Proposal for ADA Digital Accessibility – WCAG 2.1 AA / 2.2 AA Compliance Services

Tab 3: Performance Capability

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Alliance for Innovation

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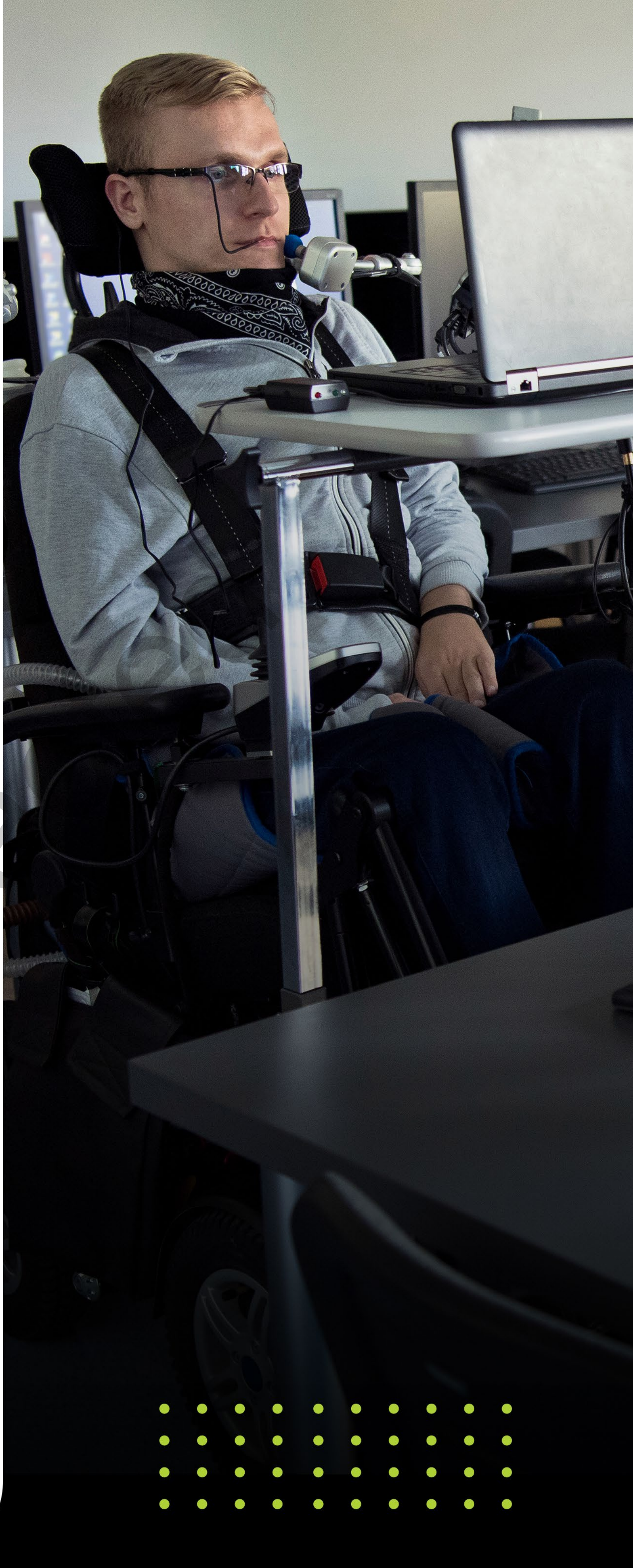

SUBMITTED BY

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Glossary of Abbreviations and Acronyms

Abbreviation/Acronym	Definition
ACH	Automated Clearing House
ACR	Accessibility Conformance Report
ADA	Americans with Disabilities Act
AFI	Alliance for Innovation
ATaaS	Accessibility Team as a Service
DOJ	U.S. Department of Justice
IT	Information Technology
MFA	Multifactor Authentication
Nelnet	Nelnet Government Services, LLC
PPA	Participating Public Agency

