Leveraging The State CIO and Statewide Accessibility Officer Partnership Across State IT Operating Structures

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Digital Accessibility in State Government

Digital accessibility (accessibility) is now number six on **NASCIO's 2026 State CIO Top 10 Priorities list**, signaling state technology leaders are continuing to incorporate accessibility across the enterprise. The overlaps between accessibility and other core technology pillars like **privacy**, cybersecurity, **procurement** and **artificial intelligence**, validate it as a core part of information technology (IT) governance—not a standalone mandate. Despite this progress, one challenge faced by states is building the most effective digital accessibility policy for their unique operating structures.

States approach IT operating structures with various strategies, business drivers and structures. Variations primarily derive from state chief information officer (CIO) authority, financial posture, political will and the ability to absorb change. Each structure's attributes present their own framework for creating, implementing and monitoring any policy, including accessibility policies. The three main components of the operating structure spectrum are decentralized, hybrid and centralized with nuance and variations within including:

Completely decentralized	Decentralized with limited enterprise policy	Federated with central policy	Federated with select consolidation	Centralized with full infrastructure consolidation	Unified

The State CIO / Accessibility Officer Partnership Across All IT Operating Structures

As states continue their journey to compliance with the **2024 Department of Justice Final Rule**, the partnership between the state CIO and the state digital accessibility officer (accessibility officer) has become more important than ever across all operating structures. **NASCIO's 2025 State CIO Survey** revealed that 66 percent of states have an accessibility officer, either within or outside of the state CIO organization.

Accessibility policies and programs are strongest when the CIO and accessibility officer (AO) are partnered. Together, the statewide accessibility officer and CIO can create and implement a clear digital accessibility policy that is easy to maintain over time. This partnership is critical across operating structures and should be leveraged fully. While the level of authority changes, the core relationship remains:

- The AO has a deep understanding of digital accessibility standards, testing, user needs and remediation. They provide the technical foundation for digital accessibility and manage the accessibility program enterprise wide.

- The CIO understands enterprise strategy, technology planning, procurement, governance and has influence across the enterprise. They provide the structure and support needed to make digital accessibility a standard part of the enterprise and keep the program's momentum.

> **PRO TIP**
> *An AO can also help develop accessibility into procurement planning, evaluation, monitoring and co-create processes to integrate accessibility into internal operations.*

The **benefits of having an accessibility officer** include fostering relationships with human rights agencies and national/state disability rights advocacy groups, leading in-house accessibility training for the enterprise, performing in-house audits, mitigating risk of ADA-related legislation and tracking accessibility mandates that can impact the entire organization.

The following CIO/accessibility officer strategies can be implemented across all IT operating structures:

1. Building a Digital Accessibility Policy Together

- Before putting pen to paper, the CIO and AO should meet to define the purpose of the accessibility policy and what it needs to solve. Referencing other state accessibility policies may be beneficial for guidance.

- Once purpose and problem identification are complete, the accessibility officer should draft the technical parts of the policy, such as accessibility standards and procurement requirements.

- The CIO should review the draft to ensure the policy fits the enterprise-wide strategy, procurement mandates and governance processes.

- The AO should engage with national and local disability rights advocacy groups to have them review the policy as well.

Together, the CIO and accessibility officer should decide how to best position the policy to move through their operating structure with minimal difficulty. In some structures, the policy would be reviewed and approved by a formal governing body. In others, the policy could be shared as guidance or integrated into platform requirements. This partnership is critical in choosing the best way to build a policy based on central authority level.

2. Implementing a Digital Accessibility Policy Together

Once the policy becomes active, the AO and CIO partnership continues to support agencies through implementation.

- The accessibility officer develops trainings, checklists, testing guidance, remediation support and sample procurement language to be shared with agencies.

- The CIO ensures that accessibility is included in the enterprise architecture and technology standards, procurement templates (working with central procurement) and development processes.

