for efficient auditing tools and remediation tools - specifically for PDFs.

Louisa County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Louisa County Public Schools maintains seven primary Powerschool/SchoolMessenger websites (one division website and six school websites) and one division mobile application. The Powershool/SchoolMessenger content management system and mobile application platform are capable of meeting current accessibility standards, and our vendor has confirmed their compliance capabilities. While the platforms themselves support accessibility, content currently published across all seven websites and the mobile application contains items that do not yet fully conform to the revised standards. Examples include: - Linked PDF documents - Linked Google Documents - A limited number of images without complete accessibility features (such as alternative text) Additionally, the division is conducting an inventory of websites outside of the SchoolMessenger platform, including: - Louisa County High School Athletics website - Preschool/Kindergarten Registration websites - Technology and instructional support (Google Sites) The total number of non-conforming websites and applications will be finalized upon completion of this inventory.

Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	At this time, no additional licensing costs are anticipated for the division's primary websites or mobile application, as the Powerschool/SchoolMessenger platform already includes accessibility features necessary to support compliance. The primary costs are expected to consist of: - Staff time required to remediate existing content - Accessibility auditing and testing tools (if purchased) - Professional development and staff training - Potential consulting services for auditing specialized websites or applications Because remediation efforts are still being inventoried, an accurate cost estimate is not yet available. However, we estimate the total costs could exceed $200,000.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	The division anticipates providing a more accurate cost estimate following completion of its digital accessibility inventory and remediation planning process during the 2026-2027 school year.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	The division has identified that numerous existing digital documents — including PDF documents, Google Documents, and other posted resources — do not currently meet all accessibility requirements. An inventory of these documents is currently underway to determine the total number requiring remediation. Priority will be given to frequently accessed documents and documents required for public services, including Code of Conduct handbooks, required forms, policies, and instructional resources.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We estimate costs could exceed $100,000 to $150,000. We estimate these fees could be made up through a combination of: - Staff time required to recreate or remediate documents - Accessibility remediation software or auditing tools - Professional development and training - Potential outside consulting services for large-scale document

	remediation
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Two key areas where our school division – and likely many others – need an immense amount of support are training and funding. Our school division has a strong desire to conform to the revised accessibility standards as quickly as possible, and some of the following steps would greatly benefit our school division: - Funding to support remediation of legacy documents and web content. - Accessibility auditing and monitoring tools. - Best-practice templates for accessible PDFs, Word documents, presentations, and webpages. - Professional development and role-specific training for staff who create digital content. - Continued state guidance on implementing accessibility requirements. - Additional staffing time and resources to review and remediate existing digital content. - Ongoing collaboration with vendors to ensure third-party platforms remain compliant with accessibility standards.

Lunenburg County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to	One

conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We currently pay Apptegy annually to house our website. They ensure that we are compliant with regard to images with requring alt text and our color contrast, etc. Our annual cost for Apptegy is $8,200.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	323
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We are currently procuring quotes from different entities that provide services that will assist us in our compliance with the accessibility standards. We have one quote at present from CivicPlus for DocAccess. Quote notes an annual subscription of $3,000 with a $500 one-time implementation fee.
If unable to provide the cost estimate for document remediation,	

when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Training, along with funding, as maintaining compliance will mean extra work for our employees and extra cost for services to help with compliance.

Lynchburg

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Division and school websites adhere to WCAG 2.1 Level AA. Platforms used by the division are WCAG 2.1 Level AA compliant.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	LCS currently budgets for the following yearly accessibility platforms: $4,500: Diligent Community Live Stream (Accessible video) Total Yearly Cost: $4,500
If unable to provide the cost estimate for website and application	See above.

remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We maintain compliance through current accessibility practices and services.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	LCS currently budgets for the following yearly accessibility services and remediation tools: $2,500: GrackleDocs (Browser Extension) $2,000: ContinualEngine PREP (Remediation Tool) $8,000: DocAccess (Website Tool - paid for by municipality) $1,000: Additional Remediation Services Total Yearly Services Cost: $13,500
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	See above.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Guidance and support resources relating to teacher-created content being shared in Learning Management Systems and on family-teacher communication platforms would be helpful.

