NACo Tech Brief:
# Digital Accessibility & ADA Compliance Guide

# Executive Summary

This guide provides county leaders and staff with essential information to comply with the Americans with Disabilities Act (ADA) Title II digital accessibility requirements. It prioritizes guidance for elected officials, followed by detailed strategies, compliance checklists and best practices for all audiences, including IT teams and vendors. The goal is to ensure equitable access, reduce legal risk, and promote modern, inclusive digital governance.

## Guidance and Scope

NACo remains committed to helping counties provide accessible services for all residents while acknowledging the need to balance compliance with practical resource limitations. This guide does not serve as a legal document or legal counsel. Counties are encouraged to consult their legal teams to interpret and apply ADA Title II requirements.

## ADA Title II Overview

County governments play a critical role in ensuring equal access to public services, programs and information. ADA Title II requires all state and local government entities — including counties — to make their services, communications and digital platforms accessible to individuals with disabilities. As counties expand online services and modernize technology, digital accessibility has become a core compliance and governance responsibility.

## What Elected Officials Must Know

County leaders are responsible for:

- Setting expectations for compliance

- Supporting countywide accessibility standards

- Ensuring sufficient resources and staffing

- Holding departments and vendors accountable

- Championing an inclusive digital strategy that reflects county values.

Digital accessibility is not only a legal mandate but a commitment to equitable access, operational excellence and modern digital government. Early, visible progress reduces compliance risk and can demonstrate good-faith efforts if your county faces an ADA challenge.

## Jurisdiction Population

| Government Size | Compliance Date* |
|---|---|
| 50,000 or more persons | April 24, 2026 |
| 0 to 49,999 persons | April 26, 2027 |
| Special district governments | April 26, 2027 |

*As of February 2026.

## Why Digital Accessibility Matters

Digital accessibility is now a fundamental component of good governance, legal compliance, technology modernization, customer service, public trust and equity and inclusion initiatives.

Accessible digital services ensure that all residents — including individuals who are blind, low vision, deaf or hard of hearing, have mobility or cognitive disabilities, or rely on assistive technologies — can fully participate in county life and access services.

## What Title II Requires

ADA Title II mandates that counties must ensure:

- Equal access to all government programs, services and activities

- No discrimination based on disability

- Communications that are as effective for individuals with disabilities as they are for others

- Accessible digital content, including websites, mobile applications, online forms, documents and video content.

The U.S. Department of Justice (DOJ) issued updated final rules in 2024 that establish clear and enforceable standards for digital accessibility. These rules adopt the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as the minimum standard for public-facing digital content.

## What Must Be Accessible

- Public-facing websites

- Internal staff systems (when needed for employment obligations)

- Mobile apps

- PDFs, forms and downloadable documents

- Online services and portals

- Videos and multimedia content

- Social media posts and graphics

- Third-party platforms used by the county.

## What Does Not Need to Be Accessible

Per the DOJ-defined list of exemptions from the the ADA's Title II Web & Mobile Accessibility Final Rule (2024), the following are not required to be in compliance:

- Archived content not used for active programs or services

- Preexisting conventional electronic documents (not needed for current services)

- Pre-compliance social media posts

- Content posted by truly independent third parties

- Linked external documents or media not created by the county

- Individualized, password-protected documents (bills, statements, notices)

- Content that cannot be made accessible without undue burden (alternative access required).

## Consequences of Non-Compliance

Failure to meet ADA title II requirements can result in:

- DOJ investigations and enforcement actions

- Civil rights complaints

- Legal settlements or litigation

- Reputational harm and loss of public trust

- Increased remediation costs if accessibility is addressed late in the process.

Proactive compliance reduces risk, increases operational efficiency and strengthens public transparency.

## Near-Term Action Steps for April 2026 County Compliance

With the final compliance date approaching in April 2026 for counties over 50,000 residents, county leaders may need to take rapid, high-impact steps to demonstrate progress while full compliance work continues. The following short-term actions can be completed within an 8-week window and help reduce risk, streamline future work and establish a strong foundation for long-term accessibility success.

- **Clean up outdated website content.** Remove or archive old pages, documents and media that no longer serve current programs or services, reducing the overall volume requiring remediation.

- **Engage current vendors to support staff training.** Ensure all staff responsible for digital content creation receive baseline training on producing accessible documents, webpages and media going forward.

- **Demonstrate active compliance efforts.** Taking visible, documented steps — rather than delaying — may be looked upon favorably if content is challenged or reviewed.

- **Publish or update an accessibility statement.** Add an affirmative accessibility statement or formal proclamation to the county website to communicate commitment and provide a clear contact pathway for feedback.

- **Partner with disability advocacy organizations.** Invite local or regional groups representing residents with disabilities to review key digital services and offer recommendations for accommodation and improvements.

These rapid actions do not replace full ADA Title II compliance but provide counties with an effective jump-start toward meeting federal requirements while improving public transparency and resident trust.

## Moving From Strategic Leadership to Operational Action

County leaders play a critical role in setting expectations, establishing accountability and ensuring the resources necessary for ADA Title II digital accessibility compliance. The sections above outline the responsibilities, timelines and strategic considerations that elected officials should understand at a high level.