- Both the AO and CIO should communicate regularly with agency leaders, technology teams and content creators.

- The AO and CIO should also work to pair accessibility policy implementation with existing initiatives; implementation works best when it is attached to current standards and policies.

In structures with shared platforms, the accessibility officer and chief information officer work together to ensure the platforms have accessible components and templates. In more decentralized structures, the partnership focuses on providing tools and incentives that help agencies adopt policy individually.

3. Continuous Compliance Monitoring Together

Monitoring accessibility is a shared responsibility.

- The accessibility officer collects and reviews accessibility reports, test results and conducts audits. They can also maintain an enterprise-wide dashboard showing progress across the state, identifying areas where support is needed and highlighting successes. The CIO can facilitate these processes through asset management and application governance resources.

- The CIO uses the information gathered by the accessibility officer to make decisions about resources, training and technology improvements. This information can also be used to address noncompliance through governance processes, procurement standards and/or operational structures.

Continuous improvement stems from regular training, updated templates and ongoing communication. The CIO and accessibility officer should meet regularly to review progress, identify challenges and adjust strategies as needed. This partnership should also be used to recognize teams that make progress and keep up engagement with digital accessibility throughout the enterprise.

Expanding the Horizons of the CIO / Accessibility Officer Partnership

The CIO and accessibility officer partnership is pivotal across all operating structures in the accessibility policy lifecycle, but the relationship can expand in a variety of ways that also further the enterprise's mission. Some of these ways include:

1. **Shaping procurement culture and vendor accountability**—The accessibility officer defines what accessibility evidence should look like while the CIO organization works with central procurement to ensure compliance among procurement officers, contract managers and vendors.

2. **Strengthening cross-agency collaboration and knowledge sharing**—The accessibility officer builds and manages a community of practice while the CIO ensures they have adequate time, tools and support to engage with the community.

3. **Using this partnership to expand outreach, support and resources to local governments**—As of July 2025, 54 percent of CIOs stated they do not provide digital accessibility services to local governments. This partnership can be leveraged to share resources, knowledge, personnel and more to help local governments meet digital accessibility compliance requirements as well.

4. **Embedding accessibility into incident response and service continuity**—The accessibility officer works with the state chief information security officer (CISO) to identify accessibility-related service failures, e.g., inaccessible outage notices, while the CIO ensures accessibility is baked into continuity plans, outage communication templates and emergency procedures.

5. **Aligning accessibility with enterprise risk management**—The accessibility officer identifies risks in digital services, while the CIO turns those risks into enterprise-level risk categories to treat accessibility as a core operational risk.

6. **Ensuring <u>cybersecurity tools and processes</u> are accessible to all employees**—If tools like multi-factor authentication, security trainings and incident reporting portals are inaccessible, employees with disabilities may not be able to follow required security protocols. The accessibility officer identifies accessibility barriers while the CISO and CIO ensure security tools are remediated to meet those standards.

7. **Integrating accessibility into <u>privacy notices and consent mechanisms</u>**—Consent forms, privacy notices and cookie banners must be easy to <u>read, navigate and understand for all users</u>. The accessibility officer reviews these materials to ensure compliance with accessibility standards while the CIO focuses on implementation across services.

   a. Further, the CIO and accessibility officer should work closely with the chief privacy officer (CPO) to identify potential areas where improving digital accessibility could create privacy concerns.

8. **Ensuring <u>artificial intelligence (AI) tools</u> do not create accessibility barriers**— AI <u>used for chat support, searches, personalization or decision-making</u> must be accessible to all people. The accessibility officer tests and evaluates potential impact/need for remediation, while the CIO enforces remediation and ensures AI procurement and deployment includes accessibility requirements.

Further, AI output should be evaluated for accessibility bias by the accessibility officer to prevent reinforcing harmful patterns. The CIO should ensure AI tools are tested for bias and inaccessibility prior to deployment.

