

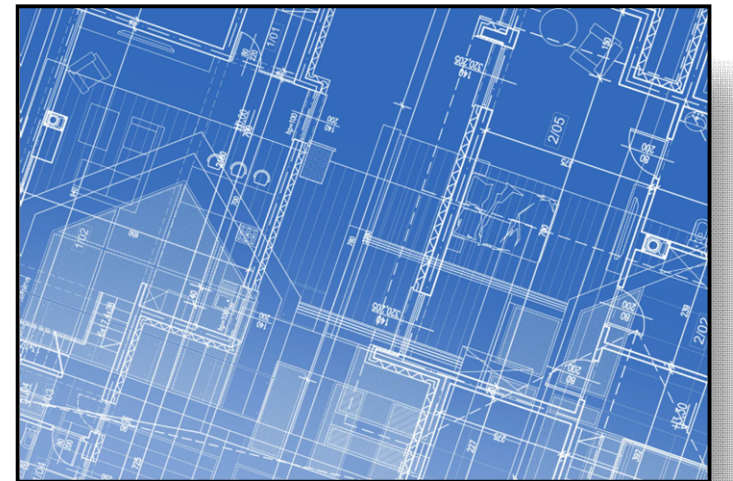
ADA Title II Web Compliance

In Plain English

By Kris Rivenburgh
FLGISA 2026 Winter Symposium

Part I

Blueprint for Success



Primer

- ADA Title II Web Rule
- DOJ First Steps Toward Complying Guide
- Explain in its Practical Application (here's what you need to do)

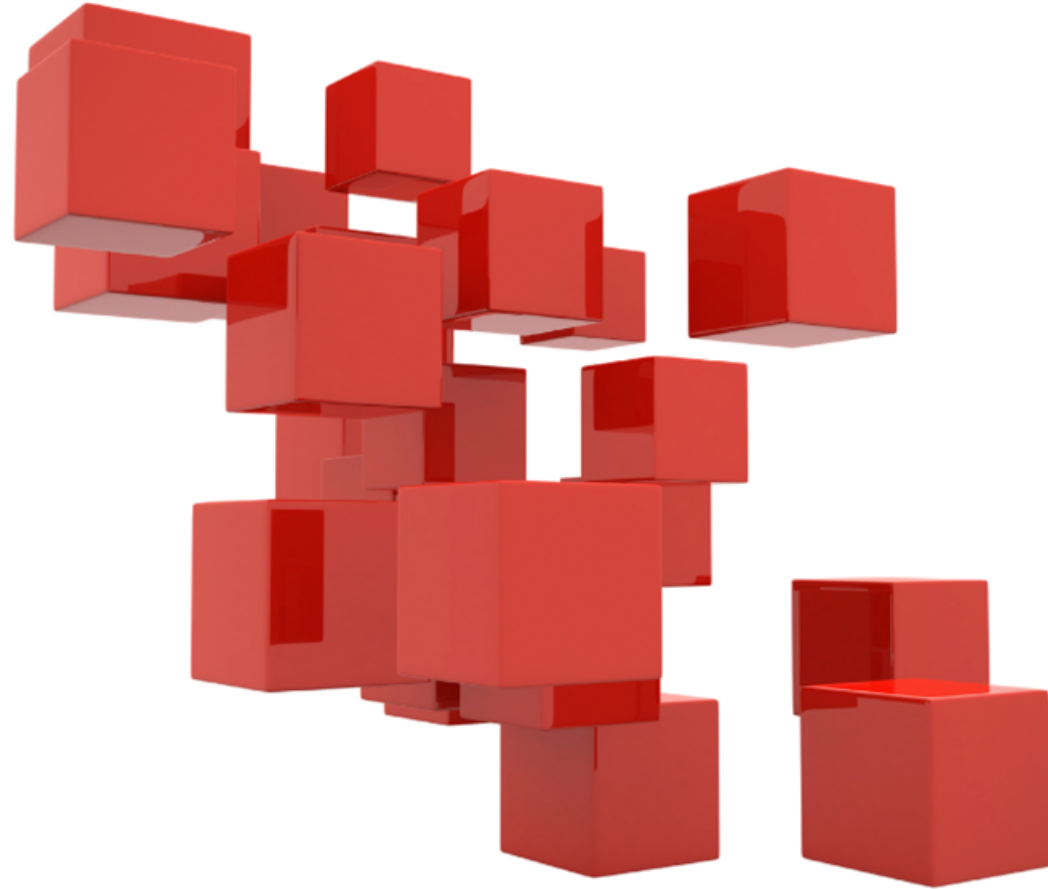
**State and Local Governments: First Steps
Toward Complying with the Americans
with Disabilities Act Title II Web and
Mobile Application Accessibility Rule**

ADA Title II Web Rule

To remain compliant with Title II of the Americans with Disabilities Act, state and local governments must make their websites, web content, mobile apps, and documents WCAG 2.1 AA conformant.

