State of California
Department of Technology

Office of Digital Services

IT Accessibility Resource Guide

Statewide Information Management Manual (SIMM) 25A

April 2025

Revision History

Revision	Date of Release	Owner	Summary of Changes
Initial Release	July 2016	Policy/Statewide Strategic Planning	
Revision	October 2017	Policy/Statewide Strategic Planning	Revised Government Code section references from 11135 to 7405.
Revision	March 2019	Policy/Statewide Strategic Planning	Corrected hyperlinks.
Revision	April 2023	Policy/Statewide Strategic Planning	Updated references and removed outdated material
Revision	April 2025	Policy/Statewide Strategic Planning	Updated entire document: • Use plain language where possible. • Updated links and references. • Removed outdated information. • Added Web Content Accessibility Guidelines (WCAG) 2.2 links.

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Overview

Our public and internal websites must be accessible to everyone who needs them, including people with disabilities. This also applies to the electronic systems that state employees and authorized users for work, and the information technology (IT) systems they access. [(State Administrative Manual (SAM) 4833)](#)

Existing federal and state laws and policies place this responsibility on:

- State entities
- Contractors (working for the state entity)

The [California Government Code Section 7405](#) directs that: "…state governmental entities, in developing, procuring, maintaining, or using electronic or information technology, either indirectly or through the use of state funds by other entities, shall comply with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended ([29 U.S.C. Sec. 794d](#)), and regulations implementing that act as set forth in Part 1194 of Title 36 of the Code of Federal Regulations."

As the government offers more services and information online, it's important that everyone can access and use these resources, regardless of any disabilities they may have. This means that each government state entity must follow laws that make it clear they cannot discriminate against people with disabilities.

To make sure online services are accessible, there are a few things agencies can do:

1. Supply assistive tools for employees who need them to do their jobs. This could include things like screen readers or speech recognition software.
2. Make sure that accessibility is considered from the very beginning of an IT project. This means thinking about accessibility when planning and setting requirements for the project.
3. Encourage awareness of accessibility among all employees who work on developing or updating electronic and information technology.

By taking these steps, agencies can increase productivity, reduce the need to fix mistakes and redo work, and make sure that important information (like public health and safety, employment, or tax law) is available to everyone who needs it.

The California Department of Technology (CDT), along with other government agencies, made a guide to help state groups follow rules for making websites and digital products accessible. This guide follows specific standards to make sure websites are easy to use for everyone.

IT Accessibility Resource Guide

This resource guide provides an overview of digital accessibility principles, laws, and best practices. State government agencies/entities follow federal guidelines to ensure digital products are usable for all users, including those with disabilities.

We reference information and resources already available throughout this resource guide. Additional links to specific language on accessibility requirements or policies are also included for those interested in learning more about specific topics.

This guide aims to explain digital accessibility in a simple way, using information that is already available. For many years, federal and state governments, as well as the higher education communities, have been working to make digital products more accessible for people with disabilities.

The guide includes content and links to more detailed information on the topics discussed. It also provides links to specific requirements or policies on accessibility for those who want to learn more about the subject.

1.0 Accessibility Commitment, Goals and Benefits

Commitment

As a technology leader, the State of California is committed to creating digital products that are usable and accessible by users with all abilities, and compatible with commonly used assistive technologies. We follow these [four principles of web accessibility](#) when creating digital products:

1. Perceivable
   - Provide text alternatives for non-text content.
   - Provide captions and other alternatives for multimedia.
   - Create content that can be presented in multiple ways, including by assistive technologies, without losing meaning.
   - Make it easier for users to see and hear content.
2. Operable
   - Ensure all functionality is available via keyboard.
   - Give users enough time to read and interact with content.
   - Do not use content that may cause seizures.
   - Help users navigate and find content.
3. Understandable
   - Make text readable and understandable.
   - Make content appear and operate in a predictable way.
   - Help users avoid and correct mistakes.
4. Robust
   - Maximize compatibility with current and future user tools.

Goals

Our goal is to provide state entity webmasters guidance for creating websites. Our [California Web Standards](#) website is an online resource available for webmasters to reference. It provides the best practices, tools, and resources to apply, such as:

- Web standards
- Website functionality
- Consistent look and feel

Benefits

Create usable and accessible products by following our [web standards](#) as well as the [four principles of web accessibility](#). Usable and accessible products benefit users with all abilities, and accommodate users experiencing:

- Blindness
- Visual impairment
- Color blindness
- Hearing problems
- Manual dexterity limitations
- Speech difficulties
- Developmental disabilities
- Seizure disorders

Accessible products provide the same experience to all users, especially users with a disability. It is important users with a disability can access and use state websites and services to complete tasks. Some task examples include:

- Search for a job
- File taxes
- Renew motor vehicle license
- Find and compare schools
- Get a fishing license
- Take a tour of state parks

2.0 Accessibility Laws

Federal and state laws require digital products and IT systems to be accessible to all users. This section will go over:

- Different federal and state laws.
- Regulations and standards developed to enforce them.

