Accessibility Maturity Roadmap
for Part C and Part B Data Systems

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RHONDA WEISS CENTER
FOR ACCESSIBLE IDEA DATA

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Introduction

Accessibility for individuals with disabilities is a civil right. Since 1973, laws in the United States have required state and government agencies to ensure accessibility for individuals with disabilities by removing barriers to access and providing reasonable accommodations. Some of these laws include:

- The Americans with Disabilities Act (ADA)
- Section 508 of the Rehabilitation Act of 1973, as amended
- Section 504 of the Rehabilitation Act of 1973, as amended
- The Individuals with Disabilities in Education Act (IDEA)

Different federal agencies enforce these laws. For example, the **Office of Civil Rights** (OCR) of the Department of Education enforces Section 504 of the Rehabilitation Act. Since 2013, **OCR** has responded to over 1,000 complaints concerning the accessibility of schools, districts, and state education agency websites or course materials. These complaints resulted in an OCR investigation leading to a Resolution Agreement requiring the education entities to resolve these issues within a specified time.

This roadmap's purpose is to guide state education agencies and leading agencies in planning, implementing, and sustaining a Part C or Part B data system that is accessible to individuals with disabilities. In the following sections, we discuss several relevant laws.

The Americans with Disabilities Act

The Americans with Disabilities Act (ADA) was first signed into law in 1990. It is a comprehensive civil rights law that prohibits discrimination based on disability. The ADA prohibits discrimination in employment, state and local government services (including public schools), places of public accommodation (i.e., businesses and nonprofits serving the public), and other areas of public life (e.g., transportation). One important element of the ADA is the requirement to provide effective communication. State and local governments and places of public accommodation must ensure that individuals with disabilities can:

- communicate with,
- receive information from, and
- convey information to the covered entity.

One way that organizations commonly communicate is through electronic information technology like websites and apps. In April 2024, the Department of Justice updated regulations for Title II of the ADA covering state and local governments. The regulations now require specific technical standards to be implemented to ensure web content and mobile applications are

accessible to individuals with disabilities. Specifically, the Web Content Accessibility Guidelines (WCAG) Version 2.1, Levels A and AA are now the technical standards for state and local governments' web content and mobile apps.

Section 508(a)(2)(A) of the Rehabilitation Act Amendments of 1973, as amended

Section 508(a)(2)(A) of the Rehabilitation Act Amendments of 1973, as amended, requires that the information and communication technology used by federal employees provide equivalent access to information and data for individuals with and without disabilities. Section 508 requires that electronic content conform to Level A and Level AA of WCAG 2.0.

In addition, the 21st Century Integrated Digital Experience Act requires that any executive agency with a new or redesigned website, web-based form, web-based application, or digital service, is accessible to individuals with disabilities in accordance with section 508 of the Rehabilitation Act of 1973.

Section 504 of the Rehabilitation Act of 1973, as amended

Section 504 of the Rehabilitation Act of 1973 (Section 504) prohibits discrimination based on disability in any program or activity receiving federal financial assistance from the Department of Education. In public elementary or secondary schools, Section 504 guarantees that students have comprehensive access to educational opportunities by providing Free Appropriate Public Education (FAPE). In postsecondary education, schools must provide academic adjustments to ensure that students are not discriminated against based on their disability.

Individuals with Disabilities in Education Act (IDEA)

The IDEA is a law that requires that public schools provide FAPE to eligible children with disabilities and ensures special education and related services are provided for those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to eligible infants, toddlers, children, and youth with disabilities. IDEA also requires states to submit and report data on the infants, toddlers, children, and youth they serve.

Preparing for Accessibility

Accessibility is a journey, not a final destination. To prepare for the journey toward an accessible data system, one of the first considerations an agency must consider is where its data are currently stored. Data may be stored in a digital format, in a file cabinet in paper form, or both. This roadmap assumes that the state agency's data collection, reporting, and storage process exists, or will eventually exist, in a digital format.

Another consideration is an agency's current technology landscape. What technologies and platforms are used? Are they compatible with recognized accessibility standards? Can they be upgraded for accessibility? These questions are not meant to discourage an agency as it moves its way through the accessibility journey, but rather, these are important questions to consider. Additional aspects include whether a new data system is being considered, and whether accessibility language is included in the Request for Proposal (RFP). We will dive deeper into these questions in the System Design and Development component section.

Making your Part C or Part B data system accessible will make it more user-friendly for all individuals, including both those with and without disabilities.

About this Resource

This resource is designed for state education agencies and lead agencies as a roadmap to an accessible Part C or Part B data system. The roadmap contains the same five interrelated sub-components found in the IDEA Data Center (IDC) and the Center for IDEA Early Childhood Data Systems (DaSy) frameworks for building a quality data system, which are:

- Purpose and Vision
- System Design and Development
- Data Governance and Management
- Data Analysis and Use
- Sustainability

The five components are interrelated. For example, the Purpose and Vision component addresses the removal of all barriers to accessibility for Part C and Part B data systems, which is fundamental to the other components. The remaining components provide a framework or roadmap to achieve that goal.

Each component contains one or more quality indicators. Quality indicators describe what is needed to build and support a viable, accessible data system. The corresponding quality elements further define each quality indicator.

Intended Audience

This roadmap is for all collaborators involved in the process of making the Part C and Part B data system accessible. Each component may require a different group to be involved. Users of this Roadmap may include:

- State Education Agency leadership.