- Social media
- PDFs
- PowerPoints

Building to Compliance



1: Understand Requirements

- Thousands of dollars – A lot of money
- Hundreds of hours – A lot of time
- You need to make sure you're doing this right.
- Learn about the rule's requirements. It is critical that you understand the requirements of the ADA Title II web rule so have at least one person who reads through the Fact Sheet.
- Imagine driving to San Diego, California. Now imagine you're halfway there and you pocket entered a Seattle, Washington into GPS. (13 hours)

Importance of Requirements



Google Maps

2: Deadline

- State and local governments and instrumentalities have one of two deadlines based on their population
- April 2026 (50,000 or more)
- April 2027 (49,999 or less)
- The DOJ gave 2 or 3 years for a compliance for a reason
 - This takes time (longer than you think)
- The longer you wait, the more expensive this becomes
- The less comfortable you will be
- There's no penalty for finishing ahead of the deadline

2: Deadline Dates

- **State or local governments with a population of 50,000 or more persons:**
 - Compliance deadline: April 24, 2026
- **State or local governments with a population of 0 to 49,999 persons:**
 - Compliance deadline: April 26, 2027

3: Roles and Responsibilities

- Figure out who will have a role in complying with the rule.
- It won't just be your IT guy and your web developer.
- Everybody needs to be on the same page, especially anyone who purchases or creates or participates in creating digital content.
- 2-3 hours with a consultant / advisor can make all the difference.

3: Roles

- ADA coordinator
- Code
- Web Content
- Documents
- Procurement
- Leadership

Source out to experts but maintain ownership mindset.

4: Training

Training and education is essential so that we understand collectively as a staff what we're doing and what the subject matter is (not something arbitrary). **This helps with BPB: budgeting, planning, and buying.**

- WCAG Training
- Specialized Training
 - Documents
 - Content creation

4: Training Part 2

The ADA BOOK

Redundant links

Buy now link

Image link

easy pa

website.com / checkout

Share

Watch on YouTube

A man with a beard and a black hoodie is pointing at a whiteboard. The whiteboard has handwritten text and a URL. The text includes 'Buy now link', 'Image link', and 'easy pa'. The URL is 'website.com / checkout'. There is a red play button icon in the center of the whiteboard. The video player interface includes 'THE ADA BOOK' logo, 'Redundant links' title, 'Share' button, and 'Watch on YouTube' button.

5: Take Inventory

- Website(s) + Web pages
- Apps
- Content
 - Images
 - Text
 - Video
 - Audio
- Documents
- Social channels

The image shows the word "facebook" in a bold, blue, lowercase sans-serif font. The text is centered within a light gray rectangular background.

6: Exceptions

- Know the 5 exceptions (study these)
- Archived content (details)
- Pre-existing conventional electronic documents (CEDs)
- Content posted by third-parties
- Individualized, password-protected documents (CEDs)
- Pre-existing social media posts

6: Exceptions: Archived Cont.

Archived content qualifies as an exception if all of the four points listed below are met:

- **Creation Date:** The content was created before the compliance deadline or reproduces materials like audio tapes or CDs from before this date.
- **Purpose:** Used solely for reference, research, or record-keeping.
- **Storage:** Located specifically in an archived section.
- **Updates:** Has not been modified since being archived.

6: Exceptions: CEDs

Traditional electronic documents such as word processing files, presentations, PDFs, or spreadsheets are exempt if they were available on a website or app before the compliance deadline.

This exception does not apply if the documents that are currently being used to apply for, access, or participate in a state or local government's services, programs, or activities – even if the documents were posted before the date the government has to comply with the rule.

6: Exceptions: Third-Parties

Content that a third party independently uploads to a platform or website is not under the control of the public entity, thus exempt. For example, if a member of the community posts a message on a message board or adds a comment to a Facebook page.

This exception does not apply if the third-party was hired to post content.

For example: social media agency posts on behalf of county.

6: Exceptions: Password

Another exception is for documents that are specific to one person, property, or account that are password protected and are in one of the formats listed. Here there are three separate conditions that must be met:

- The document is either a word processing document, PDF, presentation, or spreadsheet.
- The document is for an individual, property, or account.
- The document is password protected.

6: Exceptions: Social

Social media posts created before the compliance deadline are exempt. This highlights the importance of the creation date in determining eligibility for an exception.



7: Which Content

- Determine which content needs to be WCAG 2.1 AA conformant
- Use your inventory list
- Remove all exempted content
- Make applicable notes
 - Archive folder + migration
 - Social media accessibility start

8: What Fixes are Needed

- In-house only if you have a technical accessibility expert on staff (1+ year of experience minimum to audit website)
- In-house only for certain content, if trained
 - Videos
 - Text
- What services will you source out to an accessibility company?
 - Documents
 - Websites
 - Apps

9: Prioritize Fixes

Prioritize certain digital assets and content. You can't fix everything all at once so work on the most important digital assets and/or the most critical pages.

- Website
 - Most used web pages
- Documents
 - Most used documents
 - Document templates

10: Identify Relevant Vendors

You need to make sure that any content or mobile apps a vendor or contractor provides or posts on its behalf conforms with WCAG 2.1 AA.

We can't have vendors that introduce accessibility issues so we need to ensure all contracts going forward prioritize accessibility. We also need to use our bargaining power to ensure current contracts are upgraded to prioritize accessibility.

