



NASCIO IT Accessibility Working Group in Review

A Guide to DOJ Final Rule Compliance

JANUARY 2026

In April 2024, the U.S. Department of Justice issued [a final rule](#) mandating all state and local government websites and mobile apps be compliant with WCAG 2.1 Level AA standards. As states began planning their journey to compliance, NASCIO chartered the IT Accessibility Working Group for state members to serve as a collaborative, guiding forum led by states with mature accessibility programs. With accessibility also claiming the number ten spot on the 2025 State CIO Top 10 list and moving up to number six on the [2026 State CIO Top 10](#) list, state technology leaders signaled a renewed interest to continue work on accessibility.

[NASCIO's 2025 CIO Survey](#) revealed that 52 percent of states are in the process of implementing their DOJ final rule compliance plan. The survey also revealed that only 30 percent of CIO organizations provide accessibility services to local governments through the CIO office, while 52 percent of CIOs do not provide services at all. While IT accessibility support services are typically voluntary for local governments to join, local governments may find these opportunities difficult to leverage.

In light of this, NASCIO has compiled the IT Accessibility Working Group's content from the year into a guide towards DOJ final rule compliance. All content was previously created and reviewed by the Working Group Committee members below. The purpose of this document is to provide state and local governments with some guidance and resources that may help their journey.

Table of Contents

February: Why Digital Accessibility Matters.....	2
March: Accessibility Policy Development.....	3
April: Preparing for Title II Compliance.....	5
May: Integrating Accessibility into Procurement	8
June: Assessment Techniques	11
July: Awareness and Training Planning.....	13
August: Remediation Planning Methodologies.....	15
September: Testing and Quality Assurance Approaches	16

FEBRUARY: WHY DIGITAL ACCESSIBILITY MATTERS

In 2022, the [Centers for Disease Control and Prevention estimated](#) that 29 percent (73 million) of American adults live with at least one disability. Specifically:

- Fourteen percent (33 million) live with a cognitive disability
- Six percent (17 million) live with a hearing disability
- Five percent (14 million) live with a vision disability

These numbers are based on self-reporting, meaning actual figures are likely higher. Many people struggle with age-related hearing or vision loss, repetitive stress injuries (e.g., carpal tunnel) or other conditions that occur later in life. As such, digital accessibility is an “electronic curb cut” that will benefit far more people than originally intended.

Digital Accessibility Defined

Digital accessibility improves the digital experience of people with disabilities, especially as they interact with digital citizen services. Typically, people associate digital accessibility with language access, digital equity or broadband expansion – but in this context, digital accessibility refers to ensuring equal access online for people with disabilities.

Under the [Department of Justice’s 2024 final rule on web and mobile accessibility](#), all state and local governments, special districts and vendors who provide any service or product to said entities must ensure that all websites, mobile apps, software and services must comply with the [Web Content Accessibility Guidelines \(WCAG\) 2.1 Level AA](#). [WCAG 2.1 Level AA](#) is a widely used and respected set of digital accessibility guidelines that operates on [four main principles known as POUR](#):

- **Perceivable**--user interface and information must be accessible to all users and their needs (e.g., screen reader compatibility; not all users can see, so digital information must be available regardless of sensory or physical differences)
- **Operable**--users must be able to operate in ways that meet their need (e.g., keyboard navigation for those not able to use a mouse)
- **Understandable**--Information must be presented in plain, clear language
- **Robust**--content must be workable across devices, browsers, and assistive technologies

Laws and Guidelines

Digital accessibility is supported by a framework of laws and standards:

- [Americans with Disabilities Act \(ADA\)](#)--Title II covers state and local governments, while Title III covers public accommodations, including websites
- [Rehabilitation Act of 1973](#)--covers rights of disabled people when interacting with federal agencies and contains Sections 504 and 508
- [Section 508](#)--federal procurement law requiring accessible technology
- [Section 504](#)--civil rights protections for people with disabilities
- [W3C Web Accessibility Initiative \(WAI\)](#)--develops WCAG standards
- [WCAG 2.1 Level AA](#)--current technical standard with expanded success criteria

Accessibility as a Civil Right

Accessibility is a civil right. The [Americans with Disabilities Act](#) requires that state and local governments must provide disabled individuals with effective communication, reasonable modifications and an equal opportunity to participate in or benefit from their services, programs and activities.

