

WCAG 2.1AA Website Compliance

(We have a plan.)

Website Compliance

The Civic Clarity Plan

1. Review each client website before your April 2026/2027 compliance deadline.
2. Fix any website specific issue or document the issue for your consideration. For example, a client might want strict adherence to their color style guide and be out of color contrast compliance.
3. Create one new Document Library location, called Legacy Document Archive (discussed below.)
4. Send client an email confirmation that the website is passing based on:
 - a. WAVE testing
 - b. Keyboard navigation
 - c. Screen magnification experience
5. This email will also refer you to our [Tips page](#) for you to continue best practices to keep color contrast, heading tags, and link/button text in line with WCAG 2.1AA guidelines.

Documents Compliance

As of April 1, 2026 for municipalities over 50,000 in population and April 1, 2027 for under 50,000, every document posted on a website page or your main document library must be considered accessible.

- Pass accessibility testing
 - Tagged properly
 - Lists and tables formatted
 - Maps tagged as one figure with an extended written description
 - Forms and applications tagged correctly or converted to online forms.

Documents older than April 1, 2026/7 that do not pass accessibility testing can be put into a Legacy Document Archive.

- Consider this archive “locked.” You don’t want to edit any of these documents after 4/1/2027 or they must be remediated completely to accessible.
- If you take documents off your website before 4/1/2027 you are not required to make them accessible.
- If you keep them in this legacy archive and anyone requests the document to be remediated, you need to do so. This means you have to edit the document to be accessible or somehow help the person understand what they can not visually see.
- Document compliance is considered an important part of the DOJ 28 CFR Part 35 – so each municipality needs to balance transparency, staff capability, and general resources.

Practical Considerations for a Municipal Client

1. Learn how to save a word document as a pdf to be accessible NOW.
 - a. If a letterhead is wanted, learn how to set up word document templates. Use Header, lock header put in documents > custom office template location
2. Should you remediate older documents?
 - a. If yes:
 - i. Consider editing original Word documents instead of remediating a pdf. It might be quicker
 - ii. Expect you'll need maps remediated.
 - iii. Tables will need to be remediated.
 - iv. Review all forms and applications and consider making them online forms. Online form development might be quicker and more cost effective than trying to make them accessible.
 - b. If you choose to not remediate documents CREATED before April 2026/2027
 - i. They are placed into Legacy Archive Folder and not listed directly anywhere else on the website. If needed, the website page refers the viewer to go to the legacy archive and search for the needed document.
 - ii. You can consider unpublishing the archived documents to the public. The folders will exist in the backend and can be searched by your website editors.
 - iii. We recommend that you hold off on mass deletion of non-compliant documents as we "wait and see" what happens between the DOJ, large municipalities and their citizens.
3. Decide if you should remediate non-compliant forms or migrate to online forms.
 - a. By the DOJ ruling all federal, state, and county pdf forms should be accessible. Make sure you have their newest version that passes accessibility testing.
 - b. Non-compliant local forms might be difficult to remediate. Seriously consider migrating these forms to online versions that comply with WCAG 2.1AA requirements. (Labeling, signature requirements accommodation, consent to privacy policy, etc.)

Practical Solutions

1. Most Important: Learn how to use Word to create accessible documents.
2. Require assessor to create accessible documents (ECF, land studies, etc.)
3. Require consultants to submit accessible documents (ask for past years to be made compliant?)
4. Purchase and learn Foxit (cheaper than Adobe) \$130/year.
5. Learn how to create forms within your website platform – ultimately faster than remediation. Upload most recent state forms after April 2026 since they "must" be accessible by then.
6. Hire outside assistance.

