



Texas Department of Family and Protective Services

DFPS Uniform Digital Accessibility Requirements

Version 2.6 – Revised May 2025

1.0 Scope

In this document, "Vendor" also refers to Grantees and Performing Agencies, regardless of contract type (Vendor Contracts, Grant Contracts, Interagency, or Interlocal Agreements).

2.0 Applicable Laws and Standards

To ensure accessibility for people with disabilities, DFPS adheres to the following:

- [Section 504 of the Rehabilitation Act of 1973](#)
- [Section 508 of the Rehabilitation Act of 1973](#)
- [Americans with Disabilities Act of 1990 \(ADA\)](#), Titles I and II
- [Texas Government Code \(TGC\), Chapter 2054, Subchapter M: Access to Electronic and Information Resources by Individuals with Disabilities](#)
- [Texas Administrative Code \(TAC\), Title 1, Part 10, Chapter 206](#)
- [Texas Administrative Code \(TAC\), Title 1, Part 10, Chapter 213](#)
- [Web Content Accessibility Guidelines, Version 2.1, Level AA \(WCAG 2.1 AA\)](#)

All Electronic and Information Resources (EIR), also known as Information and Communication Technology (ICT) or Electronic Information Technology (EIT), must conform to [WCAG 2.1 AA](#). In addition, conformance to the [revised Section 508 and 255 Guidelines](#) and [Texas Administrative Code Chapters 206 and 213](#) is mandatory for applicable components and deliverables.

3.0 EIR Requirements

3.1 General Conformance

- Conform to all applicable WCAG 2.1 AA success criteria
- Meet Section 508 and TAC Chapters 206 and 213 requirements, including specific provisions for hosted and managed services
- Be user agent agnostic and support DFPS-standardized tools: Microsoft Edge, Google Chrome, and NVDA or JAWS (version 2025 or later)

3.2 Content-Specific Requirements

Web Content, Mobile Apps, and Electronic Documents:

- [All applicable WCAG 2.1 AA success criteria](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 3 \(Functional Performance Criteria\)](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 5 \(Applications\)](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 5, Subsection 502 \(Interoperability with Assistive Technology\)](#)

Software Features and Components:

- [All applicable WCAG 2.1 AA success criteria](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 3 \(Functional Performance\)](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 5 \(502, 503\)](#)

Hardware Features and Components:

- [All applicable WCAG 2.1 AA success criteria](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 4](#)

Support Services and Documentation:

- [All applicable WCAG 2.1 AA success criteria](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 3 \(Functional Performance Criteria\)](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 5 \(502, 503\)](#)
- [Revised 508 Standards and 255 Guidelines, Chapter 6 \(Support Documentation and Services\)](#)

4.0 Instructions to Vendors

Vendors should closely review and follow these instructions to ensure compliance with DFPS's digital accessibility requirements.

4.1 Accessibility Conformance Report (ACR)

- Provide an ACR for each EIR item
- Create the ACR using the [Voluntary Product Accessibility Template \(VPAT\) 2.5 INT](#) or later
- Each ACR must:
 - o Address applicable WCAG 2.1 AA and/or Section 508 criteria
 - o Include specific details on conformance by function or role
 - o Include evaluation methods, tools, and supporting test reports
 - o Explain "Not Applicable" (N/A) responses with justification

4.2 Submission Format

ACRs must be in accessible formats: tagged PDF, accessible Microsoft Word document, or accessible web page. DFPS will not proceed with review until an accessible ACR is received.

4.3 Third-Party COTS Products

Submit ACRs or links to ACRs from the third party in accessible formats. DFPS may delay review until an accessible ACR is provided.

4.4 Custom-Developed EIR

- Submit a [Vendor Accessibility Development Information Request \(VADSIR\)](#) and a [Policy-driven Adoption for Accessibility \(PDAA\) self-assessment](#)
- Describe:
 - o Universal design principles used
 - o Remediation timeline for non-conforming features
 - o Typical user scenarios/tasks for accessibility testing

5.0 DFPS Acceptance Criteria

- DFPS may conduct independent accessibility tests or reviews before final payment
- If conformance claims cannot be validated:
 - o Vendor must remediate at no cost
 - o DFPS may delay or withhold payment until remediation is accepted

6.0 Provisions and Clauses

6.1 Custom EIR Development

- Deliverables must conform to WCAG 2.1 AA and/or Revised Section 508 standards before acceptance.
- Submit VADSIR and PDAA documentation.