Federal complaints against inaccessible websites cost millions of dollars in remediation. UsableNet's [2023 Digital Accessibility Lawsuit Report](#) shows that lawsuits nearly doubled between 2018 and 2023. In 2023 alone, 4,630 lawsuits were filed – more than ten per day. Enforcing digital accessibility through lawsuits predates the 2024 DOJ final rule.

The best way to avoid costly lawsuits, remediation, reputational risks and citizen distrust is to ensure accessibility is integrated from the beginning. Key practices include:

- Embedding accessibility requirements in project planning
- Reviewing designs for accessibility (color contrast, alt text)
- Testing across devices, browsers, and assistive technologies

Building in accessibility early reduces risk, saves money, and enables more effective technology.

Additional Resources

[CDC Disability & Health Data System: Disability Estimates](#)

MARCH: ACCESSIBILITY POLICY DEVELOPMENT

A statewide digital accessibility policy is the foundation for sustainable and equitable technology practices. Having a digital accessibility policy:

- Demonstrates organizational commitment
- Drives subsequent processes and procedures
- Encourages consistency across agencies and departments
- Identifies relevant standards
- Clarifies roles and responsibilities internally and externally

Using policy to set consistent, repeatable processes is critical as they provide clarity for staff and protection during audits or reviews. Statewide digital accessibility policies also prevent fragmentation.

Key Steps for a Successful Policy

- **Secure leadership buy-in.** Executive support provides resources and credibility.
- **Keep it simple.** Avoid over-complication. Policies should be understandable and adaptable.
- **Ensure shared responsibility.** Accessibility is not just IT's job; content authors, developers, managers and leadership all play roles.

- **Shift left.** Integrate accessibility early in governance, planning, procurement and training.
- **Remember it's a journey.** Policies should evolve with organizational changes and federal mandates.

Grassroots advocacy is powerful, but policy formalizes leadership support. Policies are more than declarations; they are the culmination of organizational work and buy-in.

Policies must be documented, monitored and updated regularly. Auditors look at policies first as evidence of compliance.

Policy Story: Maryland

Maryland's journey:



- **Leveraging existing efforts:** Maryland's [non-visual access law](#) and compliance workgroup provided a foundation.
- **Establishing the Office of Accessibility:** created within the Maryland Digital Service, with a director hired to oversee the office and staffed with accessibility SMEs.
- **Interagency collaboration:** memorandum of understanding between IT, disabilities and procurement departments.
- **Policy development:** partnered with the Maryland Initiative for Digital Accessibility (academics, advocates, attorneys and procurement experts).
- **Executive branch-wide policy:** required each agency secretary to appoint an accessibility officer, trained in accessibility fundamentals.
- **Compliance standards:** elevated from WCAG 2.0 to WCAG 2.1 Success Criteria.
- **Procurement changes:** vendor accountability, validation testing and an accessibility hold-back (10 percent of contract funds retained until accessibility is proven).
- **Policy development:** announced January 8, 2024, by Governor Wes Moore and Secretary Katie Savage-- [Maryland's first comprehensive digital accessibility policy](#).

Policy Story: Illinois



Illinois' journey spanned multiple decades.

- **2002:** Illinois Web Accessibility Standards
- **2007:** Illinois Information Technology Accessibility Act (IITAA)
- **2017:** IITAA 2.0
- **2022:** Office of Information Accessibility established
- **2024:** [IITAA 2.1 and Website Accessibility Initiative launched](#)

Lessons learned include:

- Grassroots advocacy is a good start
- Leadership adds credibility
- Policy provides a reference point
- Resources bring implementation home
- Start small, keep it simple and take it one step at a time

Policy Impact: Internal and External

Policies provide internal value, but also shape external perceptions:

- **Vendors:** clear expectations and accountability mechanisms
- **Residents:** assurance of equitable access to government services
- **Government partners:** alignment across cities, counties and agencies
- **Non-profits and grant seekers:** confidence in accessibility standards

External visibility protects organizations by demonstrating commitment, not exposing them. Policies show responsibility and build trust.