- State Special Education Directors
- Data Governance Coordinators
- Part C Lead Agency Staff
- ADA Coordinators
- Part B Data Managers
- Part C Data Managers
- IT Staff (web designers, application developers, business analysts,)
- Procurement Officers
- 3rd Party Vendors
- EDFacts Coordinators
- Data Stewards
- Content Creators

How to Use this Resource

This roadmap was created to be a flexible resource for use based on the priorities of each state. State Education Agencies (SEAs) and Lead Agencies (LAs) may decide to prioritize which component to start with based on current need. For example, if an SEA or LA is creating data visualizations or representations, then the Data Use and Analysis component might be the right starting point. If the SEA or LA is currently reviewing policies, then the Governance and Management may be the right place to start. We encourage states to use this information in whatever ways they find most beneficial for their current need.

Purpose and Vision

Having a documented purpose and vision statement will inform your agency and all collaborators as to why data system accessibility is important. The purpose should clearly state the reason why data system accessibility is the goal. An example of an accessibility project purpose might be:

- To comply with accessibility requirements of the Americans with Disabilities Act and Section 508.
- To fulfill the agency's strategic goal of removing all accessibility barriers for those with disabilities.
- To promote a workforce that includes individuals with disabilities.

Once the goals of data system accessibility are identified, ask yourself how you envision your organization. The answer to that question will yield the vision statement. In other words, the

vision statement should state how the leadership envisions the agency after including accessibility best practices. An example of a vision statement for an accessibility project might be:

- To ensure that our Part C and Part B data systems are universally accessible, we strive to empower all users with seamless and comprehensive solutions that support the varied needs of every individual.

It is highly recommended that agency leadership participates in developing the purpose and vision statement to ensure leadership buy-in. Getting leadership buy-in early in the process may mitigate roadblocks as the project unfolds. It is recommended that the purpose of accessibility be woven into the agency policies and procedures to solidify the agency's stance in case of a change in leadership.

The scope of any project defines the objectives, milestones, and timelines for successful project completion. A well-documented project scope will inform and remind all collaborators of the project's goals. Examples of a scope objective might include:

- Remove accessibility barriers in Part C and Part B data and data system.
- Evaluate Part C and Part B data systems for accessibility for individuals with disabilities.
- Develop accessibility policies and procedures for Part C and Part B data collections.
- Audit or evaluate Part C and Part B data systems for accessibility conformance.

Once you have determined the project's objectives, it is important to document the milestones and determine the timeline for each phase.

For those entities whose Part C and Part B data collection process is not yet in digital format, examples of project objectives might include:

- Secure or develop accessible software applications for Part C and Part B data collection processes.
- Develop a training course for users of the new digital data system that highlights the accessibility features.

When setting the objectives for an accessibility project for Part C and Part B data systems, remember to include all the phases of data collection that internal and external users will access. Data collection phases include determining requirements, data system development or modification, data system testing, data system training, data collections, data validations, data storage, and data use.

Purpose and Vision (PV): Quality Indicators and Elements of Quality

Quality Indicator PV1: The purpose and vision statements for the Part C and Part B data systems aim to remove all barriers to accessibility for individuals with disabilities.

Elements of Quality for PV1:

- PV1a. The purpose and vision statement aligns with the accessibility standards in federal and state laws.
- PV1b. The development of the purpose and vision statement for the Part C and Part B data systems include individuals with disabilities.
- PV1c. An accessibility statement is displayed on the landing page for the Part C and Part B data system. It also includes the WCAG 2.1 Level A and AA standards, unless state or local laws establish higher conformance.
- PV1d. The state and lead agency's executive team establish goals and initiatives that incorporate compliance with accessibility standards.
- PV1e. Staff review and revise the purpose and vision statements with collaborators as needed to ensure their continued adherence to established accessibility standards.
- PV1f. Agency policymakers create or modify policies to comply with established accessibility conformance standards and best practices when possible.

System Design and Development

Ensure you have the tools and skills to evaluate the current data system and associated applications to determine if they meet accessibility standards.

Web accessibility evaluation tools target different audiences, including web designers, developers, content creators, and quality assurance testers. Knowledge of application coding and accessibility is critical when using evaluation tools. There are existing web accessibility evaluation tools that will help determine if your website, mobile application, documents, or source code meets accessibility guidelines. However, these tools are only useful for establishing a baseline and are not a substitute for manual testing with screen readers and other assistive technologies.

Determine if current technologies are compatible with accessibility standards.

Due to the age, specific version, or the overall accessibility of a given software application, retrofitting the software for accessibility may not be an option. If the current data system technology does not allow for modifications to produce an accessible application, new software may be necessary to obtain the necessary level of accessibility.

Evaluate the data collection website to determine the number of web pages and documents that need updating for accessibility.

Set priorities for updating the data system and associated applications by breaking the work into manageable chunks.

Apply accessibility compliance standards to all applicable devices (tablet, laptop, cell phone), data systems, websites, and data reports.

Please note: WCAG 2.1 Level AA is the current standard requirement for state and local governmental websites and mobile apps.

Determine the skill sets needed to successfully upgrade the current system or create a new system with accessible functionality.

The specific roles most important to this accessibility process include application developers, business analysts, web developers, quality assurance staff, content creators, Part C and Part B data managers, accessibility staff and individuals with disabilities when possible.

Do the current staff have the necessary skills and experience? Do they also have the necessary time available that the accessibility projects may require?

The answer to these questions may present budgetary constraints that could affect the timeline for the accessibility project.

Provide accessibility training to this group if their experience in this area is minimal.

A good place to start is this quick-start guide created by the U.S. General Services Administration for embedding accessibility and universal design practices into your team's workflow. The Web Accessibility Initiative (WAI) is another highly recommended site for accessibility training and information.

Look to leverage unique and free resources for project assistance.