Abbreviation/Acronym	Definition
RBAC	Role-Based Access Control
SFTP	Secure File Transfer Protocol
SLA	Service Level Agreement
URL	Uniform Resource Locator
VPAT	Voluntary Product Accessibility Template
VPN	Virtual Private Network
W3C	World Wide Web Consortium
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 3: Performance Capability

2.1 Overall Customer Experience and Program Delivery

Customer Experience

Upon engagement, Nelnet Government Services, LLC (Nelnet) will assign [redacted], Information Technology (IT) Manager – Accessibility to be a client's project manager and serve as the primary point of contact responsible for meeting business needs and addressing issues and concerns in a timely manner. [redacted] will leverage her business expertise, cross-functional skill set, and gathered knowledge of each client's content and/or programs and strategic direction to oversee accessibility tasks for digital products. Refer to section 3.6 References and Independent reviews in Tab 4 for additional information on [redacted] and our other key personnel.

We believe that open and clear communication is integral for a successful partnership. Soon after contract signing, [redacted] contacts the client's stakeholder group to establish a kickoff meeting with the Nelnet Accessibility project team. We present information on the importance of accessibility, defining it for the stakeholders; explain our team's process; share project contacts; discuss project timelines, milestones, and expectations of both parties; establish access to client systems and assets; and examine the full scope of the project and assets involved.

After the meeting and once access has been granted, Nelnet will document the agreed-upon project plan, which includes screenshots of in-scope assets, that will be sent to the client for review. Upon approval, [redacted] adds project tickets into Atlassian Jira—our project planning, tracking, and release management tool—and sets up internal team standups; frequency is dependent on project complexity and duration.

Throughout the project life cycle, [redacted]:

- Works with the client to set the right cadence and audience for regular stakeholder meetings.
- Clearly communicates the status of key milestones, recent accomplishments, key or escalated delivery risks or issues, and upcoming activities.
- Builds relationships with stakeholders to better understand client business needs, goals, and vision.
- Facilitates request/ticket management for clients, including tracking and monitoring requests, engaging the appropriate resources within Nelnet, and providing regular updates.
- Bridges technical teams and business stakeholders.
- Advocates for our clients and sets strategic direction on their behalf with Nelnet's functional teams that deliver on client business goals.

Our team breaks work down into manageable sprints and visualized story boards to maintain clarity and progress across multiple projects. This practice facilitates continuous prioritization and real-time adjustments, which is especially effective when supporting multiple work streams with differing priorities. To manage this complexity, Nelnet will incorporate regular standups and sprint reviews to maintain transparency and alignment. This helps in efficiently mitigating conflicts between workstreams. Ongoing project status will be delivered to each client based on the agreed-upon communication plan, including weekly status reports, regular update meetings, or other delivery mechanisms.

Risk management is also an important component of Nelnet's approach. As project manager, [redacted] will identify potential bottlenecks or interdependencies and proactively mitigate risks that may affect timelines or deliverables. Our organization and effective time management drive momentum across multiple workstreams to ensure timely deliverables.

After an accessibility audit, our team leads or senior engineers will peer-review the work to confirm accuracy and completion, verify the final findings report is complete and accurate, and create demonstrations to explain the highest-risk items. This final report and demonstration summary are compiled and shared in a final meeting with the client.

Our experience providing similar services for various other public-sector entities will enable us to collaborate with the participating public agencies (PPAs) and meet the accessibility requirements set forth by the U.S. Department of Justice (DOJ) and regulations established by individual states.

Onboarding PPAs

When an existing Alliance for Innovation (AFI) or Edge Public member chooses Nelnet under this cooperative contract, we will follow a structured, service-forward process (Table 1) designed to deliver a seamless user experience, preserve continuity of work, and rapidly configure all required tools, access, and data.

This transition process will apply consistently across audits, consulting, remediation, and training engagements. While the specific activities will vary by service type, the structure—kickoff, access configuration, scoped planning, execution, quality validation, and final delivery—remain the same, providing a familiar and predictable experience for all PPAs.