Accessibility Policy Through a Civil Rights Lens

Accessibility policies are about equity and ensuring access for all.

- WCAG 2.1 AA adoption is happening regardless of Title II timelines.
- Policies create mechanisms for remediation and accountability.
- Bottom line: Accessibility is legally required, but even if mandates shift, implementation takes years-- states must start now.

APRIL: PREPARING FOR TITLE II COMPLIANCE

[Title II of the Americans with Disabilities Act](#) requires state and local governments to ensure that public services, programs and activities available online or via mobile applications are accessible to people with disabilities. Agencies include:

- State and local government offices that provide benefits and/or social services like food assistance, health insurance or employment services
- State and local government offices that issue licenses, registrations and/or collect fees and taxes
- Public schools, community colleges and public universities
- State and local police departments
- State and local courts
- State and local elections offices
- Public hospitals and healthcare clinics

- Public parks and recreation programs
- Public libraries
- Public transit agencies

This broad scope means every public-facing service must be reviewed for accessibility compliance.

New WCAG Standard

The compliance criteria have been updated from WCAG 2.0 Level AA to [WCAG 2.1 Level AA](#). WCAG 2.0 had 38 Level A/AA success criteria, while WCAG 2.1 expanded to 50, adding 12 new A/AA criteria focused on mobile accessibility, low vision and cognitive/learning disabilities. Key additions include:

- **Mobile accessibility:** orientation, pointer gestures, motion actuation
- **Vision difficulties:** reflow, text spacing, non-text contrast
- **Cognitive disabilities:** timeouts, input assistance
- **Status messages:** programmatically determined for assistive technologies

The expansion makes WCAG 2.1 more comprehensive, addressing modern devices and diverse user needs.

Scope: What Are You Covering?

While Title II technically only applies to web content and mobile apps, agencies need to inventory all assets to identify candidates for retirement, archival, testing and remediation. Agencies should also revisit procurements (contracts, solicitation language, templates), review policies and processes for Title II alignment and identify employee awareness and training needs. Training is especially critical: everyone who creates digital content is responsible for accessibility.

Compliance Dates

All applicable state, local and special governments/districts are subject to be fully compliant with Title II by certain dates based on Census population. Census districts with more than 50,000 residents must be compliant by April 24, 2026. Census districts with less than 50,000 residents and special districts must be compliant by April 26, 2027.

Rule Scope

The [DOJ Final Rule's](#) scope includes: websites, web applications, mobile applications, documents, social media and third-party web content. Third-party content under contract or license is subject to the rule.

Rule Exceptions

1. **Archived Web Content:** content that was created before the applicable compliance date and kept only for reference, research or recordkeeping. It must be kept in a special area for archived content and unchanged since archival. If the content remains relevant after 2024, it must be made accessible.
2. **Preexisting Conventional e-Documents:** PDFs, Word, documents, spreadsheets or presentations

that were available before the applicable compliance date. If content remains relevant after the compliance date, it must be made accessible.

- a. Agencies may choose to lock archived documents (metadata, read-only) to prevent accidental edits, which would trigger accessibility requirements.

3. **Third-Party Content:** third-party content that is not posted under contractual or licensing arrangements.
4. **Password-Protected Documents:** individualized documents (utility bills, tax statements) secured for specific users.
5. **Preexisting Social Media Posts:** posts made before the applicable compliance date. If the post maintains relevance after this date, it must be made accessible.

For more details and examples of each exception, visit the [ADA Fact Sheet on the DOJ Final Rule](#).

State Journey: Michigan



Michigan has two laws and three state policies regarding accessibility:

- [Michigan Persons with Disabilities Civil Rights Act](#)
- [Michigan Deaf Persons' Interpreters Act](#)
- [1650.02 Accessibility and Reasonable Modifications](#)
- [Digital Standards for Websites and Applications](#)
- [State of Michigan Digital Standards](#)

Michigan's centralized IT structure supports executive government agencies, and there is an accessibility policy already in place. The policy was updated in 2024 to align with the DOJ Final Rule, and a project was created to review approximately 600 websites and applications for compliance. Additional budget and FTEs were requested to perform reviews, with applications categorized by external user counts and WCAG review status.