10: Relevant Vendors



11: Create a Policy

A digital accessibility policy formalizes, structures, and organizes your accessibility efforts. A policy is a document that centralizes your efforts in one location:

- Objective
- Roles
- Responsibilities
- Deadlines

Part 2

Accessibility Fundamentals

+Greatest ROI



Part 2 Primer

- ADA Title II Web Rule
- We need to make digital assets accessible
 - Websites
 - Web Content
 - Apps
 - Documents
 - Social Media
- Accessible means we make our digital assets usable by people with disabilities so that they have equivalent access

Fundamentals

- What to do for accessibility
- How to do it
- We'll cover some essentials
- No more talking around it

- **SOME**

WCAG

- Web Content Accessibility Guidelines (WCAG)
- Version 2.1
- Conformance Level AA
- Technical Standards
- Success Criteria
- 50 Success Criteria in WCAG 2.1 AA
- Things to do / Things to account for

Alt Text

- All non-text content (e.g., images, photos, art, maps, infographics, charts, graphs, infographics, etc.) needs to have a text alternative that conveys the same information conveyed in the content.
- Purely decorative, non-meaningful images (e.g., complementary images for articles, spacer images added for design purposes) do not need alt text but do need an empty alt attribute.
- Any image that is linked or has a function must have an alt text description that describes its purpose, even if it is decorative.

Alt Text Code

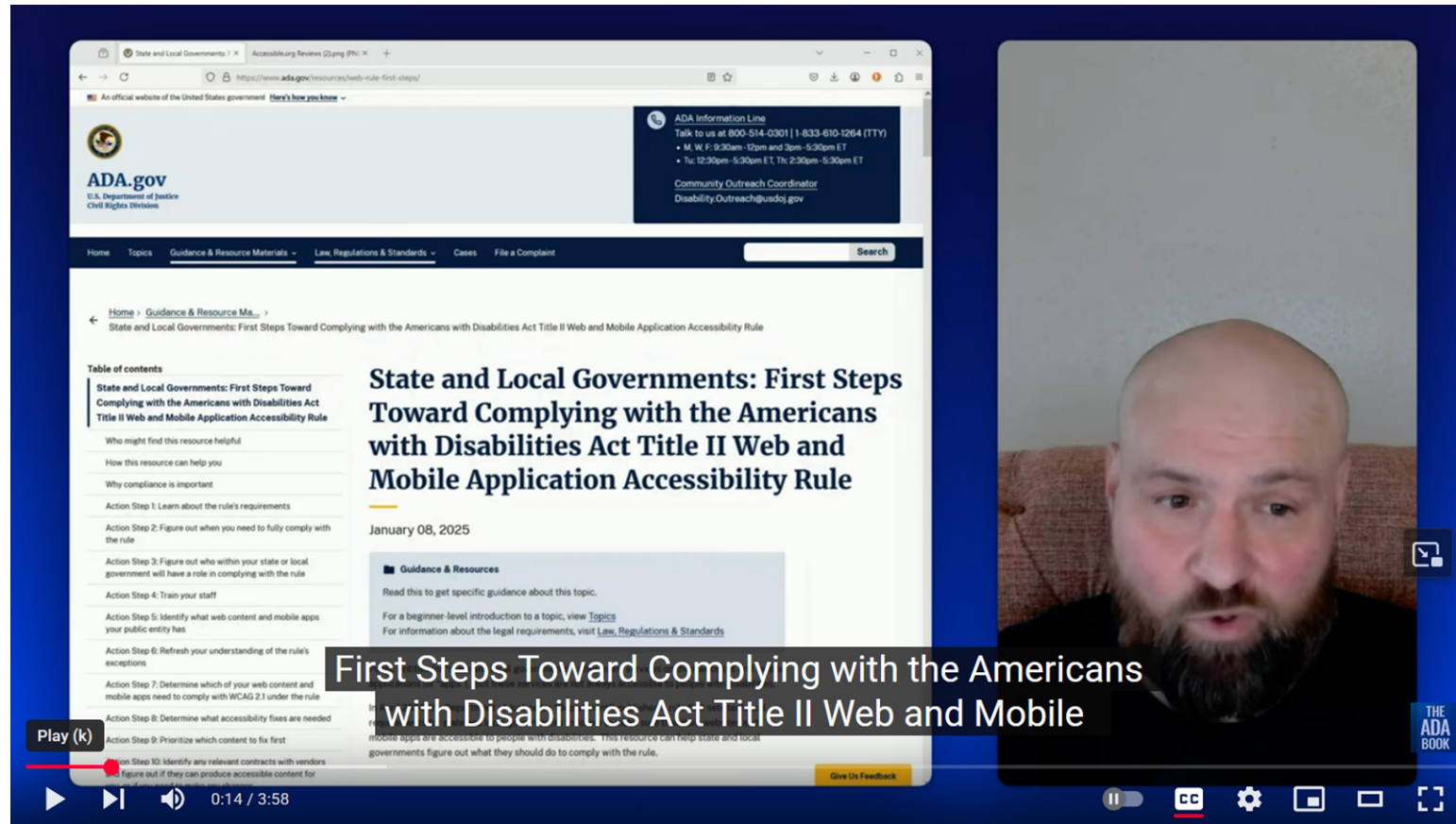
```
1. 
```

```
1. 
```

Closed Captions

- Add closed captioning to all videos with audio
- Closed captions are more than subtitles. Subtitles merely convey dialogue. Closed captions also include any important sounds in the video (e.g., door slamming, background music, etc.)

