



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

**Tab 4: Qualifications and  
Experience; References**

**AFI-2025-118**

Alliance for Innovation

January 2026

**SUBMITTED BY**

Nelnet Government Services, LLC

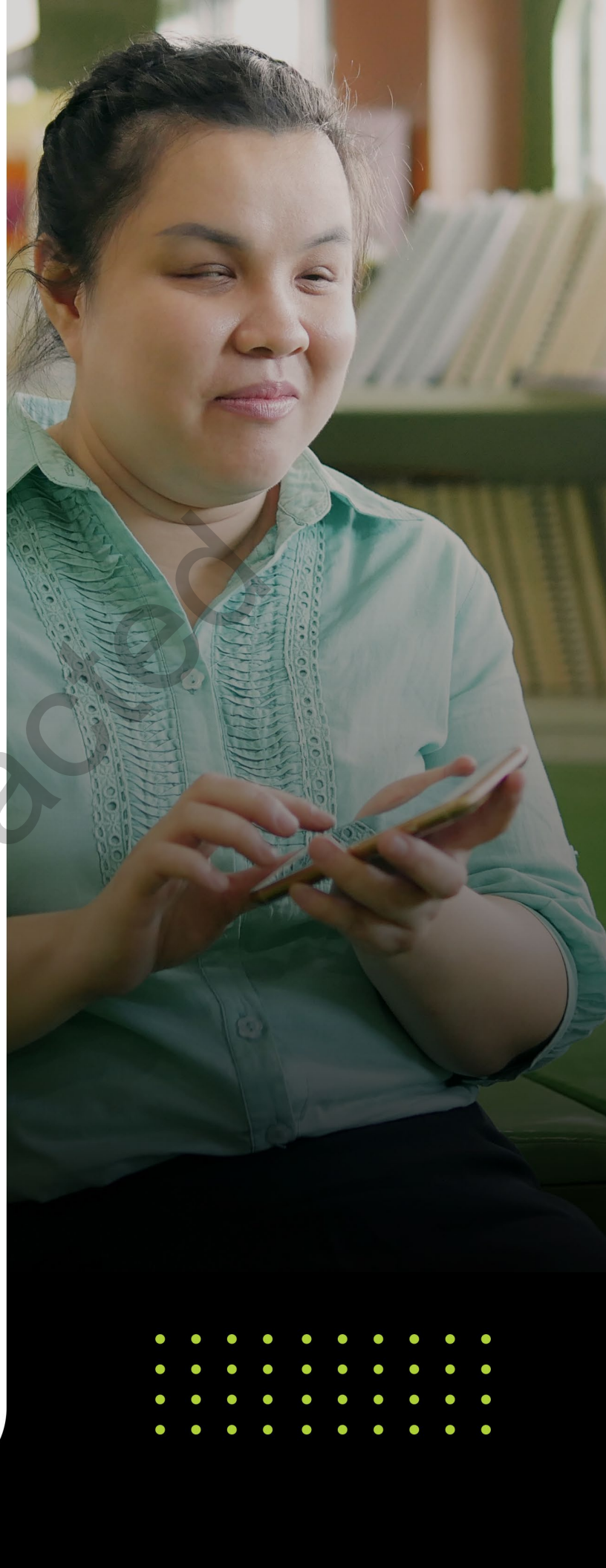
GSA Contract #47QTCA23D0069

John Turner

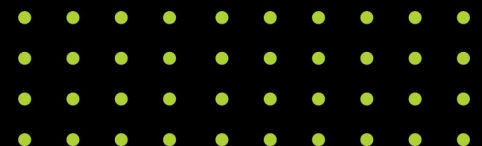
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Redacted



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## Glossary of Abbreviations and Acronyms

Abbreviation/Acronym	Definition
ADA	Americans with Disabilities Act
AFI	Alliance for Innovation
AI	Artificial Intelligence
████████	████████
ATaaS	Accessibility Team as a Service
CCaaS	Contact Center as a Service
CSUN	California State University, Northridge
DHS	U.S. Department of Homeland Security