1. Contract Activation and Administrative Setup	Once the cooperative contract is executed, the agreement will be filed in our secure Microsoft SharePoint repository and shared internally for invoicing configuration. This administrative setup will occur in parallel with transition planning, so the PPA experiences no onboarding delays.
2. Stakeholder Engagement and Kickoff	We will contact the PPA's stakeholder group to schedule a joint onboarding and kickoff meeting, which will include PPA representatives and the Nelnet project team (e.g., project manager, team lead, engineers). During this kickoff, we will: • Introduce key team members and communication channels. • Establish project objectives and clarify the PPA's accessibility priorities. • Review the transition roadmap, timelines, milestones, and expectations. • Define access needs, permissions, and any required data or platform configurations. • Align on cadence and format for ongoing touchpoints and updates. This session will confirm the PPA understands the full onboarding process and knows exactly what to expect as they transition into our program.

3. Data Migration, Access Provisioning, and Platform Configuration	Following kickoff, our team will work with the PPA to establish or transition necessary access, such as for: • Environment logins. • Content repositories. • Design systems. • Existing audit or accessibility artifacts. • Historical findings or prior documentation (if applicable). Where data migration is required, we will coordinate the secure transfer of any existing accessibility reports, tickets, or documentation so our team can maintain continuity and begin work without loss of institutional knowledge. Once access is complete, we will configure all internal project spaces, including: • Atlassian Jira project setup and ticket structures. • Atlassian Confluence project pages. • Internal standup scheduling. • Workflow definitions aligned to the member's pace, size, and complexity. This configuration will enable the PPA to immediately benefit from a structured, transparent workflow.
4. Scope Confirmation and Program Deliverables	Our team will develop a recommended scope document that details: • The pages, templates, flows, or components to be audited or supported. • Screenshots and references to confirm alignment. • Methodology, tools, and standards that will be applied. The PPA will review and approve this scope before work begins, ensuring they retain full control and clarity during transition.
5. Execution and Ongoing User Experience	As work begins, the PPA will benefit from a transparent, supportive process and receive consistent updates. • Regular meetings will be scheduled according to preferences established at kickoff. • We will share weekly usage and progress updates. • We will flag risks early with suggested mitigation plans. • Engineers will complete audits, consulting, or training based on contracted services. • Findings will undergo internal quality control by senior engineers or team leads to verify accuracy and completeness
6. Final Deliverables and Transition Completion	Upon completion of the audit or engagement cycle, Nelnet will: • Create a comprehensive findings report. • Prepare executive-level summaries and demo materials. • Hold a final presentation with the PPA's team. This structured conclusion ensures the PPA fully understands results, priorities, and recommended next steps.

Table 1. Onboarding Process. *This transition framework provides a structured, end-to-end process encompassing contract activation, stakeholder engagement, access setup, scoped planning, coordinated execution, and final delivery to provide a seamless, transparent, and consistently managed onboarding experience for all AFI or Edge Public members.*

2.2 Orders, Engagements, and Online Functions

Initiating and Managing Work

Nelnet's Accessibility team employs a standardized, client-centered request submission and delivery methodology designed for transparency, accountability, and high-quality outcomes. This methodology applies to accessibility testing, document and web remediation, training, and related accessibility services.

A typical request workflow includes the following steps.