Structure-Based Strategies

Completely Decentralized

Operating Structure: The CIO provides optional guidance; agencies independently interpret, implement and enforce guidance as policy at their discretion.

Policy Trends: Adoption can be slow, uneven and create gaps in enterprise cohesion.

Key Strategy: Use of shared templates, cross-agency communities of practice and incentives for compliance.

A strong digital accessibility policy for agencies in decentralized operating structures should be easily adoptable, practical, clear and supported by tools that agencies can use without needing to directly coordinate with the CIO. Without central enforcement mechanisms, digital accessibility policy adoption should rely on persuasion, education, relationship building and incentives. A strong digital accessibility policy also **strengthens the organization's enterprise architecture**, especially important in decentralized structures, which can lead to improved digital service delivery, cost savings and more uniform user experiences across agencies.

1. **Create a plain-language policy**— Cover the basics of digital accessibility and what agencies are expected to do, directly referencing requirements (such as **Web Content Accessibility Guidelines**) and how to ask vendors to provide evidence during procurement and testing.

2. **Create supporting materials that agencies can use immediately**—These should include sample procurement language, process documents, checklists and training modules.

3. **Provide agencies with a starting point in the policy**—Encourage them to begin with a prioritized inventory of digital services to identify the most important websites, apps and documents for remediation. Each agency will then be responsible for their own remediation plans and internal continuous monitoring.

4. **Focus on incentives instead of enforcement**—Offer shared testing tools and free training, recognize agencies that make noteworthy progress and create small grants for accessibility improvements where possible.

5. **Demonstrate the business case for accessibility by showing how accessibility reduces spending across the enterprise**—Accessibility can save money by replacing inconsistent agency-built solutions with shared guidance to build new ones and **improve services for all citizens**, including citizens with disabilities.

Decentralized with Limited Enterprise Policy

Operating Structure: The CIO provides standards, guidance and/or frameworks as central guidance; agencies choose how guidance is adopted. Some guidance is gently mandated, but agencies implement at their own discretion.

Policy Trends: Adoption varies across the enterprise, especially in agencies experiencing workforce and leadership shortages; some agencies fully adopt standards, others only adopt the minimum.

Key Strategy: Use enterprise minimum standards, centralized training, procurement language and light compliance reporting.

A successful digital accessibility policy in this structure requires a balance between enterprise clarity and agency flexibility. The central office should create a clear, simple accessibility policy with the help of an accessibility officer that applies to all agencies but can easily be adopted in any agency environment. The policy should:

1. **Reference applicable standards**—These include the Web Content Accessibility Guidelines and other federal/state accessibility laws. Define how accessibility evidence should be provided during procurement and testing for public services.

2. **Encourage agencies to ask for evidence of accessibility compliance during procurement**—Include guidance on **evaluating accessibility conformance reports**, demonstrations and **crafting narrative questions for vendors**.

3. **Provide a general framework on how to conduct baseline assessment and remediation**—Consider providing small grants for the assessment where applicable. Guidance should explain the minimum requirements for training, documentation, remediation and continuous monitoring.

4. **Build the economic case by showing small actions make drastic improvements**— Even the lightest enterprise accessibility standard **can reduce remediation costs, prevent costly retrofits and thwart litigation** while users experience less service failures.

Further, the central office should provide practical tools and resources that agencies can use immediately, such as checklists, training documents, procurement boilerplates and testing guidance. Having uniform resources used across the state ensures more cohesion across the enterprise.

The central office should also use minimal accountability mechanisms to monitor compliance in the limited decentralized environment. This could include requiring agencies to submit quarterly accessibility reports or participate in periodic reviews.

Federated with Central Policy/Planning

Structure: The CIO creates mandatory policies, standards and strategic plans; agencies implement them locally, at their own discretion, while managing their own systems and daily operations.

Policy trends: Adoption is generally strong with policy moving through a formal structure.