Abbreviation/Acronym	Definition
DOJ	U.S. Department of Justice
[REDACTED]	[REDACTED]
IAAP	International Association of Accessibility Professionals
ICT	Information and Communications Technology
IT	Information Technology
[REDACTED]	[REDACTED]
Nelnet	Nelnet Government Services, LLC
[REDACTED]	[REDACTED]
PDF	Portable Document Format
PPA	Participating Public Agency
SaaS	Software as a Service
WCAG	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 4: Qualifications and Experience; References

### 3.1 Company Information

#### Authorized Agent

Table 1 provides the contact information for John Turner, Nelnet Government Services, LLC (Nelnet)’s authorized agent.

<b>Name</b>	John Turner
<b>Title</b>	Chief Information Officer
<b>Mailing Address</b>	7150 South Fulton Street Centennial, CO 80112
<b>Phone Number</b>	303.696.5671
<b>Email Address</b>	<a href="mailto:John.Turner@Nelnet.net">John.Turner@Nelnet.net</a>

*Table 1. John Turner’s Contact Information. John will be the Alliance for Innovation (AFI)’s point of contact regarding the details of Nelnet’s response.*

#### Company Profile

Nelnet, Inc.—headquartered in Lincoln, Nebraska—is an innovative company of more than 4,650 associates, with a history of delivering education-related products and services and student loan asset management. Our company was founded with one purpose: *to serve others*. Since 1978, Nelnet, Inc. has grown to become one of the nation’s largest, most respected student loan servicers and a committed partner across various industries, including technology, consumer loan onboarding and servicing, education, and finance.

**America’s Dream Employers**

Forbes named Nelnet, Inc. one of the country’s dream employers on its inaugural list in 2025. Dream employers offer employees the chance to do inspiring work, to pursue their passions, and to collaborate with colleagues within a culture of camaraderie.

Nelnet Government Services, a wholly owned subsidiary of Nelnet, Inc., and our division affiliates provide innovative technology solutions and high-quality customer experiences for 170-plus clients ranging from federal, state, and local government agencies to nonprofit organizations, commercial businesses, and financial services institutions. Our division is geographically dispersed, with more than 2,770 associates working from our corporate offices in five states—Nebraska, Colorado, Idaho, Texas, and Wisconsin—and in home offices across the nation.

Our public sector solutions include:

- **Accessibility services**, including accessibility assessments, reporting, remediation, consulting, and training, to help clients deliver digital content that is accessible to all users.
- **Business process outsourcing**, including contact center support and back-office processing, to deliver high-quality customer service in complex, regulated markets on behalf of clients.

- **Contact center as a service (CCaaS)** solutions tailored to clients’ needs. NICE CXone is a fully cloud-based, agile customer experience platform that incorporates the complete omnichannel experience, and includes suites of tools for workforce management, quality management, and advanced artificial intelligence (AI) capabilities.
- **Data analytics and AI**, delivering advanced analytics, custom dashboards, warehousing, and AI-driven tools to help clients better serve their customers.
- A **financial aid management system** that enables state agencies and postsecondary institutions to award, pay, and manage financial aid program funds.
- **Student loan servicing** on behalf of federal and state clients; services include contact center support, back-office processing, mail intake and print fulfillment, and servicing systems.
- **Technology services**, such as custom development and modernization, information security, legacy application services, and user interface/user experience design.

From our beginnings as a student loan servicer to the diverse company we are today, we have steadily expanded with a focus on making a positive impact on our customers’ and clients’ lives. Our various customers and clients may have different goals, but they all rely on us to help them achieve those goals. That is why we take time to truly understand them—we **learn what matters to them, research what will meet their needs, empathize with those needs, and fully commit to helping them succeed.**

### Current Client Scope

Nelnet, Inc. provides a variety of services to clients and customers in the following markets.

- Education
- Financial services
- Federal, state, and local government
- Healthcare
- Nonprofits
- Professional services

Across our division, Nelnet has local government-level clients in multiple states, as well as two federal clients and state-level clients in 14 states.