Federal and state laws

Accessible digital products are important in state entities supporting federal and state laws.

Below is a list of law resources that apply to **digital accessibility**:

- Federal
  - [Americans with Disabilities Act (ADA)](#)
  - [Rehabilitation Act of 1973, as amended](#)
    - Section 504 – Nondiscrimination Under Federal Grands and Programs
    - Section 508 – Electronic and Information Technology
  - [Web Content Accessibility Guidelines (WCAG) 2.2](#)
- State
  - California Government Code
    - Section [7405](#) – Electronic and Information Technology
    - Section [11135](#) - Discrimination
    - Section [11546.7](#) – State Agency Website Compliance
  - [California Civil Code Section 51](#) - Unruh Civil Rights Act
  - [Office of the State CIO IT Policy Letter: Information Technology Accessibility](#)
  - [California Department of Technology Letter: Website Accessibility Certification](#)

Regulations and Standards

There are also other related laws and regulations that apply to accessibility in general:

- [Guide to Disability Rights Laws](#) – Federal
- [Fair Employment and Housing Act](#) – State
  - California Government Code Section 12900 – 12951, 1297 – 12928, 12955 – 12956.1 & 12960 – 12976)
- [Disabled Persons Act](#) – State
  - California Civil Code Section 54.1
- [Disability Laws and Regulations](#) – Federal and State
  - State entities are also required to provide equal employment opportunities to persons with disabilities.
- [Government Code sections 19230-19237](#)
- [Executive Order S-6-04](#)

2.1 Effects of Federal and State Law

Federal and state accessibility laws require state entities to create accessible digital products. Each law outlines specific requirements when creating digital products.

Government Code Section 7405

State entities are required to comply with [California Government Code Section 7405](#). This state law safeguards against discrimination from any program or activity that is conducted, funded directly by, or received any financial assistance from the State of California. It also directs state entities to follow Section 508 of the federal Rehabilitation Act, which requires digital products to be accessible to all users. Accessibility standards must be followed when state funds are used directly or indirectly for digital products:

- Development
- Procurement
- Maintenance

Section 508

As previously stated, state entities are required to follow [Section 508](#) (29 U.S.C. Sec. 794d), Electronic and Information Technology [Code of Federal Regulations (Part 1194 of Title 36)](#). This part of the law ensures that people with disabilities can access information from federal and state entities in a way that's similar to how users without a disability access it.

The best way to make content accessible is to think about it during the creation process. State entities should create policies and standards that support this process which includes:

- CDT's guidelines for creating accessible content.
- Providing templates for creating accessible documents and files.
- Offering training for staff on how to create accessible content.

2.4 Obligations for State Entities

State entities are required to follow the federal and state laws listed in this IT Accessibility Resource Guide. This applies to all new, updated, and existing web content and services on State of California websites, both public and internal.

The easiest way to make sure digital products are accessible is to incorporate accessibility from the beginning.

State entities may have existing digital products on their websites that are not accessible. Noncompliant digital products must be remediated and made accessible. This will help state entities meet digital accessibility standards outlined in this resource guide.

State entities should follow these steps to remediate digital products:

- Conduct an accessibility review of digital products.
- Identify any accessibility issues.
- Resolve accessibility issues.
- Repeat steps until all issues are addressed.

State entities should incorporate accessibility into their:

- Agency Information Management Strategy (AIMS)
- Web planning

Give priority to information and services that the state entity considers valuable to the people it serves.

2.5 Digital Accessibility in State Government

State entities must ensure their digital products are accessible and are required to:

- Incorporate accessibility into their IT policies and business requirements.
- Assign dedicated roles to handle accessibility for their state entity.

2.6 California Digital Accessibility Policies and Requirements

The State of California outlines digital accessibility requirements in its policies and procedures.