Closed Captions Example



The image shows a video player interface. On the left, a browser window displays the ADA.gov website page titled "State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule". The page includes a table of contents, a main heading, a date (January 08, 2025), and a "Guidance & Resources" section. On the right, a video frame shows a man with a beard speaking. Overlaid on the bottom of the video frame is a black box with white text containing the video's title: "First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile". The video player controls at the bottom show a play button, a progress bar at 0:14 / 3:58, and various icons for volume, closed captions, settings, and full screen.

State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule

Table of contents

- State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule
- Who might find this resource helpful
- How this resource can help you
- Why compliance is important
- Action Step 1: Learn about the rule's requirements
- Action Step 2: Figure out when you need to fully comply with the rule
- Action Step 3: Figure out who within your state or local government will have a role in complying with the rule
- Action Step 4: Train your staff
- Action Step 5: Identify what web content and mobile apps your public entity has
- Action Step 6: Refresh your understanding of the rule's exceptions
- Action Step 7: Determine which of your web content and mobile apps need to comply with WCAG 2.1 under the rule
- Action Step 8: Determine what accessibility fixes are needed
- Action Step 9: Prioritize which content to fix first
- Action Step 10: Identify any relevant contracts with vendors and figure out if they can produce accessible content for you

State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule

January 08, 2025

Guidance & Resources

Read this to get specific guidance about this topic.

For a beginner-level introduction to a topic, view [Topics](#)

For information about the legal requirements, visit [Law, Regulations & Standards](#)

First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile

Play (k) 0:14 / 3:58

THE ADA BOOK

Color Contrast

- Text and images of text should have a color contrast ratio of 4.5:1 against the background.
- **Exceptions**
 - Large text (18 point or 14 point bold) only has a minimum 3:1 ratio
 - Logos or brand names don't have this requirement

Color Contrast Example

Foreground

Hex Value
EE11C1

Color Picker Alpha
1

Lightness

Background

Hex Value
FFFFFFFF

Color Picker

Lightness

Contrast Ratio
3.82:1

The image shows a digital color contrast tool interface. It is divided into two main sections: 'Foreground' and 'Background'. The 'Foreground' section includes a 'Hex Value' input field containing '#EE11C1', a 'Color Picker' showing a magenta color bar, and an 'Alpha' dropdown menu set to '1'. Below this is a 'Lightness' slider with a gradient from dark purple to light pink. The 'Background' section includes a 'Hex Value' input field containing '#FFFFFF', an empty 'Color Picker' box, and a 'Lightness' slider with a gradient from black to white. At the bottom center, a box displays the 'Contrast Ratio' as '3.82:1'.

Keyboard

- Make sure all functionality / interactive features are operable with only a keyboard.
- Keyboard-only users must be able to navigate to and from all parts of a website. A mouse should never be necessary to move away from any element of a website.



Headings

- Use headings to structure and organize text
- Don't use large, bold text to indicate headings
- Use correct heading hierarchy
 - H1
 - H2
 - H3
 - H4
 - H5
- Headings need to be descriptive

Headings Example

ACCESSIBLE.ORG

Services

Pricing

Training

WCAG Checklist

ADA Compliance

Contact Us

Search This Site

← ALL POSTS

AI Doesn't Automate Accessibility, But Does Increase Efficiency

Kris Rivenburgh on April 19, 2025

Holy Batman, is AI advancing quickly. That's good.

But there are multiple digital accessibility companies who lie and make exaggerated claims about what AI is capable of. That's bad.

The truth is artificial intelligence is already making digital accessibility much more efficient. It's easy to make a mathematical

Page Titles

Make sure each web page has a unique and descriptive page title that lets the user know what the topic or purpose of the page is.

```
});  
</script>  
<title>Amazon.com. Spend less. Smile more.</title>  
<meta name="description" content="Free shipping on  
<meta name="keywords" content="Amazon, Amazon.com,
```



[Amazon.com. Spend less. Smile more.](https://www.amazon.com)

Free shipping on millions of items. Get the best of Shopping and Entertainment with Prime. Enjoy low prices and great deals on the largest selection of ...

Identify Errors

- When any input error is automatically detected, alert the user, describe the error, and provide instructions on how to correct it.
- Make suggestions on how to fix errors on forms if an input error is automatically detected.
- Example: When someone enters in an incorrect email format
 - tom@gmailcom

Identify Errors Part 2




Sign in or create account

Enter mobile number or email

tom@gmailcom



 Invalid email address

Continue

By continuing, you agree to Amazon's [Conditions of Use](#) and [Privacy Notice](#).

[Need help?](#)

Buying for work?