Nottoway County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Websites conform to accessibility standards.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	100,000 (75,000 salary & benefits) + 25,000 for any upgrades-- there would be a need to have a full time individual to load information and ensure accessibility, plus any additional upgrades that we currently do that have for the site.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	response provided
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Unknown-- we try to ensure that the original document has been loaded-- we need to review all loaded documents.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools	unknown at this time

that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	This would be a process to review and adjust for compliance with a very limited staff. We would probably have to place an RFP for an audit to identify areas and assist with adjustments.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Additional training on accessibility would be extremely helpful, funding to ensure extra time can be devoted to upgrades.

Patrick County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	9
Provide a cost estimate to have accessible features implemented in the websites and applications	

(ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	10/1/2026
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	approx 165 documents
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$10,000
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance	Training and funding

(i.e. training, funding, auditing platforms, etc.)?	

Roanoke

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	0
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Cost estimate for Roanoke City Public Schools to come into compliance: Approximately $2,500 current FY, and approx. $1,000 recurring annual cost for a tool to support the creation of accessible documents. This is not including hourly rate of staff time involved.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	It is difficult to provide a specific answer, as our school division is still in the process of completing a full document audit. We are also still receiving legal guidance on what is exempt (e.g., uncertainty regarding password-protected internal staff intranet sites). Based on built-in accessibility tools on our school division and school websites, approximately 100-200 documents are affected at some level. This includes several complex and lengthy

	documents, like our Student Code of Conduct and Parent Handbook.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Unable to currently provide.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	By August 30
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	It would be extremely helpful if there were a statewide contract or bulk pricing for an auditing or remediation tool. Grant funding or a reimbursement program specifically for accessibility remediation. Lastly, free or low-cost accessibility training, best practices, and guidance.

Rockbridge County

Question	**Response**
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194,	Not sure

Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Not sure yet
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	This fall
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Not sure
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Not sure
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Winter 2026
As you are working on your compliance, where	Not yet started

is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We are not sure

Russell County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	None.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We pay approximately $5,000 annually for this.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with	None.

accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Funding.

Salem

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by	Some if not all websites and applications fail to conform if assuming a website or application has at least one accessibility issue.

federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	Website auditing $10,000–$20,000 Accessibility monitoring $2,000–5,000/year Staff training $3,000–7,000 Document remediation software $2,000–5,000 Consulting $5,000–15,000 Total estimate - $20,00 - $60,000
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Almost all documents will likely be revealed as failing to conform but more will be revealed from an organization-wide digital accessibility assessment that has yet to take place.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Assuming the following: Acrobat Pro Grackle Microsoft accessibility tools Staff remediation hours OCR software Vendor remediation An estimate would be $15,000 - $50,000.
If unable to provide the cost estimate for document remediation, when will the division be	

able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Salem City Schools has initiated planning for compliance of this accessibility rule and corresponding Virginia law. Additionally, training has occurred on WCAG 2.1 AA as well. The division would benefit from statewide guidance on implementation expectations; funding for accessibility remediation, auditing tools, and software; standardized procurement language for accessibility requirements; professional development for instructional and administrative staff; guidance regarding third-party vendor responsibilities; and centralized resources, templates, and training materials that support WCAG 2.1 AA compliance.

Scott County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Our district website and school websites meet the accessibility standard, but we are reviewing our other applications.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have	Unsure at this time

accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	We hope to have that figure by September
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Unsure at this time, we are still assessing.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	Unsure at this time.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	We hope to know that by September.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	We would benefit from training and an auditing platform.

Shenandoah County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	While our division and school websites (11 in total) conform to many of the accessibility standards, we are in conversations with our website host provider on what other steps must be taken to comply with the upcoming federal policies.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We do not have a specific cost for any new platforms or packages we would need to purchase in order to conform with the new accessibility standards, but preliminary discussions put the cost in the thousands of dollars.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	Our last conversation with our website provider about their efforts to create programs/updates that will comply with the new federal guidelines indicated that they were hoping to have their new accessibility product available for purchase and use this year.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	Similar answer to question #4, the new platform/program our website host provider is developing would also apply to documents posted online.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools	Similar answer to question #5

that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	Similar answer to question #6
As you are working on your compliance, where is your division on training staff on digital accessibility?	Not yet started
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	All of the above. While we have been focused on the federal guidelines and timelines in relation to new accessibility standards, we were unaware that there were state laws related to digital accessibility standards in effect. We have been operating under the assumption that we had some runway in working with our website host provider to see their accessibility tool in action and how it works for larger school divisions before moving forward with purchase and implementation since the deadline for compliance with the federal accessibility requirements had been delayed to 2028.

