

ADA Web Accessibility Rule: Implementation Guidance for County Governments

The [U.S. Department of Justice issued a new rule on March 8, 2024](#). This rule requires all state and local governments—including Tennessee counties—to make their websites and mobile apps accessible to people with disabilities. “Accessible” means that everyone, including people with disabilities, can easily use and understand your county’s website or any county-operated app.

This web accessibility implementation guide will help your county understand what’s required and how to prepare. A checklist follows the guide to help you put everything into action.

1. Understand the Compliance Timeline

Counties must follow different deadlines depending on their population size. If your county has:

- More than 50,000 people, you must meet the new requirements **by April 26, 2027**; or
- 50,000 or fewer people, you have until **April 26, 2028**.

The Department of Justice [issued an Interim Final Rule on April 20, 2026](#), that extended the compliance dates for the requirements for web content and mobile application (“app”) accessibility that were adopted in April 2024.

2. Know What Must Be Accessible

The rule applies to everything the public can access on your websites or mobile apps. This includes things like county board meeting minutes, public notices, online payment systems, permit applications, forms, live video streams, and virtual meetings. If it helps people get information or take part in services, it needs to be accessible.

3. Follow the Technical Standard

Your website and app content must meet the [Web Content Accessibility Guidelines \(WCAG\) version 2.1, Level AA](#). This means you need to include text descriptions for images, allow full use by keyboard (without needing a mouse), provide captions for videos and transcripts for audio, use readable text and color combinations, and make sure link text is clear and pages are well organized to ensure everyone, including people with disabilities, can use your website or app easily.

4. Inventory and Audit Your Digital Presence

Start by reviewing all of your websites and mobile apps. Make a list of each one and what it does. County staff should check these platforms to see if they meet accessibility rules. This includes looking at how they work, how they look, and whether they meet current WCAG 2.1 Level AA standards. Be sure to include any tools from outside vendors—like payment systems or maps—and make note of all public PDFs, forms, videos, and apps. You can use accessibility

tools like [WAVE](#), [axe](#), or [Siteimprove](#) to check your content, or you can hire a company that specializes in accessibility audits.

5. Develop a Web Accessibility Action Plan

Once you know what needs to be fixed, create a plan that sets clear priorities and timelines. Your plan should explain who is responsible for each task, include any needed budget for updates or redesigns, and help you stay on track to meet your deadline. Focus first on services that are most important to the public, like payment portals, meeting notices, and applications.

6. Update Policies and Contracts

Adopt either a county-wide or office-specific policy that makes accessibility part of how you choose and manage digital tools. When you buy new software, websites, or services, make sure they meet WCAG 2.1 Level AA standards. Update your contracts so that all vendors clearly agree to meet accessibility requirements.

7. Train Staff and Web Content Editors

All staff who create or manage digital content need training. This includes IT teams, communications staff, and department administrators. Training should cover writing clearly, adding alt text to images, creating accessible PDFs and documents, and adding captions to videos. The goal is to make these practices part of daily work.

CTAS has made available the following online, self-paced web accessibility training courses for you and your staff. Further training is currently in development—stay tuned for announcements.

- [Designing with the WCAG 2.2 Guidelines](#) - .5 credits COCTP Choice Elective
- [Web Accessibility for Developers](#) - 1 credit COCTP Choice Elective
- [Creating Accessible PDFs](#) - 8 credits COCTP Choice Elective

8. Include Accessibility in Website Redesigns

If your county is planning to redesign or upgrade its website or apps, make accessibility a priority from the very beginning. It should be included in your requests for proposals (RFPs) and remain part of the process throughout development. This helps avoid costly fixes later on.

9. Communicate Accessibility Efforts

Your website should include an Accessibility Statement that tells visitors how to request help or report a problem. Be sure to list contact information and be prepared to respond quickly and professionally to any concerns.

10. Maintain and Monitor

Making your website accessible isn't a one-time task. Set a regular schedule to run automated checks and conduct manual reviews, at least once a year. Stay informed about updates to WCAG standards and any new guidance from the Department of Justice, so your county can keep up with best practices.

Resources

DOJ Rule Overview: <https://www.ada.gov/resources/2024-03-08-web-rule/>

WCAG 2.1 AA Guidelines: <https://www.w3.org/WAI/WCAG21/quickref/>

Accessibility Tools: WAVE (wave.webaim.org), axe (www.deque.com/axe/), [Siteimprove](#)

WCAG Compliance Checklist for Website Review

This checklist is based on the [W3C's Web Content Accessibility Guidelines \(WCAG\)](#) and is intended to help you begin evaluating your agency's website for accessibility compliance.

Step 1: Understand the WCAG Basics

WCAG is organized around 4 core principles: Perceivable, Operable, Understandable, Robust (POUR).