Key Strategy: Use enterprise planning mandates, shared planning cycles and central monitoring to drive consistency.

Digital accessibility policy in this structure works best when the CIO office uses its authority to set clear, mandatory standards while agencies use their operational control to best implement the policy. The CIO should:

1. **Define the accessibility requirements that apply to all agencies within the policy draft**— Include the Web Content Accessibility Guidelines, testing requirements, procurement requirements and remediation timelines.

2. **Present the policy to the governing board**—Emphasize federal requirements such as the **DOJ Final Rule on Web and Mobile Accessibility** and the **economic benefits of accessibility**, as strategic points for swaying approval.

3. **Once approved, publish the policy with implementation guidance before agency dispersion**—This includes checklists, templates, training materials, process documents and testing instructions. It may be beneficial to include sample boilerplate language for **digital accessibility in procurement processes**.

4. **Build the economic case by conducting and presenting an enterprise accessibility risk assessment to relevant stakeholders**—Inaccessible services pose multiple risks, including exposure, lawsuits, reputational damage and decreased citizen satisfaction in digital services. Proactive planning can reduce these risks and lower spending per agency.

Encourage agencies to structure their implementation process by starting with an accessibility assessment of their digital assets. From there, agencies can create remediation plans, delegate tasks and prioritize high-need digital services as starting points for improvement.

Monitoring is a key pillar of implementing digital accessibility policy in this federated structure. The CIO should require agencies to submit periodic reports on their progress as well as conduct their own audits. Further, the CIO should hold regular meetings with agency heads, joined by the accessibility officer, to gain feedback on what agencies need from the central office.

Federated Select Consolidation

Structure: The CIO manages certain shared technology platforms (i.e., management, identity, cloud environments) while agencies manage their own mission-specific systems.

Policy Trends: Enterprise systems are adopted quickly; agency-owned systems vary based on modernization and resources.

Key Strategy: Use accessible shared systems, central procurement controls and platform-level testing to reduce agency burden.

This structure is powerful for digital accessibility policy because it allows the CIO office to improve accessibility at scale while reducing duplication, lowering agency burden, increasing consistency and improving service delivery across the enterprise. Digital accessibility policy in this structure should focus on platform-level accessibility since shared platforms are relied on across the enterprise. The CIO office should:

1. **Define accessibility requirements for all shared platforms**—Reference the Web Content and Accessibility Guidelines, accessibility testing for platform updates and accessibility documentation for platform components. A process for certifying platform components and templates as accessible should also be created.

2. **Work with platform vendors, an accessibility officer and internal development teams to certify that shared platforms meet accessibility standards**—This includes testing components, remediation, documenting accessibility features and publishing a list of certified accessible components/templates agencies can use.

3. **Require agencies to use the certified accessibility components/templates list when building and upgrading mission-specific digital services**—This ensures accessibility is still the foundation of the entire enterprise. Agencies should also be given guidance on integration, training and support in using the components correctly. Templates should be designed, built and tested by the CIO and accessibility officer.

4. **Build the economic case by leaning into the broker role of the CIO role**—Including accessibility into shared platforms avoids extra costs from agencies building and remediating their own systems, reducing long-term maintenance costs enterprise-wide. This directly aligns with the CIO as broker operating structure.

Monitoring accessibility policy in this structure includes testing platform updates, reviewing agency use of the components and collecting feedback from agencies. The accessibility officer should work with the CIO to maintain a dashboard that shows accessibility status of shared platforms and standards adopted across agencies. Periodic audits and agency reports should occur as well.

Centralized Full Infrastructure Consolidation

Structure: The CIO controls most statewide infrastructure (i.e., data centers, security operations, cloud environments); agencies rely on the CIO office for the technology foundation that helps them achieve mission-specific goals.

Policy trends: Adoption is efficient and uniform since the CIO creates and implements policy directly into infrastructure.

Key strategy: Use enterprise technical standards, a central remediation pipeline and uniform testing procedures to ensure consistency and rapid remediation.

