



**Proposal for ADA
Digital Accessibility –
WCAG 2.1 AA / 2.2 AA
Compliance Services –
Consulting and Design**

**Tab 2: Services and
Pricing**

AFI-2025-118

Alliance for Innovation

January 2026

SUBMITTED BY

Nelnet Government Services, LLC

GSA Contract #47QTCA23D0069

John Turner

Chief Information Officer

303.696.5671

John.Turner@Nelnet.net

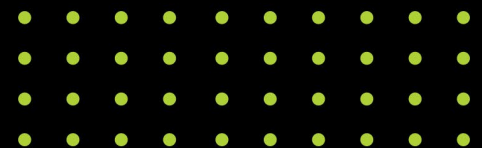
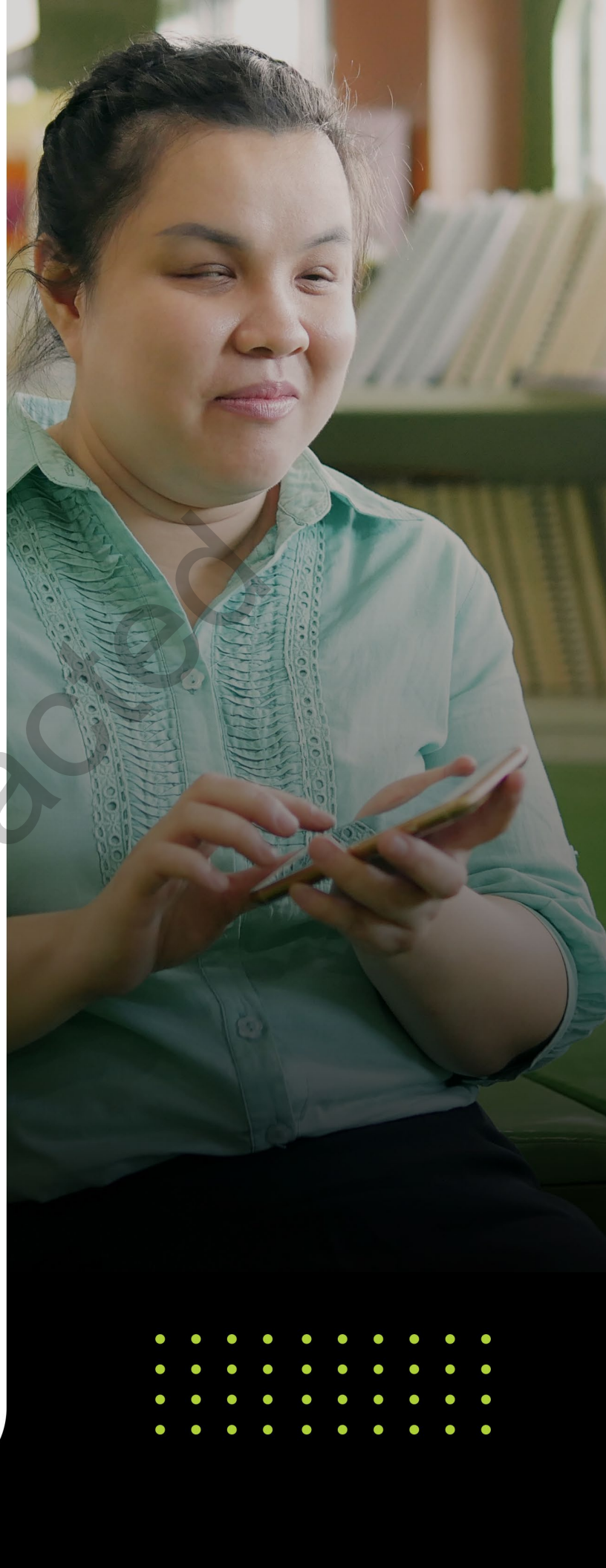


Table of Contents

Table of Contents	i
List of Tables	i
Glossary of Abbreviations and Acronyms	i
Tab 2: Services and Pricing	1
1.1 Solution Offering and Coverage	1
1.2 Pricing Structure	15
1.3 Changes, Additions, and Warranties	17
1.4 Cooperative and Administrative Fee	18
1.5 Additional Information	19

List of Tables

Table 1. Proposed Solution. Nelnet’s offering includes all the services listed in section 1.1 of the solicitation and addresses the components of all seven workstreams.	2
Table 2. Long-Term Accessibility Best Practices. Incorporating accessibility at all stages of content creation will enhance PPA progress toward delivering compliant, user-centric content and services.	8
Table 3. Live Virtual Training Topics. This training suite equips web content creators, administrators, application developers, document authors, communications and marketing staff, product owners, procurement staff, legal/compliance staff, and leadership with role-specific instruction in digital accessibility foundations, accessible document and media production, social media accessibility, and essential web accessibility testing practices.	10
Table 4. Rates for Live Training Courses. Live training is charged per course and includes up to 25 participants and a recording of the session.	16
Table 5. Document Accessibility and Multimedia Services Pricing. Rates are based on content complexity and serve as a baseline for document and multimedia services conversations with PPAs.	17

Glossary of Abbreviations and Acronyms

Abbreviation/Acronym	Definition
ACR	Accessibility Conformation Report
ADA	Americans with Disabilities Act
AFI	Alliance for Innovation
ARC	Accessibility Resource Center
ATaaS	Accessibility Team as a Service
CART	Communication Access Realtime Translation
CMS	Content Management System
DHS	U.S. Department of Homeland Security

Abbreviation/Acronym	Definition
DOJ	U.S. Department of Justice
FCC	Federal Communications Commission
HB	House Bill
HTML	Hypertext Markup Language
IAAP	International Association of Accessibility Professionals
IT	Information Technology
JAWS	Job Access with Speech
KPI	Key Performance Indicator
MMSA	Michigan Municipal Services Authority
NCRA	National Court Reporters Association
Nelnet	Nelnet Government Services, LLC
NVDA	NonVisual Desktop Access
PDF	Portable Document Format
PII	Personally Identifiable Information
PPA	Participating Public Agency
RACI	Responsible, Accountable, Consulted, and Informed
SDLC	Software Development Life Cycle
SLA	Service Level Agreement
TPGi	TPG Interactive
TVC	The Viscardi Center
VPAT	Voluntary Product Accessibility Template
VRI	Video Remote Interpreting
WAI-ARIA	Web Accessibility Initiative – Accessible Rich Internet Applications
WCAG	Web Content Accessibility Guidelines
WebAIM	Web Accessibility in Mind

This document is **compliant with the Americans with Disabilities Act (ADA) and accessible** to individuals with disabilities, including visual impairments.