[Shop on Amazon Business](#)

Link Purpose

- Write your links so that they're descriptive and easy to read. Also, try to keep your anchors concise.
- Use obvious link anchor text (anchor text are the words you link under).
- Avoid long URLs and “click here” and “learn more” general type of links.
- Try to use mostly keywords (vs. fluffy words like “click here”) when creating links.
- Be especially cognizant of creating useful alt text when linking images.

Link Purpose Part 2

- [Just click](#) here rather than reading our long and boring [2022 county financial report](#).
- The links go to Accessible.org placeholder links on this slide, but in real life they should go to a page that matches and aligns with the link purpose.

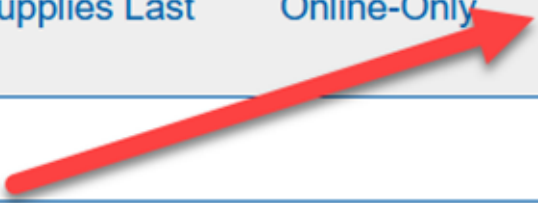
Focus Indicator

- Make sure that when someone tabs through your website, any interactive element (such as a link or form field) that receives focus has a focus indicator of some kind.
- An interactive element is one in which a user can engage with or take an action on (e.g., click on or input a value).
- Typically, a focus indicator is a rectangle box around an interactive element.

Focus Indicator Example

In-Warehouse/Online Olay Essential Botanicals \$4-\$5 OFF, E

[Costco Next](#) [While Supplies Last](#) [Online-Only](#) [Treasure Hunt](#) [What's New](#)



COSTCO
WHOLESALE

Search Costco


On Input / Focus

- No automatic changes occur due to input or settings changes.
- Example: form doesn't auto submit once all fields are filled out.
- No automatic changes occur because an interactive element receives focus.
- Example: if you tab on the submit button after completing a form, the form should not automatically submit. The form should only submit once you initiate action.

On Input / Focus Example



Sign In


[Forgot Password?](#)
 Keep me signed in ⓘ
Check this box only when on a private device.

New to Costco?

Color Not Only Way

- Color alone should not be used to convey information, make an indication or prompt the user, or distinguish between visual elements.
- Be aware of any color coded information such as on/off toggles and charts and graphs.

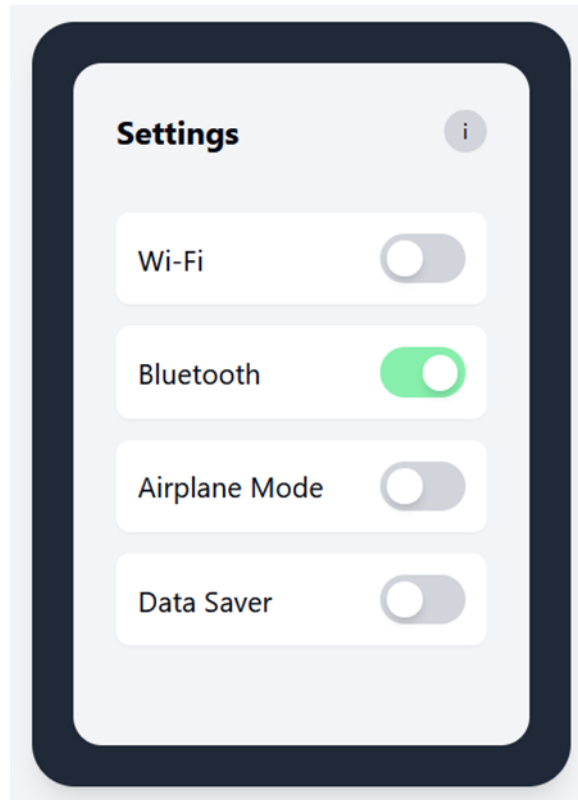
Color Not Only Way Example

County Budget



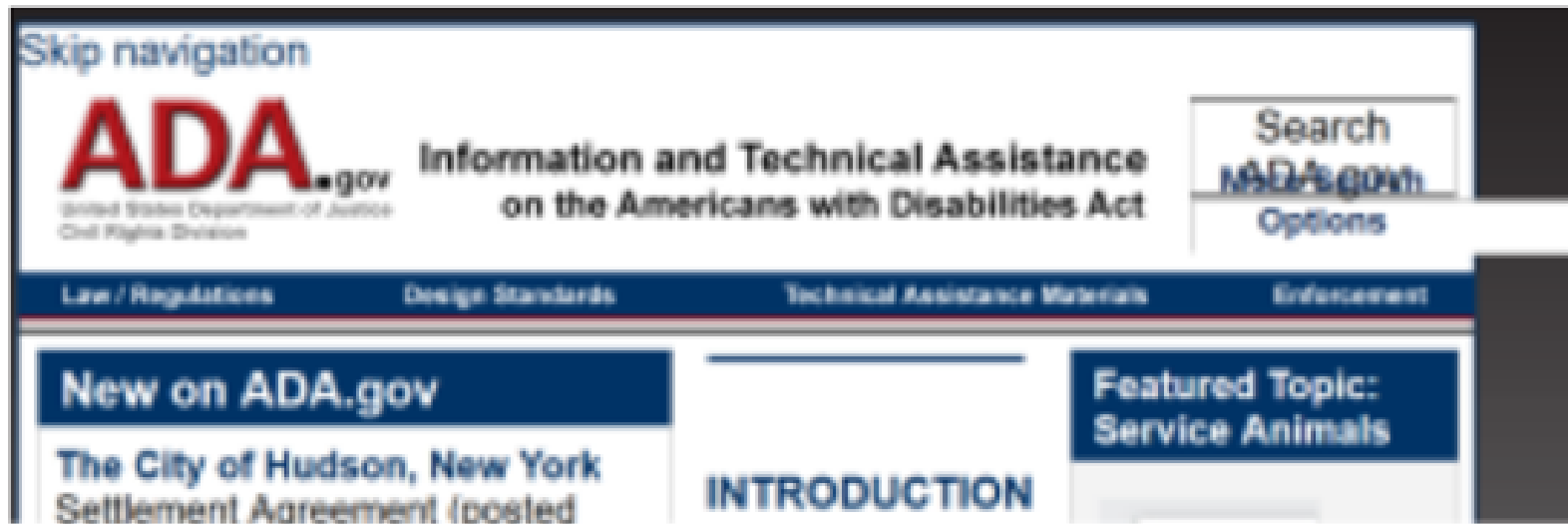
■ Payroll ■ Health Services ■ Infrastructure ■ Public Safety