The remainder of this guide shifts to practical implementation for county departments, including IT, communications, procurement, HR, public information and any staff responsible for creating or managing digital content or services. These next sections provide:

- Detailed requirements under ADA Title II

- Step-by-step road maps for county compliance

- Operational checklists for staff

- Governance models and accountability structures

- Procurement guidance and vendor expectations

- Best practices for digital accessibility across platforms

- Funding and resource planning.

Counties may also develop a sustainable resource strategy for ADA compliance. Recommendations include:

- Utilizing state and federal digital equity and ADA grants

- Budgeting for accessibility tools, training and document remediation

- Considering hybrid models combining internal staff with external experts

- Prioritizing high-impact services for early investment.

## County Governance and Accountability Model

Effective ADA Title II compliance requires clearly defined roles, responsibilities, and oversight across county departments. Key governance components include:

- ADA coordinator or digital accessibility officer to oversee compliance

- Department accessibility liaisons to implement standards

- IT responsibilities for technical accessibility and procurement review

- Communications responsibilities for content accessibility

- Executive oversight for accountability and resource support.

A structured governance model ensures consistency and sustained compliance.

## County ADA Roadmaps – Scalable Strategies

Whether you are just getting started or reviewing progress, the following road maps offer flexible options for organizing ADA Title II digital accessibility efforts. Both are effective for counties of any size, structure or resource level. These strategies simply reflect the different ways counties choose to manage digital services, not a distinction between large and small jurisdictions. The two models are:

- **Unified and centralized approach** A single team, office, or designated lead oversees and coordinates all accessibility activities.

- **Distributed and multiteam approach** Responsibilities are shared across departments, with each unit contributing to accessibility efforts within its scope.

# ADA Title II Digital Accessibility Compliance Checklists

| | Unified and Centralized Approach | Distributed and Multi-team Approach |
|---|---|---|
| **Understand the DOJ ADA Final Rule** | One team or coordinator reviews the DOJ Final Rule and NACo Summary | Multiple departments collaboratively review the Final Rule and requirements |
| | Share requirements and timelines through staff updates or briefings | Department leaders share responsibilities within their operational areas |
| **Conduct a Comprehensive Digital Accessibility Audit** | One team manages audits for websites, PDFs, mobile apps and digital services | Departments audit their own content using county standards |
| | Use automated tools and targeted manual review | Use enterprise-level tools or work with accessibility consultants |
| **Publish an Accessibility Statement & Grievance Procedure** | Develop a single countywide accessibility statement and point of contact | Use a countywide policy with optional service-specific departmental details |
| | Manage all grievances through a single, clear process | Route grievances through coordinated systems with departmental tracking |

| | Unified and Centralized Approach | Distributed and Multi-team Approach |
|---|---|---|
| **Implement Ongoing Staff Training** | Offer general accessibility training to all staff who publish content | Provide role-specific training across departments |
| | Provide easy guides and practical checklists | Use advanced modules or specialized tools as needed |
| **Integrate Accessibility into Procurement & Vendor Contracts** | One procurement workflow includes accessibility clauses and VPAT requirements | Departments include accessibility criteria in individual procurements |
| | Review vendor compliance centrally | Maintain shared standards while allowing flexibility |
| **Use AI Tools for Efficiency & Monitoring** | Use AI for alt text, captions and document remediation where most impactful | Integrate AI across multiple content workflows |
| | Apply tools on an as-needed basis | Use automated monitoring across platforms |

| | Unified and Centralized Approach | Distributed and Multi-team Approach |
|---|---|---|
| **Schedule Regular Audits & Maintain Documentation** | Periodically review digital assets and maintain a central record | Departments complete their own audits and submit updates centrally |
| | Focus documentation on transparency and improvement | Use dashboards or ticketing systems to track progress |
| **Establish a Governance Model for Accessibility** | Assign an accessibility coordinator or small team responsible for policy and oversight | Create an accessibility working group with representatives from departments |
| | Use standardized templates and guidelines | Departments manage implementation aligned to county standards |
| **Integrate Accessibility into Daily Workflows** | Use a simple checklist before publishing documents, videos or webpages | Embed accessibility into development cycles, workflows and QA reviews |
| | Add accessibility checks to existing approval processes | Require validation before major launches |

| | Unified and Centralized Approach | Distributed and Multi-team Approach |
|---|---|---|
| **Test with People with Disabilities** | Conduct focused user testing for commonly used services | Departments run their own testing for specialized platforms |
| | Partner with local disability organizations | Use advisory groups or cross-department testing |
| **Prepare for Ongoing Reporting & Leadership Updates** | Provide periodic consolidated updates to leadership | Departments report progress to a central team for combined leadership updates |
| | Maintain a simple progress log | Use dashboards or structured reporting cycles |

# Comprehensive Digital Accessibility Best Practices

Counties may adopt accessibility practices that apply across all digital platforms, not just websites. This includes mobile applications, social media, documents and multimedia content. Implementing these practices helps ensure that all residents, including individuals with disabilities, can fully engage with county information and services.

