

Teltech Information Technology Compliance (ITC) Policy

Effective Date: January 1, 2024

Applies To: Teltech Communications, LLC, its employees, subcontractors, and agents providing services under Texas DIR contracts.

1. Purpose

The purpose of this ITC Policy is to establish Teltech's commitment and procedures to ensure that all information technology (IT) products, services, and deliverables provided under Texas Department of Information Resources (DIR) and U.S. General Services Administration (GSA) contracts meet applicable accessibility, security, and compliance requirements.

2. Scope

This policy applies to:

- All Teltech employees engaged in DIR and GSA contract work.
- Subcontractors and third parties providing deliverables under Teltech contracts.
- Products, services, documentation, websites, portals, and reports delivered to state and federal Customers.

3. Accessibility Compliance

Teltech ensures that all deliverables meet the following accessibility standards:

- **Texas Administrative Code, Title 1, Part 10, Chapter 213** (aligning with Section 508 of the Rehabilitation Act).
- Web Content Accessibility Guidelines (WCAG) 2.1, Level AA for all web-based content and applications.
- **Section 508 of the Rehabilitation Act** Federal accessibility compliance for electronic and information technology (EIT).

Universal Design Commitment (GSA)

In alignment with **GSA's principles of Universal Design**, Teltech integrates accessibility and usability at the earliest stages of solution development. Universal Design ensures that products, systems, and environments are usable by all people—regardless of age, ability, or status—without requiring adaptation or specialized design. By embedding



these principles, Teltech aims to reduce barriers, improve access equity, and provide inclusive solutions "by design" rather than by exception.

Subcontractors must also certify that their offerings meet these standards. Teltech will not deliver non-compliant solutions without documented remediation plans that have been approved by the Customer.

4. Security & Data Protection

To comply with DIR security expectations, Teltech follows:

- Texas Cybersecurity Framework (based on NIST CSF).
- **DIR contract security requirements** for handling confidential or sensitive information.
- Use of secure systems and protocols (e.g., encryption for data at rest and in transit, role-based access controls, multi-factor authentication where applicable).
- Incident reporting protocols consistent with Texas Government Code Chapter
 2054 and DIR guidelines.

5. Subcontractor Compliance

- All subcontractors engaged under DIR contracts must sign flow-down agreements committing to this ITC Policy.
- Subcontractors must provide required Letters of Authorization (LOAs), HUB Subcontracting Plan (HSP) participation reports, and compliance certifications.
- Teltech retains prime contractor responsibility for all deliverables, even if performed by subcontractors.

6. Procurement & HUB Participation

Teltech follows DIR requirements for **Historically Underutilized Business (HUB)** participation:

- Develops and maintains a HUB Subcontracting Plan (HSP) for all DIR contracts where applicable.
- Reports HUB participation on a monthly/quarterly basis as required.
- Actively seeks qualified HUB vendors for subcontracting opportunities.

7. Training & Awareness

- All Teltech employees and subcontractors supporting DIR projects receive training on ADA, Section 508, WCAG, and Texas DIR compliance obligations.
- Annual refresher training is required.



 Security and accessibility responsibilities are integrated into employee onboarding for DIR-related roles.

8. Reporting & Documentation

Teltech maintains full transparency in compliance reporting by:

- Submitting Vendor Sales Reports (VSRs) to DIR monthly with complete subcontractor attribution.
- Documenting accessibility compliance testing results upon request.
- Retaining compliance and training records for at least the period required under DIR contracts.

9. Continuous Improvement

Teltech commits to continuous monitoring and enhancement of IT compliance practices, including:

- Regular audits of accessibility and security compliance.
- Incorporation of updated federal/state requirements (e.g., WCAG 2.2, revised DIR standards).
- Adoption of evolving Universal Design best practices as promoted by GSA and industry standards.
- Customer feedback integration into compliance improvements.

10. Policy Review

This ITC Policy will be reviewed **annually** and updated as necessary to reflect changes in **DIR regulations**, **Texas Administrative Code**, **or federal law**.

Approval and Oversight This policy is approved by Teltech executive leadership and is overseen by the **Compliance Officer**. All employees and subcontractors must adhere to this policy as a condition of participation in DIR and GSA projects.