Tab 2: Services and Pricing

1.1 Solution Offering and Coverage

The Alliance for Innovation (AFI) supports local governments and nonprofit organizations across the U.S. by facilitating access to innovative, cost-effective solutions that enhance public sector performance and ensure equitable access to digital services. In collaboration with the Michigan Municipal Services Authority (MMSA) and Edge Public, AFI plans to establish a comprehensive contract with providers that can offer a range of accessibility consulting services—both locally and nationwide—to meet the diverse needs of participating public agencies (PPAs). This venture will streamline the process of procuring support regarding the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and applicable Web Content Accessibility Guidelines (WCAG) in response to the U.S. Department of Justice (DOJ)’s final rule on website and mobile accessibility.

Nelnet Government Services, LLC (Nelnet)’s dedicated, U.S.-based Accessibility team is well qualified to support this opportunity and establish partnerships with PPAs that need accessibility advisory services to achieve and maintain compliance. Our approach, enhanced throughout our 16-plus years of performing accessibility work for and in conjunction with clients of various sizes, offers repeatable, scalable consulting and professional services and pricing for PPAs of all sizes that participate in the future cooperative agreement.

Our capabilities to foster growth, build partnerships, and deliver value to PPAs include:

- ★ Accessibility audits and testing.
- ★ Remediation planning and advisory services.
- ★ Design and user experience consulting.
- ★ Training and education.
- ★ Policy and governance development.
- ★ Assistive technology compatibility testing.
- ★ Programmatic support.

Proposed Solution and Services

Nelnet’s proposed solution delivers comprehensive evaluation and diagnostic accessibility consulting and professional services aligned with the ADA, Section 508, and WCAG 2.1 AA and 2.2 AA standards. **Our team combines technical knowledge with lived human experience**, leveraging industry best practices and a breadth of expertise to provide solutions that go beyond compliance.

With **more than 80 years of collective experience across federal, state, and local government, higher education, and private sector engagements, the Nelnet Accessibility team has the capabilities to support all seven AFI workstreams (Table 1)**. We will apply our decade-plus of experience to provide professional consulting to help agencies plan and maintain ongoing conformance and inclusive user experiences.

Solution Services	Workstream(s) Referenced
Comprehensive evaluation and diagnostic services for digital properties, including baseline and recurring accessibility assessments and audits , risk categorization and gap analyses, verification testing, and findings reviews with stakeholders	✔ Workstream 1
Remediation planning, design guidance, and implementation support for agency teams	✔ Workstream 3
Strategic ongoing advisory services and program road mapping to help agencies prioritize assets and user journeys based on accessibility impact, support budgeting and vendor management, and coach internal accessibility champions and/or committees	✔ Workstream 2
Training, policy development, and program governance support to build staff skills applicable to their roles, draft or refine policies and guidelines, perform accessibility program maturity assessments, develop self-service content and resources, and establish sustainable accessibility practices	✔ Workstream 4 ✔ Workstream 5
Document, PDF, and media accessibility consulting and/or remediation services to review remediation priorities and templates, assist with remediating existing assets, develop accessible document and media production workflows, and assist with third-party vendor management	✔ Workstream 6 ✔ Workstream 7

Table 1. Proposed Solution. Nelnet’s offering includes all the services listed in section 1.1 of the solicitation and addresses the components of all seven workstreams.

Our services are designed to adapt to evolving standards and regulatory requirements, empowering agencies to achieve and maintain digital inclusion efficiently and effectively. The following information describes Nelnet’s portfolio of accessibility consulting services and how we will support the workstreams, their representative activities, and the associated deliverables to meet the needs of the various PPAs that may procure accessibility-related assistance.

Accessibility Assessments and Audits (Web, Mobile, Documents, Multimedia)

Workstream 1

Baseline and Recurring Accessibility Assessments

Nelnet’s process accentuates the human element of accessibility and brings clients proven, hands-on proficiency in testing and content remediation with major assistive technologies by pairing automated checks with expert manual and technology-validated workflows to establish an accurate accessibility baseline. Automated testing verifies our work against published standards as an initial step in our review process. We then peer-review documents and web pages, which includes manual testing and functional

Hybrid Approach to Accessibility

In our experience, automated tools are only capable of detecting a small portion of accessibility barriers. Studies have shown that these tools typically identify fewer than half of common issues, and they often miss problems that require human judgment—such as usability, context, or visual focus states.

Given these shortcomings, **automated testing must always be paired with manual evaluation** to accurately assess accessibility compliance.

verification with assistive technology. Our team also assesses content to determine what should be kept, removed (i.e., out-of-date content that can be archived without remediation), or consolidated to improve efficiency.

We test and remediate to WCAG 2.1 AA or 2.2 AA, depending on clients' needs. WCAG 2.2 AA—the latest version—is a higher standard than that required by either Section 508 or the DOJ's final rule on website and mobile app accessibility. We encourage our clients to use the current criteria as their baseline. **This forward-thinking approach to accessibility helps clients put themselves at the forefront of compliance and avoid or reduce the need for costly retesting and remediation in the future as minimum standards advance.**

We generally recommend automated testing paired with targeted, risk-based manual testing on digital assets, which will benefit PPAs by:

- **Identifying common issues quickly.** We find that most accessibility issues, especially those that create significant barriers for people with disabilities, are repeated across a site. A targeted review can identify these recurring issues, informing remediation for the entire site. Clients can begin remediation earlier and identify priority tasks that make a significant impact as they are resolved.
- **Producing assessment results sooner.** A risk-based assessment report on the initial compilation of site/application inventory outlines the legal risks and suggested mitigation strategies. This opens the discussion on how to resolve specific items, and then how to propagate those improvements across a site and into future updates. Shorter, more timely assessments also limit the risk of content changing before the findings can be addressed, invalidating the specific findings reported.
- **Reducing assessment costs without sacrificing quality.** Thorough accessibility testing is a time-intensive process that may include sorting through automated results to identify true accessibility issues, manually inspecting code, and multiple passes with different assistive technologies and browsers. Risk-based assessments limit the hours required, while still producing in-depth, actionable results that can be implemented on a broader scale.