Color Not Only Way Example 2



Text is Resizable

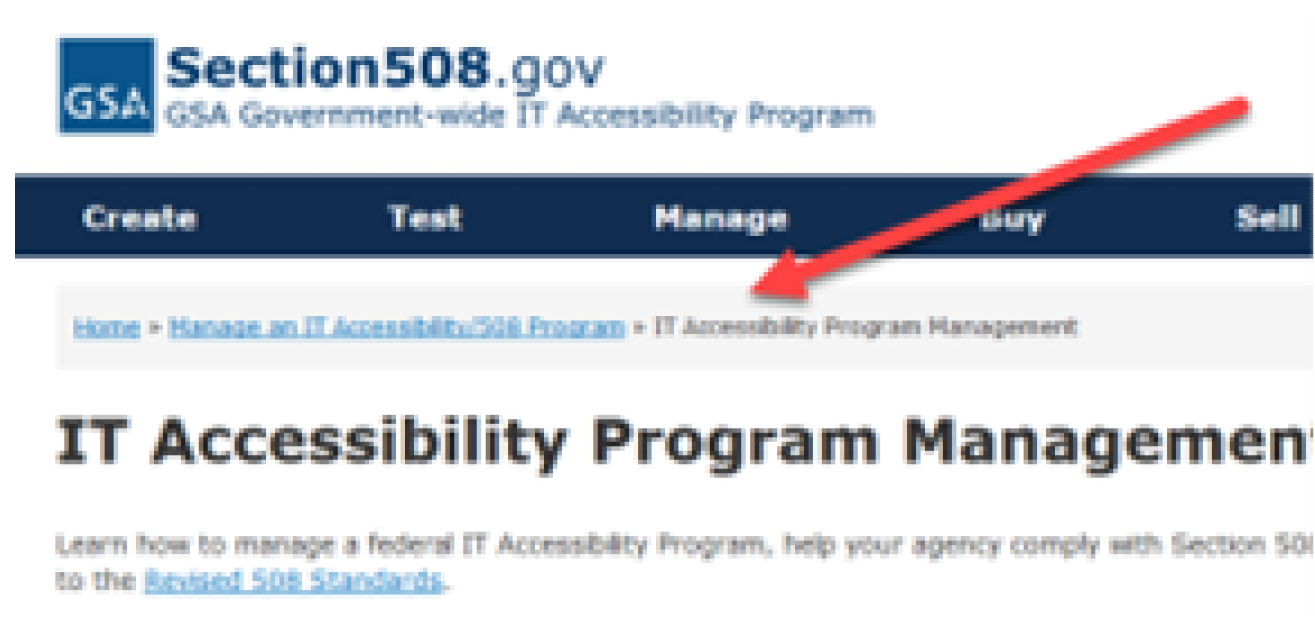
You can increase text size on your page by up to 200% without the page display messing up (i.e., having text overlap other text or elements).



Multiple Ways

- Make it so that there is more than one way to find a web page within your website.
- Navigation menu
- Add a global search
- Add a sitemap
- Add a related pages section below content
- Add breadcrumbs

Multiple Ways Example



The screenshot shows the top portion of the Section 508.gov website. At the top left is the GSA logo and the text "Section508.gov" and "GSA Government-wide IT Accessibility Program". Below this is a dark blue navigation bar with five white text items: "Create", "Test", "Manage", "Buy", and "Sell". A red arrow points from the top right towards the "Manage" item. Below the navigation bar is a breadcrumb trail: "Home > Manage an IT Accessibility 508 Program > IT Accessibility Program Management". The main heading is "IT Accessibility Program Management" in a large, bold, black font. Below the heading is a short paragraph: "Learn how to manage a federal IT Accessibility Program, help your agency comply with Section 508 to the [Revised 508 Standards](#)."