Stafford County

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194,	Our websites have undergone an extensive audit and are in compliance with standards. We are actively working with our partner and third-party agencies to help them understand the importance of applying these standards to their sites.

Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We are exploring further accessibilty assets and are not able to provide an estimate at this time.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	We expect to have a full picture by October.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	At this time, all documents are compliant or have been converted to text on pages.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	This remains an ongoing cost. What is the timespan?
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	October, with the timespan established.
As you are working on your compliance, where	Training In Progress

is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Funding for a position dedicated to accessibility support. Training, specifically with regard to remediating PDFs. We would appreciate videos that could be shared with all staff that step through compliant creation and mitigation.

Virginia Beach

Question	Response
Select your school division size:	More than 50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	GOOGLE SITES: VBCPS has identified over 1,000 staff-created Google Sites on the vbschools.com domain that have not undergone accessibility review and are presumed non-conformant. A corrected audit is currently underway to determine which of those are publicly accessible and therefore subject to the rule. However, we must be transparent about a platform-level constraint that affects how we can respond to this question. Google has itself acknowledged that Google Sites cannot fully meet WCAG 2.1 AA requirements due to inherent limitations in the platform. This means that even with dedicated remediation resources, full conformance for Google Sites content is not technically achievable under the current platform. VBCPS is left in the position of accepting residual risk associated with continued Google Sites use, while implementing governance controls — including Google Drive Trust Rules to restrict public publishing to authorized staff — to limit that exposure. We want to be clear that this is not a decision made lightly. Google Sites is deeply integrated into VBCPS instructional practice and operations. Staff and students use the platform for curriculum delivery, classroom resources, department communications, and school-based content. Eliminating it entirely would carry significant educational and operational consequences. We are therefore pursuing a governance-first approach that reduces public accessibility risk while preserving the platform's instructional value. We would ask VDOE and the DOJ to consider whether platform-level non-conformance by major technology providers — where the gap is outside the control of the public entity using the platform — warrants specific guidance or safe harbor

	provisions in the regulatory framework. This is unlikely to be a challenge unique to VBCPS. APPLICATIONS: VBCPS does have a system that provides visibility into which applications are in use across the division. However, ADA accessibility conformance has not historically been a gate requirement or evaluation criterion in the application approval process, which means we do not have a current accessibility status for the application inventory. This raises a policy question we believe VDOE should consider as part of its guidance to divisions: should ADA compliance be a hard gate requirement for application use, or a weighted factor in the decision? The answer is not straightforward. There are applications that provide significant educational value — for students with and without disabilities — that may not fully meet WCAG 2.1 AA. Categorically barring their use could itself disadvantage students if the accessible alternative is educationally inferior or does not exist. We would benefit from state-level guidance on how to balance accessibility compliance against instructional value in application procurement decisions. A compounding challenge is the speed at which new web-based applications emerge and are adopted by staff and students. Many tools are available directly on the web without any installation or administrative approval, making them effectively invisible to division oversight until they are already embedded in classroom practice. This shadow IT problem is not unique to VBCPS and represents a structural gap in how ADA compliance can realistically be enforced at the application level in a large school division. We would encourage VDOE to acknowledge this reality in any guidance it develops and to avoid framing compliance expectations in ways that assume divisions have complete visibility and control over every digital tool in use across their schools. We anticipate being able to provide a more structured application accessibility assessment by fall 2026 as we begin incorporating accessibility as a formal criterion in our application review process going forward.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new	One additional Web Developer FTE approved to begin July 1, 2026, with primary responsibility for Google Sites governance, internal site remediation, and accessibility compliance across external digital properties outside vbschools.com. Estimated annual cost including salary and benefits is approximately $65,000 to $75,000, depending on candidate.

