



RESPONDENT SUGGESTED ENHANCEMENTS

Company Name: Nelnet Government Services, LLC

Please add below any enhancements (or on an attached sheet) that you believe would be beneficial to the ECPA and other participating entities that are not listed in this solicitation.

Nelnet Government Services, LLC (Nelnet)'s Accessibility team understands the challenges accessibility laws and regulations may present for participating entities—especially those that have a significant amount of digital assets across a variety of media. Nelnet offers the following considerations for the Educational Cooperative Purchasing Alliance (ECPA), Edge Plus, and participating entities while planning for, selecting vendors for, and using a future contract to procure digital accessibility services.

- **The Value of Manual Testing.** We recommend participating entities consider the value of involving a human element in the evaluation and remediation process, rather than solely relying on a third-party tool or integration to thoroughly assess compliance. Combining modern tools with expert users of assistive technology yields more detailed, user-focused results. Because automated accessibility scanners cannot find all accessibility issues, failing to integrate manual testing as part of an accessibility assessment will result in a lack of full compliance.
- **Timeline for Compliance.** When planning a desired project timeline, Nelnet recommends participating entities consider that achieving compliance may involve multiple rounds of remediation efforts. Other considerations for the timeline and project plan include developing accessibility policies and deploying appropriate training for staff, enabling participating entities' internal development and design employees to become self-sufficient in digital accessibility.
- **Project Feasibility.** We recommend that participating entities exercise caution when considering vendor offerings that assert full audit and remediation of significant project scopes to Web Content Accessibility Guidelines (WCAG) standards within short timelines, as accessibility remediation outcomes are highly dependent on the volume, severity, and technical complexity of issues identified during manual testing. These factors cannot be fully known prior to evaluation. Nelnet's approach is designed to reduce delivery risk, avoid overstated claims of compliance, and support long-term accessibility rather than short-term attestations. We provide transparency into a client's current accessibility state to provide accurate time commitment estimates and propose a realistic, defensible project timeline for completing key milestones.
- **Updates to Current Tools and Processes.** We recommend participating entities determine whether their desired results can be achieved with current tools and/or processes, or if changes would be beneficial. Nelnet can help perform this evaluation and make suggestions to improve



current processes, such as by including user testing or incorporating at least one assistive technology and validation tool or semi-automated accessibility testing extension.

- **Training Strategy.** Nelnet recommends participating entities implement training for their employees on the fundamentals of digital accessibility, focusing on the most relevant elements necessary to support primary applications and content. We also recommend incorporating new-hire, job duty-specific (e.g., a person who creates digital documents should receive training in Microsoft Word and Portable Document Format (PDF) accessibility), and refresher training into their personnel strategies long term to reinforce skills and stay up to date with accessibility tools and techniques.
- **Risk Management Plan.** The objective of establishing a risk management plan is to minimize, mitigate, or eliminate possible negative impacts or risks to the completion of the project. We encourage ECPA, Edge Plus, and participating entities to choose a vendor(s) that will employ a continuous risk management process throughout the life of the project to ensure emerging risks are identified early and risk resolution plans are developed in a timely manner to mitigate the risks.
- **Industry Presence.** We encourage ECPA, Edge Plus, and participating entities to prioritize vendors with a proven record of serving the public sector, that understand digital accessibility regulations, and that deliver solutions that go beyond compliance to provide an inclusive user experience. Vendors should be active in the accessibility community and include team members with disabilities who use assistive technologies. Their first-hand experience adds critical insight during audit and remediation and improves solution effectiveness.
- **Domestic Delivery and Risk Reduction.** Participating entities should consider the implications of offshore digital accessibility delivery when evaluating manual accessibility testing services. While many vendors promote onshore teams, their underlying testing resources may operate offshore—introducing risks related to quality control, translation accuracy, turnaround consistency, and potential misinterpretation of findings. As federal policy discussions (e.g., the Halting International Relocation of Employment (HIRE) Act) explore measures that may penalize offshore labor models, prioritizing vendors with fully domestic digital accessibility teams can help minimize compliance uncertainty. A U.S.-based workforce strengthens data-handling alignment, reduces procurement risk, and improves communication effectiveness throughout the audit and remediation life cycle.