

Digital Accessibility Policy

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Digital Accessibility Policy

Policy Number: ADMN.303.02.E

Policy Type: External

Authority: Iowa Code 8.77; Iowa Code 8.85

1. Purpose

This policy establishes the State of Iowa's requirement that its [Digital Content and Services](#) be accessible to people with disabilities. It sets a single accessibility conformance target so that Iowans and state employees with disabilities have access to and use of state [Digital Content and Services](#) comparable to the access afforded to others.

2. Scope

This policy applies to all [Enterprise Workers](#). That includes employees, contractors, vendors, interns, board members, and any individual working for the [Department of Management \(DOM\)](#) or any [Supported Entity](#).

This policy is deliberately broader than the Digital Asset Policy. It governs accessibility across [Digital Content and Services](#), including but not limited to public [Websites](#), so that documents, applications, and procured technology are covered.

3. Accessibility Requirement

3.1 Conformance Target

While Agencies are encouraged to adopt [WCAG](#) 2.2 at Level AA as the forward-looking direction for new and substantially revised content, all [Digital Content and Services](#) within scope must conform to the [Web Content Accessibility Guidelines \(WCAG\)](#) 2.1 at Level AA, which is the binding conformance target under this policy and aligns with Title II of the Americans with Disabilities Act. This requirement is consistent with the Revised Section 508 Standards. DOM and Supported Entities must meet this conformance target no later than April 26, 2027, consistent with the Title II compliance deadline applicable to the State.

3.2 Procured and Third-Party Technology

Before deployment, any procured, licensed, or third-party product or digital service must be accompanied by a current [Accessibility Conformance Report \(ACR\)](#) for that product: the vendor's completed report, based on the [VPAT](#) format, documenting how the product conforms to [WCAG](#) 2.1 Level AA (see: <https://www.ada.gov/>

[resources/2024-03-08-web-rule/](#)) and, where applicable, the Revised Section 508 Standards. An [ACR](#) is evidence about a specific product, supplied by the vendor. Vendor self-assessments carry less weight than [ACRs](#) produced through independent, third-party evaluation. This reflects federal Section 508 procurement guidance, which treats a vendor's [VPAT-based ACR](#) as a self-disclosure supporting preliminary assessment and directs purchasers to independently validate vendor conformance claims (U.S. General Services Administration, [Section508.gov](#): Understanding vendor claims in accessibility conformance reports, and accessibility in procurement guidance).

3.3 Public Accessibility Statement

Each [Public-Facing Website](#) and [Web Application](#) must publish an accessibility statement that affirms the agency's commitment to the conformance target in this policy and provides at least one method to report accessibility barriers.

3.4 Roles and Responsibilities

The enterprise accessibility function within the Department maintains this policy, the conformance target, and the supporting testing and quality-assurance methodology. Each agency subject to this policy must coordinate with DOM on conformance, remediation, and vendor accessibility documentation.

4. Exceptions

[Enterprise Workers](#) may request clarification or ask for an exception by submitting a new request through Service Desk Plus > New Incident.

5. Authority and Enforcement

Not following this policy may lead to disciplinary action, based on human resources (HR) policy and contractual authority.

Related Policy

Digital Asset Policy (ADMN.302.01.D) governs how websites are built and operated and sets the required [Public-Facing Notices](#), including the accessibility statement that discloses the commitment established in this policy.

Document Owner: DOM Director

DOM Director Approval Date: September 1, 2026

Last Revision Date: September 1, 2026

Glossary

Accessibility Conformance Report (ACR)

A vendor-supplied report, based on the VPAT format, documenting how a specific product conforms to accessibility standards.

Digital Content and Services

Any content or capability the State provides or uses in electronic form, including websites, web applications, mobile applications, and electronic documents.

DOM

The Iowa Department of Management.

Enterprise Workers

All employees, contractors, vendors, interns, board members, and any individual working for the Iowa Department of Management (DOM) or any Supported Entity (Iowa Code Chapter 8) who has access to State of Iowa-managed systems, data, or information. This also includes anyone who does IT work or works with Criminal Justice Information (CJI) for DOM or a Supported Entity, even if they don't otherwise work for DOM or a Supported Entity. These individuals must follow any additional requirements for IT or CJI work, along with the general requirements for Enterprise Workers.

Notice

A public statement an agency publishes on its digital assets, such as an Accessibility Statement, Privacy Statement, Terms of Use, Non-Discrimination and Accommodation notice, or Contact Information.

Public-Facing

Accessible to the general public over the internet, as distinct from internal-only systems.

Supported Entity

Under Iowa Code section 8.76(13), a "Supported Entity is a unit of state government, which is an authority, board, commission, committee, council, department, or independent agency as defined in Iowa Code section 7E.4, including but not limited to each principal central department enumerated in Iowa Code section 7E.5. However, "Supported Entity" does not include: a. The office of the governor or the office of an elective constitutional or statutory officer. b. The general assembly, or any office or unit under its administrative authority. c. The judicial branch, as provided in Iowa Code section 602.1102. d. A political subdivision of the state or its offices or units, including but not limited to a county, city, or community college. e. The state board of regents and institutions operating under its authority.

Voluntary Product Accessibility Template (VPAT)

A document template established by the Information Technology Industry (ITI) Council to evaluate the accessibility of a product according to Section 508 Standards. Vendors use the VPAT® to create a self-disclosing document called an Accessibility Conformance Report (ACR), which details how the product meets each Section 508 requirement and identifies any potential deficiencies. The Voluntary Product Accessibility Template (VPAT®) serves as a standardized reporting format that helps buyers and sellers assess the accessibility features of information and communications technology (ICT) products and services.

Web Application

An interactive application delivered through a web browser that collects, processes, or transacts information for public users, providing functionality beyond content publishing. Web applications are not required to run on the Content Management System.

Web Content Accessibility Guidelines (WCAG)

Technical standards developed by the W3C's Web Accessibility Initiative (WAI). They provide a framework to help developers and designers make web content accessible to people with a wide range of disabilities. WCAG is widely cited by accessibility laws and regulations around the world. By April 2027, Iowa state agency websites must comply with WCAG version 2.1 Level AA criteria.

Website

A public-facing site whose primary purpose is publishing and managing web content for the public. Websites are built and maintained on the official Content Management System (CMS).