



2020 Biennial Performance Report

Electronic Information Resources Accessibility

This report addresses section 2054.055(b)(9) of the Government Code which requires the Texas Department of Information Resources (DIR) to provide a summary of agency and state progress in providing access to electronic and information resources (EIR) to individuals with disabilities.

Background

There are more than 1.7 million Texans with disabilities including many with conditions that affect interaction with the internet, telephone, and other electronic communications. Accessible state agency EIR helps Texans access government services and allows state employees to perform work functions independently, regardless of disability. State accessibility laws require state agencies to develop, procure, maintain, and use accessible EIR. In addition, DIR has set standards for the accessibility of state websites and technologies through rules in the Texas Administrative Code (TAC).

DIR collaborates with public and private organizations to facilitate progress in EIR accessibility at the state, national, and international levels to:

- Elevate levels of accessibility across Texas agencies and its vendor community.
- Identify and communicate best practices for EIR accessibility.
- Provide training and tools that facilitate progress in accessibility compliance.
- Evaluate and recommend revisions to statewide accessibility standards, rules, and guidelines.
- Provide input to federal government, national organizations, and international standards bodies in the development of accessibility policies and legislation that affect Texans.

EIR Accessibility Rule Revision

In fiscal year 2019, DIR updated [1 TAC 213](#) to incorporate Web Content Accessibility Guidelines (WCAG 2.0 Level AA), technical standards to align with federal procurement regulations covered by [Section 508](#) of the Rehabilitation Act of 1973. The updated rule includes provisions to improve governance of EIR accessibility programs for state agencies and state-funded institutions of higher education (IHE) and increase compliance with EIR accessibility requirements.

EIR Accessibility Initiatives

Over the past biennium, state agencies have made varied degrees of progress in their EIR accessibility initiatives. DIR recognizes the challenges in complying with recently updated accessibility rules in the TAC and has implemented several programs and tools to assist agencies in advancing EIR accessibility.

Accessibility of Products and Services in DIR's Cooperative Contracts Program

While the number of accessible information technology (IT) products and services is growing, many still do not comply or only partially comply with technical standards for EIR accessibility. DIR recognizes that only accurate documentation from vendors will enable state agencies and IHEs to understand compliance levels, assess risks, and make informed decisions in the selection of accessible IT products. To address this challenge, DIR has implemented procedures to hold vendors accountable for the accuracy of the EIR accessibility documentation they provide when responding to IT solicitations through DIR's cooperative



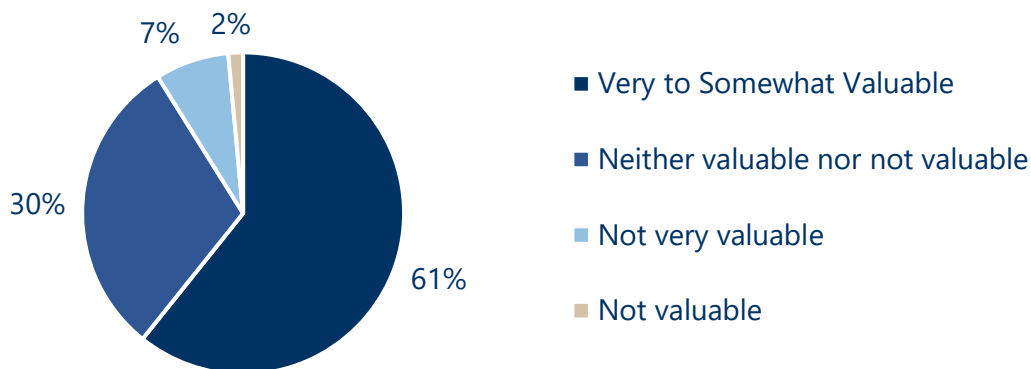
contracts program. Through these methods, DIR has generated improvement in the documentation that many vendors provide.