Policies and procedures that address digital accessibility requirements include:

- State Administrative Manual (SAM)
  - Information Technology Accessibility Policy – 4833
    "Services and information provided by state entities or entities within the California State Government must be accessible to users with all abilities....This policy applies to all new, updated, and existing [Electronic and information technology (EIT)]."
  - Uniform Standards – 5230
    "Acquisitions shall be conducted in a manner consistent with applicable laws, regulations, policies, and procedures."
- State Information Management Manual (SIMM)
  - Section 30 - Special Project Report (SPR)
- California Department of General Services
  - Information Technology General Provisions
    - Compliance with Statutes and Regulations: "Contractor warrants and certifies that in the performance of this Contract, it will comply with all applicable statutes, rules, regulations and orders of the United States and the State of California and agrees to indemnify the state against any loss, cost, damage or liability by reason of the Contractor's violation of this provision….To the extent that this contract falls within the scope of Government Code Section 7405, Contractor hereby agrees to respond to and resolve any complaint

brought to its attention, regarding accessibility of its products or services."

- Americans with Disabilities Act: "The Contractor assures the State that the Contractor complies with the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)."

2.7 Integrating Digital Accessibility

State entities and any hired contractors are responsible for making their digital products:

- Meet digital accessibility guidelines.
- Usable to everyone who needs them, including people with disabilities.

Digital products include:

- Public and internal websites.
- Electronic documents published on public and internal websites.
- Electronic and IT systems.

Steps for your State Entity

Follow these basic steps to begin integrating digital accessibility into your digital products:

1. **Designate leadership for digital accessibility:** Assign your Chief Information Officer (CIO), or designee, to lead the effort for ensuring digital product accessibility across the state entity.
2. **Establish internal processes and policies:** Develop internal processes and policies to ensure that all digital products are accessible before you publish them on your website(s).
3. **Use CDT's guidelines and resources as a foundation for creating accessible digital products:** Create guidelines and templates to help staff create digital products that are accessible from the start. Ensure that these resources are distributed to relevant departments. All sections of your state entity share the responsibility for producing accessible digital products, including:
   a. Programs and services
   b. Information technology
   c. Procurement and business services
   d. Administration
   e. Human resources
4. **Test public website for accessibility compliance:** Regularly test the public website for accessibility, ensuring it meets all required accessibility standards across both desktop and mobile devices. Remediate any pages or documents that do not comply with accessibility guidelines.
5. **Integrate accessibility into development and procurement**: Ensure accessibility testing is incorporated at all stages of the IT development and procurement processes to meet accessibility standards and guidelines.

2.8 Roles and Responsibilities

Involve all areas of your state entity in digital accessibility. Assign roles and responsibilities to help create and maintain accessible digital products.

Below are some recommended roles and responsibilities to consider:

- **State entity CIO or designee**: The CIO or designee's role is to lead the effort of digital product accessibility. They are responsible for signing the Website Accessibility Certification for the website.
- **State Entity Director/Secretary**: The Directory/Secretary role is to lead the effort of digital product accessibility. They are responsible for signing the Website Accessibility Certification for the website.
- **Content owner**: Usually an executive, such as deputy director or above, oversees this area and approves content requests for submittal. They are responsible for ensuring accessibility standards outlined in this resource guideline are followed.
- **Content requestor**: The content requestor creates and submits content for publication on the website. They are typically the subject-matter expert (SME) or collaborate with an SME to gather information. The content requestor ensures the content is accurate, consistent, and approved before submission, working with other SMEs as needed. Each year, they review content to ensure it remains up-to-date and accessible. They are responsible for applying the accessibility standards outlined in this resource guideline when creating content and documents.
- **Content editor/publisher**: The content editor/publisher is a business area staff who can create, update, and change approved content for the website. They are responsible for applying accessibility standards outlined in this resource guide.
- **Subject Matter Expert (SME)**: A SME is a person who has accumulated great knowledge in a particular field or topic. This level of knowledge is demonstrated by the person's degree, licensure, or experience. They are responsible for applying accessibility standards outlined in this resource guide.
- **Web team/person**: The web team/person can create, update, and change approved content on the website. They are responsible for applying accessibility standards outlined in this resource guide. They may also collaborate with the accessibility team/person.
- **Accessibility team/person**: The accessibility team/person makes websites more inclusive and accessible. They stay up to date on accessibility standards and guidelines. They may collaborate with and train content contributors on accessibility guidelines and practices. They are responsible for applying accessibility standards outlined in this resource guide.

The roles and responsibilities listed above are guidelines. They may need to be modified by individual state entities to fit their needs.

2.9 Website Accessibility

State entity websites are critical sources of information for the public and state employees, and they need to be accessible. There are state standards, and accessible web templates provided by CDT to assist state entities in making their websites accessible.