Using best practices to provide up-to-date, accessible information and optimize the user experience, the Nelnet Accessibility team has worked on varying project scopes for these entities, as well as nonprofit organizations, while providing services similar to those detailed within AFI’s workstreams. The following is a sample of our work.

- **Colorado State and Local Agencies:**

Nelnet engages with Colorado state agencies, such as the [REDACTED], [REDACTED], [REDACTED], and the [REDACTED].

#### Helping Create an Accessible Colorado

Our proven approach and expertise have positioned Nelnet as a preapproved vendor for the Colorado OIT’s Information Technology (IT) ADA Accessibility Auditing and ADA Remediation enterprise agreements to support state government agencies for both testing and remediating accessibility violations.

Among the limited number of providers, **Nelnet is one of only two companies granted an award into both pools.** Through those placements and additional partnerships with local governments, we have assisted—and continue to support—several Colorado entities with accessibility needs in relation to state legislation and the OIT Technical Standard.

[REDACTED], through the Governor’s Office of Information Technology (OIT) Americans with Disabilities Act (ADA) enterprise agreements, such as the [REDACTED], the [REDACTED], and the [REDACTED]. For one ongoing project, Nelnet’s accessibility experts worked closely with our mobile developers to resolve accessibility issues in the myColorado™ app. The official state mobile app has been downloaded by more than 1.8 million Coloradans and provides secure, convenient access to state services.

- [REDACTED]: Our contract with the [REDACTED] includes engaging with specific government departments and assisting in their efforts to provide more accessible digital content. We assess the accessibility level of existing websites and documents, provide detailed assessment reports to achieve compliance, and host knowledge-share sessions to introduce digital accessibility across city departments.
- [REDACTED]: As part of our contract with the [REDACTED]—and one of the largest in the U.S.—Nelnet assessed digital products, recommended compliant solutions, and reviewed accessibility conformance documentation.
- **U.S. Department of Education:** Since 2009, the Nelnet Accessibility team has supported accessibility efforts for multiple large federal contracts for the U.S. Department of Education. Services include website assessment and remediation, various types of document remediation, and consulting and training. The solutions created by our Accessibility team have improved the user experience for 12.4 million student loan borrowers.
- [REDACTED]: Nelnet partnered with [REDACTED] to audit a selection of its web pages, documents, and eNews using WCAG 2.1 and Section 508 standards. For this project, we remediated digital content, provided consulting and guidelines to incorporate accessibility into [REDACTED]’s processes, established a content review schedule, and provided fundamental web and document accessibility training.
- [REDACTED]: Our team partnered with [REDACTED], a student loan guarantor and nonprofit education philanthropy, to provide website assessment and remediation, as well as Portable Document Format (PDF) and Microsoft PowerPoint document remediation.
- [REDACTED]: Nelnet partnered with [REDACTED] to assist with modernization of unemployment insurance systems for a state agency. The Nelnet Accessibility team performed accessibility reviews for the state’s digital products, facilitating strategy sessions with [REDACTED]’s implementation team to ensure solutions were built with accessibility in mind at every stage of product development.

## 3.2 Accessibility and Government Experience

### Experience Providing Digital Accessibility Services

**Nelnet has provided accessibility services for more than 16 years.** Our focus on accessibility grew from one associate’s passion, leading to the creation and expansion of a dedicated team of experts, as well as the adoption of accessibility as part of our companywide culture.

Through our team members’ work in highly regulated industries, we have developed **solutions that rapidly identify structural and design elements to meet and exceed compliance levels.** Ingrained best practices and established tools and processes help us collaborate with each other and with clients in



We have provided services for the following additional sample of clients to support multiple agencies, departments, or municipalities.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

### Financial Stability and Support Capacity

Publicly traded (NYSE: NNI), Nelnet, Inc. has a market cap of \$4.78 billion (as of December 31, 2025) and is investment-grade rated with more than 45 years of experience in highly regulated financial and governmental markets. Nelnet, Inc. is financially strong, as evidenced by total assets and equity of \$13.9 billion and \$3.6 billion respectively (as of December 31, 2025), and has a \$495.0 million unsecured line of credit that matures in September 2026.