GSA Section508.gov
GSA Government-wide IT Accessibility Program

Create Test **Manage** Buy Sell

[Home](#) > [Manage an IT Accessibility 508 Program](#) > IT Accessibility Program Management

IT Accessibility Program Management

Learn how to manage a federal IT Accessibility Program, help your agency comply with Section 508 to the [Revised 508 Standards](#).

Status Messages

- If a status message appears, make it coded so that screen reader users are notified of the message without losing focus.
- A status message is any information that isn't directly brought to the user's attention.
- Example: Someone is using a screen reader while shopping on a website and they decide to remove an item from the shopping cart. A notification visibly shows at the top of the website that says, "Item removed" but the shopper is not alerted to the status change via their screen reader.

Status Messages Example

The screenshot displays a web application interface for 'County Shop'. At the top, there is a navigation bar with the store name 'County Shop' on the left and links for 'Home', 'Products', 'Cart (2)', and 'Account' on the right. Below the navigation bar, a green status message is shown: 'Item removed from cart: Blue T-Shirt (Medium) Undo', with a checkmark icon on the left and a close 'X' icon on the right. Underneath the message, the heading 'Continue Shopping' is followed by three product cards. Each card has a blue header with a 'Product' placeholder and a white footer with the product name and price. The products are 'County T-shirt' (\$19.99), 'County Hoodie' (\$39.99), and 'County Coffee Mug' (\$12.99).

County Shop Home Products Cart (2) Account

✔ Item removed from cart: Blue T-Shirt (Medium) [Undo](#) ✕

Continue Shopping

- Product
County T-shirt
\$19.99
- Product
County Hoodie
\$39.99
- Product
County Coffee Mug
\$12.99

POUR

4 principles of WCAG:

- Users must be able to **perceive** the information being presented.
- User interface components and navigation must be **operable**.
- Information and the operation of the user interface must be **understandable**.
- Content must be **robust** enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

Flexible

People can access our content and digital assets in different ways.

- Color alone
- Through text
- Keyboard
- Mouse
- Laptop
- Phone

User in Control

- We provide the content, the user is control of how they access it.
- Don't decide how the user is to access content unless it's necessary for correct use.
 - Example: Deposit a check on landscape mode of phone vs. portrait.

Simplicity

- Let's make everything simple and easy to use.
- Why not?

Becomes Intuitive

- The more you learn about accessibility, the more obvious it becomes.
- There are dozens of considerations (50 in WCAG 2.1 AA), but many are related to one another and can be effectively combined.
- The more fluent you become, the less work there is and the more seamlessly accessibility becomes a part of your processes.

Part 3

Myths and Misconceptions



Myths

- What people get wrong
- What people misunderstand
- What people assume
- What digital accessibility companies lie about

Alt Text is Easy

- Accessibility is mainly just about alt text or “alt tags”
- Just check your images and you’re basically done
- It’s really simple



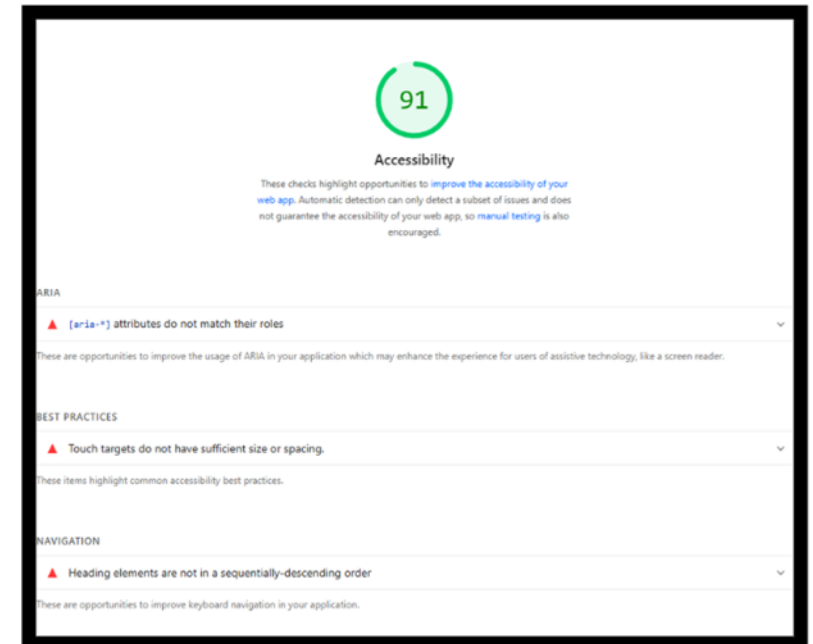
Design

- Accessible websites are ugly
- Not much of the design changes
- Maybe color contrast
- Maybe images of text
- A few others



Scans

- Flag several accessibility issues for review
- Not ADA Compliance Checkers
- ~25% of WCAG 2.1 AA success criteria
- Free (don't need to pay for them)
- Scans are not audits
- Scan-based platforms don't track full WCAG 2.1 AA conformance



Software

- No software or tools that can make your website ADA compliant
- Buyers often mislead into buying “solutions” that don’t practically help them with WCAG 2.1 AA conformance
- Think of software, tools, AI, etc. as possibly helping you with certain aspects of accessibility, but unless you know how, don’t buy them