In most cases, the Nelnet Accessibility team suggests testing 5 to 15 workflows per site, depending on complexity and content diversity within the site. To determine the size and specific workflows to include, we will work with each client to consider factors such as the **most visited pages** of the site, the **most important functions** of the site, and **whether there are multiple contributors** to the site (e.g., different departments with full control over their section of the site).

By nature, accessibility will always focus on the human element. As such, we rely heavily on evaluating user experiences with assistive technology that our clients and their customers may use. We routinely validate with leading screen readers, keyboard-only navigation (desktop and mobile), speech recognition software (desktop and mobile), switch access on mobile devices, and zoom/reflow up to 400 percent to confirm real-world operability and usability across critical user flows. We also verify compatibility with magnification tools and low-vision usage patterns,

Assistive Technology Expertise

Nelnet's accessibility experts are trained in the use of assistive technology, and our team includes people that use keyboard-only navigation, speech recognition software, and eye-gaze software in their daily lives.

Their firsthand knowledge in using assistive technology brings additional depth to our evaluations, making our testing and advocacy authentic and accurate.

including ZoomText guidance and browser zoom; incorporate speech/voice input scenarios to reflect dictation and voice control workflows; and account for refreshable Braille behavior when assessing document structures and user interface patterns. Then, our team documents outcomes in client-ready reports and Voluntary Product Accessibility Templates (VPATs)/Accessibility Conformance Reports (ACRs).

Our team uses a range of tools, platforms, and technologies for accessibility assessments and remediation to validate that systems, websites, documents, and applications meet the highest accessibility standards. The following are some of our regularly used tools.

- **Website Assessment and Remediation:** TPG Interactive (TPGi) Accessibility Resource Center (ARC), Deque axe, Web Accessibility in Mind (WebAIM) WAVE, and TPGi Colour Contrast Analyser
- **Portable Document Format (PDF) Documents:** Adobe Acrobat Pro, Adobe Experience Manager Forms Designer (i.e., LiveCycle), and Equidox
- **Microsoft Office Documents (Word and PowerPoint):** Built-in accessibility checking functionality in all versions, including Microsoft 365
- **Assistive Technology and Validation Tools:** NonVisual Desktop Access (NVDA), Job Access with Speech (JAWS), VoiceOver (iOS and MacOS), TalkBack (Android), and Dragon NaturallySpeaking
- **Mobile Devices:** Built-in assistive technology (e.g., screen readers, speech recognition, color/display modes), keyboard-only navigation, switch access, Accessibility Inspector (iOS), and Accessibility Scanner (Android)
- **Windows Desktop Apps:** Accessibility Insights

The Nelnet Accessibility team stays ahead of the market by implementing the latest tools and updating our processes to maintain our commitment to learning and staying up to date with assistive technology and new standards and regulations.

Gap Analyses, Prioritized Recommendations, and Risk Categorization

After our initial assessment, we develop and deliver comprehensive reporting in various formats, depending on a client's needs and preferences. For many clients, our proprietary report includes:

- Findings descriptions.
- Priority/severity designations based on impact to users to help guide remediation efforts.
- A recommended remediation for each finding, including code suggestions (if known) and links to additional information for remediation and research.
- A description of and rationale regarding the tools and techniques used.
- Opportunities to improve the user experience.

A sample report (Attachment 1 – Sample Accessibility Assessment Report) accompanies Nelnet's response. We can also provide results in a VPAT version 2.5, if requested.

Nelnet's reports offer an efficient benchmark for each product's accessibility status; minimize costs around product accessibility barriers; and can include any specified information regarding evaluations, mitigation and corrective plans, timelines, and/or other necessary documents. **Our clients value**

reviewing assessment results with our accessibility experts, taking the opportunity to fully understand how findings are prioritized and how to improve accessibility while collaborating with the team on how to approach remediation.

Our team will also provide stakeholders with an overview of how people with disabilities are impacted by current accessibility gaps based on the assessment results for each product; suggested changes to remediate gaps and modify processes moving forward help clients conform to both applicable laws and industry standards.

Verification and Regression Testing

After remediation, our experts help clients perform verification testing to confirm the updated websites and digital content are accessible and compliant, reinforcing our commitment to both accessibility and user-centric design. We retest the updated assets (and any dependent templates or components) using the same testing process: automated tools and manual testing, which includes assistive technology. Retesting validates that the updates meet the required accessibility standards, the assets work with keyboard and supported assistive technology, and the changes did not introduce regressions in common flows.

Our team provides clients with post-remediation verification results, indicating fixes, verification methods, and residual risks. If issues require multiple retesting cycles, each cycle is documented in the report. Once retesting confirms conformance, items are marked closed in the report; unresolved items are queued for another remediation cycle.

Refer to Attachment 2 – Sample Accessibility Remediation Executive Summary Report for a sample remediation report.

Remediation Planning, Design Guidance, and Implementation Support

Workstream 3

Our team has a strong track record and deep expertise in remediating a wide range of content and media formats and platforms, applying WCAG principles. Using that knowledge, we help our clients adopt both proactive accessible design and post-production remediation practices, enabling them to deliver inclusive, compliant multimedia experiences that meet the needs of all users.

“This is a note to let you know what an OUTSTANDING job you did today presenting the myColorado a11y remediation Phase 3 Walkthrough. ... The presentation went extremely well, and it cleared a path forward for us on our accessibility remediation journey. I want to thank you for your expertise on the subject and your ability to understand and deliver your customer’s business needs. A job well done!”

— [REDACTED]

In preparation for remediation, Nelnet will develop a remediation plan in collaboration with PPA stakeholders to address identified issues and bring content into compliance. Issues will be prioritized based on the impact to people with disabilities, the evaluated digital assets, risk, business criticality, operations, finances, stakeholder input, etc.