Investigate the Department of Corrections and other state departments and agencies within your state for free services to assist with this accessibility project. For example, the Oregon Department of Education used the Oregon Women's prison inmates to review over 300 HTML pages sent to them from Oregon DOE and noted all the areas of the HTML code that needed remediation for accessibility. Some prison systems have trained incarcerated individuals to work in this area. Also, another source of support may be high school students as part of career and technical education programs, or college students as part of a work-study program or internship.

Are you planning to purchase a new data system or new software application?

For agencies planning to acquire a new data system or software application, the procurement office should be aware of the accessibility requirements. Procurement officers and employees responsible for purchasing products for the SEA or LA may request an Accessibility Conformance Report (ACR) based on the Voluntary Product Accessibility Template (VPAT). These reports serve as a starting point for organizations who are needing to purchase the most accessible version of a product to ensure it will work for individuals with disabilities.

When posting a Request for Proposal, make sure that proposal submitters include language on the accessibility of their proposed system. Your posting should also include the minimum standard the new data system or software must adhere to, such as WCAG 2.1 AA, which is the minimum standard for the ADA and Section 508 as of April 2024. The new data system must incorporate accessibility as a core design feature as opposed to being an add-on after the system is already designed/implemented. This will help to avoid costly and time-intensive retrofits.

Are you planning to implement a new Part C or Part B data system?

When developing or modifying a data system, accessibility must be considered to ensure that it is usable by as many people as possible, including those with disabilities. See the list of considerations for an accessibility project below.

1. **Adherence to Standards**: Follow the Web Content Accessibility Guidelines (WCAG) to meet the needs of users with disabilities.
2. **Collaborative Effort**: Collaborate closely with designers, developers, and content managers to create a cohesive system that addresses accessibility from all angles.
3. **Universal Design**: Consider the needs of all users, including those with visual, auditory, motor, and cognitive disabilities.
   - Choose the right type of data visualization.
   - Use high-contrast colors and text.
   - Provide alt text for images and graphs.
   - Label your visual elements.
   - Implement keyboard navigation.
   - Create accessible tables.
   - Use semantic HTML.
   - Offer alternative accessible versions.
   - Ensure information can be accessed using screen readers.
   - Maintain simplicity.

4. **Testing and Feedback**: Regularly evaluate the system with qualified testers with disabilities when possible and incorporate their feedback to improve accessibility.
5. **Training and Awareness**: Educate the team on the importance of accessibility and provide training on how to implement it effectively.
6. **Legal Compliance**: Be aware of the legal requirements for accessibility to reduce legal risk.

By integrating these considerations into the development process, you can create a data system that is more accessible and usable for everyone. Remember, accessibility is not just a feature; it is a fundamental aspect of universal design and system development practices.

System Design and Development (SD): Quality Indicators and Elements of Quality

Quality Indicator SD1: Agency staff are actively involved in initiating the development or remediation of the state's IDEA Part C and Part B data systems and have made the content accessible to meet current accessibility standards. It is crucial to involve individuals who have a working knowledge of assistive technology solutions and recognized accessibility guidelines and standards, preferably individuals with disabilities, throughout the design and development process. This helps to ensure the systems are accessible and user-friendly.

Elements of Quality for SD1:

- SD1a. Agency staff review the plans for the new/enhanced IDEA Part C and Part B data systems to ensure they meet current accessibility standards. They also involve individuals with disabilities in the review process to gather direct feedback on the designs' accessibility and usability.
- SD1b. Accessibility tools to evaluate the current Part C and Part B data systems for accessibility are made available for each target audience (web designers, developers, content creators, quality assurance) and include mechanisms for feedback from users with disabilities to ensure comprehensive accessibility evaluation.
- SD1c. Agency staff commit to the development or enhancement of the Part C and Part B data systems to achieve the necessary accessibility standards, with a dedicated focus on engaging with the disability community to inform and guide these efforts.
- SD1d. Business requirements for the development or enhancement of IDEA Part C and Part B data systems are written to ensure robust accessibility standards are applied for all devices (desktop, tablet, laptop, smartphones, etc.), incorporating

insights and requirements from individuals with disabilities to ensure full usability across devices and assistive technologies.
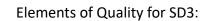
- SD1e. Agency staff evaluate the current website to determine the number of web pages and documents that need to be made accessible, involving users with disabilities, when possible, to identify priority areas for accessibility improvements.
- SD1f. Agency staff evaluate the current Part C and Part B data systems to determine the accessibility compliance level of the systems, using a wide range of testers, including individuals with various disabilities, to ensure a comprehensive assessment of accessibility and usability.

Quality Indicator SD2: The system requirements analysis produces documented requirements for the new or improved Part C and Part B data systems. These requirements accurately describe the necessary accessibility features, developed with direct input from individuals with disabilities, to ensure the systems are fully accessible and meet their needs.

Elements of Quality for SD2:

- SD2a. Agency technical staff determine if current technologies are compatible with accessibility standards, engaging with individuals with disabilities to assess compatibility and gather firsthand feedback on the technologies' effectiveness and usability.
- SD2b. The accessibility functions of the new or improved Part C and Part B data systems are drafted and prioritized for development and implementation, with input from individuals with disabilities, when possible, to ensure that the prioritization reflects real-world needs and challenges.
- SD2c. Agency staff have a clear process for approving the system requirements, which include consulting with individuals with disabilities to validate that these standards effectively address key accessibility and usability issues.
- SD2d. The IDEA Part C and Part B data systems development lifecycle requires accessibility as a standard, enforced by regular reviews and input from individuals with disabilities, when possible, to ensure ongoing compliance and relevance to user needs throughout the development process.

Quality Indicator SD3: Agency staff work closely with the IT team as they build and assess the new or enhanced Part C and Part B data systems for conformance to accessibility standards, ensuring that individuals with disabilities participate throughout the process, when possible, to validate accessibility and usability.