Widgets

- Widgets don't make your website automatically accessible or ADA compliant
- Waste of money
- Stay away from widgets
- Not a temporary fix

SEO

- Accessibility has very little effect on SEO
- Oversold as a reason to pay for accessibility
- Yes, things like headings, page titles, anchor text, alt text, etc. affect SEO, but, if you haven't already worked on this, you're not going to rank anyway for competitive terms
- Name one website who wasn't ranking and then moved to a top spot because of accessibility

Too Complex

- Many aspects of accessibility are simple and something a beginner can pick up quickly
 - Alt text
 - Closed captions
 - Images of text
 - Link purpose
 - Color contrast
 - Headings
 - Transcripts
- Just a few can make a big difference



Impossible

- Accessibility is very possible
- There is work involved
- One block at a time
- One issue fixed at a time
- Stack wins
- Training
- Source work

Journey

- “Accessibility is a journey”
- Code for “Buy our annual subscription”
- Accessibility does take time, but we can make definitive start and end points for projects
- We can also train our staff to reduce reliance upon accessibility companies

Cost

- Can be expensive at first (e.g., \$10,000 to fix your website)
- Costs decrease over time
 - Training
 - Don't introduce new issues
 - Maintain accessibility



Only for PWDs

- Accessibility improves usability which benefits everyone
- Transcripts make it easy to find certain topics in a long podcast
- Sufficient color contrast means it's easier to find unsubscribe links, read your phone in the sunlight, etc.
- Closed captions enable you to watch a video without sound
- Error instructions help you understand what exactly the error is (instead of just error)
- Increasing text size or zooming retains readability and usability

Only for Blind People

- Other visual impairments
 - Low vision
 - Color blind
- Deaf or hard of hearing
- Motor impairments
 - Limited movement
 - Lack of motor control
- Cognitive and learning disabilities
 - Difficulty focusing

Not My Audience

- “People with disabilities don’t use our services, etc.”
- Actually, they probably do.
- And everyone wins when accessibility is incorporated into digital assets.
- User experience



20% of Users Not Affected

Digital Accessibility companies love to recite the statistic that 20% of people in the United States have a disability (it's actually 28.7% according to [this CDC post](#)). They'll use this stat to imply that if you don't make your website accessible, you're missing out on 20% of customers, 20% of revenue, etc.

Obviously, this is not the case.

There's a false equivalency here. Just because 20% of people are reported to have a disability, it doesn't mean that disability prevents the entire demographic from accessing websites and other digital assets.

After all, someone can have a disability and access a website, mobile app, or other online content just fine.

For example, looking at the statistics posted on CDC.gov page, 12.2 percent of U.S. adults have a mobility disability with serious difficulty walking or climbing stairs.

A mobility disability can certainly impact web usage, but it doesn't necessarily have to.

Similarly, other disabilities can impact web use to a degree, but not to where access is significantly impacted.

And that's the problem with this narrative: it's an ongoing lie for the sake of sales.

Won't Make a Difference

- Some people may literally be blocked from access currently
- Some people aren't blocked, but take much longer to use digital assets than is necessary
 - Bad experience
 - Waiting in line for an hour vs. waiting in line for 15 minutes
 - Not being able to get in line
- Your organization: spend time now, but save time later
- Easier to find information, documents, resources
- Less requests for help

IT Guy's Job

- This isn't just for the IT guy or the tech people
- Everyone needs to buy-in
- Or else those that don't will be creating accessibility issues (e.g., documents)
- If leaders don't take accessibility seriously, it won't be a priority



Alternative Site

- It's a flawed idea that's not worth pursuing
- Separate but equal route
- Alternative site doesn't get the same attention, updates, etc.

Alternative Site Part 2

Use of Conforming Alternate Versions

- Sometimes a state or local government tries to have two versions of the same web content or content in a mobile app: one version that is not accessible and another version that is accessible and provides all the same information and features. The second version is called a “conforming alternate version.”
- Usually state and local governments should not have a main web page that is inaccessible and a separate accessible version of the same content, because people with disabilities should get equal access to that content on the same page.
- Under the rule, state and local governments may use conforming alternate versions as an alternative to inaccessible content only in very limited circumstances. State and local governments are allowed to do this only when there is a technical or legal limitation that prevents inaccessible web content or mobile apps from being made accessible.

Alternative Site Part 3

Sometimes a state or local government tries to have two versions of the same web content or content in a mobile app: one version that is not accessible and another version that is accessible and provides all the same information and features. The second version is called a “conforming alternate version.”

Alternative Site Part 4

Usually state and local governments should not have a main web page that is inaccessible and a separate accessible version of the same content, because people with disabilities should get equal access to that content on the same page.

Alternative Site Part 5

Under the rule, state and local governments may use conforming alternate versions as an alternative to inaccessible content only in very limited circumstances. State and local governments are allowed to do this only when there is a technical or legal limitation that prevents inaccessible web content or mobile apps from being made accessible.

Perfection

- We can make a perfectly accessible website, but there is a lot of work that goes into it.
- Perfection isn't the objective, access is.
- WCAG isn't perfect, but it does provide for excellent accessibility and it's a great standard to strive to meet.

Thank You Very Much