Our accessibility practice provides expert guidance to ensure digital products are designed and built for inclusivity from the outset. Drawing on our extensive experience evaluating structural and design barriers in client ecosystems, we deliver actionable recommendations for accessible page templates, components, and interaction patterns. Our team reviews and advises on design systems through the lens of WCAG conformance, usability for assistive technology users, and long-term maintainability, offering clear guidance to address structural and design issues and improve overall accessibility alignment. This approach enables clients to strengthen the foundational elements of their digital experiences and integrate accessibility seamlessly into their design and development life cycle. Refer to the [Training, Policy Development, and Program Governance Support](#) section for additional information.

Additionally, we recommend archiving outdated content and consolidating duplicates to reduce effort and improve usability. When full conformance requires redesign, we identify those needs early and plan them transparently.

For website and mobile content, our team helps clients adopt the following practices.

- **For custom-built websites**, Nelnet’s accessibility specialists remediate barriers at the source by rewriting code rather than relying on overlays or temporary fixes. This includes correcting semantic Hypertext Markup Language (HTML), applying Web Accessibility Initiative – Accessible Rich Internet Applications (WAI-ARIA) roles and properties to custom components, and ensuring robust keyboard navigation. Critical barriers that block task completion are addressed first, while also considering legal risk and remediation effort. We work collaboratively with developers, integrating fixes into clients’ deployment workflows and processes to minimize production environment disruptions.
- **For sites built on popular content management system (CMS) platforms**, Nelnet offers platform-specific remediation guidance that preserves clients’ existing themes, plugins, and integrations. Where possible, we address issues directly in the platform for issues like heading structure, image alt text, or problems with color contrast. Our specialists also address accessibility gaps in custom themes and plugins, replace inaccessible components when necessary, and optimize content for usability without disrupting existing workflows.
- **Across all platforms**, Nelnet scopes remediation realistically by considering unique layouts, third-party tools, and customization levels. When certain components cannot be remediated, we advise on design alternatives or exclusions. **All remediation fixes are retested using automated scans, manual code inspection, and functional testing with assistive technology** to confirm improved usability for users. When possible, remediated content will be compatible with mobile devices.

Nelnet can also support PPA staff with direct remediation services. Throughout remediation, we will provide clear technical reports that describe identified errors and how they were corrected. Progress toward compliance with applicable standards will be tracked approximately weekly until closure.

We welcome the opportunity to support the various PPAs through template reviews, working sessions, and guided recommendations for content creators and managers.

Ongoing Advisory Services and Program Road Mapping

Workstream 2

Understanding disabilities and related laws, standards, and strategies is complex, and achieving accessibility is a fluid, dynamic process. The Nelnet Accessibility team partners with each client to establish and maintain an accessibility program capable of serving their customers effectively.

“To me, accessibility is all about adapting our environment to make sure that we can include everyone and the way they do things. It’s good to think about either someone who’s blind (*how are they going to use our products?*) or someone with developmental disabilities (*how are we going to make it easier for them?*). Usually by concentrating on things like that, it just makes the experience better for everyone. Really, all of us get impacted at some point in our lives.”

— [Redacted]
Accessibility Team Lead

The Nelnet Accessibility team will assist PPAs in incorporating accessibility checks and best practices into their processes, helping to identify structural and design issues and enabling rapid and comprehensive remediation to achieve accessibility now and into the future. We help clients by:

- **Developing holistic digital accessibility plans** that simultaneously address immediate concerns while preparing and architecting processes and policies that support long-term digital content compliance. Development of these accessibility plans is achieved through regular assessments, prioritizing findings for remediation, and staff training.
- **Implementing new regulations and standards** to confirm Nelnet—and our clients—are on the leading edge of accessibility practices. Employing best practices helps us optimize the user experience and maintain compliance.
- **Recommending tools** to assist clients in independent testing or remaining compliant over time.

By partnering with Nelnet to create a digital accessibility plan, PPAs can seamlessly integrate accessibility into their software development life cycle (SDLC). Incorporating digital accessibility is vital throughout planning and developing new web pages or documents to save both time and resources, preventing costly remediation efforts at the conclusion of the project. Nelnet can assist with integrating the following practices into clients’ long-term compliance goals ([Table 2](#)).

SDLC Stage	Best Practices
Planning	<ul style="list-style-type: none"> • Consider accessibility from the beginning, during the planning stages of the project. • Make it a standard practice to question how people with disabilities might interact with or face challenges with a product. • Provide comprehensive guidelines and best practices for designers, developers, and quality assurance engineers to reference throughout the project.

SDLC Stage	Best Practices
Design	<ul style="list-style-type: none"> Collaborate with stakeholders to define clear accessibility goals and requirements based on WCAG and local, state, and federal laws. Conduct regular design reviews with accessibility experts to identify and address potential issues early.
Development	<ul style="list-style-type: none"> Use semantic HTML to ensure that assistive technologies can interpret and interact with content correctly. Incorporate accessibility checklists and tools to identify and fix potential issues during this stage.
Quality Assurance	<ul style="list-style-type: none"> Implement accessibility testing throughout the SDLC. Include a combination of automated and manual testing, and involve people with disabilities in the testing process. Conduct regular accessibility audits to validate ongoing compliance with standards.

Table 2. Long-Term Accessibility Best Practices. *Incorporating accessibility at all stages of content creation will enhance PPA progress toward delivering compliant, user-centric content and services.*

Nelnet understands the DOJ’s final rule presents a key challenge for entities who may have digital assets that are managed by a third-party vendor. If a client does not have access to the source code, it may not be possible to fully remediate all the findings (e.g., brand colors) from a site’s accessibility audit. Nelnet can help PPAs prioritize the highest-risk issues across their digital assets, considering what is within and beyond their control, and provide guidance for addressing accessibility issues with third-party vendors.

We will implement a robust, end-to-end process for managing accessibility compliance across all public-facing assets, beginning with the distribution of an approved accessibility compliance requirement letter to all vendors. Leveraging proven methodologies from similar large-scale state and higher education accessibility engagements, Nelnet will track vendor responses in a centralized compliance log, proactively send reminders to non-responding vendors, and rigorously review each submission for completeness and accuracy. Our approach documents all accepted responses and notifies vendors promptly of their compliance status.