Elements of Quality for SD3:

- SD3a. Agency staff select representative target audience, including individuals with disabilities, whenever possible, for testing accessibility features.
- SD3b. Agency staff collaborate with the IT team to create the testing plan for accessibility, involving individuals with disabilities in the planning process, when possible, to ensure that the testing criteria cover all necessary accessibility aspects.
- SD3c. Agency staff prepare materials and feedback mechanisms for testing accessibility features, ensuring that the feedback mechanisms themselves are accessible and user-friendly, so feedback is easily captured and acted upon.
- SD3d. All programming for the newly developed or enhanced Part C and Part B data systems must pass user acceptance testing for accessibility, conducted with the active participation of individuals with disabilities, when possible, before it is promoted to the production environment.
- SD3e. Automated and manual procedures for evaluating and testing compliance with accessibility standards have been established for Part C and Part B data systems and all outputs, incorporating tools and methodologies recommended by individuals with disabilities, when possible, to ensure comprehensive testing.
- SD3f. Tools are available to evaluate the accessibility conformance level of current or new Part C and Part B data systems. Individuals with disabilities have been included in vetting these tools, when possible, to ensure they effectively identify accessibility issues that may impact end users.

Quality Indicator SD4: Agency staff participate in creating, reviewing, and revising materials to support the implementation of the data collection system's accessible functionality and outputs. Individuals with disabilities are included, when possible, in ensuring that materials are genuinely helpful and accessible.

Elements of Quality for SD4:

- SD4a. User support and technical materials on accessibility are created, updated, and made available online and in hard copy as training resources. They are developed with input from individuals with disabilities, when possible, to ensure clarity, relevance, and accessibility.
- SD4b. An issues log is created to track accessibility issues and prioritize issue resolution. This log is reviewed regularly with the participation of individuals with disabilities, when possible, to ensure that it accurately reflects user experiences, and that prioritization aligns with their needs.

- SD4c. An accessibility best practices document has been created and is used for staff training. This document includes contributions from individuals with disabilities, when possible, to share real-world insights and strategies for creating accessible content and systems.
- SD4d. Standard procedures for developing accessible content (documents, spreadsheets, presentations, PDFs, etc.) have been documented and shared with content creators. These procedures have been co-developed with individuals with disabilities, when possible, to ensure they address a wide range of accessibility concerns.
- SD4e. On-demand help on creating accessible content is available through a help function. This resource includes input from individuals with disabilities, when possible, that answers frequent questions and provides guidance based on actual user experiences and challenges.

Data Governance and Management

From a process management standpoint, accessibility will require a cultural change to the normal course of business. It will affect every part of the data collection and reporting process and will be a continual requirement throughout the lifetime of the data system.

Steering Committee

Creating a steering committee to provide high-level oversight and strategic direction will help ensure the project goal's attainment. The steering committee should be comprised of members from various offices such as accountability, communications, data governance, and information technology. This includes data managers and individuals with disabilities. Be intentional about including individuals with disabilities throughout every phase of the process when possible. Agencies are encouraged to proactively consider the employment of qualified individuals with disabilities to further ensure that individuals with disabilities are vetting the accessibility of IDEA data collection, analysis, and its use.

Policies and Procedures

Incorporate new accessibility requirements by updating current policies or creating new policies and procedures. Accessibility requirements will not only impact staff using the Part C or Part B data system but will also impact other departments within the agency as well, such as Human Resources and Procurement. For example, when onboarding new employees, they will want to inform employees of accessibility requirements related to their job. When planning to purchase new software, the procurement and contracting process must include steps to ensure the software meets the agency's required accessibility conformance level.

Developing an accessibility statement for your website is highly recommended. It reflects your commitment to accessibility. This statement should include the accessibility standard applied, such as WCAG 2.1, and contact information in case individuals encounter accessibility issues.

Data Governance and Management (DG): Quality Indicators and Elements of Quality

Quality Indicator DG1: The data governance structure for the Part C and Part B data system delineates appropriate decision-making authority, accountability, and management consistent with the accessibility standards reflected in the purpose and vision statement.

Element of Quality for DG1:

- DG1a. A data governance steering committee on accessibility has been established to ensure compliance with accessibility standards involving all phases of the data collection process (collection, storage, and use).

Quality Indicator DG2: Data governance policies and procedures are developed that include accessibility standards for each phase of data collection, storage, and use.

Element of Quality for DG2:

- DG2a. Data governance policies and procedures are aligned with the purpose and vision of accessibility of the data system.

Quality Indicator DG3: Data governance policies define and establish accessibility conformance levels for IDEA data collections, storage, and use activities.

Element of Quality for DG3:

- DG3a. Data governance policies require all data collection instruments to follow established accessibility conformance levels.
- DG3b. Data governance policies require all output from data collection tools to follow established accessibility standards.
- DG3c. Data governance policies and procedures on accessibility are shared with all pertinent staff assigned to tasks related to IDEA data.
- DG3d. Data governance policies and procedures require all staff and contractors who use IDEA data to create content (PDFs, Word documents, Excel spreadsheets, PowerPoint slides, etc.) to participate in ongoing accessibility training.

Quality Indicator DG4: State leadership oversees the consistent implementation of accessibility standards in all business functions related to IDEA data.

Element of Quality for DG4:

- DG4a. Standardized training materials on accessibility are created and maintained.
- DG4b. Human Resources incorporates accessibility in the recruiting and hiring process.
- DG4c. The procurement office incorporates language in contracts and RFPs on the required minimum accessibility standards the new system/software must adhere to.
- DG4d. Software quality assurance staff have received training on how to evaluate new or enhanced software to determine their compliance with accessibility standards.
- DG4e. Legal office staff ensure accessibility compliance with agency policies and procedures.
- DG4f. ADA Coordinators are involved with implementing accessibility policies and procedures as they relate to Title II of the ADA.