platforms that have accessible features, hiring de...	PDF remediation tooling is currently in active vendor evaluation and testing. A cost estimate will be available once a tool is selected, anticipated by end of September 2026. Application accessibility auditing tools and any remediation costs associated with applications are not yet estimated, pending the incorporation of accessibility as a formal criterion in our application review process, which is underway. Combined with DCCE's AudioEye figure of approximately $40,000, the division's current confirmed accessibility spend is in the range of $100,000 to $115,000 annually once the FTE is in place, with additional tooling costs to be confirmed. However, the figures above do not capture what may be the most significant cost of ADA compliance across the division: the staff time required to create conformant content in the first place. VBCPS staff routinely produce digital content that is subject to accessibility requirements, including presentations used in instruction and operations, documents and resources created by teachers for classroom and public use, and externally accessible PDFs published across division websites and platforms. Making each of these conformant requires meaningful additional time per document — time that must be spent by the staff member creating the content, typically without any dedicated support or tooling assistance. Across a division the size of VBCPS, with thousands of staff producing digital content on a daily basis, this represents a substantial and largely invisible labor cost that does not appear in any budget line but is being absorbed by instructional and operational staff throughout the division. We do not yet have a reliable method to quantify this cost in dollar terms, but we want VDOE to understand that the true cost of compliance is significantly larger than the licensing and staffing figures above suggest. Any state-level cost analysis that focuses only on technology tools and dedicated FTEs will substantially undercount the actual burden on school divisions. We would encourage VDOE to consider this hidden labor cost when communicating compliance expectations to the legislature and when advocating for resources on behalf of divisions. It would be a significant omission not to note that none of these requirements — federal or state — came with any additional funding, staffing allocations, or resources to support compliance. VBCPS, like every school division in Virginia, is expected to absorb the full cost of an unfunded mandate of considerable scope and complexity within existing budgets, while simultaneously managing the operational demands of educating tens of thousands of students. The staff time, tooling costs, new positions, and compliance infrastructure described in this response are all being funded by redirecting resources that were

	previously allocated to other priorities. We believe VDOE has both the standing and the responsibility to communicate this reality clearly to the General Assembly and to advocate for dedicated state funding that reflects the actual cost of the compliance burden being placed on divisions.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	VBCPS anticipates being able to provide a complete cost estimate for website and application remediation no later than winter 2027. Website-related staffing costs are already established, however both PDF remediation tooling costs and application remediation costs require additional time to develop accurately. Regarding PDF remediation specifically, VBCPS has been actively evaluating tooling options but has not yet identified a solution that fully meets the division's requirements. We are continuing our vendor evaluation process and anticipate selecting a tool by end of September 2026. Licensing and implementation costs will be available at that time. Regarding applications, producing a credible cost estimate requires first completing a comprehensive accessibility audit of the division's application inventory, incorporating accessibility as a formal evaluation criterion in our ongoing application review process, and assessing remediation options for applications found to be non-conformant — which may include vendor negotiation, platform substitution, or accepting residual risk where no accessible alternative exists and the educational value is significant. We recognize that VDOE will need this information to inform its response and advocacy efforts ahead of the federal compliance deadline of April 26, 2027, and we are committed to providing a complete estimate in time to be useful to that process. We would note, however, that accelerating this timeline requires redirecting staff capacity that is simultaneously needed for active remediation work — a tension that is itself a direct consequence of managing a compliance effort of this scope without dedicated state funding or resources.
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	VBCPS does not currently maintain a centralized repository of all published division documents, which makes a precise count difficult to provide. Documents are published across multiple platforms and systems by a large number of staff division-wide without a centralized publication workflow or accessibility checkpoint. That said, we can characterize our conformance posture by category. Significant effort has been invested in ensuring that documents presented publicly on vbschools.com are now conformant, and externally accessible documents on our primary

