No Wrong Door: Digital Accessibility at Scale

State:	Commonwealth of Pennsylvania
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Commonwealth of Pennsylvania

Commonwealth
Office of Digital Experience

Executive summary

The Commonwealth of Pennsylvania's Digital Accessibility Program has transformed accessibility from a decentralized compliance activity into an enterprise digital experience strategy guided by visible executive level leadership.

In 2024, the Chief Accessibility Officer (CAO) was formally integrated into the Commonwealth Office of Digital Experience (CODE PA), aligning accessibility leadership with digital delivery and creating a formal avenue to sustain cabinet-level support. The CAO was also given a seat on the Governor's newly created Hire, Improve, Recruit, Empower (HIRE) Committee.

Under this strengthened leadership model, CODE PA partnered with the six IT Delivery Centers supporting over 30 agencies under the Governor's jurisdiction to transform accessibility from a decentralized compliance activity into an enterprise digital experience strategy. CODE PA established a scalable operating model built on governance, Lean manual and automated testing, risk-based scoring, executive reporting, and shared implementation support. This model enabled baseline testing of the 26 highest-impact service provider applications plus 425 additional applications, while also improving PA.gov through Adobe Experience Manager standardization, content optimization, and support for accessible content practices.

Together, these changes made accessibility a durable enterprise capability that improved consistency, reduced risk, strengthened accountability, and embedded accessibility into how digital services are designed, built, and improved across the Commonwealth.

Idea

Pennsylvania includes more than 1 million residents under age 65 with disabilities, in addition to older adults and others who rely on accessible digital services. The Commonwealth needed a practical way to operationalize Title II responsibilities and embed recognized accessibility standards into how websites, applications, content, forms, and documents are governed and delivered. Without a consistent enterprise approach, residents would continue to face avoidable barriers in high-impact digital services, agencies would deliver fragmented experiences, remediation would remain more costly when issues were found late, and the Commonwealth would carry greater legal, operational, and reputational risk with limited visibility into enterprise accessibility maturity.

What makes this initiative distinctive is that the Commonwealth did not respond with a centralized audit function or a one-time remediation effort. Instead, it built enterprise capability. CODE PA enabled IT Delivery Centers to conduct much of the testing and remediation work themselves while providing the governance, methodologies, templates, scoring approach, executive reporting, and direct support needed to make the work

consistent and scalable. The program combined manual and automated baseline testing, introduced Lean Accessibility Testing Methodologies to accelerate manual review, developed a risk-based scoring model informed by user impact and common real-world failures, and reinforced accessible content practices through content optimization, plain language standards, and collaboration with digital directors managing PA.gov content.

This work shows how government can scale accessibility without centralizing all expertise or creating a permanent bottleneck. The core idea is simple: accessibility improves fastest when it is treated as enterprise infrastructure, governed through standards and oversight, measured through meaningful risk and usability signals, and sustained through shared ownership across delivery teams.

Implementation

The Commonwealth's approach followed a deliberate roadmap: establish the enterprise framework, scale testing and remediation, and then embed accessibility into governance and delivery. CODE PA began by defining digital accessibility policy, aligning with federal requirements, enterprise digital standards, and governance structures, and developing the testing frameworks, remediation templates, risk-based scoring, executive reporting, and shared documentation needed to operationalize the work.

Scaling testing and remediation

With the framework in place, CODE PA partnered with all six IT Delivery Centers to conduct manual and automated baseline testing across the 26 highest-impact service provider applications and hundreds of additional systems. CODE PA used an enablement model: Delivery Centers applied standardized methodologies and Lean testing guidance within their portfolios, while CODE PA provided support and quality control as needed. Lean Testing also served as an on ramp for teams beginning manual testing.

The implementation model tied testing to action. Findings were paired with remediation planning, SDLC checkpoints, and executive summaries so issues were not simply documented; they were prioritized, governed, and managed. Rather than treating all defects equally, the Commonwealth prioritized barriers based on user impact, severity, and frequency of common real-world failures.

