



**Florida Fish and Wildlife Conservation Commission  
Interim Policy Memorandum  
IPM 2025-01**

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**To:** All FWC Staff  
**From:** Roger A. Young, Executive Director  
**Date:** March 26, 2025  
**Subject:** Electronically Communicated Information (ECI) Accessibility Policy

**Purpose**

The purpose of the Electronically Communicated Information (ECI) Accessibility Policy is to assist the Florida Fish and Wildlife Conservation Commission (FWC) in implementation of the Web Content and Accessibility Guidelines (WCAG) 2.1 Level AA, which covers all of the applicable laws and requirements regarding the creation, modification, or procurement of ECI within the agency. Federal law requires ECI compliance by April 24, 2026.

This policy aims to ensure comparable access to and use of agency ECI for all persons of varying abilities. ECI includes, but is not limited to:

- Web content
- Mobile apps
- Social media posts by FWC
- Email communications
- Conventional Electronic Documents
- Videos

**Key Concepts**

**Electronically Communicated Information (ECI)**

Includes but is not limited to web content, mobile apps, social media posts, mapping file formats, and email communications.

**Conventional Electronic Documents**

Web content or content in mobile apps in the following electronic file formats: portable document formats ("PDF"), word processor file formats, presentation file formats, spreadsheet file formats, and photographs.

**Remediation**

By April 24, 2026, FWC will identify and edit as necessary documents deemed non-compliant to correct accessibility issues and errors to comply with, at the minimum, WCAG 2.1, Level AA standards. Successfully remediated documents should be visually the same as their non-compliant counterparts and pass verification using one or more accessibility validation tools.

### Web Content and Mobile Apps

The information and sensory experience provided via a user agent (e.g. a web browser, screen readers), including but not limited to code or markup that defines the content's structure, presentation, and interactions. This includes but is not limited to text, images, sounds, videos, controls, animations, and conventional electronic documents.

### Data Archive

Data archiving is the practice of identifying data that is no longer active and moving it out of production systems into long-term storage systems.

### Accessibility Standard

The W3C Recommendation dated September 21, 2023, Web Content Accessibility Guidelines ("WCAG") 2.1, Level AA, available at <https://www.w3.org/TR/2023/REC-WCAG21-20230921/>, in compliance with Section 508 of the Federal Rehabilitation Act of 1973, as amended (Section 508) and as required by 28 Code of Federal Regulations (C.F.R.), Part 35 as amended for state and local government's ECI.

### Principles of Accessibility

Accessible content shall follow the POUR Hierarchy Principles.

1. Perceivable  
Information and user interface components must be presentable to users in ways they can perceive.
2. Operable  
User interface components and navigation must be operable
3. Understandable  
Information and the operation of the user interface must be understandable.
4. Robust  
Content must be robust enough that it can be interpreted by a wide variety of user agents, including assistive technologies.

### Background

#### General

FWC's electronic and information resources must be accessible to users with all levels of ability.

### Applicability

This policy applies to:

- All staff employed by or contracted with FWC and FWC volunteers; and
- All FWC electronic and information resources, including but not limited to electronic and information resources developed, procured, maintained, or used by the agency directly or by the agency's vendors and/or service providers whose contract terms require the use of electronic and information resources.

### Training

FWC shall, prior to April 24, 2026, and on a continuing basis thereafter, provide FWC employees and volunteers training, access to training resources, and assistance regarding ECI accessibility compliance; schedule ongoing training events or seminars that are focused on accessibility development, testing, procurement, and/or awareness training; and publish information regarding publicly available accessibility training opportunities and technical assistance.

### Implementation

FWC will create an ECI Accessibility Implementation and Remediation Plan, which describes methods and procedures the agency shall follow to ensure that ECI code and content developed, changed, or procured by agency staff is accessible and complies with this policy. This plan will include a process for corrective actions to remediate non-compliant items. The FWC ECI Accessibility Coordinator is the owner of this plan and will oversee the activities associated with the plan's implementation.

### Requirements and responsibilities

#### Owners

Owners, creators, and authors of ECI products and documents shall run assessments and evaluations to ensure accessibility at the author level using the Microsoft Accessibility Checker or Agency-authorized accessibility checker. Staff must complete accessibility training in order to gain understanding and ensure compliance with the rules and standards set forth.