	website have been made a priority. This represents meaningful progress in the highest-visibility and highest-risk category of published content. However, internal documents housed on our intranet and other internal platforms are largely untouched at this time and are presumed non-conformant. Additionally, instructional and curriculum documents residing in our Learning Management System represent a significant and largely unassessed body of content that has not yet been reviewed or remediated. The majority of division documents are generated in Microsoft Word, Google Docs, or through third-party platforms and exported to PDF without accessibility remediation as part of the creation workflow. Given this reality across internal systems, the LMS, and staff-created content division-wide, we estimate that overall document conformance across all platforms and locations is approximately 15%. Arriving at a more precise figure would require a comprehensive audit of published documents across all division platforms, which has not yet been conducted and would itself require dedicated resources to complete.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	VBCPS's document remediation costs are currently unquantified pending tool selection. We have been actively evaluating PDF remediation tooling options but have not yet identified a solution that fully meets the division's requirements. We anticipate selecting a tool by end of September 2026, at which point licensing and per-use cost data will be available. The labor cost for remediation will depend significantly on whether the selected tool can automate remediation at scale or whether significant manual intervention is required per document. It is important to note that there are two distinct cost dimensions to document remediation that VDOE should understand. The first is the significant upfront cost of remediating the existing backlog of non-conformant documents prior to the April 2027 deadline. Given that overall document conformance across the division is estimated at approximately 15%, the volume of documents requiring remediation is substantial. The second is the ongoing recurring cost of remediating new documents as they are created and published across the division. Most remediation tools operate on a per-page cost model, meaning that document remediation is not a one-time expense but a continuous operational cost that schools and departments will need to absorb indefinitely as new content is produced. The division's long-term strategy is to reduce this ongoing burden by incorporating accessibility into the document creation workflow from the start — through staff training and accessible

	templates — rather than relying exclusively on after-the-fact remediation. This approach reduces the recurring cost over time but requires its own upfront investment in training infrastructure. Both the upfront remediation cost and the ongoing per-page operational cost are currently unbudgeted. As with other aspects of this compliance effort, no additional funding or resources have been provided to meet these requirements, and the division is expected to absorb costs that were neither anticipated in existing budgets nor funded by the mandates that created them.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	VBCPS's document remediation costs are currently unquantified pending tool selection. We have been actively evaluating PDF remediation tooling options but have not yet identified a solution that fully meets the division's requirements. We anticipate selecting a tool by end of September 2026, at which point licensing and per-use cost data will be available. The labor cost for remediation will depend significantly on whether the selected tool can automate remediation at scale or whether significant manual intervention is required per document. It is important to note that there are two distinct cost dimensions to document remediation that VDOE should understand. The first is the significant upfront cost of remediating the existing backlog of non-conformant documents prior to the April 2027 deadline. Given that overall document conformance across the division is estimated at approximately 15%, the volume of documents requiring remediation is substantial. The second is the ongoing recurring cost of remediating new documents as they are created and published across the division. Most remediation tools operate on a per-page cost model, meaning that document remediation is not a one-time expense but a continuous operational cost that schools and departments will need to absorb indefinitely as new content is produced. The division's long-term strategy is to reduce this ongoing burden by incorporating accessibility into the document creation workflow from the start — through staff training and accessible templates — rather than relying exclusively on after-the-fact remediation. This approach reduces the recurring cost over time but requires its own upfront investment in training infrastructure. Both the upfront remediation cost and the ongoing per-page operational cost are currently unbudgeted. As with other aspects of this compliance effort, no additional funding or resources have been provided to meet these requirements, and the division is expected to absorb costs that were neither anticipated in existing budgets nor funded by the mandates that created them.
As you are working on your compliance, where	Training In Progress

is your division on training staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	VBCPS's staff training on digital accessibility is in early stages.The division has made meaningful progress in training the staff responsible for managing and publishing content on vbschools.com, and that work is ongoing. However, broad division-wide training for the general staff population on how to create accessible content including accessible documents, presentations, and digital resources, has not yet been systematically deployed. The primary reason is that we have prioritized building the governance infrastructure and tooling that staff will need to actually act on that training before rolling it out at scale. Training staff to create accessible PDFs, for example, is most effective once a remediation tool is in place that they can use as part of their workflow.As governance controls are established and tooling decisions are finalized through fall 2026, the division will be in a position to deploy more structured accessibility training. Broader training for all staff who create and publish digital content is planned for calendar year 2027. We would note that effective accessibility training at scale is itself a resource-intensive undertaking. Developing quality training materials, delivering them across a division of thousands of staff, and building the ongoing reinforcement necessary to change deeply ingrained content creation habits requires dedicated time, personnel, and funding — none of which has been provided as part of the compliance mandate. This is an area where state-level support, whether in the form of vetted training resources, a centralized training platform, or direct funding to divisions, would have immediate and meaningful impact.VBCPS's needs fall into several distinct categories, and we want to be direct with VDOE about what would actually move the needle for divisions working to meet these requirements. Dedicated Funding. VBCPS recognizes that the obligation to provide equal access to programs and services for individuals with disabilities has existed under ADA Title II since 1990, and we are not suggesting that the underlying requirement is new. What is new is the specificity, scale, and enforceability of what is now being asked. The 2024 rule did not create the obligation — it codified a precise technical standard and attached a compliance deadline to it, effectively requiring divisions to audit and remediate thousands of websites, tens of thousands of documents, hundreds of applications, and the ongoing digital