Standardization through PA.gov migration

A major implementation accelerator was the Commonwealth's transition of PA.gov to Adobe Experience Manager. Standardized templates, components, and content structures improved baseline accessibility and reduced variation across public-facing sites. CODE PA reinforced this foundation through content optimization, plain language standards, and collaboration with agency staff responsible for PA.gov content across more than 30,000 pages.

Change management and enablement

Adoption was built into the model. Communities of Practice created recurring forums for designers, developers, testers, content owners, and digital leaders to share approaches and normalize expectations. Accessibility Office Hours gave teams a regular place to work through difficult questions and reduce delivery friction. The OA Digital Accessibility Resource Hub provided a self-service location for policy, tools, training, guides, and program information. Together with executive reporting and governance checkpoints, these mechanisms helped shift accessibility from a specialist concern to a shared quality responsibility embedded in governance, delivery, and culture.

Impact

Before this work, accessibility performance depended heavily on the team, system, or vendor involved and often surfaced late in the delivery cycle. After this work, the Commonwealth had a structured operating model for how accessibility would be assessed, prioritized, reported, and improved across agencies. That shift moved the state away from episodic reaction and toward repeatable digital governance.

The program also created the Commonwealth's first meaningful enterprise view of accessibility risk and maturity. Through the Digital Accessibility Program, the Commonwealth completed manual and automated baseline testing for 26 highest-impact service provider applications and assessed 425 additional applications, creating a shared picture of where the most significant barriers existed and where effort should be focused first. Instead of isolated findings living within individual projects, accessibility information could now support enterprise prioritization, executive decision-making, and cross-agency coordination. It also helped translate enterprise findings into resident-facing improvements, including modernization of a 32-page Department of Human Services (DHS) Benefits Application PDF so residents applying for benefits could access a critical service document more easily.

Operationally, the Commonwealth improved how accessibility work gets done. Lean Accessibility Testing Methodologies made manual testing more efficient and scalable, giving teams that had not yet started manual testing a practical way to move beyond automated scans alone. By focusing on the most common and consequential barriers, the methodology reduced manual testing time by nearly 75 percent, allowing IT Delivery Centers to establish faster baselines, surface critical- and high-impact issues earlier, and determine the best path forward based on current maturity. It was designed as a starting point for fuller iterative manual testing as resources and maturity grow. Standardized remediation templates and shared testing practices reduced duplication, improved consistency, and sped the move from findings to action.