Quality Indicator DG5: Accessibility standards are required when creating data privacy requirements.

Elements of Quality for DG5:

- DG5a. The implementation of accessibility standards aligns with federal and state privacy laws.
- DG5b. Privacy agreements required by the state agency are available in accessible formats (screen reader accessible, plain language, etc.).
- DG5c. The use of assistive technology does not compromise the user's privacy, nor the privacy of the information being viewed.

Quality Indicator DG6: Security does not negate accessibility requirements.

Element of Quality for DG6:

- DG6a. The use of assistive technology should not reduce access to security features of the application or tool (login, two-factor authentication, automatic time-outs, etc.).
- DG6b. Accessibility compliance is required when procuring third-party security features or tools.
- DG6c. Software developers have been trained in implementing security solutions that meet accessibility requirements.
- DG6d. Quality assurance testing includes the accessibility of security features.

Data Use and Analysis

The way an agency analyzes and presents data for use by the public can either support access or create barriers for individuals with disabilities.

Accessible Data Visualizations/Representations

Effective data use includes creating reports (e.g., data tables, visualizations/representations) that are accessible to everyone, regardless of their abilities. This means designing data representations that are understandable, accessible, and engaging for everyone.

Identifying Barriers

By analyzing data on how individuals with disabilities access and use data visualizations/representations, you can proactively identify barriers and workarounds. This helps to inform how to better understand the current challenges, and plan improvements for greater accessibility in the future. For example, a common accessibility barrier for data visualizations/representations includes color schemes that are not accessible to people who have visual impairments or interactive visualizations that are not accessible for all users. Ensuring that color schemes are high in contrast and meet accessibility requirements resolves this issue.

Data Access

Proper data analysis and use can provide comprehensive access to information and opportunities for individuals with disabilities. The data use and analysis component is vital for enhancing accessibility. It drives the creation of data products that are accessible to everyone, identifies barriers, and ensures that individuals with disabilities experience the benefits of data-driven insights and services.

Data Use and Analysis (DU): Quality Indicators and Elements of Quality

Quality Indicator DU1: Agency staff have implemented continuous improvement processes. This includes achieving accessibility conformance level standards as an active part of their efforts to ensure quality Part C and Part B data are available and accessible for analysis.

Elements of Quality for DU1:

- DU1a. Processes are in place, and are documented, to prioritize accessibility within data reports and analyses made available to the public.
- DU1b. Processes are identified and documented for the purpose of building accessibility into developing new data reports and visualizations/representations.

- DU1c. Processes are identified and documented to remediate existing displays of data reports and visualizations/representations to the identified accessibility conformity level as needed.
- DU1d. The pathway to accessing electronic accessible reports is readily apparent to individuals accessing the website.

Quality Indicator DU2: Agency staff plan and prepare accessibility features to conform to accessibility standards in the development of any products, visualizations/representations, or resources that support the use and analysis of IDEA Part C and B data.

Elements of Quality for DU2:

- DU2a. All data products, created routinely or ad hoc, are vetted and undergo accessibility checks to meet the identified conformance level.
- DU2b. Data products are evaluated by an experienced screen reader user for accessibility.
- DU2c. All data visualizations/representations are checked for color contrast.
- DU2d. All data representations are accompanied by access to the data table for additional accessibility and digestibility.
- DU2e. All data products meet the minimum reading level to maximize reading comprehension and understanding.

Quality Indicator DU3: Agency staff actively plan and prepare to integrate digital accessibility in compliance with accessibility standards in all data analysis of Part C and Part B data.

Elements of Quality for DU3:

- DU3a. Agency staff will identify the type and format of data products used to disseminate the results of the analyses, and the necessary support needed to ensure the product conforms with accessibility standards.
- DU3b. Individuals with disabilities are actively included in the review of data analysis plans and products when possible.
- DU3c. Agency staff prepare feedback mechanisms designed to be accessible and user-friendly for reviewers with disabilities, ensuring their feedback is easily captured and acted upon.

Quality Indicator DU4: Agency staff serve as accessible data leaders to create and maintain the conditions for a culture of accessible data use at the state level for Part C and Part B data.

Elements of Quality for DU4:

- DU4a. Agency staff have the knowledge and skills to create accessible data analysis plans and products to increase participation and feedback by individuals with disabilities.
- DU4b. A commitment to using accessible data for decision-making exists throughout the agency.
- DU4c. Agency staff involved in sharing, linking, and/or integrating IDEA data activities with other early childhood data programs ensure accessibility standards are incorporated.

Quality Indicator DU5: Agency staff actively review their data-informed decision-making process to ensure data included in this process conforms to accessibility standards.

Element of Quality for DU5:

- DU5a. All data extracted from Part C and Part B data systems are made accessible for all data-driven decisions.

Sustainability

Ensuring that the Part C and Part B data system is accessible is an ongoing process that must be sustained over the lifespan of the data system. Key factors leading to sustainability include the following:

- People in leadership positions are committed to accessibility standards for Part C and Part B data systems.
- Job descriptions require all staff involved in the development, governance, maintenance, and use of the Part C and Part B data systems to adhere to documented accessibility standards.
- The orientation for new staff includes accessibility training, especially for those staff members involved with the Part C or Part B data system and all content creators.
- The budgeting process includes a line item for accessibility.
- The agency's strategic goals include the implementation of accessibility standards.
- Current software applications are updated to meet accessibility standards, and new software applications are acquired based on documented accessibility standards.
- Each component of the accessibility maturity roadmap incorporates sustainability measures.

