



<https://bit.ly/title2nasppo>

Advancing Accessibility: Navigating ADA Title II Changes Changes for State and Local Local Governments



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What to Expect in this Session

ADA Title II Updates

Identify aspects of the ADA Title II updates, and how these changes impact digital accessibility requirements for state and local governments.

Explore the Standards

Explore the WCAG 2.2 Level AA standards, and how these guidelines apply to online learning content and digital materials.

Digital Accessibility

Examine how to integrate digital accessibility requirements into your existing training programs.

Implementation Resource





















Receive a resource and implementation manual you can customize into job aids for ongoing reference and application.

Title II What's New & What's Not

ADA Title II, enacted in 1990, requires state and local governments to ensure that people with disabilities have equal access to programs, services, and activities. While it didn't name websites or mobile apps back then, courts and the Department of Justice have long interpreted "effective communication" to include digital formats as they became essential to accessing services. **The 2024 final rule just makes it explicit:** digital content must meet **WCAG 2.1 Level AA** to be considered accessible.

Accessibility is Usability

Image Description

					
	Touch	See	Hear	Speak	Cognitive
Permanent	 One arm	 Blind	 Deaf	 Non-verbal	 ADHD/ concentration difficulties
Temporary	 Arm injury	 Cataract	 Ear-infection	 Laryngitis	 Fatigue / depression
Situational	 Carry a baby or a computer	 Sun on screen	 Noisy surroundings	 Heavy accent	 Open office- landscape

Elisabeth Aguilera & Netta Korhonen / Modifierad från Microsoft inclusive design toolkit

Who Are You Designing For?

Each persona has different access needs.

You can use these personas to experience the web from different perspectives and gain more understanding of accessibility issues people face.

Shift your Perspective

Choose one persona and spend the next 3-5 minutes exploring the web through their experience. Take a moment to reflect on the barriers. Now imagine if this barrier were part of your everyday experience.

- **Claudia**: a sight impaired screen magnifier user.
- **Ashleigh**: a severely sight impaired screen reader user (requires use of screen reader).
- **Ron**: an older user with multiple conditions.
- **Chris**: a user with rheumatoid arthritis.
- **Pawel**: a user with Autism.
- **Simone**: a dyslexic user.
- **Saleem**: a profoundly deaf user.
- **Helena**: a user with dyscalculia.

Mentimeter Poll

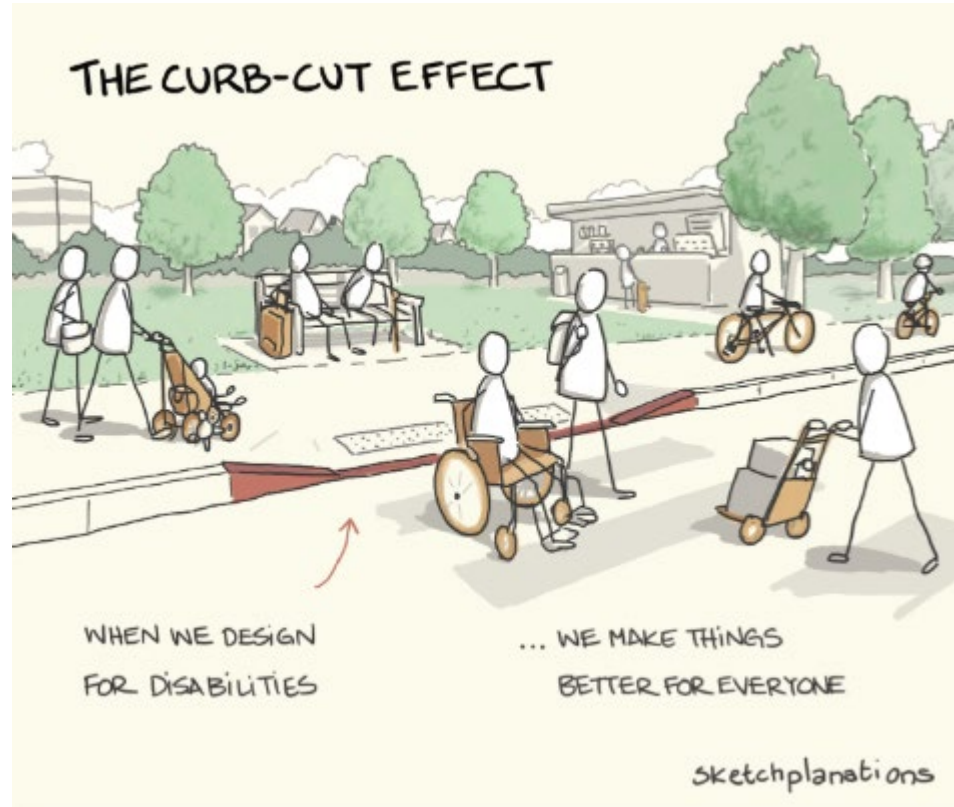


One word to describe
your experience?