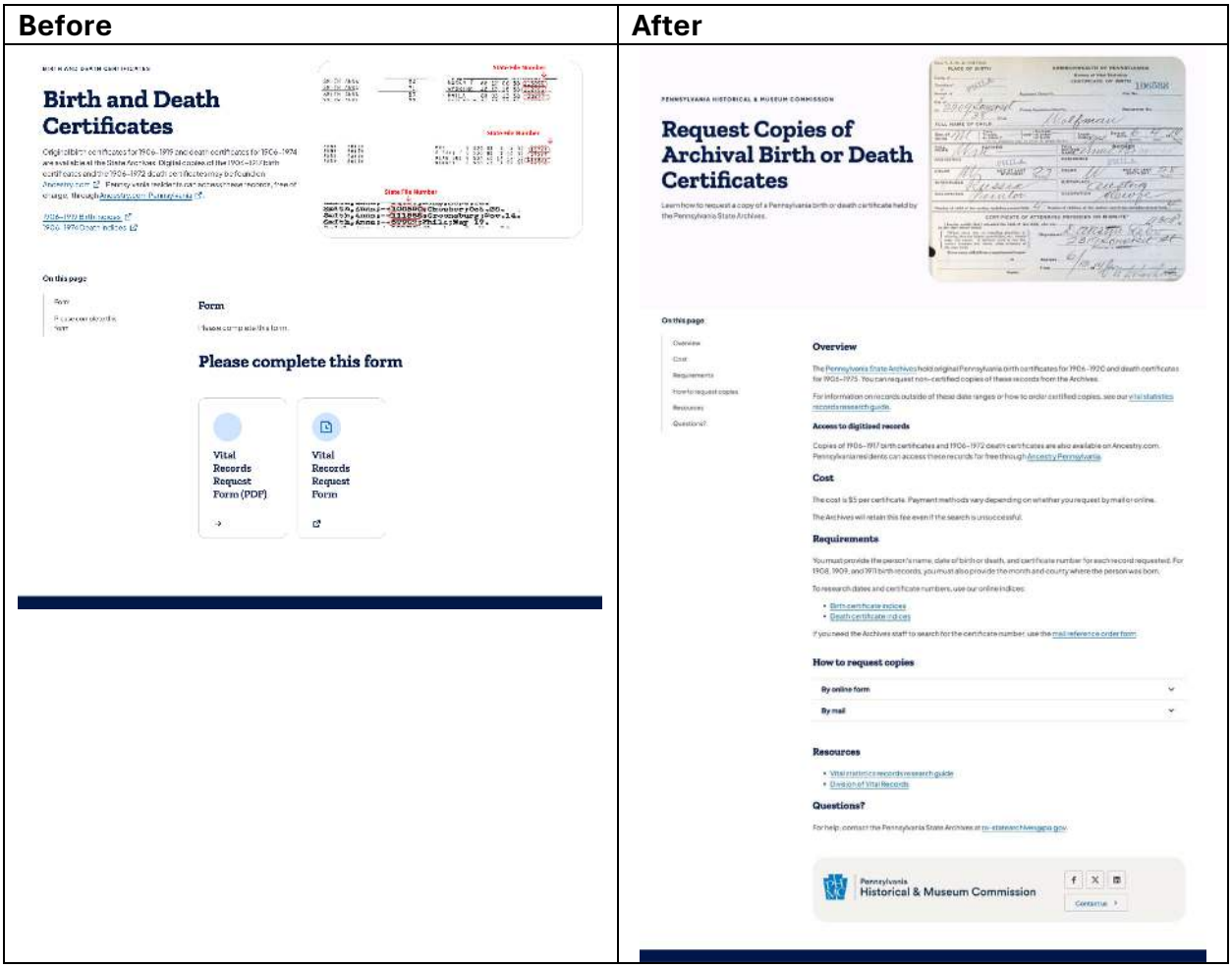

Figure 1: PA.gov content optimization improvements are visible in the "after" example from the Pennsylvania Historical & Museum Commission engagement. Accessibility is improved through clearer hierarchy, simpler language, and more scannable sections, making it easier for screen reader users and people with cognitive disabilities to understand what to do next.

The initiative also improved the user experience of public-facing digital services. Migration of PA.gov to Adobe Experience Manager elevated baseline accessibility by standardizing templates, components, and content structures across more than 30,000 pages. Post-migration content optimization extended those gains by improving readability, structure, and usability.

Leadership visibility improved as well. Executive reporting translated technical findings into risk posture summaries that could be understood and acted on outside technical teams. Reports also included estimated remediation hours, giving technical teams a practical way to explain planning, resourcing needs, and potential costs in terms that supported prioritization and funding decisions. The same methods and consultative support also provided a repeatable model for other areas; one IT Delivery Center used the reports to negotiate a reduction of approximately $10 million to a vendor's estimate for accessibility work over two fiscal years.

Improved visibility has produced tangible results. In one example, the Careers Application supported by the General Government IT Delivery Center moved from a 96.9 percent baseline score at Critical Risk in November 2024 to a 100 percent score at Low Risk in March 2025.