This process is supported by our deep expertise in WCAG 2.1/2.2 Level AA, ADA Title II, and Section 508 standards, as well as our commitment to transparent project management and rapid feedback loops. By integrating lessons learned from previous projects, our compliance management methodology is thorough and adaptable to evolving regulatory requirements. Our team’s dedication to accessibility, combined with our structured and communicative project management style, confirms that PPAs will achieve and sustain full compliance with federal and state mandates, setting a new standard for accessibility excellence.

We have collaboratively developed digital accessibility plans with several clients, including Colorado’s [REDACTED], [REDACTED], and [REDACTED] governments; refer to section 3.6 References and Independent Reviews in Tab 4 for additional information. Additionally, we collaborated with the [REDACTED] to achieve compliance with Colorado House Bill (HB) 24-1454, Grace Period for Noncompliance Digital Accessibility. This bill temporarily extended the state’s digital accessibility compliance deadline for public entities and state agencies that have demonstrated good faith efforts. Nelnet helped create a progress-to-date report for the [REDACTED] while staff continue to make progress toward compliance.

Training, Policy Development, and Program Governance Support

Training

Workstream 4

We provide ongoing, flexible accessibility training to help organizations maintain compliance with current and emerging legal accessibility requirements, including WCAG 2.2 Level AA, evolving mobile accessibility expectations, and future readiness for WCAG 3.0. Training addresses the practical application of WCAG success criteria across web and mobile platforms, focusing on risk-driven compliance areas, platform-specific mobile considerations, and real-world implementation guidance. Training materials are updated as standards, assistive technologies, and enforcement trends evolve.

Nelnet’s Accessibility team will create a customized training package to fit any agency’s needs. Based on information gathered in the project’s discovery phase, training will focus on the most relevant elements necessary for employees to perform their roles or build upon employees’ existing experience.

Our tenured accessibility experts leverage their experience to facilitate instructor-led seminars and create training documentation. Nelnet’s trainers provide a range of interactive and demonstration-based, live, virtual sessions, which include practical exercises that provide participants with hands-on experience implementing digital accessibility—transcending the passive learning offered by LinkedIn, YouTube, or other similar platforms. **Our demonstration-based training sessions are customized to include relevant client content.**

While comparing the Microsoft Word Accessibility training series to her word processing course in college, one attendee stated, “I learned more from them in a few hours than I did in an entire semester.”

With a role-based training approach, we tailor content to the responsibilities of specific staff, work with our clients to identify applicable staff roles, and map existing courses to each role to deliver relevant, practical instruction. [Table 3](#) provides examples of our live, virtual trainings aligned to specific roles.

Web Content Creators, Web Administrators, Application Developers	<ul style="list-style-type: none"> • Digital Accessibility Foundations • Video Accessibility (if applicable) • Web Accessibility Testing Basics
Document Authors	<ul style="list-style-type: none"> • Adobe Acrobat PDF Accessibility • Adobe InDesign Accessibility • Digital Accessibility Foundations • Microsoft Excel or Google Sheets Accessibility • Microsoft PowerPoint or Google Slides Accessibility • Microsoft Word or Google Docs Accessibility

Communications and Marketing Staff	<ul style="list-style-type: none"> • All courses in the Document Creators suite, as applicable • Digital Accessibility Foundations • Platform-Specific Social Media Accessibility (if applicable) • Video Accessibility • Web Accessibility Testing Basics
Product Owners, Procurement Staff, Legal/Compliance Staff, and Leadership	<ul style="list-style-type: none"> • Digital Accessibility Foundations • WCAG Unwrapped: A People’s Guide to Accessible Digital Experiences

Table 3. Live Virtual Training Topics. *This training suite equips web content creators, administrators, application developers, document authors, communications and marketing staff, product owners, procurement staff, legal/compliance staff, and leadership with role-specific instruction in digital accessibility foundations, accessible document and media production, social media accessibility, and essential web accessibility testing practices.*

This role-based model delivers targeted, efficient training aligned to day-to-day responsibilities and supports consistent application of accessibility best practices across teams.

We recommend live training sessions because participants have the opportunity to engage in a dialogue with the trainers. Participants can ask questions and seek solutions for any challenges they may have encountered in their journey toward creating more accessible digital environments. **This interactive approach creates a more effective and personalized learning experience.** Live training can accommodate up to 25 participants per session.

Following the initial training, our Accessibility team works with client leadership to determine whether additional training would be valuable to employees. Nelnet also provides clients with the following post-training deliverables.

- Training materials, such as slide decks, captioned videos, and how-to guides
- Specific guidance by topic (e.g., procurement, social media, etc.)
- Schedule for training cycles
- Resources, such as an accessibility checklist and maintenance documentation, to help clients incorporate accessibility checks and best practices into their daily processes

In addition to structured training, our experts can:

- Deliver **one-on-one coaching** for unique issues and small-group guidance on specific topics.
- Provide **flexible consulting hours** to support ongoing training needs, review and maintain existing policies and management plans, and suggest changes based on any gaps noted in annual audits to conform to updated laws and industry standards.
- Supply **on-demand courses** that are available to staff at any time, enabling users to continuously refresh and enhance their skills.

To incorporate personnel strategies into long-term [accessibility program management](#) practices, Nelnet recommends the following approach.

- **New Hire Training:** All new hires who will be creating/editing digital content should receive basic accessibility training.

- **Job Duty Training:** All new hires or people transitioning to positions with new job duties should receive accessibility training relevant to their duties, such as the following examples.
 - A person who updates web or mobile pages should receive HTML accessibility training.
 - A person who creates digital documents should receive training in Microsoft Word and PDF accessibility.
- **Refresher Training:** Personnel who create/edit digital content should regularly receive refresher training to reinforce skills and stay up to date with accessibility tools and techniques. Refresher training should occur at least annually.

Policy Development and Program Governance Support

Workstream 5

We leverage our team members' experience creating plans for internal and external clients, including government agencies, private companies, nonprofits, advocacy groups, and technology companies. After performing initial assessments, our team helps identify the highest-priority improvements, discusses next steps for remediation, and supports each client in developing policies and resources to implement their plans.