Accessibility Helps Us All

Curb-Cut Image Description Description



Accessibility Helps Everyone Everyone

When your courses and trainings are accessible, it benefits all learners, not just those with disabilities.

The Web Content Accessibility Guidelines (WCAG) are the framework to design with accessibility in mind.

Mentimeter Poll



What best describes your current awareness of the new ADA Title II Digital Accessibility Accessibility Rule (effective April April 2024)?



ADA Title II Update

In April 2024, [a significant update to ADA Title II](#) was published. This update mandates that state and local governments make their web content and mobile apps accessible to people with disabilities. WCAG 2.1, Level AA is now the technical standard for this mandate.

Applies to the Following

State Governments, including executive agencies and offices such as such as Departments of Health and Motor Vehicles; Local Governments, Governments, such as counties, cities, towns, and their governing governing bodies; Public Education Institutions, including public K–12 public K–12 schools, charter schools, community colleges, and state state universities; Special Purpose Districts, such as public transit transit agencies, utility districts, housing authorities, and library or park library or park districts.

Compliance Goal Dates

Dates depend on the population size of the public entity.

- 50,000 or more persons: April 24, 2026
- Less than 50,000 persons: April 26, 2027
- All special district governments: April 26, 2027
 - Utility, Transit, Water and sewer board, and Zoning.
- These deadlines apply to any content created before the dates.

Goal Date: Examples

- The total population of the city of Stillwater, OK is 49,525 people. This is people. This is under 50,000 people, so the compliance date for any city any city government office that serves Stillwater is April 26, 2027. 2027.
- Oklahoma State University (OSU) is located in Stillwater, OK, and is a public university that serves the entire state. This means it would use the total population of OK. It would not use the population of the city of Stillwater, nor the current number of enrolled students. Based on this figure, OSU's compliance date is April 24, 2026.

Digital Services Under Title II

The Learning Management System (LMS), whether accessed via a web-based platform or a mobile app, falls within the scope of the ADA Title II web and mobile accessibility requirements. This includes not only the LMS itself but also the tools used to create content within it (such as Articulate), as well as all educational and job training materials delivered through the LMS.

Implications for Vendors

While vendors aren't directly under this Title II rule, their public entity buyers are. The rule explicitly states that all web and mobile experiences must be accessible, including those provided by third-party vendors and agencies.

So even though vendors themselves aren't bound by Title II, the public entities that buy from them are still legally responsible for ensuring everything they offer to the public, even through a vendor, is accessible.

Who is Responsible?

- Trainers, who select and present content.
- Designers, who structure and format the materials.
- Developers, who build or manage the digital platforms and tools used to deliver the training.
- Procurement and purchasing staff, who select, approve, or contract digital tools, platforms, or content for use in trainings and services.

Are there Exceptions?

Yes. These are listed in the
[Advancing Accessibility Training Toolkit](#)

How Do We Prepare?

1. Review existing materials (audit).
2. Develop a remediation plan.
3. Define goals and responsibilities.
4. Provide ongoing training.
5. Accessibility considerations for new products.
6. Partner with accessibility experts.

Where Should I Start?

Start with POUR : Perceivable, Operable, Understandable, and Robust. Can learners see and hear everything clearly? Can people see it? Hear it? Navigate it? Does it work across devices and assistive tech?

Make Everything Keyboard-Friendly: Some learners don't (or can't) use a mouse. That's why your course should work with just a keyboard.

How to start: Try navigating your course using only the keyboard. If you get stuck or something skips, note it. Does it flow in a logical order? If someone's using assistive tech, can they navigate it without hitting roadblocks?

MentiMeter Poll



How familiar are you with the the Web Content Accessibility Accessibility Guidelines (WCAG (WCAG 2.1-2.2)?



WCAG 2.2 Structure Overview

4 Principles

1. Perceivable
2. Operable
3. Understandable
4. Robust

13 Guidelines

Each principle has multiple guidelines.

These guide the intent behind accessibility and are supported by testable success criteria.

86 Success Criteria in WCAG 2.2.

- This includes 9 new criteria added from 2.1

Web Content Accessibility Guidelines



Perceivable

- 1.1 Text Alternatives
- 1.2 Time-based Media
- 1.3 Adaptable
- 1.4 Distinguishable



Understandable

- 2.5 Input Modalities
- 3.2 Predictable
- 3.3 Input Assistance



Operable

- 2.1 Keyboard Accessible
- 2.2 Enough Time
- 2.3 Seizures and Physical Reactions
- 2.4 Navigable
- 2.5 Input Modalities



Robust

- 4.1 Compatible

Success Criteria



Level A

30 Guidelines

- For Level A conformance (the minimum level of conformance), the page satisfies all the Level A.



Level AA

Level A (30) + 20

- For Level AA conformance, the page satisfies all the Level A and Level AA.



Level AAA

Level A, AA (50) + 36

- For Level AAA conformance, the page satisfies all the Level A, Level AA and Level AAA.

Perceivable



Content is presented in ways that all users can perceive it.