The prioritization process was:

- Priority 1: No prior review or issues found; high-use systems (>10,000 users)
- Priority 2: Medium-use systems (501-10,000 users)
- Priority 3: Low-use systems (<500 users)

This prioritization process allowed efforts to be focused on high-impact systems first, like food assistance and parks and reservations.

Project Roadmap and Work Breakdown

Agencies should:

1. Identify and notify internal stakeholders (leadership, counsel, web admins, procurement, accessibility SMEs)

2. Notify external stakeholders (vendors, customers)
3. Assess and remediate impacted technology (websites, apps, SaaS/PaaS, documents, social media, course content)
4. Update governance documents (contracts, solicitation language, evaluation scoring, social media policies)
5. Archive assets appropriately
6. Provide outreach and training for employees, vendors and customers

Continuous monitoring, risk assessment and proactive remediation are also key steps on the journey to compliance.

ADA Title II Rule Recommended Timeline

- **April 24, 2024 – June 24, 2024:** Review rule and exceptions, notify stakeholders.
- **June 25, 2024 – April 24, 2026:** Implement WCAG 2.1 AA; update governance documents; remediate technology assets; amend contracts; archive appropriately; and train staff and vendors.
- **April 25, 2026, and beyond:** Compliance and DOJ enforcement period; continuous monitoring, scanning manual testing; responsive remediation when gaps are identified.

MAY: INTEGRATING ACCESSIBILITY INTO PROCUREMENT

Procurement as a First-Line Defense

States go through the procurement process for nearly all technology products and services. Procurement is therefore the first line of defense in ensuring accessibility. Most states buy technology rather than build it, making procurement a critical point of influence. By requiring WCAG 2.1 AA (and in some cases WCAG 2.2 AA) compliance in procurement, states elevate vendor expectations and ensure accessible solutions.

Accessible and well-designed technology is:

- More efficient to build and use
- More cost-effective over time
- More valuable and future proof

Accessibility requirements should be framed not only as compliance obligations but as drivers of better technology design, similar to how states integrate security and privacy requirements into procurement.

Benefits of Partnering with Procurement

Procurement professionals are essential allies. They:

- Understand regulatory obligations
- Help identify and mitigate accessibility gaps early
- Conduct proactive vendor outreach
- Strengthen technology contract requirements

- Develop policies that support accessibility

Procurement staff are instrumental in ensuring accessible technology is “baked in” from the beginning. Building strong partnerships creates accountability and consistency. In Maryland, the accessibility team meets regularly with the Office of State Procurement to align on accessibility standards. Agencies should visually map procurement processes to identify gaps where accessibility language can be inserted.

Vendors and VPATs

When procuring new technology, agencies should request:

- [Accessibility conformance reports \(ACRs\)](#), created from completed [voluntary product accessibility templates \(VPATs\)](#), plus product demonstrations
- Development and professional services documentation, including SDLC practices, training, testing and sample work
- Vendor maturity assessments, such as the [Policy Driven Adoption Assessment \(PDAA\)](#)

[A voluntary product accessibility template \(VPAT\)](#) is an industry standard document developed by the Information Technology Industry Council that forms the basis of an [accessibility conformance report \(ACR\)](#). VPATs list WCAG success criteria that vendors use to test their products for conformance, labeling them as “supports,” “partially supports,” or “does not support.”

Evaluating Responses

The credibility of the ACR depends on detail and transparency. Agencies should be wary of vague and/or AI-generated responses and ask for specific training records, testing tools and remediation practices. Ideally, VPATs should be completed by product manufacturers or third-party testers.

Agencies should evaluate ACR credibility by reviewing comments and explanations, going beyond pass/fail metrics. Key practices include:

- Using vendor data to inform scoring and contract terms
- Assessing barriers vs. compliance
- Reviewing the quality of narrative responses
- Consider vendor willingness to improve via accessibility roadmaps

ACRs can also reveal vendor maturity levels and should be used to open conversations, not excluding vendors outright. Three common ACR mistakes are:

1. **No ACR or “What’s an ACR?”** This could indicate low maturity levels but can be used as an opportunity to educate vendors.
2. **ACR says all “supports” with no comments.** This could indicate the VPAT was created by a sales team. Agencies should ask vendors to verify through demonstrations.
3. **Mixed responses with partial supports and comments.** This could appear more credible, but comments may lack detail. This requires agency follow-up.

