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[National Center on Accessible Digital
Educational Materials & Instruction]

Meeting the ADA Title II Web and Mobile Accessibility Requirements: A Roadmap for State and Local Educational Agencies

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IDEAs that Work
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Purpose and Intended Audience

This resource was developed by the National Center on Accessible Digital Educational Materials & Instruction (NCADEMI or "n-cademy") to help education leaders guide their agencies toward compliance with a new rule under Title II of the Americans with Disabilities Act (ADA). The "NCADEMI Roadmap" is primarily intended for representatives of state educational agencies (SEAs) and local educational agencies (LEAs) who are responsible for providing systemwide digital educational materials and technology.

Introduction

In April 2024, the United States Department of Justice (DOJ) issued a final rule with website and mobile app accessibility requirements under Title II of the ADA. The Title II regulation applies to state and local governmental entities, which include SEAs and LEAs. Examples of web content under the revised regulation include, but are not limited to, images, text, and multimedia. A mobile app is software downloaded on phones, tablets, or other mobile devices. Conventional electronic documents are also covered. These include documents published in PDF, Microsoft Word, PowerPoint, Excel, and similar formats like Google Suite documents.

As an SEA or LEA, your agency has two or three years from the publication of the regulation to meet the requirements. If your agency serves a population over 50,000, the deadline is April 24, 2026. Agencies serving a population under 50,000 and special district governments have until April 26, 2027. DOJ provides [guidance on calculating population size](#).

Educational agencies must make accessibility a fundamental requirement for the technology they create, maintain, purchase, or use, by and after the conformance deadline. NCADEMI has prepared this resource to help SEAs and LEAs take actions toward meeting the revised regulation in a timely manner. The guidance provided here specifically addresses communication and educational technologies used by teachers, students, and parents or caregivers. However, the revised Title II regulation covers a broader range of technologies beyond those addressed by the Roadmap, such as those used in business and administrative offices. Your agency is advised to [read the Title II final rule.](#)

Title II Roadmap for SEAs and LEAs

NCADEMI's Roadmap helps SEAs and LEAs prioritize activities for meeting the revised regulation's requirements within the conformance deadlines. Your agency should work backward from the conformance deadline that matches your population size. Create a timeline of activities with specific milestones and plan for sustainability. A successful digital accessibility program requires ongoing monitoring and timely corrections when gaps are detected.

The Roadmap is presented in three tiers. A tiered approach is recommended to help manage the coordination of multiple activities within your agency's timeline to required conformance.

To meet your agency's conformance deadline, multiple team activities within the Roadmap must happen simultaneously. Identify opportunities to distribute work across different divisions and individuals.

Tier One

Tier One activities are the most urgent, focusing on mobilizing leadership, communicating internally and externally, addressing the inaccessibility of current technology, and preventing the inaccessibility of future technology.

Establish a cross-disciplinary steering committee

It cannot be overstated that the responsibility for meeting the revised regulation requirements does not rest with special education. The regulation relates to the accessibility of your educational agencies' technology used by everyone. To cast this wide net, establish a steering committee with cross-disciplinary representation determined by the size and organizational structure of your agency. At a minimum, the following roles and responsibilities should be included:

- Administration,
- Technology (education, information, instruction, and assistive),
- Instructional materials adoption,
- Curriculum and instruction,
- Assessment,

- General education,
- Special education and related services,
- Procurement, and
- Finance

Include the perspectives of parents, caregivers, staff, and students, particularly those with disabilities or who have children with disabilities.

Tip: Relevant roles and responsibilities will emerge over time. Be prepared to adjust the steering committee as needed throughout the process.

Communicate both internally and externally

Use established communication channels to widely inform both agency staff and the broader community about the Title II final rule. Use a known accessible method of communication to ensure the information reaches recipients with disabilities.

Communicate the impact of the requirements, who will be involved in helping to meet them, and the associated activities and timelines. Because of the variability in department and position responsibilities in an educational agency, staff may need explicit direction in their roles to meet the requirements. Externally, inform the public about your agency's commitment to improving digital accessibility and how the community can support your efforts. Use indicators of a comprehensive communication plan to guide your agency's messaging.

Tip: Within your communications, provide a way for people to report current accessibility barriers. This can be as simple as providing a contact name and email address.

Create an inventory of all digital materials and technology products

Develop a comprehensive record of all communication, teaching, and learning technologies your agency provides, including websites, platforms, tools, digital documents, apps, and social media. For each product, identify the following:

- Whether it is produced by a third party or created by agency staff. Record contact information for communicating about the agency's plan to meet the conformance deadline.

- The division or department that purchased the product and/or in which the product is used and maintained. This information will be useful for coordinating a differentiated training program for staff with common responsibilities.
- Existing accessibility requirements in contracts or service agreements. These documents should include language clearly stating that the [Web Content Accessibility Guidelines (WCAG) version 2.1](#), [Level AA](#), is a minimal requirement. If they don't, work with vendor partners to add accessibility language and communicate expectations for meeting the conformance deadline.

Tip: Use this inventory as a tool to track new technologies beyond the conformance deadline.

Address accessibility in purchasing decisions

Your agency will likely purchase or use new products between now and your conformance deadline. To avoid adding more inaccessible third-party products to your inventory, proactively include accessibility requirements in both formal and informal procurement documentation. This includes requests for proposals, scopes of work, documented functional requirements, purchasing contracts, and agreements. These documents must explicitly reference WCAG 2.1 Level AA as the minimum standard. Learn about [procuring technologies that are accessible](#) and [using Accessibility Conformance Reports (ACRs) in the procurement process](#).