- Provide text alternatives for non-text content (e.g., [alt text for images](#), transcripts for audio, and audio descriptions.
- Ensure [sufficient color contrast](#) between text and background.
- Avoid using color as the only way to convey meaning.
 - Underline hyperlinks.

Operable



Users must be able to navigate and interact with content using different different input methods.

- Access via keyboard only (no mouse required).
- Proper use of headings (<h1> to <h6>), allow users to navigate content with a screen reader.
- Avoid flashing content that can trigger seizures.

Scenario 1



Pause, Stop, Hide 2.2.2 and Avoiding Seizures and Physical Reactions 2.3:
Reactions 2.3: Do not include content that causes seizures or physical physical reactions.

You've created an animated "Congratulations!" screen in your e-Learning course, with flashing stars and rapidly changing colors to celebrate learners who completed the module.

There is no stop, pause, or hide button included with this animation. It is on a loop and it plays longer than 3 seconds at a time.

Understandable



Content and interfaces should be easy to comprehend.

- Use clear and simple language; avoid jargon.
- Describe your hyperlinks: "Avoid click here" or "learn more".
- Provide predictable navigation and consistent icons and elements.
- Use the language setting options to declare a language.

Scenario 2



Guideline 3.1 Readability

Task Instructions:

1. Use the [Hemingway Editor](#): Paste the sample text into the tool to evaluate readability. Simplify the language. Shorten long sentences. Replace difficult words with simpler alternatives. Aim for clarity while keeping the meaning intact while making the text easier to understand.
2. Use [ChatGPT](#): Paste sample text and try prompts: Can you rewrite this content to be at an 8th grade reading level? Keep the meaning the same but simplify the vocabulary and sentence structure. Make sure it still sounds professional and appropriate for adult readers, just easier to read.

Scenario 3



Keyboard Testing: [WebAIM Keyboard Test Table](#)

1. Open an e-Learning or online course in its current state. If you don't have one you can use this sample course built in [Articulate Storyline](#).
2. Use only the keyboard (Tab, Shift+Tab, Enter, and Space) to navigate.
 - Test for logical focus order. Is the navigation moving through buttons, links, and inputs in the correct sequence? Check if focus "jumps" to unexpected elements or skips over important ones. Are learners able to follow the content logically?

Robust



Content must be compatible with different technologies, including assistive devices.

- Use semantic HTML to ensure compatibility with screen readers.
- Ensure content works well across various browsers and devices.

Principles to Practice

We've just explored the POUR principles: Perceivable, Operable, Understandable, and Robust. Now it's time to apply them. Meet Emma, a learner engaging with an e-Learning course. As we read her story, keep the POUR principles and the WCAG guidelines in mind.

Emma

Emma is sitting at her desk in front of her computer. Using her mouse, she logs on to the company LMS and selects the e-Learning course she needs to take. She turns up the volume on her speakers and listens to the narrator speak, while images fade in and out on the screen. A few moments later, the course poses a series of questions about the images on her screen. Emma uses her mouse to click on, click on, drag-and-drop, and submit her answers.

Emma's Experience

Let's say, for instance, that Emma has hearing loss. What would her experience be like when taking this course? Now imagine that Emma is not able to use a mouse. The course also has interactive exercises. Can Emma navigate the course with only her keyboard? And lastly, imagine Emma has a visual impairment? Will she be able to identify the images to answer the questions?

Identify Barriers and Solutions

1. Discuss one of the barriers Emma might experience.
 2. Suggest a strategy or design feature that would help remove or reduce this barrier.
 3. Align to WCAG Guideline and Criteria [Quick Reference Guide](#).
- ❑ ChatGPT [WCAG 2.2 Reference](#) for additional support.
 - ❑ [ADA Title II](#) Assistant ChatGPT.
 - ❑ [Accessibility Guide for Online Content](#) ChatGPT.

Mentimeter Poll

Which standards did you identify in Emma's story and why did you select it?
it?



From Design to Reality

You've identified barriers.

You've explored solutions.

Now it's time to ask:

Does it actually work for everyone?

Testing & Evaluation

When it comes to learning content, Learning Management Management Systems, and authoring tools the best approach approach is a manual review, followed by automated. The The [Advancing Accessibility Training Toolkit](#) will help you get help you get started.

Advancing Accessibility Roadmap



State and Local Governments: [First Steps Toward Complying](#) with the ADA
[ADA](#)
[Title II Web and Mobile Application Accessibility Rule.](#)



[New Bill Tracker:](#) This will give a snapshot of every active digital accessibility bill introduced since January 2024.



[Advancing Accessibility Training Toolkit:](#) Step-by-step accessibility training toolkit, offering a clear roadmap, templates, and guidance to help state and local agencies comply with the new ADA Title II requirements and WCAG 2.1 standards.

Conclusion & Action



By aligning with WCAG we create digital spaces that are inclusive and built for everyone.

Let's lead with accessibility in every design decision.



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