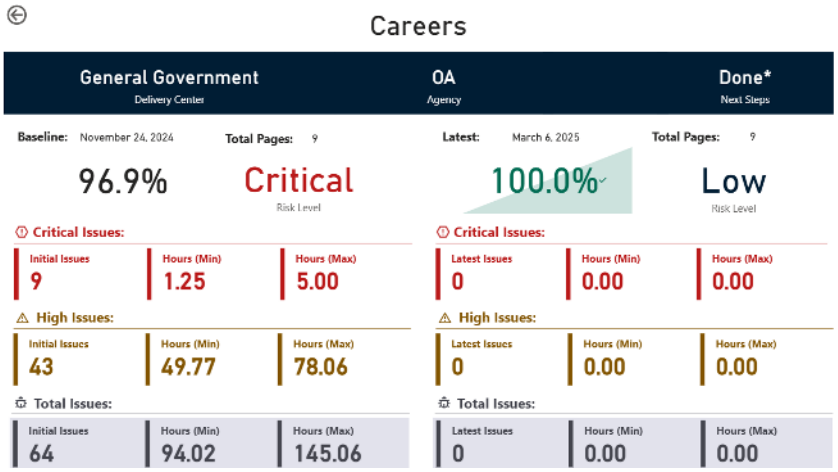

Figure 2: Executive Reporting Tool open to the Careers Application supported by the General Government IT Delivery Center. Baseline scan on November 24, 2024, showed 96.9% score at Critical Risk Level. The latest test on March 6, 2025, showed 100% score at Low Risk Level.

Executive Order 2024-01 further strengthened visibility by establishing the Hire, Improve, Recruit, Empower (HIRE) Committee to strengthen the state government workforce and meeting the needs of an increasingly diverse population, including ensuring that digital services are accessible to users with disabilities. The Committee gives the CAO and CODE PA a formal avenue to engage senior administration and cabinet-level leadership on accessibility as a service-delivery priority, report progress, demonstrate results, and reinforce executive support for enterprise accessibility work.

Culturally, the Commonwealth made accessibility part of how digital work is done through quarterly technical and content-focused Communities of Practice, monthly Accessibility Office Hours, governance alignment, and SDLC integration. Developed in 2025 and optimized by early 2026, the OA Digital Accessibility Resource Hub reinforced that model by giving agencies and IT Delivery Centers self-service access to policy, tools, training, guides, and program information. Together, these mechanisms built capability across all six IT Delivery Centers and converted accessibility from specialist knowledge into institutional knowledge that could be scaled and sustained.

The program's impact also extends beyond internal processes into workforce development, external partnership, and broader culture change. During the 2025 Global Accessibility Awareness Day (GAAD) Fix-A-Thon, CODE PA, Digital Directors, and Office of Vocational Rehabilitation (OVR) partners, including employees with disabilities who brought lived experience to the effort, worked through seven major PA.gov issues together. Building on that success, the 2026 GAAD event will give developers an immersive JAWS-

based comparison of accessible and inaccessible web pages. In March 2026, the Chief Accessibility Officer presented to the OVR Board on the Commonwealth's approach to scaling digital accessibility, and the Commonwealth also hosted an OVR intern last summer, creating a meaningful pipeline for disability talent into public service.

The next phase of the program focuses on institutionalizing that model at enterprise scale through workforce enablement, policy and governance, shared knowledge and tools, and partner-driven process improvements that shift accessibility into procurement, design, and software development lifecycles. Partner feedback from IT Delivery Center CIOs indicates the model is delivering clear operational value through stronger collaboration, streamlined accessibility processes, reduced administrative burden, staff time savings, and lower future maintenance demands.

The Commonwealth did not simply improve accessibility findings. It created a scalable enterprise model for delivering accessible digital government. It aligned platform modernization, governance, testing, content practice, executive reporting, culture change, and leadership engagement into a single operating approach. In doing so, it made 'No Wrong Door' a more durable reality for Pennsylvanians who rely on government services.

Figure 3: 2025 GAAD Fix-A-Thon. CODE PA, Digital Directors, and OVR partners worked side by side to identify and remediate seven high-priority accessibility issues affecting the Public Web Presence, turning accessibility learning into hands-on practice.