- A culture of accessibility that will withstand structural and staff changes is established.

Sustainability (S): Quality Indicators and Elements of Quality

Quality Indicator S1: Agency leadership has committed to the continued process of incorporating and maintaining accessibility.

Elements of Quality for S1:

- S1a. The agency implements a process that includes input from all collaborators to sustain and enhance accessibility.
- S1b. Accessibility is included within the strategic goals of the agency regarding digital and website platforms.
- S1c. The agency garners political and fiscal support to maintain and enhance the implementation of accessibility across all digital and website platforms.
- S1d - Accessibility is included in job descriptions for all digital content creators.

Quality Indicator S2: Agency staff foster a culture of accessibility. They strive to include accessibility in all tools/products, are accountable for the accessibility of their tools/products, and advocate for accessibility whenever possible.

Elements of Quality for S2:

- S2a. An accessibility review committee is formed and is made up of agency staff who meet regularly to ensure accessibility issues are addressed and remediated. This committee also includes individuals with disabilities.
- S2b. The accessibility committee holds regular training or information sessions related to disability awareness and accessibility on topics that include, but are not limited to, digital media, website accessibility, document accessibility, data visualizations, hosting virtual meetings, etc.
- S2c. Accessibility reviews of all digital material platforms (word, excel, pdf, etc.) are performed regularly to ensure consistency.
- S2d. Websites are reviewed yearly to ensure accessibility requirements are being met.
- S2e. All virtual meetings and PowerPoints are reviewed for accessibility before the event, and all necessary issues are corrected.

Quality Indicator S3: The agency develops a structured training program for new employees.

Elements of Quality for S3:

- S3a. The agency creates and implements a structured training program for new employees, including agency policies.
- S3b. The agency develops a method for documenting and reviewing the training for new employees.

Resources

- [OCR Search | OCR (ed.gov)](#)
- [Civil Rights Division | Section 508 Home Page (justice.gov)](#)
- [The 21st Century Integrated Digital Experience Act | HHS.gov](#)
- [Disability Overview | Office for Civil Rights (ed.gov)](#)
- [Individuals with Disabilities Education Act (IDEA)](#)
- [Web Accessibility Evaluation Tools List | Web Accessibility Initiative (WAI) | W3C](#)
- [Accessibility for teams | Digital.gov](#)
- [Introduction to Web Accessibility | Web Accessibility Initiative (WAI) | W3C](#)
- [How to Create Accessible Infographics and Data Visualizations (accessibility.com)](#)
- [Planning and Managing Web Accessibility | Web Accessibility Initiative (WAI) | W3C](#)
- [Developing an Accessibility Statement | Web Accessibility Initiative (WAI) | W3C](#)
- [Disability Rights Laws in Public Primary and Secondary Education: How Do They Relate? | ADA National Network (adata.org)](#)

Appendix A: Accessibility Checklist for Purpose and Vision

Directions. For each checklist item, please provide the operational level as follows: **Level 1** indicates no planning has taken place, **Level 2** indicates planning in process, **Level 3** indicates partially operational, and **Level 4** indicates fully operational.

Checklist Item	Operational Level	Notes
1. Agency leadership staff such as the Chief Information Officer and/or Chief Data Officer, ADA Coordinator, or other collaborators determine minimum accessibility conformance level that Part C and Part B data system must adhere to.		
2. The required WCAG conformance level is formalized in agency policy.		
3. The purpose and vision statement for the Part C and Part B data system include the requirement to adhere to the documented conformance level.		
4. Individuals with disabilities are included in the discussions and creation of the purpose and vision statement of the Part C and Part B data system.		
5. The webmaster for the agency updates all Part C and Part B web pages with an accessibility statement sharing the accessibility standards that the website conforms to. Example website accessibility standards are as follows: Web Content Accessibility Guidelines (WCAG) 2.1 AA Section 508 of the U.S. Rehabilitation Act of 1973.		

Checklist Item	Operational Level	Notes
6. Staff review and regularly revise the purpose and vision statements with collaborators as needed to ensure its continued adherence to established accessibility standards.		
7. Staff review current policies to identify, and address, existing barriers to accessibility.		
8. Agency department and division leaders have incorporated accessibility compliance into applicable policies agency wide.		

Appendix B: Accessibility Checklist for System Design and Development

Directions. For each checklist item, please provide the operational level as follows: **Level 1** indicates no planning has taken place, **Level 2** indicates planning in process, **Level 3** indicates partially operational, and **Level 4** indicates fully operational.

Checklist Item	Operational Level	Notes
1. Part C and Part B staff, the ADA Coordinator, people with disabilities, and other collaborators, meet with technology staff to discuss new or enhanced business requirements for the Part C and Part B data system, and ensure they meet current accessibility standards.		
2. Part C and Part B staff, the ADA Coordinator, people with disabilities, and other collaborators, meet with technology staff to provide feedback on the accessibility and usability of the new or enhanced data system design.		
3. Web designers have tools to evaluate the current Part C and Part B data system for accessibility.		
4. Developers utilize tools to evaluate the current Part C and Part B data system for accessibility.		

Checklist Item	Operational Level	Notes
5. The developers have received training on how to utilize the evaluation tool.		
6. Individuals with disabilities have had an opportunity to provide feedback on the new or enhanced Part C and Part B data system.		
7. The project team assigned to the development/enhancement of the Part C and Part B data system engages with the disability community to help inform and guide these efforts.		
8. The project team create business requirements for the development or enhancement of the IDEA Part C and Part B data system that incorporate insights and requirements from people with disabilities to ensure full usability across devices and assistive technologies.		
9. The project team creates the business requirements for the development or enhancement of the IDEA Part C and Part B data system to ensure that accessibility standards are applied on all devices (desktop, tablet, laptop, smart phones, etc.)		