Building Accessibility into Templates

Procurement staff manage hundreds of compliance considerations. Accessibility professionals can help ease accessibility compliance processes by:

- Building processes that ensure consistency
- Providing boilerplate language referencing state policy and standards
- Requiring completed VPATs (ACRs) referencing ITIC guidance
- Mandating professional and technical deliverables
 - o IT services (development, customization)
 - o Documents (support manuals, reports, work papers, development notes)
 - o E-Learning materials (course content, research papers)

[Texas' Vendor Accessibility Development Services Information Request](#) (VADSIR) is a form with six questions about developer training, tools, testing practices, defect tracking and remediation planning. Requiring sample products helps evaluate vendor competence.

Integrating Accessibility into the Procurement Cycle

Accessibility must be embedded throughout the procurement cycle:

- Create checks and balances
- Establish accountability mechanisms
- Shift responsibility to vendors
- Move accessibility “to the left” (early in the process)

Accessibility should be treated like security and privacy--integrated into procurement standards and vendor evaluation from the outset.

Scaling Across the Enterprise

Key questions:

- Who evaluates and scores accessibility in procurements?
- Who supports non-RFP procurements?
- How is accessibility integrated into existing IT governance?

Accessibility in procurement is a journey. Starting small--with one-line requirements or VPAT requests--builds momentum and credibility across the enterprise.

Additional Resources

[ITIC's ACR Training](#) (focuses on how to create a good VPAT)

[Minnesota's Procurement Page](#)

[Texas' Procurement Page](#)

JUNE: ASSESSMENT TECHNIQUES

Assessment Types

Procurement evaluations include VPATs/ACRs, narrative questions, demos and pre-procurement sandboxes or high-level evaluations. Technology evaluations extend beyond procurement:

- Deciding what to test in-house vs. hiring a third party
- Understanding the difference between accessibility assessments and audits
- Holding vendors and contractors accountable

Assessments focus on credibility and practicality. No system is 100% accessible, but assessments help identify risks and mitigation strategies.

ACR Evaluations

Accessibility Conformance Reports, (ACRs), created from VPATs, are industry-standard but imperfect. Key standards to review include:

- Format: [ITI VPAT](#) or similar templates
- Date: older reports may not reflect current versions
- Cover page: must include evaluation methods used, a strong indicator of vendor maturity
- WCAG section: depth and quality of comments
- Section 508: chapters three (functional performance criteria) and six, plus software and hardware sections if relevant

VPATs/ACRs are not pass/fail tools. They speak to vendor maturity and credibility, not a definitive score (refer to the three common ACR mistakes in May).

Narrative Questions

Narrative questions are also important and useful for both products and services.

- “Tell me in your own words what your organization does to ensure accessible products and services.”
- “Describe how you ensure staff and contractors have the knowledge and skills to create accessible digital technology within the scope of this RFP.”
- “Describe your approach to ensuring accessibility for your solution (e.g., strategy, tools, design, testing and ongoing evaluation).”
 - o Include accessibility in development requirements, design, development, testing, maintenance and bug prioritization.
 - o Explain how accessibility is ensured post-implementation (future enhancements).

[Texas' VADSIR](#) form asks vendors about developer training, testing tools, defect tracking, remediation planning and sample work. This helps identify red flags and evaluate credibility.

Automated vs Manual Testing

Both automated and manual testing are essential.

- Automated testing: efficient for identifying common issues, but prone to false positives and limited in scope.
- Manual testing: necessary to evaluate usability, keyboard-only navigation, color contrast and assistive technology compatibility.

Agencies should be cautious of copy-and-paste results from automated tools. Vendors must demonstrate understanding and interpretation, not just raw output.

Demos

Set expectations that vendors will demonstrate accessibility during demos. Watch for:

- Keyboard order and focus
- Color contrast
- Zoom capacity

Using simple demo requests like keyboard-only navigation to verify vendor claims often reveals gaps in “perfect” ACRs.