Financial statements are publicly available at [NelnetInvestors.com](https://www.nelnet.com/investors) in Nelnet, Inc.’s annual report and U.S. Securities and Exchange Commission (SEC) filings. Financial information for Nelnet Government Services is reported in the Loan Servicing and Systems operating segment.

## 3.3 Capacity and Reach

### Ability to Provide Full Scope of Services

As described in section 1.1 Solution Offering and Pricing Structure in Tab 2, Nelnet has the experience and capabilities to provide the full scope of products and services described in AFI’s solicitation to agencies throughout the U.S. With **more than 16 years of service** to clients spanning local, state, and federal government, as well as the private sector, **Nelnet’s Accessibility team brings experience with WCAG 2.1 AA and 2.2 AA, Section 504/508 of the Rehabilitation Act, and the ADA (including Title II and Title III requirements)**, executing on a range of services that includes:

- **Testing, evaluating, and remediating complex, responsive digital products.** Our team leverages a hybrid approach to accessibility audits. As the first step in our process, we conduct automated testing, when appropriate, to verify our work against published standards. We then peer-review documents and workflows, which includes manual testing and functional verification using assistive technology that our clients and customers may use. We evaluate public-facing websites, documents, internal tools, etc., and provide guidance or remediation assistance to bring assets into compliance.
- **In-depth reporting.** We deliver comprehensive post-assessment reporting with descriptions, priority/severity designations, and a recommended remediation for each finding, including code suggestions (if known) and opportunities to improve the user experience.
- **Developing and executing holistic digital accessibility and remediation plans** that address immediate concerns while architecting processes and policies that ensure digital content is compliant into the future. We work with clients to identify an accessibility strategy; guide teams through training, process adjustments, and implementation; and integrate accessibility into all stages of website and

document creation. We also perform hands-on remediation of websites, apps, documents, and multimedia content to meet WCAG 2.1 AA or 2.2 AA standards, verifying compatibility with assistive technologies.

- **Training.** Nelnet trainers deliver live, virtual training on the fundamentals of digital accessibility, focusing on the most relevant elements necessary to support clients’ primary websites and systems and equipping our clients’ employees to meet the highest standards of accessibility.
- **Implementing new regulations and standards** so we and our clients are on the leading edge of accessibility. For example, though not required by the DOJ’s final rule, our accessibility standards and processes typically reflect WCAG 2.2 because the updated guidelines provide better accessibility for users and help clients stay ahead of future updates to regulations.

The Nelnet Accessibility team is well-versed in accessibility law and will use our wealth of experience to perform services in accordance with relevant state and local digital accessibility statutes, regulations, settlement agreements, and consent decrees, as well as EN 301 549 requirements for information and communications technology (ICT) products and services when applicable.

### Ability to Provide Services in the U.S. Territories

Nelnet has no limitations regarding serving participating public agencies (PPAs) in the U.S. territories and welcomes the opportunity to explore how we can support a variety of needs across AFI member agencies.

### Anticipated Challenges

Nelnet is fully committed to delivering high-quality accessibility consulting services. [Table 2](#) provides some challenges we have encountered in our experience and how we have addressed them.

Challenge	Description	How We Address the Challenge
<b>Capacity and Surge Demand</b>	Peak periods of manual testing and document remediation can create capacity constraints, especially where assistive technology expertise is needed.	★ We plan proactively and flex resourcing to protect quality.
<b>Multijurisdiction Operations</b>	Variations in state and local compliance requirements can add startup complexity.	★ We stay current on registration, licensing, data handling, and procurement prerequisites to avoid delays.
<b>Timeline Realism and DOJ Deadline Pressure</b>	Aggressive schedules relative to scope and Title II deadlines carry delivery and compliance risk.	★ We recommend phased plans that prioritize high-impact assets and reduce risk.
<b>Dependencies on Client Teams and Third-Party Software as a Service (SaaS)</b>	Full conformance may be limited when platforms are vendor controlled.	★ We implement a vendor accessibility compliance program with standardized outreach, evidence review, a centralized log, and clear determinations.