1. **Request Initiation:** The client initiates an accessibility request by submitting relevant project details, which may include, but are not limited to:
    - A brief description of the request, including the desired service(s) and the associated products, websites, or documents.
    - Files, uniform resource locators (URLs), or systems requiring evaluation or remediation.
    - Client point(s) of contact.
    - The target completion date and key deadlines.
    - Access credentials or testing information, where applicable.
    - Project scope, expected deliverables, and any known risks or concerns.
2. **Intake and Project Confirmation:** Upon receipt, Nelnet logs the request into our internal tracking system and acknowledges the submission. When appropriate, Nelnet schedules a kickoff meeting with client stakeholders to confirm project scope, timeline, deliverables, communication expectations, and estimated costs.
3. **Project Management and Assignment:** Each request is assigned a dedicated Nelnet project manager who serves as the client's single point of contact. The project manager oversees scheduling, prioritization, resource allocation, and risk mitigation. Work is assigned to qualified Nelnet Accessibility team members or vetted partners, as appropriate. Any obstacles, questions, or concerns are promptly communicated to client point(s) of contact for the request.
4. **Service Execution:** Accessibility testing or remediation activities are conducted in accordance with agreed-upon standards and timelines. Nelnet provides ongoing project status updates based on the client's preferred communication approach (e.g., regular meetings, written updates, status reports). Any questions, issues, or scope considerations are promptly communicated to the client.
5. **Quality Assurance and Validation:** All deliverables undergo intensive internal validation to confirm alignment with project requirements and applicable accessibility standards. This step helps our team confirm accuracy, consistency, and completeness prior to delivery.
6. **Deliverables and Reporting:** Nelnet delivers final reports or remediated assets using the agreed-upon secure delivery method (e.g., Secure File Transfer Protocol (SFTP), secure email). Refer to Attachment 1 – Sample Accessibility Assessment Report for a sample audit report. Deliverables may include summaries of high-risk findings, remediation outcomes, and supporting documentation.

Nelnet Accessibility team members are available to respond to client questions and provide clarification as needed.

7. **Acceptance and Completion:** Upon client confirmation that deliverables have been received and approved, Nelnet formally closes the request in our tracking system.

For urgent requests, Nelnet will streamline and expedite this process to accommodate accelerated timelines. We also leverage established partnerships with qualified third-party vendors to provide scalable, high quality remediation services when required.

Nelnet values open and honest communication and collaboration and views accessibility as a collaborative effort. We will foster ongoing communication between Nelnet personnel, client teams, and content creators to support sustained accessibility compliance and long-term success.

Portal/Platform Features

The monitoring platform provides a structured approach for continuously detecting, tracking, and managing accessibility issues across covered digital properties.

- It supports onboarding and configuration activities that define in-scope environments, establish crawl rules and sampling strategies, and align scan schedules with release cycles.
- Automated scanning capabilities perform recurring template-level and component-level checks, deduplicate findings to target underlying sources, and capture detailed evidence mapped to Web Content Accessibility Guidelines (WCAG) 2.1 AA or 2.2 AA and Section 508 criteria.
- Role-based analytics and reporting deliver actionable dashboards, exportable reports, trend monitoring, and progress tracking across releases.
- Issue management workflows enable teams to triage findings, confirm severity and business impact, assign work with clear remediation guidance, and manage verification and retesting cycles.
- Threshold-based alerts, scheduled digests, and notifications provide timely visibility into regressions and high-priority violations, enabling stakeholders to identify risks early and maintain ongoing conformance governance.

Integrations

The proposed ongoing monitoring software does not incorporate a single sign-on experience.

Minimum Engagement Thresholds

Our accessibility team as a service (ATaaS) model provides the services of our team for a fixed number of hours per month at a fixed cost. Nelnet is open to discussing the terms of engagement and maximizing the value of our services with each client, depending on their needs.

2.3 Monitoring, Changes, and Issue Handling

Our team provides a structured, standards-aligned monitoring program designed to give both technical and non-technical stakeholders clear, ongoing visibility into accessibility work. We implement automated, scheduled scans across all in-scope properties and aggregate findings into role-based dashboards that present actionable metrics for engineers, product owners, program managers, and executives. These dashboards and reports track issue trends, severities, backlog health, and progress toward conformance targets, enabling stakeholders to monitor new, resolved, reopened, and aging issues over time.

To support active management, we provide recurring status updates, exportable reports, triage summaries, and executive scorecards that highlight risk and remediation velocity. Threshold-based alerts and scheduled digests ensure critical regressions, release-gating issues, and changes in accessibility posture are communicated promptly to the appropriate audiences, helping teams make informed decisions and sustain compliance throughout development cycles.