Civic Clarity Consulting to Assist Clients

1. Review and fix website issues and notify clients on editing they do that can affect ADA accessibility. No Fee
2. Make sure all clients have two help documents. No Fee
 - a. How to save your word document as a PDF – very short and bare minimum (not enough)
 - b. Make Your Documents Accessible from Conception
 - c. NOTE: we are not Microsoft experts and can not provide additional training on the use of Word or Excel
3. Set up Document Library on client websites in two locations. No Fee
 - a. Current Document Library page for only accessible documents
 - b. Legacy Document Archive in a separate location, possibly nested under Home or where news archives are located.
 - i. These two document locations have their own search.
 - ii. At some point we (briefly) unpublish the archive to gauge reaction vs potential issue remediation requests.
4. Specific Document Accessibility Remediation Assistance. \$120/hour

If client asks Civic Clarity to review and remediate older documents to keep on main document library, we have to bill for our time, with the following scope of work limitation:

- a. When requested, Civic Clarity will assist with the remediation of selected PDF documents to improve accessibility. Due to variations in document age, source quality, and content type, Civic Clarity does not guarantee that remediated documents will meet all accessibility requirements or pass all automated or manual audits. The client is responsible for approving remediated documents prior to website publication and for determining whether additional remediation or alternate formats are required.
- b. We will generate an Accessibility Report before and after each document remediation attempt that states accessibility tests passed/failed in order to assist the client in approval decision for website publication.

Accessibility Report			
Filename: twpminutes082924 spc_mtg.pdf			
Report created by: [Personal and organization information from the Preferences > Identity dialog.]			
Organization: Summary			
The checker found problems which may prevent the document from being fully accessible.			
<ul style="list-style-type: none">▪ Needs manual check:2▪ Passed manually:0▪ Failed manually:0▪ Skipped:3▪ Passed:12▪ Failed:15			
Detailed Report			
Document	Rule Name	Status	Description

15 to 0
Failed

Accessibility Report			
Filename: twpminutes082924 spc_mtg converted to word.pdf			
Report created by: [Personal and organization information from the Preferences > Identity dialog.]			
Organization: Summary			
The checker found no problems in this document.			
<ul style="list-style-type: none">▪ Needs manual check:2▪ Passed manually:0▪ Failed manually:0▪ Skipped:3▪ Passed:27▪ Failed:0			
Detailed Report			
Document	Rule Name	Status	Description

15 to 0
Failed

- c. “Some remediation vendors advertise a 100% conformance guarantee, meaning they will return documents that meet a defined technical standard. However, **technical conformance guarantees are not legal guarantees of ADA compliance or immunity from audits or lawsuits**. Whether a document meets accessibility requirements under the ADA or other law remains a legal determination. Clients should view vendor guarantees as confidence in quality of remediation, not as legal indemnification.”

5. Forms/Applications. We recommend the following:
 - a. That you test all county, state, federal pdfs for compliance.
 - b. Move all local municipality specific forms to online forms.
 - i. Civic Clarity will create the forms and confirmation-notification process for each form. Fee is \$120/hour.
 - ii. Civic Clarity will give you access to the form builder for \$100/year. After 2 hours of training, we have to charge for our consulting time at \$120/hour.

Hiring us is your best option if you do not have staff that enjoys creating forms as it can be tricky to fulfill all ADA requirements. If we do it, we are responsible for it working as intended, that all necessary people are emailed the submissions.

What Compliance Looks Like on April 1, 2026/2027

By your April 2026/2027 deadline date, accessibility compliance for a municipal website is defined by reasonable access and responsible management of content, not by perfection or retroactive remediation of every historical document.

By these dates, a compliant municipality will confidently say:

- My website meets WCAG 2.1 AA standards, including keyboard navigation, readable color contrast, meaningful headings and image description, and clear link and button text. New documents are accessible by default, having been created using accessible Word templates and saved properly as tagged PDFs.
- Older documents created prior to the compliance deadline are either archived, removed from public access, or placed in a Legacy Document Archive, where they are not actively edited or republished.
- Requests for access to archived or older documents are handled reasonably and promptly, through document remediation, alternate formats, or direct assistance to the requester. No municipality is expected to proactively remediate every historical document, only to respond appropriately when access is requested.
- Automated accessibility tools are used to confirm accessibility, not to create additional obligations for staff. When combined with basic keyboard checks and standard document practices already outlined in this plan, accessibility tools provide a clear and reasonable way to verify accessibility. No specialized testing, ongoing monitoring, or technical expertise beyond routine website maintenance and document creation is expected of municipal staff.