In-House vs. Third Party Testing

When deciding whether to test in-house or hire a third party, consider the following:

- In-House:
 - o Web and App developers: desktop testing early in sprints
 - o Staff: ensure conventional documents are accessible in daily work
 - o Web content administrators: audit content and return issues to creators
- Third party:
 - o Large audits and assessments
 - o Independent review of vendor software
 - o Extra support when internal capacity is limited

Accessibility Audits vs. Assessments

Audits are comprehensive but can be time-consuming and expensive. Consider the return on investment before choosing an audit. Assessments are lighter reviews, triage and independent verification and validation (IV&V) using a representative sample of screens. Audits provide depth while assessments offer agility. Both use a mix of automated, manual and assistive technology tests.

Holding Vendors and Contractors Accountable

When holding vendors and contractors accountable, checks and balances are paramount:

- Enhanced accessibility requirements in boilerplate language
- Testing and remediation plan requirements
- Third-party source code provision
- Ten-percent retention/holdback until accessibility compliance is demonstrated

Accountability mechanisms shift responsibility to the vendors and ensure accessibility commitments are met.

JULY: AWARENESS AND TRAINING PLANNING

Accessibility training must be tailored to the audience—statewide or agency specific. A “one size fits all” approach should not apply; every employee has a role, whether large or small, and training should reflect that. Levels of need include:

- **General awareness:** broad understanding of accessibility concepts
- **Role-based training:** deeper instruction for developers, procurement staff, project managers and document creators

In Texas, training is provided to vendors as well, recognizing their role in compliance and service delivery.

General Awareness

States are sprawling, diffuse entities. Raising awareness requires multiple approaches:

- Leveraging Title II rule as a motivator
- Publishing resources on websites
- Distributing newsletters
- Hosting brown bag events
- Building communities of practice

Minnesota’s public website and monthly newsletter helped establish the state as a leader in accessibility. Making resources visible is crucial. Texas hosts statewide meetups, office hours and a public listserv, plus vendor conferences tied to solicitations.

Targeted Awareness

Targeted awareness prioritizes specific roles and agencies, including but not limited to:

- Software developers
- Procurement officers
- Top management
- Document creators

Michigan focuses on onboarding new practitioners without overwhelming them. Introductory sessions and compliance guardrails in policies, and technical standards help ease the learning curve.

Training Resources

Training can be delivered through multiple channels:

- In-house session
- On-demand vendor training
- Webinars
- Blogs, articles and government updates

Some trainings are required, while others are ad hoc. Meeting people where they are, like offering lunch-and-learns, conferences and flexible formats to reach diverse audiences are critical in building accessibility awareness.

Communities of Practice

Communities of practice help scale awareness and training across large organizations. In Minnesota, each agency designates a digital accessibility coordinator, supported by the CIO office. Coordinators meet monthly and lead agency-specific awareness efforts. Specialized communities of practice (e.g., for PDFs, developers, design, e-learning) provide targeted support. In Michigan, internal development teams now run their own accessibility training sessions, a sign of growing maturity and ownership.

Compliance Guardrails

Compliance-driven cultures can be leveraged to reinforce accessibility.

- Codify accessibility in policies, procedures and technical standards
- Update contract language to reflect accessibility requirements
- Use compliance expectations to motivate staff

Michigan embedded accessibility into its administrative guide to state government, ensuring developers and vendors see it as a formal requirement.

Leading Horses to Water

Awareness and training require both encouragement and accountability:

- Required vs. “highly encouraged” training
- Carrots and sticks, zero incentives and mandates
- Leveraging passion and early adopters to build momentum
- Refreshing topics over time to sustain engagement

Offering opportunities for those eager to learn creates momentum. Enthusiastic participants become advocates who influence colleagues.

Federal and Regional Support

The Department of Justice owns Title II but has limited current involvement. States must lead, but regional ADA centers can provide resources. ADA regional offices have been supportive, offering webinars and Q&A sessions.