In conducting project planning, our team will, as applicable, incorporate practices we have in place to keep our own virtual environment successful, including:

- Collaboration tools such as:
  - **Microsoft Teams.** We collaborate in Teams, keeping communication flowing whether associates are in the office or working from home.
  - **Microsoft SharePoint.** Through SharePoint, team members can share project documents.
  - **Atlassian Confluence.** Our team's collaborative knowledge management tool facilitates and organizes documentation and discussions.
  - **Atlassian Jira.** Jira is our project planning, tracking, and release management tool.
- Video conferencing and communication.
- Frequent internal standup meetings to discuss current work and priorities and removal of any roadblocks.
- Weekly planning meetings with client stakeholders to prioritize tasks and the work queue.

Nelnet primarily uses Microsoft Teams, but we work with clients that use other platforms like Zoom, Cisco Webex, Google Meet, and more, while following virtual meeting best practices.

Refer to section 2.2 Orders, Engagements, and Online Functions for additional information.

2.4 Payment and Invoicing

Standard Invoicing and Payment Terms

Nelnet invoices clients within the first 10 business days of each month for the previous month's work. The invoice details the total hours worked by each associate assigned to the project. Invoices are to be paid within 60 calendar days after receipt and approval of the invoice. If payment is not received within that time frame, a late fee of 2.5 percent of the total invoice will be charged to the client. Late fees are not subject to the administrative fees.

If payment is still not received 90 days after the initial invoice date, an additional 2.5 percent (for a total of 5 percent of the initial invoice amount) will be charged to the client. Clients have the right to ask for clarification on any invoice after receipt and may request supporting documentation.

In the event payment of uncontested amounts for any given invoice has not been made within 90 calendar days of receipt of the invoice, Nelnet may, after giving written notice, without penalty or liability, suspend all authorized services specified in the scope of services. Upon receipt of payment in full for services rendered, Nelnet will resume all authorized services.

Accepted Forms of Payment

Invoices can be paid via Automated Clearing House (ACH) (preferred) or check. Nelnet does not accept credit card payments from clients at this time.

Additional Payment Method Fees

There are no fees associated with ACH or check payments.

2.5 Service Delivery, Timelines, and SLAs

National Service Delivery Model

Our Accessibility team members span three different time zones, enabling us to be reactive to clients across the country. We also serve clients of varying technical maturity, guiding them through each process and providing comprehensive training to meet their needs.

Scalability

Nelnet's **scalable operating model** supports clients of all sizes by using cross-functional pods, standardized scoping and deliverable templates, and a repeatable sustainment workflow that **accommodates both small-scale engagements and complex, multiprogram implementations**.

This structure enables multiple workstreams to run concurrently; incorporates surge capacity without sacrificing quality; and adapts smoothly to varied technology environments, distributed teams, and large content networks. With strong program governance capabilities, flexible training models, and tools that handle high-volume scanning, remediation, and reporting, Nelnet can serve organizations with differing accessibility maturity levels while maintaining consistent processes, reliable throughput, and alignment across even the most complex digital ecosystems.

Standard SLAs

The following are our standard and proposed service level agreements (SLAs) for items requested.

- **Response Times for Critical and Noncritical Issues:** Two business hours (critical), eight business hours (noncritical)
- **Resolution/Mitigation Targets for Critical Accessibility Problems:** 98-plus percent of applicable criteria passing per deliverable
- **Scanning Tool Uptime/Availability:** Available 24 hours a day, seven days a week, excluding periods of scheduled maintenance, using commercially reasonable efforts

2.6 Problem Escalation, Warranty, and Support

Escalation Process

If, during the life of the contract, an SLA defined in our agreement is not being met, the client may initiate an escalation by contacting the assigned project manager, who will review and assess the issue and coordinate with assigned staff to resolve the matter as quickly as possible. If the issue persists or requires heightened attention, the project manager will advance the escalation through the standard management chain to provide timely remediation and transparent communication until the issue is resolved to the client's satisfaction.