- **Digital Accessibility Policy:** Activities include collaborating with the client to develop a digital accessibility policy that aligns with current standards and best practices, and creating a procurement plan, accommodation plan, compliance process, exception process, and more.
- **Digital Accessibility Maintenance and Management Plans:** Activities include developing an accessibility strategy to be used throughout the life cycle of digital content, providing guidance on issue prioritization, and implementing a reporting dashboard for tracking compliance.
- **Digital Accessibility Plan Resources:** Activities include providing guidance on testing strategies to verify content is accessible, including automated tools and manual testing; developing internal checklists for publishing content; and assisting in developing accessible templates and other materials.

Our policy, governance, and program management workstream establishes a sustainable, policy-driven accessibility program aligned to ADA Title II, Sections 504 and 508, WCAG 2.1 AA or 2.2 AA, and applicable state rules. We develop or refine a complete policy suite that includes a digital accessibility policy, standards, publishing and remediation guidelines for web and documents, role-based checklists, and accessible procurement language with contract clauses that require ongoing conformance. These artifacts set clear expectations, enable consistent practices across roles, and verify new and updated content is created and reviewed for accessibility before publication.

We implement a governance framework that clarifies decision rights and escalation paths through a defined Responsible, Accountable, Consulted, and Informed (RACI) matrix and cross-functional steering committee charter. The committee, chaired by the accessibility coordinator, reviews risks, exceptions, vendor compliance, and progress against milestones. A phased program roadmap sequences inventory and foundation activities, representative assessments, prioritized remediation, role-based training for content authors and developers, and operations for continuous improvement. Vendor governance is integrated to secure ACRs, validate claims through demos or evaluations, and maintain conformance over the contract term.

To measure and improve outcomes, we baseline organizational maturity across policy, people, process, technology, and vendor management, then track advancement annually with clear key performance indicators (KPIs). Typical measures include percent of active content meeting standards, accommodation turnaround, audit pass rates, and vendor ACR coverage, reported through dashboards and an annual accessibility report. Deliverables include the finalized policy and standards, role-based checklists, the governance framework and steering committee charter, escalation and exception procedures, a phased roadmap with a prioritized remediation backlog and training plan, maturity assessment results with target states, KPI definitions, reporting templates, and ongoing advisory support to sustain the program.

Document, PDF, and Media Accessibility Consulting and/or Remediation Services

We help clients navigate DOJ requirements by grounding every remediation and consulting engagement in a risk-based, standards-aligned approach that prioritizes digital assets according to regulatory impact, user impact, and operational need. Our process begins with detailed assessments that identify barriers across documents, PDF files, and multimedia, followed by structured prioritization based on factors such as legal exposure, content criticality, frequency of use, and archival status. We then develop phased remediation plans that align with WCAG 2.1 or 2.2 AA, Section 508, and ADA Title II obligations, ensuring clients understand which assets must be addressed first to meet DOJ expectations.

Throughout remediation, we provide clear reporting, recommended fixes, and validation testing using automated, manual, and assistive technology-based methods, supporting sustainable compliance and helping clients embed accessibility into governance, workflows, and long-term maintenance practices.

We deliver document and multimedia accessibility—including auditing, remediation, and training—at scale by combining robust standards with repeatable workflows in the following ways.

- **PDFs:** We apply rigorous tagging, reading order, alt text, and form field practices verified through structured manual assistive technology testing and tailored to real user journeys.
- **Presentations:** Our team remediates slide structure, reading order, and link/graphic semantics, then validates with keyboard and screen reader passes to confirm accurate announceability in normal and presentation modes.
- **Video:** Nelnet’s quality policy requires descriptive narration where appropriate, platform captions, and distribution of accessible transcripts, with clear quality assurance checkpoints so these steps become routine rather than exceptional. To make compliance sustainable, we publish practical standards, checklists, and how-to templates (e.g., Microsoft Word authoring guidance, image description standards) and pair them with hands-on training programs for creators, editors, and reviewers.

Our team’s recent work includes a combined template and file audit for a large municipality, along with our execution playbooks and training materials and captioning/transcript requirements codified in our internal Quality Assurance Process and Policy.

The following further details how the Nelnet Accessibility team can support PPAs through [document accessibility services](#) and [video, audio, and multimedia accessibility consulting](#).

Document Accessibility Services

Workstream 6

Many of our clients have faced an overwhelming number of PDF documents that require assessment and remediation. The Nelnet Accessibility team will support PPAs with document accessibility services by using a phased approach to prioritize the backlog while also training agency staff to repair the source document, which will limit future remediation needs. For long-term sustainability, Nelnet can help PPAs establish and/or refine accessible document templates and style guides, and guide content creators to adopt accessible content creation practices as part of our customized training services. We can also provide individualized, one-on-one or small-group coaching from an accessibility trainer to address challenging or unique topics, such as complex Microsoft Word or PDF accessibility issues. Refer to the [Training, Policy Development, and Program Governance Support](#) section for additional information.

Depending on agency needs and backlog volume, if a PPA requests direct remediation services, Nelnet can leverage our partnership with The Viscardi Center (TVC), a third-party vendor with extensive experience in digital accessibility, for access to document remediation and a suite of audio/visual media services, including post-production captioning. **TVC has certified accessibility specialists—including professionals with disabilities**—who enable equal access to all users through accessible content.

High-Volume Document Remediation Capabilities

Using its proprietary software, **TVC can remediate approximately 10,000 pages of content per month** while meeting industry standards and guidelines.

TVC's process includes a secure intake and assessment of source files. Remediation is performed using proprietary technology and verified through automated and manual testing, including assistive technology checks with screen readers such as NVDA and JAWS. Nelnet will work with TVC's dedicated project management team, which will oversee all phases, maintain transparent communication, and provide detailed compliance documentation and reporting.

Video, Audio, and Multimedia Accessibility Consulting

Workstream 7

Nelnet has a strong track record and deep expertise in directly remediating and supporting clients' remediation of presentations and videos to meet digital accessibility standards. Our experience spans a wide range of formats and platforms, applying WCAG principles, including proper color contrast, audio descriptions, and optimized slide structure and navigation for assistive technologies. Our team is well-versed in both proactive accessible design and post-production remediation, enabling us to deliver inclusive, compliant multimedia experiences that meet the needs of all users.