Tip: Always use the most up-to-date version of third-party products, as vendors are unlikely to improve accessibility in older versions.

Tier Two

Tier Two introduces activities that focus on developing policies and procedures, training, and professional learning.

Evaluate for accessibility

Your agency's current technology inventory likely contains a high volume of products that fall short of the revised regulation requirements. In this period before the conformance deadline, prioritize products for evaluation. For example, SEAs that review instructional materials for LEA adoption might prioritize the products most chosen from the adoption list. LEAs might prioritize products most used by assistive technology users. Early testing

of products that have the most impact on students and parents, particularly students and parents with disabilities, is a meaningful way to begin identifying existing barriers.

To make the evaluation process effective, your agency will need a plan to engage and act on evaluation data. For example, if the product is a website created by a staff member, will that individual be responsible for making necessary fixes? If the product was procured through a third party, who within your agency will be responsible for communicating evaluation results? Be sure your agency is prepared to use evaluation data so that the time and effort leads to productive outcomes.

Tip: Use the following resources for evaluating web-based materials:

- [WAVE Browser Extensions](#) are free and allow you to evaluate web content for accessibility issues directly within Chrome, Firefox, and Microsoft Edge. The Web Accessibility Evaluation Guide and Quick Reference below have instructions for using WAVE.
- [Web Accessibility Evaluation Guide](#) outlines important accessibility checks, organized by content type. While it is not an exhaustive guide to testing all WCAG 2 requirements, it includes checks for most common accessibility issues.
- [Quick Reference for Testing Web Content for Accessibility](#) is a downloadable checklist. It includes links to tutorials for using screen readers (JAWS, NVDA, and VoiceOver) to test web content.
- [Word and PowerPoint Accessibility Evaluation Guide](#) combines automated checks from the Accessibility Checker in Microsoft Office 365 with a series of manual checks to help you evaluate and repair common accessibility issues in Word and PowerPoint.

Adopt a digital accessibility policy

Digital accessibility policies should align to the revised regulation. If your agency has an existing accessibility policy, carefully review and update it to reflect the new requirements. SEAs can take the lead by developing a statewide digital accessibility policy for LEA adoption to reduce duplication of effort at the local level. In addition to citing the minimum conformance requirements, SEAs can include recommended guidelines for procurement processes (e.g., ACR requirements), production practices (e.g., teacher-created materials), and roles and responsibilities (e.g., by division and staff position). LEAs in states where the SEA is not taking a lead should move forward and develop their own

policies and guidelines to ensure conformance with the revised regulation by the deadline. See [recommendations for a comprehensive accessibility policy](#).

Tip: Contact the individuals in your state's university system who are responsible for digital accessibility. Because most state universities have digital accessibility policies in place, they may be able to help as your agency develops your own.

Initiate ongoing role-based training and professional learning opportunities

SEAs and LEAs will need to support a wide and diverse range of staff in developing digital accessibility knowledge and skills. As the steering committee implements activities, roles and responsibilities across divisions will become clearer. For instance, the needs of curriculum adoption committees will be different from those of teachers creating their own digital materials. Refer to [recommendations for providing training and technical support to staff](#).

Tip: Use training materials that are exemplars of accessible content, modeling best practices for creating accessible materials.

Tier Three

Tier Three focuses on ensuring long-term success by developing an implementation plan, revising job descriptions, budgeting for accessibility, and collecting feedback.

Draft and maintain an organizational implementation plan

Your agency's implementation plan will put the digital accessibility policy into action. A comprehensive implementation plan defines tasks and projects needed to guide the agency toward compliance with the revised regulation. A plan will also assign timelines and more specific responsibilities for the tasks and projects than is in the digital accessibility policy. As your agency moves past the conformance deadline, the implementation plan can support sustainability of your emerging accessibility program.

Tip: Although the implementation plan will cover remediation of current accessibility barriers, look for opportunities to improve accessibility without focusing only on remediation. If a product is nearing the end of its life in the coming months, focus on replacing it with something that conforms to WCAG 2.1 AA at a minimum.

Review job descriptions for accessibility responsibilities

As the steering committee implements the activities in this Roadmap, such as creating a product inventory, developing a policy, and identifying role-based training needs, the roles and responsibilities of individual positions throughout your agency will become clearer. Update job descriptions to include relevant accessibility skills and knowledge. This formal documentation ensures accessibility efforts are sustained through staff turnover.

Tip: Including relevant accessibility skills as requirements or preferences for job roles can be an effective way to ensure successful professional development efforts. When a skill is in a job description, it is more likely to be developed and assessed.

Identify needed investments and prepare to budget for them

An accessibility program requires human, fiscal, and technological resources. For example, if your agency does not currently employ a digital accessibility specialist, consider adding this position to your personnel. Additionally, enterprise accessibility evaluation tools can help monitor accessibility on a large scale over time. Learn about [indicators of a budget sufficient for organization-wide efforts](#).

Tip: Consider having your agency's steering committee make recommendations for investments.

Get feedback on progress

The success of your agency's accessibility efforts will ultimately be measured by the user experiences of individuals with disabilities—whether staff, students, parents, or others in the community. Actively request feedback from them as strategies for meeting the conformance deadline are implemented. This feedback is essential to assess whether your agency's efforts are leading to the intended benefits for users with disabilities.

Tip: Offer multiple ways to provide feedback, such as online surveys, listening sessions, and occasional website pop-ups. Education teams can ask questions about accessibility during IEP and 504 meetings with parents and students.

Additional Resources

DOJ published a fact sheet about the revised regulation and a Small Entity Compliance Guide. WebAIM prepared a summary of the revised regulation with interpretations.

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