Warranty and Rework Policies

Nelnet will rework a deliverable at no additional charge should it not meet the agreed-upon scope in the statement of work associated with the request. Should the deliverable meet the agreed-upon scope but require additional work, Nelnet will perform corrective actions on the deliverable at the rates established for that deliverable.

Support Resources

As part of our accessibility services, **we provide a comprehensive set of support resources designed to guide clients through remediation, implementation, and ongoing accessibility maturity**. This includes access to a dedicated knowledge base containing self-service articles, how-to guides, and best practices checklists. Clients will also receive detailed accessibility audit reports that outline findings, WCAG mappings, user impact, and recommended fixes, along with step-by-step remediation guidance.

To support learning and internal enablement, we additionally provide knowledge base videos that demonstrate common remediation techniques, assistive technology testing practices, and content authoring standards. These resources collectively provide clients both the strategic insights and the practical tools required to maintain accessibility compliance and continuously improve their digital experiences.

2.7 Cooperative Administration and Reporting

Contract Marketing

Nelnet will collaborate closely with AFI and Edge Public to actively market and promote the awarded contract to eligible public agencies nationwide through a coordinated, transparent, and value-driven approach.

When agencies are open to public visibility, we will jointly issue press releases hosted on the Nelnet website, develop real-world case studies once implementation is underway, and feature participating agencies in sales presentations, exhibit materials, and future solicitation responses to demonstrate proven outcomes.

Additional initiatives can include the following.

- **Joint Webinars and Educational Thought Leadership:** Opportunity to educate agencies on the benefits of digital accessibility and how this contract offers distinct value and simplifies procurement

- **Cobranded Marketing Materials:** Development of brochures, email campaigns, and social media content to highlight the contract's key advantages
- **Industry Events and Conferences:** Participation in accessibility- and procurement-related events to promote the contract to a broad audience
- **Contract-Specific Landing Pages:** PPA access to information through their membership explaining scope and eligibility

Pricing Verification

Nelnet will review the contract with the PPA client and enter into terms based on the type of work being contracted and the roles required to complete that contract.

Quarterly Sales and Usage Reports

Nelnet can provide a report of the services performed for PPAs (per client), the number of hours used, and the type of work completed. We can deliver this to the appropriate AFI/Edge Public/PPA stakeholder(s) 10 calendar days after each quarter. If no work is completed in a quarter, no report will be generated.

Standards and Regulatory Compliance

The Nelnet Accessibility team is well-versed in accessibility law and will use our wealth of experience to provide solutions, perform services, and deliver expert guidance that enable PPA clients to achieve and maintain conformance with current and emerging digital accessibility standards and requirements, including but not limited to the following.

- WCAG 2.1 AA or 2.2 AA
- Section 508, as amended
- Americans with Disabilities Act (ADA), including Title II and Title III, as applicable
- EN 301 549
- Applicable state and local digital accessibility statutes, regulations, settlement agreements, and consent decrees

Our methodology (Table 2) is architected for durability and change tolerance so PPAs can adopt emerging standards, including WCAG 3.0 when released, without reimplementing program structures or reauthoring test collateral. We separate policy from implementation through versioned rulesets, a governed test case library, reusable remediation patterns, and a predictable communication and release process. This design enables incremental adoption of new or revised criteria while preserving prior evidence and reporting continuity.

How We Track Evolving Standards and Guidance	• Maintain a standing governance cadence to review World Wide Web Consortium (W3C) publications, U.S. Department of Justice (DOJ) and federal guidance, state rules, and industry practices, resulting in documented change proposals to rulesets and test artifacts • Update training and enablement materials so stakeholders stay oriented to current WCAG versions and principles before adopting new criteria • Keep statements of work and proposal language synchronized with the latest assistive technology matrices, test methods, and conformance reporting practices to provide a ready foundation for WCAG 3.0 outcomes

