

Summary

Name **Respond to Questions**

Vendor **Nelnet Government Services**

Status **Submitted**

Response

Solution Offering/Pricing Structure

1. Clearly describe the solutions and services you are proposing under this RFP, including which of the following are included: a. accessibility assessment and audits, b. ongoing monitoring and scanning, c. code-level remediation support and consulting, d. platform/software tools for issue management, reporting and governance, e. training, policy development, and program governance support.

Nelnet Government Services, LLC (Nelnet) offers the Educational Cooperative Purchasing Alliance (ECPA), Edge Public, and participating entities our dedicated, U.S.-based Accessibility team with **a portfolio of accessibility services to support the scope of ECPA's solicitation, including the components of all seven workstreams**. Our **comprehensive web accessibility solutions and related services** align with the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and applicable Web Content Accessibility Guidelines (WCAG) standards to provide end-to-end support for participating entities.

Nelnet's team combines technical knowledge with lived human experience, leveraging industry best practices and a breadth of expertise to provide solutions that go beyond compliance. Our in-depth approach combines automated and manual testing, robust remediation at the code and content level, continuous compliance monitoring, and tailored training for all roles. We provide flexible deployment options, scalable support for participating entities of all sizes, and transparent reporting, delivering sustainable accessibility governance and measurable outcomes.

We have enhanced our approach throughout our 16-plus years of performing accessibility work for and in conjunction with clients of various sizes across education; federal, state, and local government; and private sector engagements. The result is **repeatable, scalable services and pricing** for entities that participate in the future cooperative contract. **Our offering is designed to adapt to evolving standards and regulatory requirements, diverse technical environments, and member staff roles and skill levels to empower participating entities to learn, achieve, and maintain accessible digital assets and best practices.**

Nelnet welcomes the opportunity to establish partnerships with participating entities that may procure assistance to achieve and maintain accessibility conformance for their public-facing and internal digital properties and associated third-party integrations. The following information describes our portfolio of accessibility services and how we will support the workstreams, their representative activities, and the associated deliverables to meet the various participating entities' needs.

Accessibility Assessments and Audits (Web, Mobile, Documents, Multimedia) – Workstream 1

Baseline and Recurring Accessibility Audits

Nelnet conducts comprehensive accessibility evaluations for websites, web and mobile applications, online portals, digital documents and forms, and multimedia content using a combined automated and manual testing approach. Because automated tools detect only a portion of WCAG violations, **our audits emphasize human review to bring clients proven, hands-on proficiency in testing with major assistive technologies**. Pairing automated checks with expert manual and technology-validated workflows establishes an accurate accessibility baseline, focuses remediation on recurring patterns, and reduces the cost and duration of full site reviews.

Our methodology includes identifying the most-visited or business-critical pages, reviewing representative workflows per site, and assessing opportunities to streamline or archive outdated content. **Testing aligns to WCAG 2.1 AA or 2.2 AA, with 2.2 recommended to future-proof compliance.** WCAG 2.2 AA—the latest version—is a higher standard than that required by either Section 508 or the U.S. Department of Justice (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.**

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.**

By nature, accessibility will always focus on the human element. As such, the Nelnet Accessibility team heavily relies on evaluating user experiences with assistive technology that our clients and their customers may use. We routinely validate with screen readers (desktop and mobile), 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, 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.

Our standard accessibility testing environment is optimized for Windows-based platforms, which enables us to deliver consistent, high-quality results with rapid turnaround times. Testing on macOS (desktop) and iOS (mobile) is fully supported upon request. When Mac testing is required, we configure the appropriate devices and assistive technologies to mirror the client's environment. Because this equipment is not part of our standard toolkit, Mac-based testing may require additional lead time, which will be mutually agreed upon at project kickoff. This approach ensures that all testing—whether on Windows or Mac—meets the same high standards of accuracy, reproducibility, and WCAG compliance.

Gap Analyses, Prioritized Findings, and Risk Categorization

After our initial audit, we develop and deliver comprehensive, client-ready reporting in various formats, including optional Voluntary Product Accessibility Template (VPAT) or Accessibility Conformance Report (ACR) documentation, depending on a client's needs and preferences. For many clients, our proprietary report includes:

- A description of each finding, including where it occurs and how it impacts people with disabilities.
- 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.

For an example, refer to Attachment 1 – Sample Accessibility Assessment and Remediation Report in the **Additional Information section**. 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.

In addition, our team develops clear, comprehensive executive summaries tailored for both internal and external stakeholders, delivering complex information into precise, decision-ready insights. These summaries provide structured, high-level overviews that align with organizational priorities and support effective communication across diverse audiences. We provide stakeholders with a clear overview of how people with disabilities are affected by identified accessibility gaps. Based on audit results, we recommend targeted remediation actions and process improvements that help clients conform to applicable laws and industry standards. For an example, refer to Attachment 2 – Sample Accessibility Assessment Executive Summary in the **Additional Information section**.

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.

Verification and Regression Testing

Using the same manual and assistive technology methods applied in the initial audits, verification and regression testing follow remediation cycles to validate 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. This step also reinforces our commitment to both accessibility and user-centric design.