Challenge	Description	How We Address the Challenge
<b>Limitations of Automated Testing Alone</b>	Automated scans typically find only a portion of issues and can misclassify results.	★ We pair automation with manual and assistive technology-validated testing to ensure reliable findings.
<b>Scale and Content Volume</b>	Large inventories make full coverage impractical early in an engagement.	★ We use representative, risk-based sampling to accelerate insight, begin remediation sooner, and prevent findings from going stale.
<b>Change Management and Skills Gaps</b>	Sustained compliance requires new practices and role-based upskilling.	★ We supply training, roadmaps, and governance to embed accessibility into daily workflows.
<b>Evolving Standards and Regulations</b>	WCAG and Title II interpretations change over time.	★ We typically align to the latest version, such as WCAG 2.2 AA, and update methods as standards evolve.
<b>Resourcing Model and Cost Control</b>	Maintaining momentum within budget is a recurring concern.	★ We propose fixed-capacity models like accessibility team as a service (ATaaS) with defined resource allocations that flex by phase.
<b>Risk Acceptance, Escalation, and Procurement Decisions</b>	Some issues cannot be remediated immediately.	★ We use risk-based mitigation, leadership sign-off for undue burden, and procurement checks for third-party tools.

**Table 2. Potential Challenges and Nelnet’s Solutions.** Nelnet anticipates common operational, regulatory, and capacity-related challenges in delivering accessibility consulting services and outlines structured, risk-based methods to proactively manage and mitigate each one.

Beyond these considerations, shifting regulatory landscapes, rapid changes in accessibility standards, and dependency on client-side development cycles can also impact project timelines. In navigating any of these challenges that could arise, we plan proactively, maintain flexible resourcing models, and stay current on regulatory and operational requirements to ensure reliable and compliant delivery for all clients.

### 3.4 Key Personnel

Our Accessibility team is comprised of tenured accessibility leads, a project manager, software engineers, and trainers, boasting **more than 80 years of combined experience providing support to people with disabilities across a range of disciplines**. The following key members of our team will lead and be engaged in the implementation and ongoing management of this contract. Our Accessibility team leadership helps our experts create solutions that improve the user experience for all our clients and customers.

- [REDACTED], IT Manager – Accessibility, has 12 years of tenure with the organization. Her diverse background includes operations management, leadership of cross-functional teams, and resource management allocation. [REDACTED] has direct experience managing projects through transition, driving expense savings and quality programs in multiple locations, both onshore and offshore. She serves as the primary Nelnet point of contact for all accessibility project stakeholders, facilitating meetings, workshops, and status reviews throughout the project life cycle. [REDACTED] works with a variety of clients

across public, private, and nonprofit sectors to develop full project plans, including scope, schedule, budget, and resource allocation.