We can also support third-party vendor selection and management. For example, our trusted partner TVC can help remediate multimedia files for PPAs, including video content, by providing comprehensive post-production captioning services for compliance with WCAG 2.1 AA or 2.2 AA, Section 508, ADA, and Federal Communications Commission (FCC) requirements, as mandated by each PPA's digital accessibility objectives. TVC's process includes the creation of accurate open and closed captions in more than 20 languages, with flexible turnaround options to meet project timelines.

TVC’s captioning services are supported by strict service level agreements (SLAs) for quality and turnaround, and all work is verified through rigorous quality assurance protocols, including the use of National Court Reporters Association (NCRA) Certified Realtime Captioners and ongoing performance monitoring. This approach verifies that all client public-facing multimedia content is perceivable, operable, understandable, and robust, thereby supporting equal access and full WCAG Level AA conformance.

Additionally, TVC’s video remote interpreting (VRI) services provide immediate, high-quality access to certified interpreters through a secure video platform. VRI is ideal for organizations seeking flexible, reliable communication access for people who are deaf or hard of hearing. With VRI, interpreters connect remotely and access audio live through a secure platform link. The consumer can view the interpreter in real time on a laptop, tablet, or other device—providing the same interactive experience as in-person interpreting, without the need for travel or on-site coordination.

Collectively, Nelnet and TVC’s capabilities deliver content that is fully accessible to people with limited or no hearing or vision and in compliance with all relevant regulations and best practices.

We look forward to exploring how we can help PPAs review tools and integrations that support accessible streaming, players, and media platforms based on each agency’s needs.

Workstreams

Nelnet has the experience and established processes to support all seven workstreams identified in the solicitation.

- ✔ **Workstream 1 – Accessibility Assessments and Audits** (refer to the [Accessibility Assessments and Audits \(Web, Mobile, Documents, Multimedia\)](#) section)
- ✔ **Workstream 2 – Program Roadmaps, Strategy, and Ongoing Advisory** (refer to the [Ongoing Advisory Services and Program Road Mapping](#) section)
- ✔ **Workstream 3 – Remediation Planning, Design, and Implementation Support** (refer to the [Remediation Planning, Design Guidance, and Implementation Support](#) section)
- ✔ **Workstream 4 – Training, Education, and Capacity Building** (refer to the [Training](#) section)
- ✔ **Workstream 5 – Policy, Governance, and Program Management** (refer to the [Policy Development and Program Governance Support](#) section)
- ✔ **Workstream 6 – Document and PDF Accessibility Services** (refer to the [Document Accessibility Services](#) section)
- ✔ **Workstream 7 – Video, Audio, and Multimedia Accessibility Consulting** (refer to the [Video, Audio, and Multimedia Accessibility Consulting](#) section)

Ability to Support Agencies Nationally

Nelnet supports agencies across the U.S. with policy, governance, and program management for digital accessibility. Our national delivery combines reusable, proven artifacts with local adaptation, supporting distributed work across U.S. time zones, enabling rapid turnaround, sustained throughput, and reliable long-term partnership for clients with large and continuously evolving digital footprints. We standardize assessments, reporting formats, and remediation backlogs so results are comparable across programs, then tailor priorities and engagement models to each client’s statutes, processes, and platforms.

will assign roles as appropriate to deliver services on time and on budget within workstreams 1 through 3 and 5 as requested by PPA clients.

Specifically for training (workstream 4), Nelnet offers a range of live, virtual courses ([Table 4](#))—charged per course—that can match the needs of various roles within PPAs. All training is provided by experienced accessibility trainers and will be tailored for each agency. We recommend our Digital Accessibility Foundations session for all users to establish a baseline understanding of accessibility; from there, clients can select from our course catalog as appropriate for their staff, considering users’ roles and skill levels. Refer to the [Training](#) section for additional information.

To maximize participant engagement and development of practical skills, each class is limited to 25 participants. Live training requires two weeks’ notice to ensure availability and preparation. Recordings of live training sessions will be provided to the client within one week of the training date.

Title	Duration	Cost
Digital Accessibility Foundations	3 hours	\$2,625.00
Microsoft Word Accessibility	4 hours	\$5,100.00
Microsoft PowerPoint Accessibility	3 hours	\$3,825.00
Microsoft Excel Accessibility	3 hours	\$3,825.00
Microsoft Teams Accessibility	1 hour	\$1,875.00
Google Docs Accessibility	1.5 hours	\$2,362.50
Google Sheets Accessibility	1.5 hours	\$2,362.50
Google Slides Accessibility	1.5 hours	\$2,362.50
Adobe Acrobat PDF Accessibility Basics	4 hours	\$5,100.00
Alt Text for Social Media	1 hour	\$1,875.00
Platform-Specific Social Media Accessibility	1 hour	\$1,875.00
Videos	1 hour	\$1,875.00
Web Accessibility Testing Basics	1.5 hours	\$2,062.50
Adobe InDesign Basics	3 hours	\$3,825.00
WCAG Unwrapped: A People’s Guide to Accessible Digital Experiences	1.5 hours	\$1,462.50
Accessibility Coaching	Varies	Varies

Table 4. Rates for Live Training Courses. Live training is charged per course and includes up to 25 participants and a recording of the session.

The following solution components are priced depending on the usage type.

- **Document Remediation:** Priced per page
- **Multimedia Remediation:** Priced per minute
- **General VRI Services:** Priced hourly with a minimum hour commitment

[Table 5](#) provides the rates associated with the potential remediation services within workstreams 6 and 7.

Role	Rate
Workstream 6	
Document Remediation Services	\$8.00 per page
Workstream 7	
Multimedia Remediation: Closed Caption/Transcription	\$4.40 per minute of video
Multimedia Remediation: Encoding for Open Captioning	\$17.60 (one time)
Multimedia Remediation: Extended Audio Description	\$30.70 per minute
Remote Communication Access Realtime Translation (CART) (Standard Event)	\$253.50 per hour
Remote CART (Advanced Event)	\$316.90 per hour
General VRI Services	\$27.10 per hour

Table 5. Document Accessibility and Multimedia Services Pricing. Rates are based on content complexity and serve as a baseline for document and multimedia services conversations with PPAs.

