



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

Tab 5: Value-Added  
Services

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Alliance for Innovation

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**SUBMITTED BY**

Nelnet Government Services, LLC

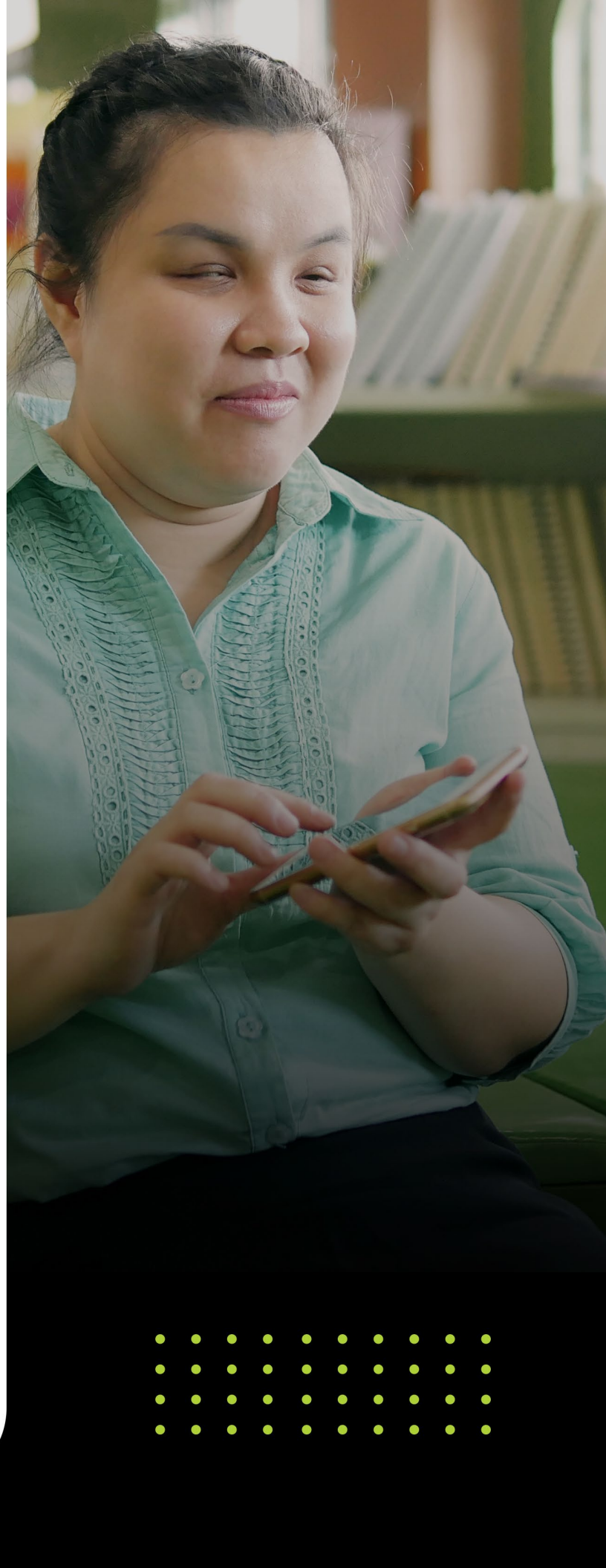
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## Glossary of Abbreviations and Acronyms

Abbreviation/Acronym	Definition
<b>ACR</b>	Accessibility Conformance Report
<b>ADA</b>	Americans with Disabilities Act
<b>AFI</b>	Alliance for Innovation
<b>CSUN</b>	California State University, Northridge
<b>DHS</b>	U.S. Department of Homeland Security
<b>DOJ</b>	U.S. Department of Justice
<b>HIRE</b>	Halting International Relocation of Employment
<b>IAAP</b>	International Association of Accessibility Professionals
<b>KPI</b>	Key Performance Indicator
<b>Nelnet</b>	Nelnet Government Services, LLC
<b>PDF</b>	Portable Document Format
<b>PPA</b>	Participating Public Agency
<b>SaaS</b>	Software as a Service
<b>SDLC</b>	Software Development Life Cycle
<b>VPAT</b>	Voluntary Product Accessibility Template
<b>WCAG</b>	Web Content Accessibility Guidelines

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

## Tab 5: Value-Added Services

The following information further describes how Nelnet Government Services, LLC (Nelnet)'s Accessibility team and our services will add value to the Alliance for Innovation (AFI), Edge Public, and participating public agencies (PPAs).