Checklist Item	Operational Level	Notes
10. The project team evaluates the current website to determine the number of webpages and documents not meeting accessibility requirements.		
11. The project team involves users with disabilities to identify priority areas for accessibility improvements.		
12. To ensure a comprehensive assessment of accessibility and usability of the Part C and Part B data systems, the project team, including people with various disabilities, evaluate the current Part C and Part B data systems to determine the accessibility compliance level of the systems.		
13. Agency technical staff determine if current technologies are compatible with accessibility standards. They engage with people with disabilities to assess compatibility and gather firsthand feedback on the technologies' effectiveness and usability.		
14. Accessibility features of the new/enhanced Part C and Part B data systems are drafted and prioritized for development and implementation, with contributions from people with disabilities to ensure that the prioritization reflects real-world needs and challenges.		

Checklist Item	Operational Level	Notes
15. Agency staff have a clear process for the review and approval of the final accessibility standards. This includes consultation with people with disabilities to verify that these standards effectively address key accessibility and usability issues.		
16. Accessibility is a standard requirement for the Part C and Part B data system and enforced by regular reviews and input from people with disabilities and staff members.		
17. The project team selects representative end users, including people with a variety of disabilities, for acceptance testing of accessibility features.		
18. Agency staff collaborate with the IT team to create the acceptance testing plan for accessibility, involving people with disabilities in the planning process to ensure that the testing criteria cover all necessary accessibility aspects.		
19. Agency staff prepare materials and feedback mechanisms for quality control of accessibility features, designed to be accessible and user-friendly for testers with disabilities, ensuring that their feedback is recorded and acted upon where possible.		

Checklist Item	Operational Level	Notes
20. All programming for the newly developed Part C and Part B data systems, or enhancements to the current Part C and Part B data systems, must pass quality control for accessibility, conducted with the active participation of people with disabilities before it is promoted to the production environment.		
21. Automated and manual procedures for evaluating/testing compliance to accessibility standards occur for Part C and Part B data systems and all outputs, incorporating tools and methodologies recommended by people with disabilities to ensure comprehensive testing.		
22. Accessibility testing tools are available to evaluate the accessibility conformance level of current or new Part C and Part B data systems. These tools have been vetted by people with disabilities to ensure they effectively identify accessibility issues that may impact end users.		
23. User support and technical materials on accessibility are created, updated, and made available online and in hardcopy as training resources, developed with input from people with disabilities to ensure clarity, relevance, and accessibility		
24. An issues log exists to capture accessibility issues and prioritize issue resolution. This log is reviewed regularly with the participation of people with disabilities to ensure that it accurately reflects user experiences, and that prioritization aligns with their needs.		

Checklist Item	Operational Level	Notes
25. An accessibility best practices document exists and is used for staff training. This document includes input from people with disabilities to share real-world insights and strategies for creating accessible content and systems. This document is reviewed and updated regularly.		
26. Standard procedures for developing accessible content (documents, spreadsheets, presentations, PDFs, etc.) exist, and are shared with content creators. These procedures have been co-developed by people with disabilities to ensure they address a wide range of accessibility concerns.		
27. On-demand help for creating accessible content is available through an accessible help function. This resource includes input by people with disabilities to answer frequent questions and provide guidance based on actual user experiences and challenges.		

Appendix C: Accessibility Checklist for Data Governance and Management

Directions. For each checklist item, please provide the operational level as follows: **Level 1** indicates no planning has taken place, **Level 2** indicates planning in process, **Level 3** indicates partially operational, and **Level 4** indicates fully operational.

Checklist Item	Operational Level	Notes
1. The steering committee has clearly defined decision-making authority on accessibility within the data governance structure for the Part C and Part B data system.		
2. Roles within the steering committee are incorporated into the governing authority's policies and procedures.		
3. The steering committee has established a regular meeting structure and frequency to review the accessibility of websites and website content.		
4. The steering committee has designated a person or team with the responsibility of helping users with questions or concerns on the accessibility of the Part C and Part B data system to include data collections, data storage, and data use.		
5. Policies and procedures adhere to all federal, state, and local laws on accessibility.		
6. Policies and procedures on accessibility are developed with input and testing from various collaborators including those with disabilities.		

Checklist Item	Operational Level	Notes
7. There is a documented policy that establishes the standard conformance level that all documents and websites must adhere to before being promoted to production.		
8. A process is in place to enable policy or procedural changes for compliance with accessibility standards.		
9. Data governance polices require all data collection instruments to follow established accessibility conformance levels.		
10. Data governance policies require all output from data collection tools to follow established accessibility standards.		
11. Data governance policies and procedures on accessibility are shared with all pertinent staff who have tasks related to the creation, editing, dissemination, and oversight of IDEA data.		
12. Data governance policies and procedures require all staff and contractors who use IDEA data to create content (i.e., pdfs, Word docs, Excel spreadsheets, PowerPoint slides, etc.) to participate in ongoing accessibility training.		
13. Standardized training materials on accessibility are available and maintained.		

Checklist Item	Operational Level	Notes
14. Work assignments related to the creation, editing, dissemination and oversight of IDEA data require compliance to accessibility standards.		
15. The staff onboarding process includes training in compliance with accessibility standards.		
16. ADA Coordinators are involved with the Human Resources procedures for the hiring and onboarding process for individuals with disabilities.		
17. The procurement office requires all vendors submitting Request for Proposals (RFPs) to submit accessibility standards requirements for their product.		
18. Procurement officers and employees responsible for purchasing products request an Accessibility Conformance Report (ACR) based on the Voluntary Product Accessibility Template (VPAT) before purchasing new software.		
19. Before purchasing, the procurement process includes software testing to confirm the accuracy of the Accessibility Conformance Report (ACR). (Trust but verify)		
20. Legal office staff are involved with ensuring accessibility compliance to agency policies and procedures.		