Nelnet welcomes the opportunity to discuss assessment and remediation services, accessibility training, and consulting options with interested PPAs to best meet their needs and priorities.

Volume- or Portfolio-Based Pricing

Each prospective opportunity will be evaluated to determine whether volume- or portfolio-based pricing applies.

Discounts

Discounts will apply in the event a PPA engages in a three-year contract term. Additionally, PDF remediation that exceeds 1,000 pages is eligible for a 10 percent discount. Each prospective opportunity will be evaluated to determine whether volume- or portfolio-based pricing applies.

Services Ineligible for Discounts

Each prospective opportunity will be evaluated to determine whether discounts may apply.

Public Entity Pricing Comparison

Nelnet has contracts with numerous public and private clients across a range of industries. As such, our finance team is adept at understanding various pricing models applicable to those entities. In addition, the team is aware of different state and local laws that can affect costs for services rendered. With this knowledge, our objective is to ensure funds are being used effectively and efficiently, and that our pricing is reasonable and realistic.

1.3 Changes, Additions, and Warranties

Introduction of New Products, Modules, or Services

As new products and services are added to our offerings, Nelnet performs market research to confirm our pricing remains competitive across the industry. We may also offer tiered pricing, typically evaluated on a case-by-case basis, which would enable a client to choose specific services as opposed to a bundle. Nelnet can negotiate with agencies to determine a pricing model that is mutually beneficial.

Nelnet has an accessibility team as a service (ATaaS) model, where we offer our team for a specific number of hours per month, allowing a client to schedule work across any period of time. This provides a client the flexibility to schedule work to match each client's pace. Refer to the [Additional Pricing Proposal\(s\)](#) section for additional information.

Service Warranties

The following represents the SLAs we base our work against.

- **Accessibility Standard:** All deliverables shall conform to WCAG 2.1 AA or 2.2 AA (or higher where required by jurisdiction) across web, mobile, documents, and multimedia. To measure this, we map our formal assessment results to the respective success criteria, targeting 98 percent or more of the applicable criteria passing per deliverable.
- **Assistive Technology Coverage:** The Accessibility team must test against a representative assistive technology matrix. We target success across all source combinations listed for critical user journeys. To measure this, our testing is documented and reproducible on the following.
 - **Desktop:** JAWS and Chrome, NVDA and Firefox, and VoiceOver and Safari
 - **Mobile:** TalkBack (Android), VoiceOver (iOS)
 - **Magnification/Zoom:** Operating system and browser zoom to 400 percent (200 percent on mobile)
- **Report Quality:** Each issue must include WCAG criterion, severity, impacted assistive technology/ operating system/browser, reproducible steps, code/location, screenshots or video, and code-level remediation guidance.
- **Accuracy:** We track false positives.

Additional Pricing Proposal(s)

Nelnet also offers our ATaaS model, through which we provide the services of our team for a fixed number of hours per month at a fixed cost. Those hours can be used to address accessibility needs such as consulting, auditing, and remediation tasks for websites, applications, and other digital content—depending on the highest priorities of the month.

Under the ATaaS model, a client will have Nelnet subject matter expert resources available on demand to augment its existing staff—providing flexibility to quickly reprioritize tasks, focus team members on the most important issues, and make decisions in real time. We will collaborate with client stakeholders to further define the project scope and prioritize tasks with the greatest impact on their end users.

Based on the scope, Nelnet will discuss options with each PPA to recommend an appropriate number of hours and/or adapt the team size to meet budgetary constraints, remaining transparent about any impact to the proposed project plan.

1.4 Cooperative and Administrative Fee

Understanding and Agreement

Nelnet understands and agrees to the administrative fee structure outlined in the solicitation.

Administrative Fee

The administrative fee is priced separately from hourly or per-unit costs and will have no impact on costs related to services Nelnet provides. This helps ensure agencies receive the best pricing available and keeps rates competitive within the market.

1.5 Additional Information

The following assumptions inform Nelnet's services and pricing structure.

- Project scope adjustments that increase complexity or scale will require a change order.
- The risk-based assessment scope will only include workflows within the agreed-upon, targeted assets at the time Nelnet begins testing. Scope will not include any workflows that are added or modified after testing begins. For mobile application testing, the scope will not include any workflows that open externally in a browser or another application. Third-party vendors, such as embedded tools or plug-ins, are excluded unless specifically incorporated in an agreed-upon sample.
- The client will make every effort to respond to Nelnet within two business days regarding scope and access questions. The timeline is dependent on timely deliverables from the client and staff availability. Planned content outages may affect the proposed schedule.
- Nelnet will work within our own ticketing system (Atlassian Jira). If required, Nelnet can use a client's ticketing and/or reporting system; however, it may increase the time needed to complete the project. The client will provide necessary training, reporting, and technical support for its ticketing system throughout the life of the project.
- Testing will be performed in a pre-production, development environment and will use anonymized test data wherever possible. If certain personally identifiable information (PII) is required to test a particular function and there is no other way to anonymize the data, the client will dispose of any and all PII from Nelnet associates at the conclusion of the project. For example, if a Nelnet associate uses a personal cell phone and number to test text messages that the site/app would routinely send, the phone number and any PII collected during the exchange will be safely purged from all client data repositories and file systems.
- Nelnet can provide weekly updates on project progress and deliverables completed/the number of hours used. More frequent meetings with the client (such as participation in daily meetings) may impact project progress and the amount of time required.
- Nelnet anticipates no travel for projects; however, we can provide hourly rates for on-site training if a client determines travel to be a requirement.
- Pricing for PDF file remediation and captioning is at the standard services rate. For jobs with a required turnaround of five business days or fewer, rush pricing rates may apply.
- The following assumptions apply to document and multimedia remediation.
 - File versions, whether document or multimedia, uploaded for remediation services into TVC's secure portal are considered "final versions" and will not undergo any additional editing.

- If file versions, whether document or multimedia, require additional editing after accessibility remediation has already been performed, then additional costs may be incurred.
- Deliverable turnaround time may vary depending on complexity and volume of the documents and pages.
- TVC will provide edits/corrections of transcription and Web Video Text Tracks captioning files upon request.