New EIR Accessibility Learning Management System

In September 2019, DIR introduced a free [EIR Accessibility Learning Management System \(LMS\)](#) in response to survey results that identified availability and cost of accessibility training as significant barriers to EIR accessibility compliance. Access University is a comprehensive, role-based LMS that DIR has made available at no cost to all employees of Texas state agencies and IHEs. Topics range from basic introductory material to curriculums for programming, testing, and other complex areas of EIR accessibility. The service has been well received, with over 950 users enrolled during the first year.

Figure 1 shows that over 60% of agencies and IHEs responding to the 2020 Accessibility Survey included as part of the Information Resources Deployment Review (IRDR) found the LMS somewhat or very valuable to achieving accessibility compliance. It should be noted that the LMS rollout was in its early stages at the time of the survey, and DIR expects continued widespread adoption in the new biennium.

Figure 1
How valuable and effective is the free EIR Accessibility Learning Management System in achieving accessibility compliance to 1 TAC 213 and 1 TAC 206?



Source: 2020 IRDR

Promoting Policy-Driven Adoption for Accessibility

Policy-Driven Adoption for Accessibility (PDAA), a maturity model developed through the National Association of State Chief Information Officers (NASCIO), is based on the premise that organizations with mature EIR accessibility policies and programs are more likely to produce accessible products and deliverables. When vendors work to and achieve mature accessibility policies and programs, it instills greater confidence in the accuracy of the accessibility documents they provide for solicitation responses and ultimately, results in more accessibility compliant offerings.

PDAA tools are used by DIR as part of nearly every solicitation. They have been published on the [US General Services Administration US Section 508 resources page](#), further enhancing its use in federal procurements and is also being implemented as part of several state's accessibility programs.



DIR Web Accessibility Scanning Program

DIR continues to offer web accessibility web scanning services at no charge to enrolled Texas state agencies and IHEs. This free service analyzes websites for compliance with WCAG, checking web pages for compliance with common accessibility issues. It also reports quality assurance errors such as misspellings or broken links. The responses to the IRDR indicate that there are 44 agencies and IHEs using this service, with an additional 38 using their own web accessibility scanning tools and services. Combined, responses indicate a total scanning utilization of 61%. DIR continues to promote the free service and encourage use of other scanning solutions.

Outreach

Outreach continues to be an important aspect of EIR accessibility efforts. DIR's Statewide EIR Accessibility Program Director participates in workgroups, panel discussions, presentations, and learning sessions. Areas of outreach during the current biennium include participation in the following:

- International Association of Accessibility Professionals
- World Wide Web Consortium ICT Accessibility Maturity Model Initiative
- GSA Interagency Accessibility Forum (US General Services Administration)
- Partnership on Employment & Accessible Technology (PEAT) Think Tank
- Multi-state Digital Accessibility Collaboration Work Group
- AccessU Technical Conference

In addition, DIR moderates an EIR accessibility discussion list with over 350 government and private sector subscribers. The list offers discussion forums, information on meetings, and webinars on EIR accessibility topics. Also, DIR provides consultation with agencies and the vendor community on a wide range of accessibility-related topics.

EIR Accessibility Progress and Challenges

Each biennium, DIR surveys state agencies and IHEs to evaluate EIR accessibility progress, gauge compliance with state accessibility requirements, and understand barriers to ensuring accessibility of state information technology (IT) resources. The 2020 Accessibility Survey was conducted as part of the [Information Resources Deployment Review \(IRDR\)](#).

Key findings from this survey show progress in the areas of:

- Increased compliance with EIR accessibility standards for public-facing web pages.
- Increased use of accessibility metrics.
- Increased compliance with Web Content Accessibility Guidelines (WCAG 2.0).