AUGUST: REMEDIATION PLANNING METHODOLOGIES

Scoping and Baseline

Building a remediation plan starts with knowing your current accessibility level. Without establishing a baseline, planning is meaningless. States should begin with a high-level audit to identify key challenges. Areas to assess include:

- Websites (including PDFs, videos, multimedia and forms)
- Mobile apps
- Web applications
- Software applications (not in Title II scope, but critical for usability)

Some states may feel overwhelmed when scoping but remember not to let the scale of the problem prevent starting. Prioritize websites first since fixes often have broad impact.

Setting Short and Long-Term Goals

With the Title II deadline in mind (April 24, 2026, for larger entities), remediation planning should balance immediate fixes with longer rebuilds.

- **Short-term goals:** address high-traffic sites, frequently downloaded forms and critical public-facing applications.
- **Long-term goals:** integrate accessibility into rebuilds, origination documents and systemic processes.

Accessibility is a journey, not a finish line. New content is created daily; the focus should be on prioritization and continuous improvement. Measurable progress is key. Illinois uses monitoring tools to track website accessibility scores, providing evidence of improvement even if perfection isn't achieved.

Tools and Resources

Remediation requires both tools and trained staff. In-house tools include:

- Free single-page checkers
- Licensed sitewide checkers
- PDF validation tools
- Manual testing (keyboard navigation, zoom and color contrast)

- Involving people with disabilities in testing

Vendor responsibilities include providing accurate documentation, proof of compliance and delivering accessible products and services. Vendors largely rely on automated checkers. States should mandate manual validation and test cases to ensure credibility.

For more resources on implementation plans, see [Minnesota's Implementation Toolkit](#).

PDFs: Short and Long-Term Approaches

PDF remediation is a common challenge. In addition to determining whether it should be done in-house or through vendors, states should set short and long-term goals:

- **Short-term:** Identify most popular downloads and key forms, then remediate in-house or with vendors.
- **Long-term:** Focus on accessible origination documents and reducing reliance on PDFs.

Illinois' strategy includes ensuring new documents are accessible instead of retrofitting large archives. Some documents may not need to be online at all. Archiving these documents or providing them upon request can reduce workload.

Monitoring and Feedback

Monitoring ensures accountability and continuous improvement.

- **Direct monitoring:** When you directly control remediation.
- **Indirect monitoring:** When others integrate accessibility into operations.

Key considerations include:

- **Scaling:** you can't control everything
- **Data and tracking:** collect evidence of progress
- **Documentation:** prove action is being taken (e.g., in response to audits)

Measurable evidence, like training records, accessible document uploads and/or monitoring scores, are critical for demonstrating compliance and progress.

SEPTEMBER: TESTING AND QUALITY ASSURANCE APPROACHES

Accessibility testing can be divided into buy vs. build:

- **Procurement (buy):** testing during or after acquisition
- **Development (build):** testing in-house or by vendors

Evaluations vs. Audits

- **Evaluation:** quick checks for barriers and challenges (e.g., keyboard navigation, automated scans).
- **Audit:** comprehensive validation against WCAG 2.2 AA, using multiple modalities (manual, automated, assistive technology)

Procurement often limits testing until after purchase, while development allows testing throughout the lifecycle.

Testing During Procurement

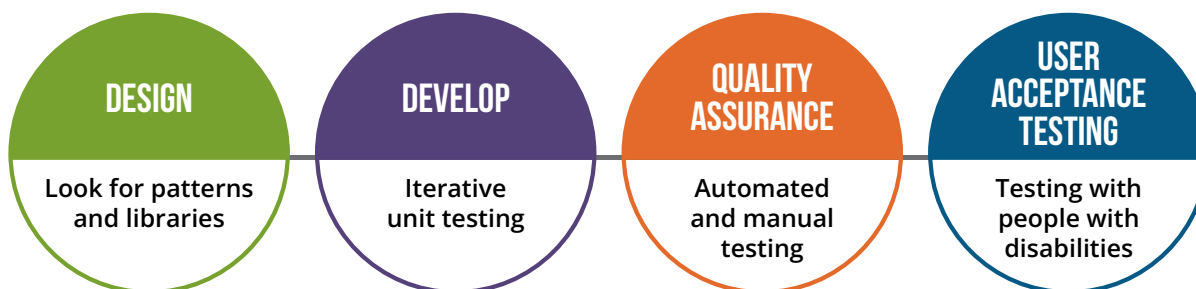
Key approaches include:

- ACR evaluation (accessibility conformance report)
- Narrative evaluation ([VADSIR](#), [PDAA](#))
- Vendor website scan
- Sandbox testing
- Deliverable testing
- Third-party testing

Sandbox opportunities and vendor demos can provide early insights. High-dollar, high-visibility applications should budget for third-party testing. Procurement teams, QA staff, accessibility SMEs and project managers all play roles. Free or licensed tools can be used, but credibility depends on trained staff interpreting results.