6.2 Installation, Configuration, and Integration

Must not reduce original level of conformance.

6.3 Maintenance, Upgrades, Replacements

Must maintain or improve original conformance level.

6.4 Service Personnel

Must possess relevant digital accessibility knowledge/skills.
Documentation may be requested.

6.5 Hosting Services

Must not reduce accessibility of hosted content. DFPS may test for conformance.

6.6 Validation for EIR Items

- Perform both automated and manual testing, including keyboard-only testing with and without JAWS 2025 or later
- Maintain documentation of accessibility measures and test results

6.7 Conformance Reporting

- Submit ACR before final payment.
- When testing is required, submit a Supplemental Accessibility Report (SAR) including
 - o Test results
 - o Usability features
 - o Inaccessible functions
 - o Setup instructions for compatibility with assistive technology tools
 - o Documentation regarding the accessibility of authoring tool interfaces and content produced using such tools

7.0 Non-Compliance

- DFPS will notify the vendor in writing

- Vendor must remediate, repair, or replace the non-compliant product or service at no cost
- DFPS may withhold payment until compliance is achieved and verified

8.0 Glossary of Terms

Term	Definition
ADA	Americans with Disabilities Act of 1990 — a federal law that prohibits disability discrimination and requires accessibility in public programs, services, and facilities.
ACR	Accessibility Conformance Report — a document that evaluates the accessibility of an EIR item against applicable standards. Based on the Voluntary Product Accessibility Template (VPAT).
COTS	Commercial Off-The-Shelf— pre-built, third-party software or hardware not developed in-house.
DFPS	Texas Department of Family and Protective Services.
EIR	Electronic and Information Resources — includes software, hardware, documents, and any ICT that delivers user content or functionality.
ICT	Information and Communication Technology — alternate term for EIR, used in federal documentation.
JAWS	Job Access With Speech — a popular screen reader for Windows.
PDAA	Policy-driven Adoption for Accessibility — a self-assessment for vendors to evaluate internal accessibility practices.
SAR	Supplemental Accessibility Report — a document supporting ACR findings,

	required when DFPS needs detailed validation.
TAC	Texas Administrative Code — official rules for Texas state agencies; Chapters 206 and 213 contain digital accessibility requirements for EIR.
VADSIR	Vendor Accessibility Development Information Request — form detailing vendor's development and testing approach for accessibility.
VPAT	Voluntary Product Accessibility Template — format used to create ACRs; defines how a product meets accessibility standards.
WCAG	Web Content Accessibility Guidelines — internationally recognized accessibility standards for web and digital content.

9.0 Reference Links Table

Title	URL
Americans with Disabilities Act of 1990	http://www.ada.gov
ADA Title II – Web and mobile Accessibility Final Rule	https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state
Revised	https://www.access-board.gov/ict/

Section 508 & 255 (ICT Accessibility Guidelines)	
Section 504	https://www.hhs.gov/civil-rights/for-individuals/disability/section-504-rehabilitation-act-of-1973/index.html#:~:text=The%20Office%20for%20Civil%20Rights,against%20otherwise%20qualified%20disabled%20individuals.
Section 504, Part 84 Final Rule – HHS Fact Sheet	https://www.hhs.gov/civil-rights/for-individuals/disability/section-504-rehabilitation-act-of-1973/ocr-detailed-504-fact-sheet/index.html
Section 508 Chapter 3 – Functional Performance Criteria	https://www.access-board.gov/ict/#chapter-3-functional-performance-criteria
Section 508 Chapter 4 – Hardware	https://www.access-board.gov/ict/chapter-4-hardware/
Section 508	https://www.access-board.gov/ict/chapter-5-software/

Chapter 5 – Software	
Section 508 Chapter 6 – Support Documentation and Services	https://www.access-board.gov/ict/chapter-6-support-documentation-and-services/
Section 508 Overview (General Law)	https://www.section508.gov/manage/laws-and-policies/section-508-law/
TAC Chapter 206	https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=206&interface=VIEW_TAC&part=10&title=1
TAC Chapter 213	https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=213&interface=VIEW_TAC&part=10&title=1
TGC Chapter 2054, Subchapter M	https://statutes.capitol.texas.gov/Docs/GV/htm/GV.2054.htm#2054.451
VPAT 2.5 INT	https://www.itic.org/policy/accessibility/vpat

Forma t	
WCAG 2.1	https://www.w3.org/TR/WCAG21/