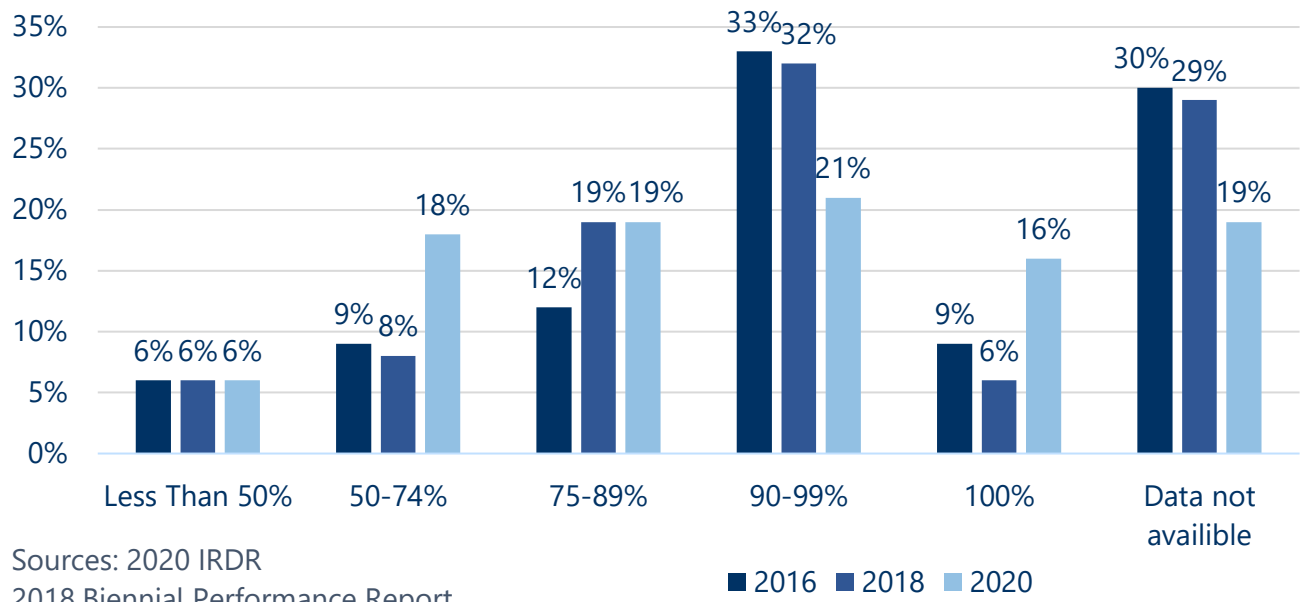
Barriers and continued challenges include:

- Continued struggles with EIR accessibility compliance for public-facing applications.
- Limitations in agency staff knowledge and budget for EIR accessibility training.
- Limitations in the accessibility of vendor procured solutions and Commercial-Off-The-Shelf (COTS) products.



As shown in Figure 2, agencies and IHEs report improvement with compliance on externally facing websites and webpages. This may be due in part to better accuracy in reporting through the wider use of scanning tools for reporting errors and providing technical guidance to remediating the found errors. Some of the improvement may also be attributed to higher levels of knowledge by staff.

Figure 2
What percentage of publicly-facing web pages are in full compliance with state accessibility requirements, 1 TAC 206 and 213?

