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Annual Report on Information and Communications Technology Accessibility

Reporting Period: 10/1/2025 through 10/1/2026

PREPARED FOR:

VIRGINIA GENERAL ASSEMBLY

PURSUANT TO § 2.2-3504 OF THE CODE OF VIRGINIA

EXECUTIVE SUMMARY

The Virginia Department of Energy submits this report pursuant to § 2.2-3504 of the Code of Virginia to identify information and communications technology (ICT) that does not meet applicable accessibility requirements and to describe the anticipated fiscal impact of bringing that technology into compliance.

Based on the Agency's assessment for the reporting period, existing agency website content and Esri StoryMaps constitute the only identified category of nonconforming ICT. The Agency is continually working toward WCAG 2.1 AA compliance on general web content and has identified ten StoryMap publications that do not meet applicable accessibility requirements. No other nonconforming ICT has been identified.

The assessment completed during this reporting period focused on public-facing ICT. Internal employee-facing windows applications have not yet been fully assessed due to public-facing applications and web sites/applications taking priority. This report does not represent a determination that all other Agency ICT conforms to applicable accessibility requirements.

The anticipated remediation approach is for the Digital Accessibility Coordinator and IT staff to utilize SiteImprove to identify and remediate existing accessibility issues, and for Agency mapping staff led by the GIS Administrator with support from the Digital Accessibility Coordinator to recreate the affected StoryMap publications using new tools and verify the accessibility of the resulting content. The primary anticipated fiscal impact is employee time as all affected content exists within the agency purview.

SCOPE

DOJ Title II ADA Rules

The U.S. Department of Justice's rule under Title II of the Americans with Disabilities Act requires covered state-government web content and mobile applications to conform to the Web Content Accessibility Guidelines, Version 2.1, Level AA, by April 26, 2027, subject to applicable exceptions and legally permitted limitations.

Although the Title II rule and associated deadline is a separate obligation, they are linked in the scope and type of accessibility issues that are being remediated as part of the Virginia Information Technology Access Act. As such there are references to the April 26, 2027, federal deadline for conformance of covered web content and mobile applications with WCAG 2.1 Level AA throughout this report.

Identified Nonconforming Technology

The Agency identified thousands of pages on its public-facing website and ten existing Esri StoryMaps that did not meet applicable accessibility requirements at the beginning of the

reporting period. These represent the only categories of nonconforming ICT identified during the reporting period.

Remediation of the identified public-facing content required the Agency's available accessibility resources throughout the reporting period. As a result, internal employee-facing windows-based applications were not formally assessed, and their accessibility status remains undetermined. Additional deficiencies may be identified when those assessments are completed.

Although no formal assessments have been conducted, it is worth mentioning that the Agency received no employee complaints concerning accessibility barriers in internal applications, and no barriers affecting employees' ability to perform their assigned duties were reported.

Planned Remediation Approach

A. WEBSITE CONTENT

Throughout the reporting period the agency has worked to continually remediate accessibility issues throughout the public facing website and associated applications. The Digital Accessibility Coordinator in conjunction with development staff has remediated 42 separate issues across more than 4000 pages and has increased the overall accessibility score by 37.45 points.

There are still twenty accessibility issues of varying difficulty spread across hundreds of pages remaining. The Agency continues to utilize this existing workflow to work toward WCAG 2.1 AA compliance across the public facing website and anticipates we will meet WCAG 2.1 AA compliance by the April deadline which should also satisfy the requirements pursuant to the Virginia Information Technology Access Act.

B. ESRI STORYMAPS

The anticipated remediation approach is to recreate the affected StoryMaps using new tools rather than rely on the existing publications in their current form.

The agency has completed an inventory of affected publications. Documented accessibility deficiencies and determined the applicability of any cited exceptions. Identified replacement tools capable of supporting accessible content.

1. The proposed workflow to remediate is as follows:
2. Reviewing and recreating the information contained in each affected publication.
3. Evaluating replacement publications against applicable accessibility requirements and correcting remaining deficiencies before release.
4. Replacing or retiring the affected publications, as appropriate.

The Agency's remediation planning will account for both its existing Virginia-law obligations and the federal web and mobile accessibility deadline.

Estimated Fiscal Impact

The primary existing and anticipated fiscal impact is the cost of employee time required to remediate web accessibility problems and to recreate StoryMaps using new tools. Use of existing employees will require an allocation of Agency resources, even if the work does not result in additional hiring or direct expenditures. Time devoted to remediation has and will continue to reduce employee capacity for other assigned duties.

The workload includes reviewing existing content, learning the replacement tools, rebuilding publications, evaluating accessibility, and correcting identified deficiencies. The level of effort varies according to each component's complexity. Current assessment of hours spent are estimates:

Cost Component	Staff Involved	Current Assessment
Inventory and accessibility review	Digital Accessibility Coordinator, GIS Administrator, GIS Staff, IT Staff, PR Staff	DAC: 100-150 hours 50-75 hours across all other employees
Familiarization with replacement tools for StoryMaps	GIS Administrator, GIS Staff	Minimal: 20-30 hours across staff
Recreation of affected StoryMap publications	GIS Administrator, GIS Staff, Digital Accessibility Coordinator	100-150 hours
Accessibility verification and corrections	GIS Administrator, GIS Staff, Digital Accessibility Coordinator, IT Staff, PR Staff	DAC: 800-1,000 hours All other employees: 100-150 hours
Total estimated employee hours up to this point	GIS Administrator, GIS Staff, Digital Accessibility Coordinator, IT Manager, IT Staff, PR Staff	1,170 to 1555 hours across all employees
Estimated dollar value of employee time up to this point	Pending application of appropriate compensation rates to estimated hours	$42,120 – 55,980
Estimated dollar value of employee time from now to complete remediation	Digital Accessibility Coordinator, GIS Administrator, GIS Staff, IT Staff	$20,000-25,000
Additional licensing, software, or contractor costs	N/A	No additional software licenses have been required. No contractors required as in-house staff have been able to remediate all existing issues

Conclusion

The Agency's remaining accessibility work is concentrated on remediating its public-facing website and applications. These efforts have required a substantial commitment of employee time and represent the most labor-intensive component of the Agency's accessibility initiative. Prioritizing this work, including preparation for the April 2027 federal web and mobile accessibility deadline, has limited IT staff capacity to complete a comprehensive assessment of internal applications. The workload has also placed significant demands on the Digital Accessibility Coordinator and delayed other Agency priorities, including internal development projects and planned operational improvements.

The Agency benefits from in-house staff expertise and direct control over its website and internally developed applications. These capabilities allow staff to implement accessibility corrections without the anticipated need for external contractors, reducing the costs and administrative effort associated with contractor procurement, coordination, and oversight. The current remediation approach does not anticipate purchasing replacement software. However, the scope of any additional remediation needs will remain uncertain until internal applications have been fully assessed.

The primary anticipated fiscal impact is therefore employee labor and the resulting reduction in capacity for other work. Although an exact dollar estimate has not yet been established, the impact is substantive: time devoted to accessibility assessment and remediation is time unavailable for other Agency responsibilities. The use of existing staff limits anticipated additional expenditures but does not eliminate the resource demands or the operational consequences of delayed projects.

Moving forward, the Agency's priorities are to continue remediating public-facing content, complete the assessment of internal applications, and develop a more complete estimate of the staff effort required to address any remaining deficiencies. The pace of this work will depend on available employee capacity and the need to balance accessibility responsibilities with other essential Agency functions.