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 (refer to Attachment 1 for an example). Once retesting confirms conformance, items are marked closed in the report; unresolved items are queued for another remediation cycle.

Ongoing Monitoring and Scanning – Workstream 2

Our approach to helping clients continually detect, track, and manage digital accessibility issues across covered properties aligns with WCAG 2.1 AA or 2.2 AA and Section 508 requirements, and provides reporting and workflows suitable for technical teams, program leadership, and executive stakeholders. Our team's methodology:

- Provides comprehensive onboarding, automated scanning, analytics, issue management, and alerting capabilities that establish WCAG-aligned configurations.
- Delivers recurring, evidence-based accessibility evaluations.
- Supports actionable reporting and workflow integration.
- Ensures timely notifications of critical issues across development cycles.

We implement a platform-agnostic, standards-aligned monitoring program that performs automated, scheduled scans of in-scope properties, aggregates results into role-based dashboards, and drives remediation through a structured triage and workflow process. Access is controlled by least-privilege principles, and scan credentials are stored securely. Stakeholders receive alerts for critical regressions and scheduled reports that show trends in issue counts, severities, time to resolution, and conformance across sites and applications. This service provides the evidence and governance needed to manage accessibility at scale, reduce risk, and sustain compliance over time.

Optional add-on services for this workstream include expert manual verification and assistive technology validation on high-value user journeys; release-gating checks in continuous integration/continuous delivery (CI/CD) to prevent regressions; and targeted training for engineers, designers, and content authors based on scan trends.

Code-Level Remediation Support and Consulting – Workstream 3

Nelnet offers remediation services and guided remediation workflows for complex issues and tight integration with modern development workflows, tailored to help participating entities achieve digital accessibility compliance. Our team has a strong track record and deep expertise in remediating a wide range of content and media formats and platforms.

In preparation for remediation, Nelnet will develop a remediation plan in collaboration with participating entity stakeholders to address identified issues and bring content into compliance. Issues will be prioritized based on the impact to people with disabilities, the audited digital assets, risk, business criticality, operations, finances, stakeholder input, etc. We recommend archiving outdated content and consolidating duplicates to reduce effort and improve usability. Progress toward compliance with applicable standards will be tracked approximately weekly until closure.

The following information details our capabilities and processes for website and mobile application remediation; document remediation; and video, audio, and multimedia accessibility.

Website and Mobile Application Remediation

Using the list of priorities identified during the assessment phase, our team remediates the accessibility issues agreed on in the development phase of the remediation plan. When full conformance requires redesign, we identify those needs early and plan them transparently. Our team prioritizes issues based on severity and user impact—critical barriers that block task completion are addressed first—while also considering legal risk and remediation effort.

We provide hands-on, source-level remediation for **web and mobile applications** by partnering with client product and engineering teams to refactor Hypertext Markup Language (HTML), JavaScript, and Cascading Style Sheets (CSS); update design system components; and resolve framework-specific issues in alignment with WCAG 2.1 AA or 2.2 AA standards.

- **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 enforcing correct semantic HTML, CSS, and JavaScript; applying Web Accessibility Initiative – Accessible Rich Internet Applications (WAI-ARIA) roles and properties to custom

components; and ensuring robust keyboard navigation.

- **For sites built on popular content management system (CMS) platforms**, Nelnet offers remediation that preserves clients' existing themes, plug-ins, and integrations. Where possible, we address items 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 plug-ins, replace inaccessible components when necessary, and optimize content for usability without disrupting existing workflows.
- For **native iOS and Android**, we reinforce semantics and accessible names, roles, and traits; adjust focus order, touch-target sizing, and dynamic announcement patterns; and verify gesture alternatives and compatibility with keyboard and switch control.
- **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.

We also deliver corrected code samples and pull requests with before and after differences, implementation notes, and test updates; execute targeted remediation sprints to reduce backlogs; and validate fixes through manual and assistive technology retesting prior to merge, performing additional cycles as needed to prevent regressions. Verification mirrors our assessment practices, including manual inspection, keyboard and screen reader validation, and cross-browser checks, to validate conformance before closing out issues.

Where findings implicate commercial off-the-shelf (COTS) platforms or third-party integrations, we collaborate directly with client information technology (IT) and product teams as well as offeror/vendor engineering to triage defects, provide reproducible test cases, and validate patches in staging prior to deployment. We routinely meet with third-party software teams to explain WCAG issues, recommend code and configuration changes, track remediation through vendor backlogs, and confirm fixes to maintain the client's compliance.

In addition to direct remediation, our team can also advise and coach clients and their staff, supporting designers, developers, and content creators to integrate fixes into deployment workflows and processes to minimize production environment disruptions, and implement sustainable solutions aligned to best practices. Refer to the **Training, Policy Development, and Program Governance Support section within this question** for additional information. We welcome the opportunity to support participating entities through issue walkthroughs, working sessions/office hours, and specific code/media recommendations.