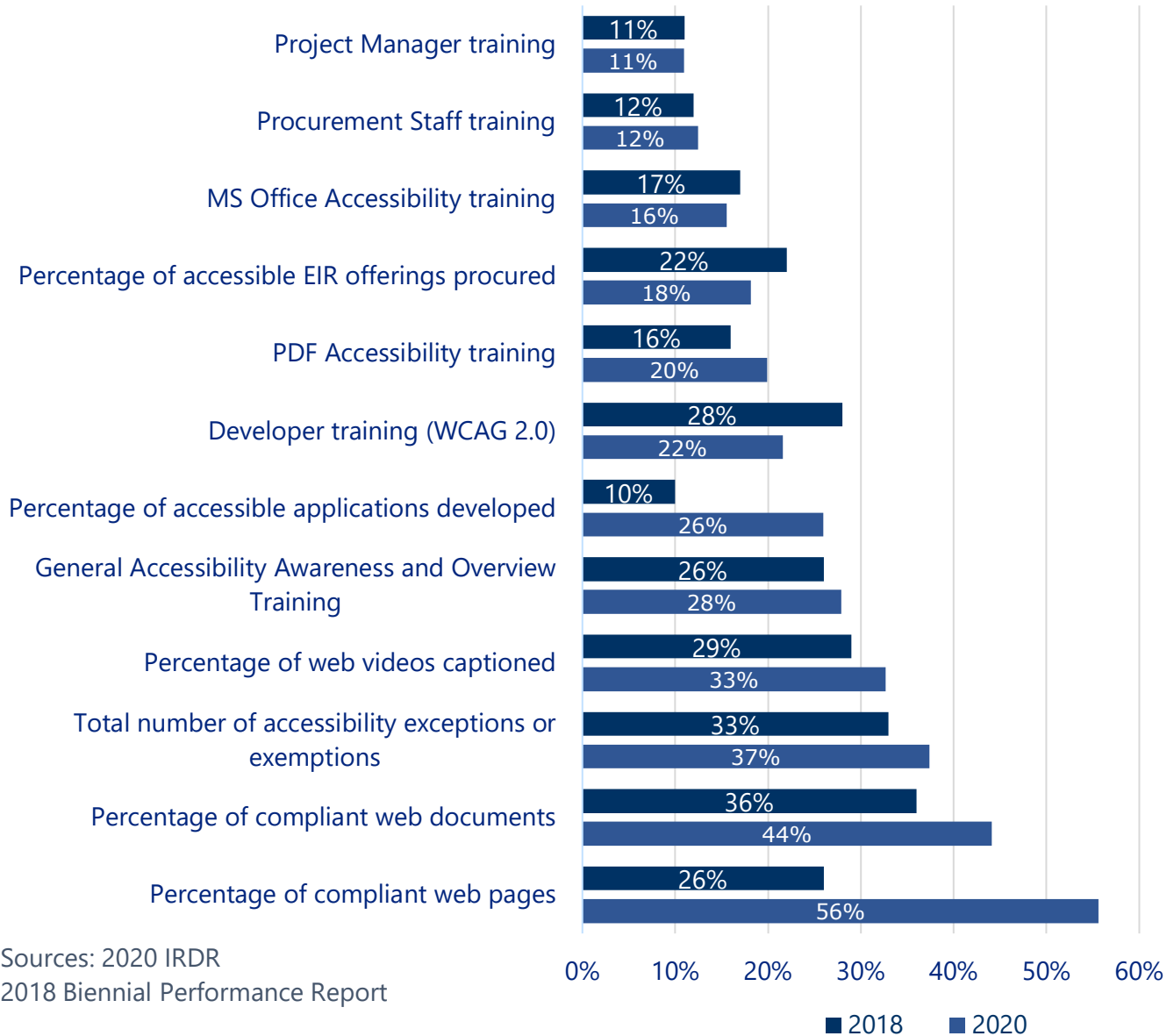


Setting goals for EIR accessibility and tracking progress is a critical factor for advancing EIR accessibility. Statewide standards for accessibility require state agencies and IHEs to establish and track EIR accessibility metrics. (See [1 TAC 213.21\(f\)](#) and [1 TAC 213.41\(f\)](#).)



Figure 3 shows an increase in use of various accessibility metrics between 2018 and 2020.