	content output of thousands of staff simultaneously and within a fixed timeframe. The practical effect is that divisions are being asked to retrofit a digital infrastructure that was never engineered to meet this standard, at scale, on a deadline, using tools that in many cases are still maturing. That is a categorically different undertaking from simply doing an existing thing better, and the costs associated with it are real and substantial. We are not raising this as an excuse for non-compliance — VBCPS is committed to meeting its obligations and is actively investing to do so. We raise it because VDOE asked what divisions need, and honest cost transparency is a legitimate and useful answer to that question. VDOE is in a position to ensure that the General Assembly understands the true scope of what is being asked of divisions, and we would encourage VDOE to use that position to inform policy conversations even where immediate funding may not be forthcoming. State-Vetted Vendor Recommendations. Every Virginia school division is independently evaluating the same universe of accessibility tools — PDF remediation platforms, web auditing tools, document creation guidance, and training platforms — with no shared infrastructure for that evaluation. VDOE could provide significant value by establishing a vetted vendor list or negotiating statewide contracts for commonly needed accessibility tools. (sending the rest of this graph to the email address since it won't fit here)

Waynesboro

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	

Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training	Training Complete

staff on digital accessibility?	
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	

Winchester

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	We are still evaluating the requirements of WCAG 2.1 AA to determine the number of resources impacted.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	We are not at a point yet to provide an accurate cost estimate. We are still working through the process of identifying the compliance issues and developing a plan to correct them.
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	We hope to be able to provide a cost estimate by the end of the calendar year.
How many documents fail to conform with accessibility standards	We are still evaluating the requirements of WCAG 2.1 AA to determine the number of resources impacted.

and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	We are not at a point yet to provide an accurate cost estimate. We are still working through the process of identifying the compliance issues and developing a plan to correct them.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	We hope to be able to provide a cost estimate by the end of the calendar year.
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Additional time to complete the auditing process. Time and resources to develop a plan of action. Time and likely additional funding for compliance resources/applications.

Wise County

Question	Response
Select your school division size:	Less than 10,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under	

28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	$0
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	
How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	None to my knowledge.
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	$0
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	

As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	Training for our division leaders as well as recommendtations for auditing would be helpful so that we ensure we are as compliant as we think!

York County

Question	Response
Select your school division size:	10,000-50,000 students
How many websites or applications fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	I don't have the data to answer this question. The division and school websites confirm to accessibility standards, and we have DPA agreements with applications acting as "school officials" - however, with more than 1800 employees being able to create their own content on applications such as Canvas, our learning management system, we have not been able to review every single piece of content.
Provide a cost estimate to have accessible features implemented in the websites and applications (ex: license to turn on accessible features, new platforms that have accessible features, hiring de...	unknown
If unable to provide the cost estimate for website and application remediation, when will the division be able to provide a cost estimate?	December 2026

How many documents fail to conform with accessibility standards and are not covered by federal exceptions under 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202?	again, unable to determine due to the shear volume of documents created and posted on learning platforms
Provide a cost estimate (ex: cost of hours for staff to remediate, cost of tools that remediate, etc.) to have documents remediated to conform with accessibility standards.	cost estimates vary by document size and content.
If unable to provide the cost estimate for document remediation, when will the division be able to provide a cost estimate?	
As you are working on your compliance, where is your division on training staff on digital accessibility?	Training In Progress
What does the division need to support their accessibility compliance (i.e. training, funding, auditing platforms, etc.)?	funding and common training at the state level.