Testing During Development

Testing should be embedded across the lifecycle:



Testing during development offers full control, allowing accessibility can be integrated from idea to deployment.

Usability vs. Accessibility Testing

Accessibility testing:

- Test against WCAG standards
- Document success criteria failures
- Recommend fixes using WCAG guidance

Usability/UX testing:

- Document user journeys
- Identify issues (may or may not be accessibility related)
- Often design driven

Assistive technology testing can fall into both categories, depending on context and who performs it. While usability and accessibility have some overlap, they are distinct in that accessibility ensures compliance while usability ensures effective experience.

Monitoring and Maintenance

Monitoring requires clarity on scope:

- What can you manage?
- Focus on high-dollar or high-impact issues
- Hundreds of small procurements may be harder to track

Ask the following questions:

- Are you in the room when initiatives launch?
- Who gets notified or invited?
- How many accessibility champions are available?

Monitoring can be direct (you control remediation) or indirect (when others integrate accessibility). In either case, documentation is critical for audits, assessments and accountability.

Long-Term Strategies

Sustainable accessibility requires:

- Leadership buy-in
- Internal communications pipelines
- Budgeting and authority
- Scaling through training and outreach
- Empowering champions across agencies
- Treating accessibility as a program, not a one-off project

Embedding accessibility into policy and organizational culture ensures long-term compliance.

Additional Resources

- [CIAO \(IL\) Mike Scott's List of Resources](#)

Developer Tools

- [ANDI](#) - Accessibility Testing Tool
- The [VISUAL ARIA](#) Bookmarklet
- Web Developer Toolbar: <https://chrispederick.com/work/web-developer/>
- [Lighthouse](#) (Chrome Dev Tool)
- [Keyboard Accessibility Testing](#)

Website Scanning

- [The National Center on Disability and Access to Education](#)
- [WAVE Browser Extensions](#)
- [WAVE URL Page](#)

Portable Document Format (PDF)

- [SSA PDF Basic Testing Guide](#)

Color Contrast Checkers

- [Accessible Color Picker](#) (Chrome extension)
- [Color Contrast Analyzer](#)

Screen Readers (text to speech)

- [NVDA](#) (non-visual desktop access)
- [Microsoft Narrator](#)

Other

- [Accessibility Conformance Checklists \(HHS\)](#)
- [WCAG 2.1 Checklist \(BeAccessible\)](#)

IT Accessibility Working Group Advisory Committee

Jay Wyant, Chief Information Accessibility Officer, *Minnesota, Chair*

Marie Cohan, Statewide Digital Accessibility Officer, *Texas, Co-Chair*

John Estill, Digital Information Accessibility Coordinator, *Michigan*

Andrew Drummond, State Director of Accessibility, *Maryland*

Henry Quintal, Digital Accessibility Coordinator, *Maine*

Mike Scott, Chief Information Accessibility Officer, *Illinois*

Primary Author

Kalea Young-Gibson
Policy Analyst
NASCIO



About NASCIO

*Founded in 1969, the National Association of State Chief Information Officers (NASCIO) represents state chief information officers (CIOs) and technology executives and managers from the states, territories and District of Columbia. NASCIO's mission is advancing government excellence through trusted collaboration, partnerships and technology leadership. NASCIO provides state CIOs and state members with products and services designed to support the challenging role of the state CIO, stimulate the exchange of information and promote the adoption of IT best practices and innovations. From national conferences to peer networking, research and publications, briefings and government affairs, NASCIO is the premier network and resource for state CIOs. For more information, visit **NASCIO.org***