Figure 3
Agencies & IHEs Accessibility Metrics - 2018-2020

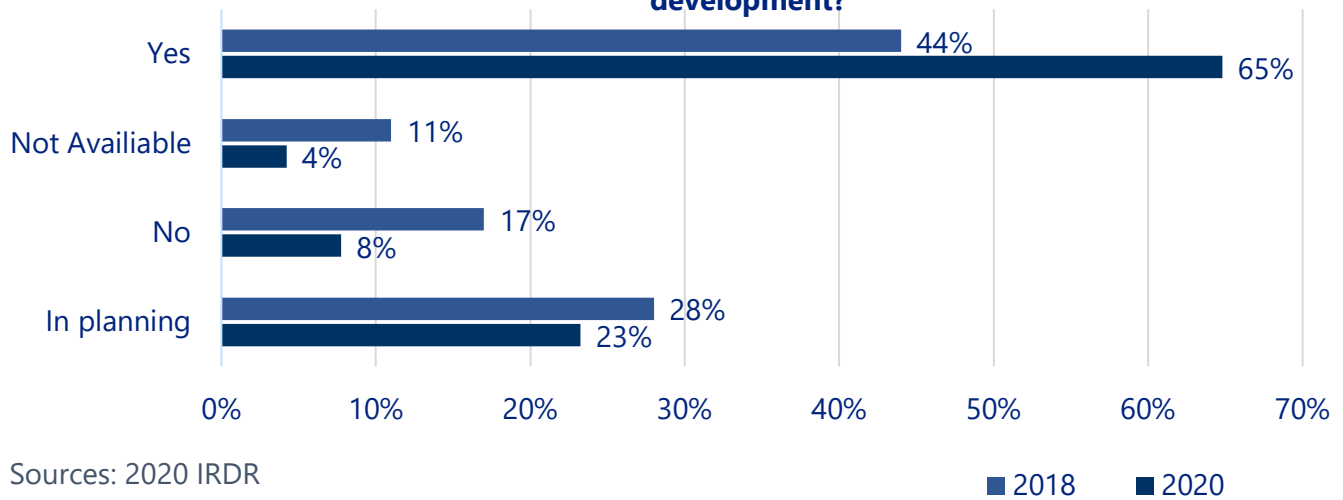


By April 2020, state agency and IHE websites were required to be compliant to WCAG 2.0 Level AA, the new technical standard for web accessibility. (See [1 TAC 206.50\(a\)](#) and [1 TAC 206.70\(a\)](#).) In 2013, DIR started promoting the use of this standard in preparation for this transition.

Figure 4 shows that substantial progress had been made over the biennium after the April 2020 effective date of the rule.



Figure 4
Has your agency begun to implement accessibility technical standards defined in WCAG 2.0 level AA for new website and web application development?



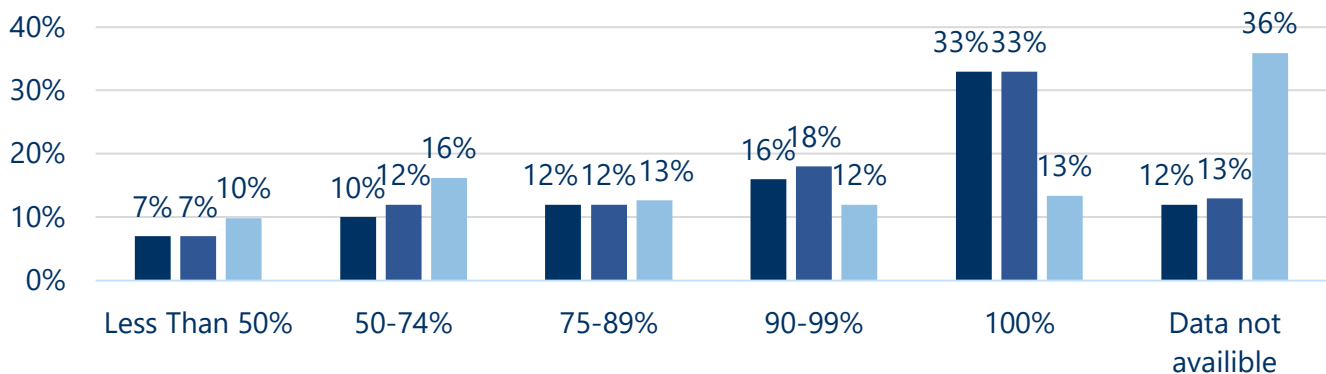
Sources: 2020 IRDR
 2018 Biennial Performance Report

The journey to accessibility compliance is complex and there can be challenges along the way. For example, Figure 5 shows a decline in agencies reporting that public-facing web-based applications are complaint. DIR believes this may be attributed to:

- The transition to WCAG 2.0 AA and the resources needed to meet this technical standard.
- The procurement of vendor offerings that are not EIR Accessibility compliant, but still required by agencies to operate.