> This structure gives **digital accessibility a strong opportunity to be mandated and enforced by the CIO office**, in addition to its incorporation directly into the enterprise's infrastructure. This includes embedding accessibility into deployment pipelines, monitoring tools and procurement language. Agencies benefit from consistent tools and processes as accessibility becomes a normal pillar of the workflow.

In this structure, digital accessibility policy works best as an operational requirement, not a separate activity. The CIO, with the help of the accessibility officer, should:

1. **Define accessibility requirements for all hosted digital services, including requirements from the Web Content Accessibility Guidelines**—Include information on accessibility testing during development and deployment, procurement language and remediation timelines. Include these requirements in all places relevant, including service-level agreements, **request for proposals (RFPs) / other submission calls** and content creation.

2. **Integrate digital accessibility into the continuous integration and continuous deployment pipelines**—Accessibility checks should be performed automatically whenever a digital service is updated. If issues are found, deployment should be paused until issues are remediated. Further, accessibility should also be integrated into the application governance process and the application/asset management and tracking process.

3. **Create a centralized remediation pipeline (*sample framework here*)**—This pipeline makes it easier for agencies to report issues, receive support, track remediation progress and keep the CIO aware of areas needing a new improvement strategy. The CIO office can deploy the accessibility officer, their team or third-party help where needed.

4. **Build the economic case by advocating for whole-of-state infrastructure**—Bettering the entire state begins with a strong accessibility policy that results in lower remediation costs and improving service reliability, in turn pushing the organization closer to meeting key economic performance goals.

Monitoring digital accessibility in this structure includes continuous testing, automated scanning and regular audits. Further, the CIO office should provide training, guidance and support to agencies. Despite centralized infrastructure, agencies still make individual decisions regarding content creation and application management. Regular training helps ensure that agencies understand their responsibilities and know how to use resources provided by the CIO office.

Fully Unified

Structure: The CIO oversees infrastructure, applications and IT workforce; agencies rely entirely on enterprise services.

Policy trends: Adoption is highly consistent and integrated across the full technology lifecycle.

Key strategy: Use end-to-end integration, central workforce training and design-system enforcement to embed accessibility into the beginning of all IT services.

This structure provides the strongest foundation for digital accessibility policy because the CIO can enforce accessibility throughout the enterprise, and agencies will benefit from consistent tools, processes and expectations. Digital accessibility policy works best in this structure when it is treated as a core enterprise requirement. The CIO office, working with the accessibility officer, should:

1. **Draft a clear, plain-language digital accessibility policy that applies to all agencies, using the Web Content Accessibility Guidelines**—Include clear testing requirements, procurement expectations and remediation timelines. The policy should also define roles and responsibilities for accessibility across the enterprise.

2. **Integrate accessibility into the design system**—Create accessible components, templates, patterns and process documentation that developers and designers are mandated to use.

3. **Integrate accessibility into the development and deployment process**—Include automatic accessibility scans/assessments in the continuous integration and deployment pipelines. If remediation is needed, deployment should be paused until the issues are resolved, ensuring accessibility is maintained over time.

4. **Create a centralized accessibility testing and remediation program**—The program can include automated scanning, manual testing, user testing with disabled citizens and remediation pipelines.

5. **Build the economic case by emphasizing the benefits of this governance structure**—With the CIO having full control of the enterprise, accessibility can be built into all aspects of digital government and receive the highest return on investment (ROI) of all structures. Fully accessible services in this structure could lead to an increase in citizen-generated revenue over time.

Monitoring accessibility includes continuous testing, regularly occurring audits and maintaining enterprise-wide dashboards to track progress across agencies, identify areas needing more support and improve the overall strategy. Further, the CIO office should provide regular training for the workforce. Training can be standardized and mandated for all state employees in fully centralized structures, ensuring accessibility is understood and adopted across the organization.

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