Document Remediation – Workstream 6

Nelnet will leverage our partnership with The Viscardi Center (TVC), a third-party vendor with extensive experience in digital accessibility for access to document (e.g., Portable Document Format (PDF)) 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.

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 NonVisual Desktop Access (NVDA) and Job Access with Speech (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.

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.

The Nelnet Accessibility team can also help participating entities establish accessible document templates and style guides, and guide content creators to adopt accessible content creation practices as part of our customized training services. Refer to the **Training, Policy Development, and Program Governance Support section within this question** for additional information.

Video, Audio, and Multimedia Accessibility – Workstream 7

TVC will also remediate multimedia files for participating entities, including video content, by providing comprehensive post-production captioning services for compliance with WCAG 2.1 AA or 2.2 AA standards, Section 508, ADA, and Federal Communications Commission (FCC) requirements, as mandated by each participating entity'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.

Each multimedia file will be reviewed, captioned, and transcribed by certified professionals, leveraging technical glossaries and participating entity-provided instructions to ensure content accuracy and accessibility for individuals using assistive technologies. 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.

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 can help participating entities explore tools and integrations that support accessible streaming, players, and media platforms based on individual needs. Through individualized coaching sessions, we can help teams evaluate and select accessible video players and streaming solutions, assessing essentials such as keyboard and screen reader support, caption and audio description workflows, player application programming interface (API) extensibility, and analytics. Where native capabilities are limited, we provide practical alternatives and workarounds, including transcript-first delivery, third-party caption and description services, configurable player plug-ins, and interim publishing patterns, while establishing a roadmap toward full compliance.

Platform/Software Tools for Issue Management, Reporting, and Governance – Workstream 2

Nelnet will implement a platform-agnostic, standards-aligned monitoring program that performs automated, scheduled scans of in-scope properties, aggregates results into role-based dashboards, and drives remediation through a structured triage and workflow process. Refer to the **Ongoing Monitoring and Scanning section within this question** for additional information.

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 and evolving mobile accessibility expectations. 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.

Our tenured accessibility experts leverage their experience to facilitate instructor-led seminars and create training documentation. **Nelnet's Accessibility team will create a customized training package to fit any participating entity'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.

- 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 into training suites for each role to deliver relevant, practical instruction. **This role-based model delivers targeted, efficient training aligned to day-to-day responsibilities and supports consistent application of accessibility best practices across teams.**
- For **on-demand training**, we offer an online learning platform where client staff will have access to a growing library of 20-plus courses to start their accessibility journey and continuously refresh and enhance their skills. Content areas include accessibility for documents, videos, web and mobile applications, and design, giving staff the flexibility to focus on the courses that are most relevant to their role. Dozens of additional courses are scheduled to be released in Q1 2026.
- 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.**

We recommend live training in addition to on-demand sessions to enable participants to engage with the trainers, 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 will work with participating entity leadership to determine whether additional training would be valuable to employees. We will also

provide clients with post-training deliverables such as training materials; specific guidance by topic (e.g., procurement, social media, etc.); a schedule for training cycles; and other resources (e.g., an accessibility checklist and maintenance documentation) to help clients incorporate accessibility checks and best practices into their daily processes.

In addition to structured training, Nelnet 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, suggesting changes based on any gaps noted in annual audits to conform to updated laws and industry standards.

Policy Development and Program Governance Support – *Workstream 5*

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 client's accessibility coordinator, reviews risks, exceptions, vendor compliance, and progress against milestones. A phased program roadmap sequences inventory and foundation activities, representative audits, 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 demonstrations 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.

Ensuring 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. 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.

By partnering with Nelnet to create a digital accessibility plan, participating entities 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.

We have collaboratively developed digital accessibility plans with several clients, including Colorado's City of Fort Collins, Town of Parker, and City of Manitou Springs governments; refer to **question 11 in the Offeror Qualifications and Experience section** for additional information. Additionally, we collaborated with the City of Fort Collins 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 City of Fort Collins while staff continue to make progress toward compliance.

2. Indicate the workstreams your firm is able to support.

Nelnet, in conjunction with our partner, TVC, 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 in question 1)
- **Workstream 2 – Ongoing Monitoring, Scanning, and Analytics Platform** (refer to the Ongoing Monitoring and Scanning section in question 1)
- **Workstream 3 – Source-Level Remediation Support and Consulting** (refer to the Code-Level Remediation Support and Consulting section in question 1)
- **Workstream 4 – Training, Education, and Capacity Building** (refer to the Training section in question 1)
- **Workstream 5 – Policy, Governance, and Program Management** (refer to the Policy Development and Program Governance Support section in question 1)
- **Workstream 6 – Document and PDF Remediation** (refer to the Document Remediation section in question 1)
- **Workstream 7 – Video, Audio, and Multimedia Accessibility** (refer to the Video, Audio, and Multimedia Accessibility section in question 1)

3. Confirm your ability to support agencies nationally and describe any limitations on geography or scope.

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.

Our recent and past work spans state and local governments, utilities, and higher education, including engagements with the following entities.