These four principles provide the foundation for creating accessible digital content (your website content). "Perceivable" means users must be able to see or hear the content, "Operable" means they can navigate and interact with it, "Understandable" ensures the content and interface are clear, and "Robust" means the content works across different devices and assistive technologies. Understanding these concepts helps guide accessibility decisions during design and development.

Compliance is measured at three levels: A (minimum), AA (recommended), and AAA (enhanced).

Level A addresses the most basic accessibility requirements, while Level AA builds on those requirements to cover more significant usability barriers. Level AAA is the most rigorous and not always feasible for all content, so most public agencies aim for Level AA compliance. Knowing the difference helps prioritize efforts and set realistic accessibility goals.

WCAG 2.1 is the current widely adopted version (WCAG 2.2 is available, but adoption is still growing).

WCAG 2.1 is a set of guidelines that help make websites easier to use for people with assistive devices, low vision, and cognitive disabilities. It is the most popular standard used today. WCAG 2.2 introduces new rules, but many tools and organizations are still working to update and fully support it. Staying updated with these versions helps make sure your county website is easy for everyone to use and that you are following the newest best practices.

Step 2: Begin Evaluating Your Website

Once you understand the basics of accessibility, the next step is to evaluate how your website actually performs. WCAG is organized around four principles—**P**erceivable, **O**perable, **U**nderstandable, and **R**obust (POUR)—which provide a framework for identifying and fixing barriers. Use the points below as a practical starting guide to assess whether your website meets user needs and legal expectations.

A. Perceivable – Users must be able to see or hear website content.

- Add descriptive alt text to all images so screen readers can describe them.
- Provide captions for videos and transcripts for audio content.
- Check that text and background colors have strong contrast for readability.

- Make sure content can be resized or zoomed without loss of function.
- Don't rely on color alone to convey meaning (e.g., use labels or icons in addition to color).

B. Operable – Users must be able to navigate and interact with the website.

- Ensure all features (menus, links, forms) work with keyboard-only navigation.
- Include visible focus indicators so users can see where they are when tabbing.
- Avoid flashing or blinking content that could trigger seizures.
- Give users enough time to complete tasks, such as extending timeouts on forms.
- Use clear, consistent navigation menus and link labels across pages.

C. Understandable – Users must be able to comprehend the content and interface.

- Write in plain, straightforward language that is easy to read.
- Make sure instructions and form fields are clear, with helpful error messages when needed.
- Keep layout and terminology consistent across the entire site.

D. Robust – Content must work reliably across devices and assistive technologies.

- Test compatibility with screen readers and other assistive tools.
- Use clean, valid HTML and CSS so the site behaves as expected.
- Use [ARIA](#) tags (Accessible Rich Internet Applications—special labels for screen readers) when your site includes pop-ups, tabs, or other content that changes on the page.

Step 3: Tools & Testing

- Use automated testing tools like: [WAVE](#), [axe](#), [Google Lighthouse](#).** Start with automated tools to quickly identify common accessibility issues such as missing alt text, low contrast, or improper heading structure. Free tools like WAVE, axe, and Google Lighthouse can scan your website and highlight problem areas. While these tools don't catch everything, they are a good first step in your evaluation process.
- Manually check using keyboard-only navigation and screen reader simulation (e.g., [VoiceOver](#), [NVDA](#)).** Test your site without a mouse to ensure users can navigate using only the keyboard—especially for forms, menus, and buttons. Also try using a screen reader like VoiceOver (built into Macs and iPhones) or NVDA (free for Windows) to experience how a visually impaired user might interact with your content. These manual checks reveal usability issues that automated tools can miss.
- Review site using a color blindness simulator or contrast checker.** Use tools like [Coblis](#) or Chrome extensions like [Colorblindly](#) or [Colorblind](#) to simulate color blindness

and verify that key information isn't lost for users with vision differences. A contrast checker can help ensure that text stands out clearly against background colors. These tools are especially helpful for reviewing charts, buttons, and alert messages.

Step 4: Make a Remediation Plan

- Prioritize fixing Level A and AA issues first.** Start by addressing the most critical accessibility barriers—those that fall under WCAG Level A and AA—since these issues have the greatest impact on users with different accessibility needs. Examples include fixing missing form labels, ensuring sufficient color contrast, and making sure navigation works with a keyboard. Tackling these issues first helps improve usability and reduces legal risk.
- Document findings and track fixes.** County offices should keep a running log of accessibility issues identified during website reviews, such as missing alt text or poor color contrast. Each entry should include the date, a description of the issue, and notes on how and when it was resolved. This documentation can be maintained in a shared spreadsheet or accessibility tracking tool to ensure accountability and demonstrate ongoing compliance efforts.
- Create a regular audit schedule for ongoing compliance.** Establish a routine schedule to review your website for accessibility, such as quarterly or biannually, depending on how often content is updated. Use automated tools and manual checks to identify new issues that may have emerged. Keeping a consistent audit cycle helps ensure continued compliance and catches problems before they affect users.