### The Nelnet Benefit

- **Fully Domestic Digital Accessibility Team:** Nelnet establishes effective, frequent communication between our team—which includes accessibility engineers and a project manager—and clients, and successfully delivers timely results. Many vendors may promote an onshore workforce; however, their manual testing resources operate offshore. In these structures, quality control across team members can be inconsistent, and translation can lead to misinterpreted findings and yield falsely flagged results. Additionally, as federal policy debates (e.g., the Halting International Relocation of Employment (HIRE) Act) move to penalize offshore delivery, our fully domestic digital Accessibility team minimizes compliance uncertainty and will help PPAs maintain alignment with emerging procurement and data-handling requirements.
- **Program Governance That Reduces Risk and Sustains Compliance:** We provide an accessibility governance framework that goes beyond point-in-time audits. It includes a standing steering committee charter, risk triage, exception handling, vendor oversight, and measurable key performance indicators (KPIs) reported through dashboards and an annual accessibility report. Deliverables include finalized policy and standards, role-based checklists, KPI definitions, and reporting templates. This structure accelerates early wins while building a durable operating model that outlasts the contract term.
- **Software as a Service (SaaS) and Vendor Accessibility Compliance Management:** Many agencies face accessibility challenges with third-party platforms where they cannot alter source code. We manage vendor compliance at scale by standardizing the outreach packet, tracking responses in a centralized log, validating submissions, and issuing clear determination letters. This repeatable process closes gaps across the SaaS portfolio and is tuned for Web Content Accessibility Guidelines (WCAG) 2.1 AA, Americans with Disabilities Act (ADA) Title II, and Section 508.
- **Code-Ready Remediation Guidance for Faster Fixes:** Our findings reports do more than identify issues. We prioritize by user impact, add rationale, cite techniques used, and include recommended remediation with code suggestions and links for further research. This format shortens developer turnaround and improves first-pass fix rates.
- **U.S. Department of Justice (DOJ) Title II Expertise and Roadmaps to the 2027 Milestone:** We align deliverables to the updated DOJ Title II rule for website and mobile accessibility, and design workplans that help public entities demonstrate steady progress toward the April 26, 2027, compliance deadline. Our proposals and roadmaps are already structured to those expectations.
- **Maturity-Based Improvement with Measurable Outcomes:** Nelnet has established organizational maturity across policy, people, process, technology, and vendor management. We track advancement with defined KPIs, such as percent of active content meeting standards, accommodation turnaround, audit pass rates, and vendor Accessibility Conformance Report (ACR)

coverage. We supply the dashboard and report templates so leaders can see outcomes, not just activities.

- **Hands-On Training, Coaching, and Change Enablement:** Beyond custom training sessions, we deliver role-specific coaching for content authors, developers, designers, and product owners, integrated with remediation sprints and quality assurance. This enables each team to ship accessible changes continuously rather than relying on periodic audits. We can also support webinars upon request.
- **Assistive Technology Integration and User-Centered Validation:** Our approach incorporates real-world assistive technologies that our clients may use, such as screen readers and speech recognition, and we can conduct live validation sessions to confirm fixes work for end users with disabilities.
- **Policy, Standards, and Voluntary Product Accessibility Template (VPAT)/ACR Support:** We provide templates and expert support to produce and maintain accessibility policies, standards, and ACRs using the VPAT format, giving procurement and legal teams the artifacts they need to manage risk and vendor accountability.
- **Proven Government Experience:** Our team’s approach has been selected by various state and local entities for accessibility assessments, remediation, roadmap development, and consulting services. Our depth verifies our methods are practical in public sector environments with complex stakeholders and legacy platforms.

## Additional Team Qualifications

Some members of our team are individuals with disabilities, whose **firsthand experience with assistive technology, extensive industry knowledge, and leadership in the accessibility community enhances our suite of accessibility services with a knowledgeable human component.** These team members inspire our team—and the entire Nelnet, Inc. organization—to:

- **Develop accessibility** as a skill set.
- **Integrate accessibility** into our processes and embrace it as a vital component of Nelnet’s culture.
- **Constantly improve** how we serve both our customers and our clients’ customers.

Our team’s diversity directly informs our understanding of other people with disabilities and our ability to help clients remove barriers for their end users. We can help make content accessible for:

- ✓ People without vision.
- ✓ People with limited vision or who have limited color vision.
- ✓ People without hearing or with limited hearing.
- ✓ People with limited cognition, learning, or understanding.
- ✓ People with limited dexterity, limited strength, or reach.

Our team members have expertise in a variety of methodologies, with a preference for an Agile approach for its iterative development process and flexibility. Employing this methodology enables us to apply each team member’s particular expertise as appropriate to a project.

## Professional Certifications

Nelnet's Accessibility team members have earned various certifications, including the following.

- International Association of Accessibility Professionals (IAAP) Certified Professional in Accessibility Core Competencies
- IAAP Web Accessibility Specialist
- U.S. Department of Homeland Security (DHS) Section 508 Trusted Tester

**IAAP certifications** cover a range of accessibility topics—including testing, remediation, assistive technologies, and program management—aligned with newer WCAG standards.

The **Trusted Tester certification** demonstrates deep expertise in Section 508 compliance testing.

## Accessibility Industry Presence

Our accessibility experts also promote disability awareness and are actively involved in the greater accessibility community. Team members have shared their knowledge at numerous accessibility and disability advocacy conferences and events, including the following.

- **Accessing Higher Ground:** An accessible media, web, and technology conference focusing on universal design, the creation of accessible resources, and legal and policy issues
- **AccessU:** An annual conference where content creators, technologists, policymakers, and accessibility advocates converge to gain accessibility skills and learn how to implement accessibility tools and practices into their professional environments
- **California State University, Northridge (CSUN) Assistive Technology Conference:** A forum—40 years running—where attendees explore technological innovations and accessibility advancements

### Recent Industry Engagement

In 2025, our associates presented [“WCAG Unwrapped: A People’s Guide to Accessible Digital Experiences”](#) at the CSUN Assistive Technology Conference and at AccessU. During this interactive session, our experts guided participants through applying WCAG principles to real-life scenarios to create accessible digital experiences.

Presentation topics have ranged from promoting people with disabilities in the workforce to developing accessible Portable Document Format (PDF) files and incorporating accessibility into a software development life cycle (SDLC).