- Adams County, Colorado
- City of Fort Collins, Colorado
- City of Manitou Springs, Colorado
- City of Portland, Oregon
- Colorado Department of Health Care Policy & Financing
- Colorado Department of Human Services
- Colorado Energy Office
- Colorado Governor's Office of Information Technology
- Los Angeles Community College District
- National Aging and Disability Transportation Center
- Town of Parker, Colorado
- Town of Superior, Colorado
- University of Maryland Global Campus

We hold federal procurement credentials that streamline acquisition nationwide, and we tailor deliverables to each client's regulatory landscape while maintaining alignment to ADA Title II, Section 508, and WCAG 2.1 AA or 2.2 AA.

Our national support model combines reusable, proven artifacts with local adaptation. For example, Nelnet deploys a policy suite, governance framework, and phased roadmap that have been adopted by Colorado municipalities. We then customize each plan to the client's statutes, processes, and systems. Role-based guidelines and checklists standardize publishing and remediation across web and documents, accessible procurement language and vendor governance confirm conformance in contracts and renewals, and a maturity assessment with KPIs and annual reporting drives measurable improvement.

We deliver these services with a mix of remote and on-site facilitation, cross-functional steering committees, and ongoing advisory services, supported by training curricula for authors, approvers, developers, and managers.

Nelnet scales to service significant numbers of digital assets by leveraging our staffing depth and strategic partners. For example, county inventories exceeding 5,000 PDF files and hundreds of Microsoft Office documents have informed our backlog planning, sprint prioritization, and accommodations governance. Our document and multimedia remediation capacity is augmented by established partners for high-volume PDF work and captioning, while our internal engineers and coaches guide source-level remediation for web and applications.

4. Describe in detail your pricing structure for this cooperative contract, including: a. how you price platform/software components, b. how you price professional services, c. any volume-based or portfolio-based pricing models.

Platform/Software Component Pricing

Table 1 provides pricing for the ongoing monitoring component of our solution (workstream 2).

Role	Rate
Workstream 2	
Dashboard	\$5,000.00 per year

Table 1. Monitoring Dashboard Pricing. The monitoring dashboard comes with an annual maintenance fee.

The accessibility dashboard is priced at \$5,000 per year per project as a bundled offering. A project is defined as an assessment of a specific digital property. This bundled price includes up to 50 platform users and 1,000 automated uniform resource locator (URL) scans per month. Additional users, scans, or projects can be added following a standard usage-based or block pricing structure. Volume-based discounts apply to platform components, and unlimited user, scan, or project options are available upon request.

Professional Services Pricing

Professional services are priced at an hourly rate of \$136.00 (which does not include the administrative fee) and may fluctuate depending on several factors, including the type of service (e.g., audit versus live training), remote versus on site, multi-year commitments, and the overall size of the opportunities. Nelnet will assign roles as appropriate to deliver services on time and on budget within workstreams 1 and 3 through 5, as requested by participating entities.

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 2 provides the rates associated with these services that comprise 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 2. Document and Multimedia Services Pricing. Rates are based on content complexity and serve as a baseline for document and multimedia services conversations with participating entities.

Specifically for training (workstream 4), Nelnet offers a range of live, virtual courses (Table 3)—charged per course—that can match the needs of various roles within each participating entity. All training is provided by experienced accessibility trainers and will be tailored for each client. 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.

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

On-demand training is charged per user, on either a monthly basis (for up to 250 users) or annual basis (for 250 or more users). Table 4 provides monthly and annual rates for comparison.

Number of Users	Monthly Per-User Cost	Annual Per-User Cost	Annual Minimum
1-249	\$30.00	\$360.00	N/A
250-499	\$20.83	\$250.00	\$62,500.00 (250 users)
500-999	\$14.58	\$175.00	\$87,500.00 (500 users)
1,000-Plus	\$8.33	\$100.00	\$100,000.00 (1,000 users)

Table 4. Rates for On-Demand Training. On-demand training is charged per user, either monthly or annually depending on the number of users.

Nelnet welcomes the opportunity to discuss assessment and remediation services, accessibility training, and consulting options with interested participating entities 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.

5. Describe any discounts you are offering through this ECPA/Edge Public cooperative contract, including: a. discounts by service type, b. discounts based on volume, term length, or aggregated cooperative usage.

Discounts will apply in the event a participating entity 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.

6. Identify any services or modules that are not eligible for discounts, if applicable, and explain why.

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

7. Explain whether your proposed pricing under this contract is equal to or better than pricing you offer to individual public entities or other cooperatives with comparable or lower volume, and describe how you will ensure most-favored customer pricing is maintained.

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. Our pricing is structured to reflect our most competitive rate for the ECPA catalog. We also maintain consistent pricing across all our opportunities to ensure fairness, transparency, and alignment with our overall pricing strategy.

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.

8. Describe how new products, modules, or services introduced during the term will be price and incorporated into the contract to ensure continued competitive, cooperative-level pricing.

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, enabling a client to choose specific services as opposed to a bundle.

In addition to the pricing models represented in **question 4**, Nelnet also 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 its own pace. Refer to **question 10** for additional information.

9. Describe any service warranties or guarantees you provide, including: a. performance or uptime commitments, b. remediation quality or rework policies, c. satisfaction or opt-out guarantees.