State entity websites provide critical sources of information for the public and state employees. Everything on the websites must meet digital accessibility requirements so that information is usable to everyone who needs them, including people with disabilities. Below are resources to help make your website accessible:

- Web Standards: Accessibility
- California Department of Rehabilitation (DOR)
  - Web Accessibility Toolkit
  - How to create Accessible Content

3.0 Accessibility Reporting and Requests, and Certification

Reporting and Requests

Management Memo (MM) 03-08, Alternative Formats, requires state entities follow ADA Title II. ADA Title II "requires that State and local governments give people with disabilities an equal opportunity to benefit from all of their programs, services and activities (e.g. public educations, employment, transportation, recreation, health care, social services, courts, voting, and town meetings)."

State entity websites must provide information on how a user can:

- Report on an issue with accessibility.
- Report on a question about accessibility.

MM 03-08 also requires that state entity websites provide information on how a user can request information in an alternative format.

Instructions to submit a report or request may be posted on all or one of the following pages:

- State website homepage.
- Accessibility page.
- Contact page.

The state entity should establish an individual or group within the organization to handle submitted reports or requests. The individual or group may be:

- A webmaster.
- Accessibility group.

They should have the technical knowledge to be able to respond successfully.

Certification

State entities are required to follow:

- State of California policy [SAM 4833.2, Website Accessibility Certification](#).
- [California Government Code Section 11546.7](#).

SAM 4833.2 and California Government Code Section 11546.7 require state entities to provide a certification on their website that confirms compliance with accessibility standards outlined in this resource guide.

To meet certification requirements, state entities may either:

- Use [SIMM 25B, Website Accessibility Certification Template](#).
- Develop a web version of the signed certification.

The **Website Accessibility Certification** must be:

1. Signed by the state entity Director and Chief Information Officer (CIO) to ensure accountability at the highest levels of the agency.
2. **Posted on the state entity website homepage** to communicate compliance to the public and stakeholders.
3. Renewed every two years (odd calendar years) and reposted to the homepage to maintain ongoing compliance.

3.1 Accessible IT Projects

Just as retrofitting accessibility into existing buildings can be costly and challenging, the same applies to IT projects. Designing with accessibility in mind from the start is more effective, cost-efficient, and less challenging. You can incorporate accessibility into the procurement or development process without difficulty. Performing simple accessibility checks throughout the project helps reduce the need for costly rework later.

Accessibility should be integrated into every stage of IT development, not added as an afterthought. Understanding the following is crucial for successful integration:

- Accessibility requirements in IT project development.
- Key aspects of the Rehabilitation Act and ADA.
- Types of IT projects that must comply with accessibility standards.
- The standards required for compliance.
- How to include accessibility requirements in IT procurement documentation.

3.2 Accessible Policy Guidance

CDT, together with the California Health and Human Services Agency and the DOR, has determined that the intent of Government Code Section 7405 is for the state's IT to be accessible. State entities should identify the individuals and organizations being served by the IT project and address the need for digital accessibility early. State of California policy (SAM 4833) requires digital products to be usable for all users, including those with disabilities.

3.3 Accessible Content Creation

Digital product creators exist throughout each state entity. Creators may include the:

- CIO or designee
- Director/Secretary
- Public information office/Communications office
- Human resources
- Business services
- Entities providing programs and services
- IT section

Creators are responsible for the accessibility of digital products they create. This includes content they:

- Publish on their website.
- Place on their internal systems.
- Distribute via email to staff/the public.

CDT and DOR developed and organized resources to help owners create digital products that are accessible. Content creators can reference and find useful resources on their websites:

- California Web Standards: Accessibility
- California Web Accessibility Toolkit

3.4 How Persons with Disabilities Use Computers and the Web

More than seven million Californians have one or more disabilities. Many use the web and online resources to:

- Expand their world.
- Increase their opportunities for education, careers, and employment.
- Better health care, independent living, and personal fulfillment.

Digital products also need to be readable by all users - this includes users who rely on assistive technology.

The following sources explain how people use assistive technology together with accessible IT:

- World Wide Web Consortium (W3C): How People with Disabilities Use the Web

- University of Washington: [DO-IT (Disabilities, Opportunities, Internetworking and Technology) Videos](#)

3.5 General Usability Guidance for Content Creators

Usability plays a crucial role in making digital products accessible. When websites and web content are easy to use, they become more accessible to all users. To improve usability, focus on creating content that is simple and clear to understand. For additional guidance on writing clear content, visit [PlainLanguage.gov](#)..

Additionally, carefully choose appropriate file formats when publishing digital products on state entity websites. This helps ensure that the formats do not create unnecessary barriers for the intended audience.