DIR continues to work with agencies, IHEs, and the vendor community to help all parties understand the requirements for public-facing applications and steps that can be taken to meet those requirements.

Figure 5
What percentage of the agency's publicly-facing web-based applications, are in full compliance with state accessibility requirements, 1 TAC 206 and 213?

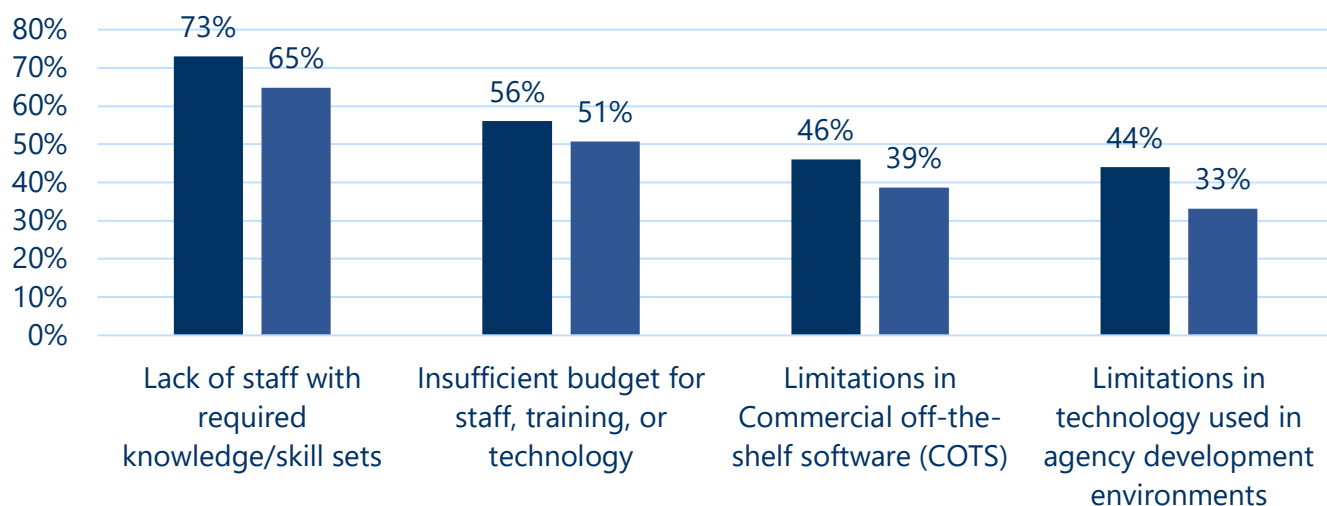


Sources: 2020 IRDR
 2018 Biennial Performance Report



Figure 6 shows top barriers to compliance reported by agencies and IHEs in 2018 and 2020. The good news is gaps in accessibility skills and budget appear to be dropping. DIR believes that the free programs for web scanning and staff training through Access University contribute to this downward trend.

Figure 6
Top Barriers to EIR Accessibility Compliance



Sources: 2020 IRDR
2018 Biennial Performance Report

■ 2018 ■ 2020

Next Steps/Recommendations

Agencies and IHEs should:

1. Fully implement WCAG 2.0 Level AA or higher for all new IT projects and procurements.
2. Use their EIR accessibility survey results to understand their strengths and deficiencies, and work with their EIR Accessibility Coordinators to address accessibility challenges.
3. Commit to agency investments in EIR accessibility initiatives.

DIR will:

1. Encourage agency use of DIR-provided scanning tools, Access University, and other initiatives to increase understanding of EIR accessibility and improve compliance.
2. Continue to introduce new methods, processes, and tools to help vendors participating in DIR's Cooperative Contracts program that improve vendor documentation and improve the compliance of their products.
3. Consult with agencies, IHEs, and vendors to improve EIR accessibility for all Texans.