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 audit 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) and VoiceOver (iOS)
 - **Magnification/Zoom:** Operating system and browser zoom to 400 percent on desktop and 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.

10. Describe any additional pricing proposals you wish to offer.

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 client's 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 participating entity 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.

11. Confirm your understanding and agreement of the administrative fee structure outlined in the RFP.

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

12. Explain how the administrative fee is accounted for in your pricing and how you will ensure that net pricing to agencies remains competitive.

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 participating entities receive the best pricing available and keeps rates competitive within the market.

13. Provide any additional information relevant to your solution offering and pricing structure that will help ECPA and Edge Public evaluate the overall value of your proposal to agencies of varying sizes and complexity.

Sample Reports

To illustrate our team's thorough approach, Nelnet is providing the following in the **Additional Information section** as samples of reports we have delivered to other clients.

- Attachment 1 – Sample Accessibility Assessment and Remediation Report, referenced in **question 1**
- Attachment 2 – Sample Accessibility Assessment Executive Summary, referenced in **question 1**

Pricing Assumptions

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 project 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 participating entity 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 participating entity 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.

Performance Capabilities

1. Describe in detail the customer experience from start to finish for a typical agency utilizing this contract including: a. initial discovery and onboarding, b. assessment and roadmap phases, c. remediation and monitoring, d. ongoing governance and improvement.

Upon engagement, Nelnet Government Services, LLC (Nelnet) will assign a project manager to serve as the primary point of contact responsible for meeting a participating entity's business needs and addressing issues and concerns in a timely manner. The project manager will leverage their business expertise, cross-functional skill set, and gathered knowledge of each participating entity's content and/or programs and strategic direction to oversee accessibility tasks for digital products. Refer to **question 9 in the Offeror Qualifications and Experience section** for information on our lead project manager, Lanae Miers, and our other key personnel.

We believe that open and clear communication is integral for a successful partnership. Soon after contract signing, the project manager will contact the participating entity's stakeholder group to establish a kickoff meeting with the Nelnet Accessibility project team. We will 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 participating entity 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 participating entity for review. Upon approval, the project manager will add project tickets into Atlassian Jira—our project planning, tracking, and release management tool—and set up internal team standups; frequency is dependent on project complexity and duration.

Throughout the project life cycle, the project manager will:

- Work with the participating entity to set the right cadence and audience for regular stakeholder meetings.
- Clearly communicate the status of key milestones, recent accomplishments, key or escalated delivery risks or issues, and upcoming activities.
- Build relationships with stakeholders to better understand the participating entity's business needs, goals, and vision.
- Facilitate request/ticket management for the participating entity, including tracking and monitoring requests, engaging the appropriate resources within Nelnet, and providing regular updates.
- Bridge technical teams and business stakeholders.
- Advocate for the participating entity and set strategic direction on its 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 efficiently mitigate conflicts between workstreams. Ongoing project status will be delivered to each participating entity 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. The project manager 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 participating entity.

Our experience providing similar services for various other public-sector entities will enable us to collaborate with participating entities and meet the accessibility requirements set forth by federal regulations and established by individual states.

2. Outline how an existing ECPA or Edge Public member would be transitioned into your program under this cooperative contract. Describe the expected user experience during transition, including any data migration, onboarding, or platform configuration.

When an existing Educational Cooperative Purchasing Alliance (ECPA) 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 participating entities.

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 participating entity experiences no onboarding delays.

2. Stakeholder Engagement and Kickoff

We will contact the participating entity's stakeholder group to schedule a joint onboarding and kickoff meeting, which will include participating entity 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 participating entity'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 participating entity 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 participating entity 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 participating entity's pace, size, and complexity.

This configuration will enable the participating entity to immediately benefit from a structured, transparent workflow.

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.
- The methodology, tools, and standards that will be applied.

The participating entity will review and approve this scope before work begins, ensuring it retains full control and clarity during transition.

As work begins, the participating entity 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.

Upon completion of the audit or engagement cycle, Nelnet will:

- Create a comprehensive findings report.
- Prepare executive-level summaries and demonstration materials.
- Hold a final presentation with the participating entity's team.

This structured conclusion ensures the participating entity 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 ECPA or Edge Public participating entities.*

3. Describe the ways in which participating entities can initiate and manage work with your company, including but not limited to: a. requesting assessments, remediation assistance, training, or advisory services, b. configuring and accessing your platform/portal.

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 participating entity 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.
 - Participating entity 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 participating entity 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 participating entity'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 participating entity 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 participating entity's preferred communication approach (e.g., regular meetings, written updates, status reports). Any questions, issues, or scope considerations are promptly communicated to the participating entity.
5. **Quality Assurance and Validation:** All deliverables undergo comprehensive 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). Deliverables may include summaries of high-risk findings, remediation outcomes, and supporting documentation. The Nelnet Accessibility team is available to respond to participating entity questions and provide clarification as needed.
7. **Acceptance and Completion:** Upon participating entity 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, participating entity teams, and content creators to support sustained accessibility compliance and long-term success.