How We Update Rulesets, Test Cases, and Remediation Patterns	• **Versioned Rulesets**
	  ◦ Map to WCAG success criteria, test method, required evidence, and known false positive caveats
	  ◦ Apply changes under semantic versioning, with new or revised rules added as a minor version and deprecated items retired, so prior results remain interpretable
	• **Test Case Governance**
	  ◦ Curate example findings and recommended remediations per criterion
	  ◦ Require multi-reviewer approval for additions and revisions to ensure consistency and clarity
	• **Remediation Patterns**
	  ◦ Standardize code-level verification and remediation across keyboard testing, screen readers such as NonVisual Desktop Access (NVDA) and Job Access with Speech (JAWS), browser zoom up to 400 percent, and automated scanning with tools such as Deque axe and Web Accessibility in Mind (WebAIM) WAVE
	  ◦ Update implementation guidance in lockstep with ruleset changes and document known platform patterns
	• **Conformance Reporting Templates**
	  ◦ Maintain centrally governed Voluntary Product Accessibility Template (VPAT) and Accessibility Conformance Report (ACR) templates that reflect the current testing matrix and reporting taxonomy
	  ◦ Revise templates under version control so deliverables remain consistent and audit ready as standards evolve

How We Will Communicate and Deploy Updates for PPAs	• **Release Notes and Change Summaries** ◦ Provide concise notes for each update that explain what changed, why it changed, and what actions product, content, and engineering teams should take ◦ Deliver updated checklists, refreshed VPAT or ACR templates, and example defects mapped to new or revised criteria • **Client Communication Rhythm** ◦ Establish a quarterly change window for planned releases, with urgent patches for critical issues ◦ Brief stakeholders through scheduled sessions and distribute written guidance that is suitable for broad program use • **Safe Adoption and Backward Compatibility** ◦ Avoid overwriting rulesets in place ◦ Allow projects in flight to complete under the version they started with, while new work begins on the updated set ◦ Apply cross checks for accuracy and consistency before promoting a release to general use • **Deployment Packaging** ◦ Deliver a new tagged ruleset and test case pack, updated remediation pattern guidance, and refreshed reporting templates ◦ Include a mapping appendix that translates changes from the prior version to the new one to minimize retraining time
Governance and Quality Assurance	• Apply a documented quality assurance policy that defines review stages, rubrics, and roles for estimates, scoping, assessment reports, training, and deliverables • Require peer review of ruleset and test case releases prior to client deployment to ensure accuracy, consistency, and accessibility of materials
Tooling and Evidence	• Standardize functional and manual testing across assistive technologies and browsers, including keyboard-only navigation, screen readers, and zoom up to 400 percent • Capture evidence in accessible formats that are suitable for audits and can be compared across ruleset versions

Table 2. Future-Focused Services. *Our team keeps current on emerging standards and applies that forward-thinking approach to keep us and our clients at the forefront of compliance.*

This overall approach will benefit PPAs through:

- Rapid uptake of evolving standards through governed, low-risk releases.
- Minimal rework due to versioned, backward-compatible rulesets and templates.
- Clear communications and training that support organization-wide adoption.
- Continuity of evidence for audits and progress reporting.

Deployment and Security Requirements

As one of Nelnet’s top priorities, **we build security into everything we do**. We are dedicated to protecting the privacy of our customers and clients and handling information in a secure and confidential manner.

Our organization uses a multifactor authentication (MFA) solution to grant network, cloud platform, and local access for individual and privileged individual user accounts. All local access to desktop and laptop computers requires MFA, as well as all remote access to the network via virtual private network (VPN), which is controlled by a hardware or software token. Additionally, Nelnet and the systems we design and implement employ a role-based access control (RBAC) approach for managing logical access that is based on predefined user roles within the organization. This approach ensures that users are granted only the permissions necessary for their job functions, minimizing security risks and enforcing least-privilege access principles.

Nelnet's digital Accessibility Testing team uses exclusively onshore, U.S.-based resources for all delivery tasks to align with data security requirements and streamline procurement by eliminating the need to source or onboard additional vendors should offshore resourcing become a barrier. Additionally, using our organization's shared services enables alignment across cross-functional teams while balancing the demand of centralized functions, such as security and asset management.