

# ADA Title II Compliance Checklist — Parallax Audit

## ADA Title II Web Compliance — Quick-Start Checklist for 2027

A working checklist for state and local government IT directors and ADA Coordinators. Print, mark up, share. Free, no email required, no commitment.

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### Your deadline tier

| POPULATION SERVED                                                                                              | COMPLIANCE DATE | STANDARD          |
|----------------------------------------------------------------------------------------------------------------|-----------------|-------------------|
| ≥50,000 (state agencies, large counties + cities, public university systems, large transit/hospital districts) | April 26, 2027  | WCAG 2.1 Level AA |
| <50,000 (smaller municipalities + special-purpose districts of any size)                                       | April 26, 2028  | WCAG 2.1 Level AA |

Source: 28 CFR Part 35, Subpart H, as extended by the DOJ Interim Final Rule published April 21, 2026.

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### The 12 items every public-sector entity must have

If you can check all 12, you have a defensible compliance posture under the DOJ Title II Final Rule. If you cannot check most of them, you have work to do.

## Governance

- ] A designated ADA Coordinator with name, title, email, phone, and physical office address publicly posted (28 CFR §35.107). The posting must be on the entity's main public-facing website, easily found by a non-technical user.
- ] A grievance procedure for accessibility complaints, publicly posted, that names the responsible office and provides a clear filing path. Not buried inside a 50-page general grievance policy.
- ] An alternative-format request workflow — citizens can request accessible alternatives to documents, with a stated turnaround time (best practice: ≤5 business days at no cost).

## Public-facing accessibility statement

- ] The statement names WCAG 2.1 Level AA explicitly as the conformance target. Not "WCAG2," not "Section 508," not "the ADA." The DOJ Final Rule names a specific standard and version; your statement must too.
- ] The statement lists the most recent comprehensive audit date and the auditor. Reviewers and counsel look for currency — a statement dated 2018 is a finding.
- ] The statement names the ADA Coordinator with a working email and phone (not just a generic webmaster@ address).

## Technical baseline

- ] Every page in scope has a declared `lang` attribute on `<html>` (e.g., `<html lang="en">`). WCAG 3.1.1 Level A.
- ] Every page has a skip-to-content link as the first focusable element. WCAG 2.4.1 Level A.
- ] Every interactive element (link, button, form input, custom widget) has an accessible name when accessed by a screen reader. WCAG 4.1.2 Level A.
- ] Color contrast ratios meet WCAG 1.4.3 Level AA (4.5:1 for body text, 3:1 for large text and UI components). Critically — measured against the actual rendered pixels, not just CSS color values. Text on hero images and gradients is the most common failure point.

## Active program

- ] A current audit (signed PDF, dated within the last 12 months) covering at minimum the public-facing pages of your primary domain. Conducted with both automated tooling AND manual interaction testing. Not just a scanner export.
- ] A prioritized remediation queue with completion timestamps. Treated as an active engineering backlog, not a static document.

## Bonus — what reviewers respect but the rule doesn't strictly require

- ] A current VPAT (Voluntary Product Accessibility Template) for any procured systems requiring conformance disclosure
  - ] A continuous-monitoring cadence (weekly or monthly automated scans) so regressions are caught before users encounter them
  - ] An accessibility-acknowledgment requirement in your vendor RFP templates (so new procured systems must conform out of the gate)
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## The two paths that don't work

- **Automated scanner alone.** Scanners catch the machine-decidable layer of WCAG (computed CSS contrast, missing alt, ARIA syntax). They cannot evaluate keyboard interaction order, focus traps, ARIA state changes, dynamic content announcements, or contrast on rendered pixels behind images. WebAIM's annual audit of one million homepages consistently finds critical WCAG failures on the majority of sites scanners pass clean. A scanner report does not satisfy DOJ Title II on its own.
  - **Overlay widgets.** Tools like accessiBe, UserWay, AudioEye, and EqualWeb inject a JavaScript layer that does not modify the underlying HTML, ARIA, or content. The Federal Trade Commission fined accessiBe approximately \$1 million in April 2025 for deceptive WCAG conformance claims. More than 800 sites running overlay widgets were sued under the ADA in 2024. Public-sector counsel will not certify a remediation plan that depends on an overlay.
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## A 6-month plan if you haven't started

| MONTH | GOAL                                                                                                                                                                                                                                                            |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1     | Free preliminary audit of top 25 pages. Identify procurement path for the real engagement. Publish ADA Coordinator info if not yet posted.                                                                                                                      |
| 2     | Engage an audit vendor running the full three-layer process (automated + interaction-trace + rendered-pixel + human review). Sign engagement.                                                                                                                   |
| 3     | Receive audit. Top 30 findings into sprint backlog. Replace stale Accessibility Statement with audited version. Fix template-level defects first (one fix propagates to hundreds of pages).                                                                     |
| 4–5   | Burn-down of remediation queue. Weekly automated regression scans. Monthly diff reports.                                                                                                                                                                        |
| 6     | Re-audit. Confirm remediated issues stay remediated. Reissue signed PDF. By this point you have the artifacts a DOJ investigation expects: current audit, active remediation queue, correct accessibility statement, working grievance procedure, current VPAT. |

Procurement reality: a fixed-fee scoped audit at 9,500–15,000 sits inside the small-purchase or P-card threshold at most state and local governments. Larger remediation contracts go through NASPO ValuePoint, GSA cooperative purchasing, or state cooperative vehicles — these typically take 60–120 days. **Skipping straight to a formal RFP for first-time vendors is the slowest path. Reserve formal RFPs for engagements above \$250,000.**

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## If you want help

Parallax runs the audit + monitoring service this checklist describes. Fixed-fee preliminary audit (free, 24-hour turnaround) at <https://parallax.morton-digital.com/>. Full audit at \$9,500. Continuous monitoring at \$499/month. Both tiers are sized to fit under typical state and local P-card single-purchase ceilings — purchasable directly without formal solicitation.

Email [hello@morton-digital.com](mailto:hello@morton-digital.com) to start.

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