**Recommended best practices include:**

- Using plain language and avoid jargon to ensure content is easy to understand

- Providing accurate captions and transcripts for all video and audio content

- Maintaining WCAG-compliant color contrast ratios for text, icons and user interface components

- Ensuring full keyboard navigation and a clear, logical heading and page structure

- Applying meaningful alternative (alt) text to images and using descriptive labels on all form fields

- Reviewing PDFs and Office documents for accessibility (tags, reading order, alt text, headings) before publishing

- Adding alt text, captions and image descriptions to social media posts and graphics

- Confirming mobile apps are compatible with assistive technologies, including screen readers and voice navigation.

# Vendor Accountability Framework

Counties are responsible for ensuring that any vendor delivering digital products or services on the county's behalf adheres to ADA and WCAG accessibility standards. This applies to websites, applications, documents, video platforms, third-party tools and any public-facing digital service.

## 1. Require Vendor Accessibility Documentation

Counties should request and review:

- Accessibility statements

- Voluntary product accessibility templates (VPAT) or equivalent documentation

- Evidence of conformance testing, including reports or audit summaries

- Descriptions of their accessibility road maps for future enhancements.

## 2. Verify Compliance Prior to Procurement

Before selection or renewal:

- Review and validate the vendor's accessibility claims along with all supporting documentation

- Request demos or sandbox access to validate accessibility independently

- Require vendors to disclose known accessibility gaps and planned remediation timelines.

### 3. Include Accessibility Clauses in All Contracts

Contracts should clearly define accessibility obligations. Two recommended clauses to include:

"Vendor agrees to deliver all digital content, products and platforms in compliance with WCAG 2.1 Level AA (or the most current version adopted by the County). Any content found to be non-compliant during the contract term must be remediated at no cost to the County."

"Vendor will defend in court, at their own expense, any ADA challenge made to content solely provided by vendor and hold county harmless for any damages incurred as a result of those challenges."

Additional recommended provisions:

- Vendor must notify the county of significant updates affecting accessibility

- Vendor agrees to participate in accessibility reviews and provide responses within defined timelines

- County may withhold payment or terminate the contract if accessibility requirements are not met.

### 4. Implement Ongoing Monitoring and Accountability

Counties should maintain a vendor accessibility compliance checklist that includes:

- Documentation received (e.g., VPAT, testing results)

- Accessibility compliance status,

- Issues identified and dates of remediation

- Vendor responsiveness and support quality

- Dates of periodic reviews or re-evaluations.

## 5. Require Remediation and Support

Vendors must:

- Fix accessibility issues identified by the county or third-party audits

- Address issues within agreed timelines

- Provide updated documentation when improvements are made

- Support the county in responding to public accessibility complaints related to the vendor's product.

## 6. Promote a Collaborative Compliance Culture

Counties should encourage vendors to:

- Participate in accessibility training or onboarding sessions

- Follow county digital accessibility standards

- Integrate accessibility into product updates and lifecycle management.

# Additional Resources

Counties have access to a wide range of resources to support ADA compliance and accessibility initiatives. Below are updated NACo resources, ADA tools and national references to help counties meet and maintain compliance standards.

## NACo Resources

**NACo Tech Xchange:** A hub for county technology leaders to share best practices and tools. https://www.naco.org/techxchange

**ADA Compliance Webinar:** Practical guidance for government websites. https://www.naco.org/event/ada-compliance-government-websites-practical-conversation

**Policy Templates:** Resources available through NACo's Unlimited Library for accessibility and IT governance. https://www.naco.org/resources

## ADA Tools

- **WAVE (Web Accessibility Evaluation Tool):** Suite of evaluation tools helping make web content more accessible. https://wave.webaim.org

- **axe Accessibility Checker:** Tools to help make their websites, mobile apps & digital content accessible. https://www.deque.com/axe

- **Google Lighthouse:** Open-source, automated tool to help improve the quality of web pages. https://developers.google.com/web/tools/lighthouse

- **Siteimprove:** Helps create high-performing, accessible content that is discoverable by both humans and AI. https://siteimprove.com

- **AudioEye:** Tool that detects, fixes and protects accessibility issues. https://www.audioeye.com

- **Acquia:** Web governance tool that optimizes content for accessible websites. https://www.acquia.com/products/acquia-web-governance

- **UserWay:** Digital accessibility tool that automatically finds and fixes code errors. https://userway.org

- **NVDA (Screen Reader):** Solution that allows blind and vision impaired people to access and interact with the Windows operating system and many third party applications. https://www.nvaccess.org

- **Accessible Color Palette Generator:** Create color systems with consistent lightness and contrast. https://accessiblepalette.com

## National Resources

- **ADA.gov:** Official DOJ site for ADA compliance guidance. https://www.ada.gov

- **W3C Web Accessibility Initiative:** Source for Web Content Accessibility Guidelines (WCAG) international standard, including documents that explain how to make web content more accessible to people with disabilities. https://www.w3.org/WAI/standards-guidelines/wcag

- **NAGW Accessibility Guides:** Categorized list of free tools and guides for digital accessibility.https://nagw.org/Tools_and_Guides_for_Digital_Accessibility