COMMONWEALTH of VIRGINIA

Virginia Information Technologies Agency
7325 Beaufont Springs Drive
Richmond, Virginia 23225
(804) 510-7300

Michael Watson
Chief Information Officer
Email: cio@vita.virginia.gov

TDD VOICE -TEL. NO.
711

October 1, 2026

TO: The Honorable Abigail D. Spanberger
Governor

The Honorable Traci J. Deshazor
Secretary of Administration

Members of the General Assembly

FROM: Michael Watson, Chief Information Officer, Virginia IT Agency

SUBJECT: Commonwealth of Virginia 2026 Information and Communications Technology Nonconforming Report

This report is submitted in compliance with Va. Code § 2.2-3504, as amended, which requires:

> 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.

Please accept this report as fulfillment of this responsibility and contact me with any questions.

VIRGINIA
IT AGENCY

Information and Communications Technology Nonconformance Report

Virginia Information Technologies Agency

October 1, 2026

Background

The Virginia Information Technologies Agency (VITA) submits this report pursuant to Va. Code § 2.2-3504 which requires the head of any covered entity or his designee to report to the appropriate executive branch agency any information and communication Technology (ICT) that does not conform with accessibility requirements and is not included in the exceptions outlined in 28 C.F.R. § 35.201 or 36 C.F.R. Part 1194, Appendix A, § E202. Each executive branch agency must report annually to the General Assembly on such ICT and provide an estimate of the fiscal impact involved in bringing this technology into compliance with applicable federal and state laws and regulations.

VITA is the Commonwealth's consolidated information technology agency, responsible for procurement, infrastructure, cybersecurity, and governance of ICT for executive branch agencies. As part of its mission, VITA develops, maintains, and provides technology resources and services to customer agencies across the Commonwealth. VITA continuously plans, builds, and supports information and communications-related technologies to meet statewide needs.

VITA's accessibility resources and capabilities

VITA assembled a cross-agency accessibility workgroup tasked with identifying, planning, and acting on needs related to accessibility laws, standards, and guidelines. The workgroup consists of VITA staff with ICT accessibility, procurement, enterprise architecture, communications, and legal compliance expertise. In addition, VITA's Digital Accessibility Coordinator (DAC) reviews accessibility needs across the agency, identifies user experience issues and assesses the conformance and performance of various tools.

The information presented in this report reflects the initial collection and review of VITA's applications and systems. A significant portion of VITA's efforts were dedicated to identifying and distinguishing which applications and systems were VITA-specific, a time-intensive but necessary step before remediation could begin.

Assessment methodology and results

The Information Technology Access Act (ITAA) defines information and communications technology (ICT) as any website, application, or other product or service primarily intended to fulfill or enable information processing and communication electronically, including through the internet.

As described above, VITA operates in two capacities: first, as an executive branch agency subject to the reporting requirements of Va. Code § 2.2-3504, and second, as a

governing authority. For purposes of this report, VITA assessed only its own ICT and did not assess ICT belonging to other executive branch agencies.

VITA's DAC extrapolated data from two systems:

- **Archer**, the Commonwealth's governance, risk, and compliance management tool that houses information about, and provides and inventory of applications, and,
- **SiteImprove**, a tool that automates the detection and remediation of issues on websites to optimize performance and conformance, including accessibility.

To ensure accuracy, VITA conducted a manual review of the extrapolated Archer data to identify which ICT belonged to VITA for reporting purposes. This manual review is extensive and remains ongoing as VITA continuously develops and deploys new technology tools for internal and customer use.

As of September 15, 2026, VITA identified 671 systems in Archer and 46 applications in SiteImprove, for a total of 717 ICT systems that need to be assessed. Systems are assessed on a rolling basis as they are created or, if vendor-procured, during contract renewal.

Of the identified systems and applications that have been reviewed, VITA has determined that 78 systems are non-conforming ICT and not subject to an exception. Of these, 46 are actively tracked in SiteImprove and undergo regular automated accessibility evaluations. The evaluations are run every 7 days. Due to the dynamic nature of web content, while VITA works to ensure accessibility conformance, full conformance is difficult to achieve. VITA takes proactive steps by reviewing scan results and acting on the issues found.

Fiscal impacts

Va. Code § 2.2-3504 also requires executive branch agencies to provide an estimate of the fiscal impact required to bring non-compliant technology, which is not subject to exception, into conformity with federal and state accessibility laws and regulations. VITA is still developing its fiscal impact assessment, as the agency continues to determine which ICTs meet accessibility conformity standards and which do not.

When this statute was amended in 2025, VITA determined that compliance would require the addition of two classified positions to support full implementation of the ITAA requirements, but these positions were not filled. VITA currently employs one full-time staff member (VITA's DAC) responsible for determining whether the agency's ICTs are accessible.

Based on the past year's experience implementing the ITAA, including conducting reviews to identify non-conforming ICT which are not subject to an exception, VITA anticipates the need for additional resources to continue supporting ITAA compliance

efforts. These needs include, but are not limited to, additional staff, contractor support, software tools, and increased vendor costs.

Conclusion

VITA is committed to meeting the accessibility requirements established in the ITAA. Evaluations of VITA's systems and applications for accessibility conformity are ongoing due to the large number of technologies involved and limited staff resources.

After completing the full review of its systems and applications, VITA anticipates that its 2027 report will provide additional information on the compliance status of its ICT, as well as the estimated fiscal impact of bringing non-excepted technology into compliance with applicable federal and state laws and regulations.