Checklist Item	Operational Level	Notes
21. Content creators have received training on how to create or remediate documents and content to meet accessibility standards.		
22. ADA Coordinators are involved with implementing accessibility policies and procedures relating to Title II of the ADA and Section 508.		
23. The implementation of accessibility standards is in line with federal and state privacy laws.		
24. Privacy agreements required by the state agency are available in accessible formats for individuals with disabilities.		

Appendix D: Accessibility Checklist for Data Use and Analysis

Directions. For each checklist item, please provide the operational level as follows: **Level 1** indicates no planning has taken place, **Level 2** indicates planning in process, **Level 3** indicates partially operational, and **Level 4** indicates fully operational.

Checklist Item	Operational Level	Notes
1. Develop procedures for ensuring data reports and analyses are accessible.		
2. Perform quality assurance on all data reports and analyses before making public.		
3. Document the process content creators will use when creating accessible data reports and visualizations.		
4. Document the process technical staff will use when creating accessible reports, websites, and visualizations.		
5. Analyze all website pages for accessibility.		
6. Determine how many website pages need remediation.		
7. Determine how many digital reports need remediation.		
8. Prioritize the remediation work - What should be done first, etc.		

Checklist Item	Operational Level	Notes
9. Remediate identified and prioritized website pages and content for accessibility.		
10. Compile a list of data products that are used by your program. What data products are used to publicly report your SPP/APR data?		
11. For each data product, determine how it was originally created. For instance, if it is a PDF, was it originally created in Word?		
12. For each data product, determine what resources you will need to ensure the products meet the required conformance level. For example, do you have resources available to make PDF or Word accessible? If the data product is generated through your data system, are you connected to your data system developers to ensure the product is accessible?		
13. Once you have identified the products and resources requiring accessibility checks, evaluate the products to make sure they meet accessibility standards.		
14. Purchase and install screen reader software.		
15. Ensure screen reader can read products.		
16. Ensure data visualization products have accessible color contrast.		

Checklist Item	Operational Level	Notes
17. Ensure data tables used in data representations are accessible.		
18. Ensure all data products use plain language for the reading level of audience.		
19. Establish a reading level range for different audiences (e.g., parents 4th-6th grade; agency staff 9th-12th grade; researchers 12th grade and above).		
20. Check the reading level of each data product for conformity with the reading range for each audience.		
21. Develop feedback mechanisms that incorporate people with disabilities into the process.		
22. Identify your current process for receiving feedback on data products.		
23. Evaluate your current processes for accessibility. Are they posted on an accessible website? Is the posting in plain language? Is it easy for people to express interest?		
24. Ensure that any feedback received is acted upon and followed up on.		
25. Research your agency's accessibility policies and practices. Does your agency offer training for staff on accessibility standards?		

Checklist Item	Operational Level	Notes
26. Research your agency's accessibility policies and practices. Does your agency require an accessibility statement posted on its website?		
27. Identify data shared, linked, or integrated with other programs and determine if they meet accessibility standards.		
28. Incorporate accessibility standards into any legal agreements such as Memorandums of Understandings (MOUs), or other legally binding agreements with 3rd party vendors.		
29. All data extracted from Part C and Part B data systems are accessible for all data-driven decisions.		

Appendix E: Accessibility Checklist for Sustainability

Directions. For each checklist item, please provide the operational level as follows: **Level 1** indicates no planning has taken place, **Level 2** indicates planning in process, **Level 3** indicates partially operational, and **Level 4** indicates fully operational.

Checklist Item	Operational Level	Notes
1. A structured process is in place to gather feedback from collaborators regarding accessibility needs. Individuals with a wide range of perspectives and experiences are represented, including individuals with disabilities.		
2. Accessibility goals are integrated into the strategic plans of the agency, particularly concerning digital and website platforms. These goals are measurable and are aligned with broader organizational objectives.		
3. The agency has secured political and fiscal support to maintain and enhance accessibility efforts. There is evidence of budget allocation and advocacy efforts to support accessibility initiatives.		
4. Job descriptions for digital content creators explicitly mention responsibilities related to accessibility.		
5. There is a mechanism to assess accessibility skills and knowledge during the hiring process.		
6. There is a dedicated committee responsible for monitoring and addressing accessibility issues, comprised of agency staff and individuals with disabilities. This committee meets regularly to		

Checklist Item	Operational Level	Notes
review and remediate accessibility barriers across various tools and products.		
7. Regular training sessions occur for staff on various aspects of accessibility, including digital media, document accessibility, and virtual meeting hosting. There is documentation to track participation in these sessions.		
8. Routine accessibility audits occur on digital material platforms (e.g., Word, Excel, PDF) to ensure compliance and consistency. Action plans address identified issues.		
9. Remediation of identified accessibility barriers occurs as soon as possible.		
10. A checklist or guideline is used to review virtual meetings and associated materials prior to the event to ensure accessibility compliance.		
11. An accessibility checklist or guideline is reviewed and updated as needed.		
12. New employees must attend a structured training program covering agency policies and accessibility best practices. Accessibility considerations are integrated into various aspects of the training curriculum.		

Checklist Item	Operational Level	Notes
13. There is a method in place to document and review the new training program's effectiveness. Adjustments occur based on feedback and evolving accessibility requirements.		