4. If your company provides a web-based platform or portal, describe its key features and ease of use including: a. accessibility issue search, filtering, and drill-down capabilities, b. visibility into compliance scores, trends, and risk indicators, c. workflows for assigning, tracking, and verifying remediation tasks, d. access to order history, engagement history, and completed assessments, e. access to invoices, contracts, and reports online.

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.

5. Describe your ability to integrate with or provide "punch-out" or single sign on experiences from purchasing systems, portal, or intranets. Include your typical implementation timeline for these integrations.

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

6. Describe any minimum engagement thresholds and how you accommodate small entities with limited budgets.

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 participating entity, depending on their needs.

7. Describe your ability to monitor ongoing work, including: a. tracking open assessments, remediation items, and training activities, b. providing status updates and dashboards for both technical and non-technical stakeholders.

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 provide advisory support that helps clients build their own sustainable, WCAG-aligned monitoring practices by guiding them in selecting and configuring automated scanning tools, defining in-scope properties, and establishing effective schedules and sampling strategies. Through this consultative approach, we show teams how to aggregate scan results into role-based dashboards and interpret trends, severities, backlog health, and progress toward conformance targets.

Our goal is to equip client staff with the methods, evaluation criteria, and reporting structures reflected in our established methodologies so they can independently identify, track, and manage new, resolved, reopened, and aging issues over time, ultimately reducing reliance on external services and strengthening long-term accessibility governance.

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 **question 3** for additional information.

8. Describe how you manage change requests, expansion to new sites/apps, or scope adjustments over the term of the contract.

Nelnet performs thorough discovery phases with our clients to establish an agreed-upon scope early in the project. Any scope adjustments that increase complexity or scale later in the project will require a change order.

Using our collaborative project management approach enables our team to effectively adapt to evolving priorities while maintaining clarity and momentum. In one example, we ensured full transparency with the client by outlining the implications for timeline, cost, staffing, etc., enabling stakeholders to make an informed decision to move forward with the change. Nelnet then aligned client priorities with all applicable accessibility requirements to deliver a solution that preserved conformance and supported project success.

9. Describe your standing invoicing and payment terms, including any quick pay or early payment discounts.

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.

10. Describe payment types accepted including but not limited to: a) Purchase orders, b) Procurement card, c) Credit card/Debit card d) ACH.

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

11. Please outline any additional charges for customers for using different payment forms.

There are no fees associated with ACH or check payments.

12. Describe how your organization proposes to deliver services nationally, including supporting agencies across time zones and with varying technical maturity.

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.

13. Describe your ability to scale for large portfolios while also supporting smaller entities.

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, multi-program 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.

14. Describe your standard proposed service level agreements for: a. response times for critical and non-critical issues, b. resolution/mitigation targets for critical accessibility problems, c. platform uptime/availability, maintenance windows, and incident communications.

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

16. Describe how your company will work with ECPA and Edge Public to market and promote the awarded contract to eligible entities nationally. How will your team differentiate this contract from other cooperative or state contracts you may hold?

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

When clients are open to public visibility, we will jointly issue press releases hosted on the Nelnet, Inc. website, develop real-world case studies once implementation is underway, and feature participating entities 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 participating entities 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:** Participating entity access to information through their Edge Public membership explaining scope and eligibility

15. Describe your problem escalation process, including escalation paths, communication expectations, and how you coordinate with agency staff to resolve issues.

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.

17. Describe how customers can verify they are receiving the correct contract pricing and terms.

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

18. Describe your ability to provide quarterly sales and usage reports showing total gross dollar volume generated from this contract, including breakdowns by: a. participating agency, b. state/region, c. major service categories or products.

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

Offeror Qualifications & Experience

1. Please provide the name, address, phone number, and email address for the authorized agent submitting the proposal.

Contact information for Nelnet Government Services, LLC (Nelnet)'s authorized agent is as follows.

- **Name:** John Turner, Chief Information Officer
- **Address:** 7150 South Fulton Street, Centennial, CO 80112
- **Phone Number:** 303.696.5671
- **Email Address:** John.Turner@Nelnet.net

2. Provide a brief company profile including: a. legal name and corporate structure, b. year established and corporate headquarters location, c. primary office locations relevant to servicing this contract.

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 education, technology, consumer loan onboarding and servicing, 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 (CaaS)** 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.**

3. Describe the scope of clients you currently service, with emphasis on public sector entities.

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 the Educational Cooperative Purchasing Alliance (ECPA)'s workstreams. The following is a sample of our work.

- **Los Angeles Community College District:** As part of our contract with the largest community college district in California—and one of the largest in the U.S.—Nelnet assessed digital products, recommended compliant solutions, and reviewed accessibility conformance documentation.
- **Colorado State and Local Agencies:** Nelnet engages with Colorado state agencies, such as the Colorado Department of Early Childhood, the Colorado Department of Human Services, and the Colorado Department of Transportation, through the Governor's Office of Information Technology (OIT) Americans with Disabilities Act (ADA) enterprise agreements, as well as local entities, such as the City of Fort Collins, the Town of Parker, and the Town of Superior. 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 application has been downloaded by more than 1.8 million Coloradans and provides secure, convenient access to state services.