- [REDACTED], Accessibility Team Lead, has nine years of experience supporting public-sector clients and leading digital accessibility programs across statewide, municipal, education, and enterprise environments. She has directed accessibility initiatives for the State of Colorado, [REDACTED], [REDACTED], the [REDACTED], and the [REDACTED]. Her expertise includes WCAG 2.2, inclusive of 2.1 standards, and Section 508 compliance; large-scale audit and remediation programs; policy and standards development; and accessibility integration into Agile and software development life cycle (SDLC) workflows. [REDACTED] has extensive experience managing multi-entity projects involving cross-functional teams, vendors, and concurrent workstreams, delivering consistent results and high client satisfaction. Her professional certifications include International Association of Accessibility Professionals (IAAP) Certified Professional in Accessibility Core Competencies and U.S. Department of Homeland Security (DHS) Section 508 Standards for Web.
- [REDACTED], Accessibility Team Lead, has 11 years of experience at Nelnet and a background in web development, with a strong foundation in front-end technologies and frameworks (e.g., Hypertext Markup Language (HTML), JavaScript, Cascading Style Sheets (CSS)). Before joining the Nelnet Accessibility team, [REDACTED] performed maintenance and updated content within web portals related to our division's student loan servicing contract with the U.S. Department of Education, ensuring all content met WCAG standards. Combining this expertise and leadership, he is a technical liaison among clients and other technology teams, and assesses and remediates accessibility issues across complex web environments. He has also helped clients such as the [REDACTED] and [REDACTED] in Colorado with developing digital accessibility plans to document their accessibility programs and processes for maintaining compliance. [REDACTED] is adept at testing and remediating to WCAG and Section 508 standards, holds a Web Accessibility Specialist certification from the IAAP, and is a DHS Section 508 Trusted Tester.
- [REDACTED], IT Accessibility Engineer, has nine years of digital accessibility experience working in community, healthcare, and higher education settings. In addition to leading a schoolwide validation committee in procuring new course materials for students, [REDACTED] trained student employees to remediate course materials to give students with disabilities equivalent access to their education. Her primary role within Nelnet's accessibility team involves following WCAG standards to develop and implement digital accessibility training plans, and leading live training sessions for towns, cities, counties, and other public-sector clients. Her certifications include IAAP Certified Professional in Accessibility Core Competencies and DHS Section 508 Trusted Tester. [REDACTED] also frequently shares her knowledge at accessibility industry events; she was a featured presenter at both the California State University, Northridge (CSUN) Assistive Technology Conference and AccessU in 2025.

In addition to these leaders and their qualifications (refer to Tab 5: Value-Added Services for additional information), Nelnet can leverage skills across the greater team as needed.

### 3.5 Diversity and Inclusion

Nelnet, Inc. is neither a minority-owned nor woman-owned business, and we do not hold any related certifications. However, our organization-wide diversity efforts have been recognized through the following honors.

- **America’s Best Employers for Diversity** (2024, 2022, 2021) and **America’s Best Employers for Women** (2023, 2021), Forbes
- **America’s Greatest Workplaces for Diversity** (2024), Newsweek
- **Excellence in Practice Award**, Diversity and Inclusion (including Cultural Competence) category (2023), Association for Talent Development
- **Diversity and Inclusion Excellence Award** (2020) Young Lincoln Leaders Awards, Lincoln Young Professionals Group

### 3.6 References and Independent Reviews

In our more than 16 years of providing accessibility services, the Nelnet Accessibility team has worked with a diverse range of clients, from state, local, and federal government entities to private companies. While performing project services—many similar to those described in AFI’s solicitation—our team uses best practices to provide up-to-date, accessible information; engaging, comprehensive accessibility training; and an optimized user experience.

Our public sector references—the [REDACTED], the [REDACTED], and the [REDACTED]—will attest to the quality of our team’s accessibility services and support; describe their experience working with Nelnet; and verify our team’s proficiencies in state and federal law and delivering comprehensive, tailored solutions.

#### Digital Accessibility Audits and Planning for the [REDACTED]

Contact information for Nelnet’s [REDACTED] point of contact is provided in [Table 3](#).

Entity Name	[REDACTED]
Entity Type	Local government
Contact Name and Title	[REDACTED]
Telephone Number	[REDACTED]
Email Address	[REDACTED]

**Table 3.** [REDACTED] **Contact Information.** To achieve compliance with Colorado law, we assisted the [REDACTED] in developing accessibility plans and providing digital accessibility training.

As part of our initial one-year contract with the [REDACTED], from June 2024 to June 2025, Nelnet collaborated with its staff to ensure public-facing documents and websites complied with Colorado House Bill 24-1454. Our Accessibility team met with City stakeholders to identify ICT priorities and targeted assessment content in preparation for an audit and remediation plan, based on the digital accessibility plan.

Our team worked on an additional auditing contract from April into August 2025, during which we performed a citywide WCAG 2.2 AA accessibility audit based on the ICT survey created during the previous digital accessibility plan project, and audited PDF documents and several public websites.