#### ECI Accessibility Committee

Members of the FWC ECI Accessibility Committee, led by the ECI Accessibility Coordinator, assist staff with understanding the methods for compliant creation, modification or procurement of ECI as described in Section 508 and in the Web Content Accessibility Guidelines (<https://www.w3.org/TR/WCAG21/>) (WCAG). Members of the Accessibility Committee work with Division staff to follow the FWC ECI Accessibility Implementation and Remediation Plan, developed to ensure compliance with all ECI across the agency. The ECI Accessibility Committee will be created prior to April 24, 2026.

#### ECI Accessibility Coordinator

The ECI Accessibility Coordinator provides ECI accessibility leadership and guidance, and acts as a liaison between the ADA Coordinator, the Executive Director, Division Accessibility Committee members, and FWC staff that produce ECI. The ECI Accessibility Coordinator works with staff to develop compliance plans, reports on the status and progress of those plans, and identifies training needs.

#### ADA Coordinator

The agency ADA Coordinator oversees and coordinates all agency accessibility efforts across the state. This role supports the ECI Accessibility Coordinator and ECI Accessibility Committee in reporting accessibility efforts, disseminating knowledge among FWC employees, and ensuring we are current with federal and state accessibility efforts.

#### Accommodations and Exceptions

#### Alternate Methods and Exceptions

#### *Archived web content*

Web content that meets all four of the following points would not need to meet WCAG 2.1, Level AA:

1. The content was created before April 24, 2026, or reproduces paper documents or the contents of other physical media (audiotapes, film negatives, and CD-ROMs for example) that were created before April 24, 2026, **AND**
2. The content is kept only for reference, research, or recordkeeping, **AND**
3. The content is kept in a special area for archived content, **AND**
4. The content has not been changed since it was archived.

#### *Preexisting conventional electronic documents*

Documents that meet all three of the following points usually do not need to meet WCAG 2.1, Level AA, except in some situations:

1. The documents are word processing, presentation, PDF, or spreadsheet files; **AND**
2. The documents are not used to apply for, access, or participate in an FWC service, program, or activity; **AND**
3. They were available on the state or local government's website or mobile app before April 24, 2026.

Note: If the document has been updated since April 24, 2026, then the document would not fall under this exception.

*Content posted by a third party where the third party is not posting due to contractual, licensing, or other arrangements with a public entity*

Content that is posted by third parties on a state or local government's website or mobile app would not need to meet WCAG 2.1, Level AA.

*Individualized documents that are password-protected*

Documents that meet **all three** of the following points do not need to meet WCAG 2.1, Level AA:

1. The documents are word processing, presentation, PDF, or spreadsheet files, **AND**
2. The documents are about a specific person, property, or account, **AND**
3. The documents are password-protected or otherwise secured.

*Preexisting social media posts*

Social media posts made by a state or local government before April 24, 2026, do not need to meet WCAG 2.1, Level AA.

*Alternative methods*

Should the ECI Accessibility Coordinator and division Accessibility Committee member determine compliance is not possible due to a significant difficulty or expense, FWC may provide alternate methods of access, including voice, fax, teletypewriter, internet posting, captioning, text-to-speech synthesis. Alternative versions must remain synchronized to the primary ECI and updated whenever the primary ECI changes.

Exceptions for a significant difficulty or expense must be approved in writing by the Executive Director for each ECI. The ECI Accessibility Coordinator will submit an exception request to the ADA Coordinator. The exception request will include:

- a. Description of the difficulty or expense
- b. Date of expiration or duration of exception
- c. Plan for alternate means of access for persons with disabilities
- d. Written justification, including:
  - i. Technical barriers
  - ii. Cost of remediation
  - iii. Fiscal impact for bringing ECI into compliance
  - iv. Other identified risks

- e. Documentation of how FWC considered all resources available to the program or program component for which the product is being developed, procured, maintained, or used. This may include such examples as:
  - i. Agency budget
  - ii. Grants
  - iii. Alternative vendor or product selections

The ADA Coordinator shall grant or deny the exception request. FWC shall maintain copies of approved exceptions in accordance with the records retention schedule.

This policy shall remain in effect until modified or rescinded.

Roger A. Young Date: 3/26/2025

Roger A. Young, Executive Director or Designee