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.

- **City of Portland, Oregon:** Our contract with the City of Portland 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.
- **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.

- **National Aging and Disability Transportation Center (NADTC):** Nelnet partnered with NADTC to audit a selection of its web pages, documents, and eNews using Web Content Accessibility Guidelines (WCAG) 2.1 and Section 508 standards. For this project, we remediated digital content, provided consulting and guidelines to incorporate accessibility into NADTC's processes, established a content review schedule, and provided fundamental web and document accessibility training.
- **Ascendium Education Group, Inc. (Ascendium):** Our team partnered with Ascendium, 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.
- **Flexion Inc. (Flexion):** Nelnet partnered with Flexion 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 Flexion's implementation team to ensure solutions were built with accessibility in mind at every stage of product development.

4. Describe your company's experience and expertise in digital accessibility including: a. number of years providing accessibility services and/or platforms, b. experience with WCAG, Section 508, ADA Title II/III, and other relevant standards, c. experience working under or with DOJ consent decrees, settlement agreements, or formal remediation plans.

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.

Driving Force for Inclusive Experiences

Marc Thorson, one of our lead accessibility experts, has Spinal Muscular Atrophy and relies entirely on speech recognition and eye-gaze technology to operate a computer. Applying his lifetime of assistive technology use and 20-plus years of web development and architecture experience, Marc champions accessibility and inclusion as part of Nelnet's 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 a virtual environment. Team members are active in the accessibility industry, and are frequent presenters and thought leaders at industry conferences across the country.

Nelnet supports numerous types of public, private, and nonprofit sector contracts with Section 508 compliance, ranging from consulting to helping improve organizations' websites, apps, and documents. Our digital accessibility experience includes longstanding work with the U.S. Department of Education that supports 12.4 million federal student loan borrowers, as well as services for state and local governments, supporting their needs related to the U.S. Department of Justice (DOJ)'s final rule on website and mobile application accessibility and WCAG 2.1 AA or 2.2 AA standards, ADA standards, and various state regulations.

5. Describe your experience with cooperative or multi-agency contracts, including any relevant examples where you supported a program that scaled across many agencies.

Our team has been particularly active in Colorado with the passage of the Colorado Laws for Persons with Disabilities Act. **Nelnet is one of two vendors preapproved to perform services for both the Colorado OIT's IT ADA Accessibility Auditing and ADA Remediation vendor pools for evaluating and remediating accessibility violations.** Our services

across the following state and local agencies impact more than 5.84 million Coloradans.

- Adams County Board of County Commissioners
- City of Fort Collins
- City of Manitou Springs
- Colorado Department of Corrections
- Colorado Department of Early Childhood
- Colorado Department of Health Care Policy & Financing
- Colorado Department of Higher Education
- Colorado Department of Human Services
- Colorado Department of Personnel and Administration
- Colorado Department of Transportation
- Colorado Division of Water Resources
- Colorado Office of Economic Development & International Trade
- Colorado OIT
- Colorado River Water Conservation District
- Denver Metro Water District
- Town of Parker
- Town of Superior

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

- Ascendium
- City of Portland (City of Portland Parking Operations and City of Portland Water Bureau)
- Easterseals (NADTC)
- Flexion
- Los Angeles Community College District

6. Provide a high-level overview of your company's financial stability and capacity to support a multi-year, national cooperative contract.

Publicly traded (NYSE: NNI), Nelnet, Inc. has a market cap of \$4.74 billion (as of January 31, 2026) 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.nelnetinvestors.com) 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.

7. Describe your capacity to provide the full scope of products and services described in this RFP to agencies throughout the US.

As described in the **Solution Offering/Pricing Structure section**, Nelnet has the experience and capabilities to provide the full scope of products and services described in ECPA's solicitation to participating entities 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)**. We

execute 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 and regulations.

8. Describe any anticipated challenges in servicing agencies of varying sizes and technical capabilities, and how you address those challenges.

Nelnet is fully committed to delivering high-quality accessibility services. Table 1 provides some challenges we have encountered in our experience and how we have addressed them.

Challenge	Description	How We Address the Challenge
Capacity and Surge Demand	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.
Multi-Jurisdiction Operations	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.
Timeline Realism and DOJ Deadline Pressure	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.
Dependencies on Client Teams and Third-Party Software as a	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

Service (SaaS)		determinations.
Limitations of Automated Testing Alone	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.
Scale and Content Volume	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.
Change Management and Skills Gaps	Sustained compliance requires new practices and role-based upskilling.	We supply training, roadmaps, and governance to embed accessibility into daily workflows.
Evolving Standards and Regulations	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.
Resourcing Model and Cost Control	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.
Risk Acceptance, Escalation, and Procurement Decisions	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 1. Potential Challenges and Nelnet's Solutions. Nelnet anticipates common operational, regulatory, and capacity-related challenges in delivering accessibility 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.

9. Identify the key personnel who will lead and be engaged in the implementation and ongoing management of this contract.