Project tasks included:

- Creating a digital accessibility plan and progress-to-date report.
- Working with City stakeholders to create a plan for long-term PDF accessibility compliance.
- Updating procurement, accommodation, and undue burden processes.
- Facilitating targeted accessibility training based on the digital accessibility plan.
- Providing audit estimates for the City’s top ICT priorities.

Regarding Nelnet’s Digital Accessibility Foundations course, one attendee stated, “Thanks for the great information and examples. Hearing how the text readers work was really helpful for me as I’ve had little exposure to them. Really good training to get started!”  
— [Redacted]

### Digital Accessibility Audits and Planning for the [Redacted]

Contact information for Nelnet’s [Redacted] point of contact is provided in [Table 4](#).

Entity Name	[Redacted]
Entity Type	Local government
Contact Name and Title	[Redacted]
Telephone Number	[Redacted]
Email Address	[Redacted]

**Table 4. [Redacted] Contact Information.** We provide the [Redacted] with website audits, digital accessibility training, and policy and plan development.

Nelnet partnered with the [Redacted] from March 2024 to March 2026 to assist with assessing its current digital accessibility status and tools, deliver training covering the foundations of digital accessibility, and help create a comprehensive digital accessibility plan for compliance with federal and state laws. Nelnet evaluated a portion of the Town’s web pages and web-based documents, assisted with creating an action plan to remediate non-compliant content, developed a training program and supporting materials for the Town’s staff, and identified tools that could assist with continued compliance.

After demonstrating accessibility fundamentals related to the Town’s content and process, our trainers encouraged staff to practice those techniques in real time. Nelnet believes in the value of live training, as it provides opportunities for attendees to become directly involved through demonstrations, hands-on practice, and question and answer periods, reinforcing their learning.

In the second phase of the project, Nelnet is delivering advanced Microsoft Word and Adobe InDesign accessibility training, providing individualized coaching, conducting testing of additional sites, and evaluating a third-party event registration widget.

Project tasks include:

- Initial website audit report and supplemental website audits, followed by comprehensive accessibility audit reports for the main website and all microsites and supplemental website audits, performing both automated and manual testing against WCAG standards.
- Support for the remediation of issues found during accessibility assessments.
- Live, interactive training from our trainers—who are well-versed in accessibility laws and WCAG guidelines—covering accessibility for Microsoft Word and PDF documents, videos, and social media.
- Development of a comprehensive digital accessibility strategy, digital accessibility plan, and supporting policies to achieve ADA and WCAG compliance for all web properties.

### Digital Accessibility Audits and Training for the [REDACTED]

Contact information for Nelnet’s [REDACTED] point of contact is provided in [Table 5](#).

<b>Entity Name</b>	[REDACTED]
<b>Entity Type</b>	Local government
<b>Contact Name and Title</b>	[REDACTED]
<b>Telephone Number</b>	[REDACTED]
<b>Email Address</b>	[REDACTED]

**Table 5.** [REDACTED] *Contact Information. We help the [REDACTED] by providing website audits and digital accessibility training.*

Nelnet partnered with the [REDACTED] to help it reach conformity with Colorado state accessibility laws and regulations. We began evaluating its web pages and documents in July 2024 and provided additional audits of digital content and staff accessibility training through December 2025.

Project tasks included:

- Comprehensive accessibility assessment of the Town’s primary website and microsites using automated and manual testing; delivery of an audit report with findings and remediation recommendations; and support for remediation of accessibility issues found during the assessment.
- Supplemental audits to verify progress toward WCAG 2.1 AA and Section 508 compliance.
- Live, interactive training on the implementation of ADA and WCAG 2.1 AA standards, covering website management, document remediation, videos, and social media, tailored to the Town’s staff and stakeholders.
- Collaboration with the Town to create accessibility policies and plans aligned with ADA and WCAG 2.1 AA, providing guidance on compliance, documentation, and integration into web governance and operations.