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.

- **Lanae Miers**, 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. Lanae 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. Lanae works with a variety of clients across public, private, and nonprofit sectors to develop full project plans, including scope, schedule, budget, and resource allocation.
- **Joanne Hawley**, 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, Texas Workforce Commission, Texas Education Agency, the City of Fort Collins, and the Town of Superior. 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. Joanne 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.

- **Harrison Papesh**, 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, Harrison 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 Town of Parker and City of Manitou Springs in Colorado with developing digital accessibility plans to document their accessibility programs and processes for maintaining compliance. Harrison 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.
- **Robin Eckelberry**, 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, Robin 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. Robin 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 the **Value-Added Features section** for additional information), Nelnet can leverage skills across the greater team as needed.

10. Indicate whether your company is minority-owned, women-owned, or holds any other relevant certifications.

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

11. Provide 3 references from public sector clients for whom you have provided digital accessibility services and/or platforms of similar scope and complexity.

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 ECPA'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 City of Fort Collins, the Town of Parker, and the Town of Superior—will attest to the quality of our team's accessibility services; 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 City of Fort Collins

Contact information for Nelnet's **City of Fort Collins, Colorado**, point of contact is as follows.

- **Name:** Jan Reece, Lead Equal Opportunity Compliance Specialist
- **Phone Number:** 970.416.4254
- **Email Address:** JReece@FCGov.com

As part of our initial one-year contract with the City of Fort Collins, from June 2024 to June 2025, Nelnet collaborated with its staff to ensure public-facing documents and websites complied with Colorado House Bill (HB) 24-1454. Our Accessibility team met with City stakeholders to identify information and communications technology (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.

Digital Accessibility Audits and Planning for the Town of Parker

Contact information for Nelnet's **Town of Parker, Colorado**, point of contact is as follows.

- **Name:** Emily Hogan, Assistant Town Manager – Administration
- **Phone Number:** 303.805.3117
- **Email Address:** EHogan@ParkerCO.gov

Nelnet partnered with the Town of Parker 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 Town of Superior

Contact information for Nelnet's **Town of Superior, Colorado**, point of contact is as follows.

- **Name:** Emily Clapper, Management Analyst II
- **Phone Number:** 303.499.3675 ext. 169
- **Email Address:** EmilyC@SuperiorColorado.gov

Nelnet partnered with the Town of Superior 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.

Value-Added Features

1. Please describe any additional features, advantages, and benefits of your solution and organization that you believe will provide extra value to ECPA, Edge Public, and participating entities.

The following information further describes how Nelnet Government Services, LLC (Nelnet)'s Accessibility team and our services will add value to the Educational Cooperative Purchasing Alliance (ECPA), Edge Public, and participating entities.

The Nelnet Benefit

- **Fully Domestic Digital Accessibility Team:** Nelnet's digital accessibility testing team is fully based onshore in the U.S. 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 participating entities maintain alignment with emerging procurement and data-handling requirements.
- **Complete Spectrum of Accessibility Services:** Nelnet's Accessibility team is proficient in performing the full range of services listed in ECPA's solicitation. Our ability to be a single solution for participating entities can improve collaboration and reduce friction from working with multiple vendors. Our proficiencies include comprehensive assessments and audits across websites, web and mobile applications, portals, digital documents, and multimedia; ongoing automated monitoring and analytics with dashboards, alerts, and issue workflows; true source-level remediation at the code, template, and design system level, including collaboration on commercial off-the-shelf (COTS) and third-party integrations; role-based training and enablement for developers, designers, content authors, product owners, procurement staff, and leadership; policy, governance, and program management with

roadmaps and maturity assessments; high-volume document and Portable Document Format (PDF) remediation with accessible templates and quality documentation; and video, audio, and multimedia accessibility services such as captioning, transcripts, audio description, and accessible player guidance.

Our methods align with the Americans with Disabilities Act (ADA), Section 508, and Web Content Accessibility Guidelines (WCAG) 2.1 and 2.2 AA, and include verification and regression testing to confirm remediations, delivered at national scale for participating entities of varied size and technical maturity to achieve measurable, sustainable conformance and inclusive user experiences.

- **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.
- **Vendor Accessibility Compliance Management:** Many clients 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 software as a service (SaaS) portfolio and is tuned for WCAG 2.1 AA, 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:** Our blended program combines live training, role-specific coaching, and embedded sprint guidance with on-demand resources to enable continuous accessible releases and reduce reliance on audits. Training can be customized for each client, and we can also support webinars upon request.
- **Assistive Technology Integration and User-Centered Validation:** Our remediation approach incorporates real-world assistive technologies such as screen readers and speech recognition, and we can conduct live validation sessions to confirm fixes work for end users with disabilities. We stay 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.
- **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 Public Sector Experience:** Our team's approach has been selected by various state and local governments, education industry entities, and more for accessibility assessments, remediation, and roadmap development. 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 PDF files and incorporating accessibility into a software development life cycle (SDLC).

Experience in the Education Industry

Nelnet's Accessibility team includes several associates who have worked in various capacities in both higher education and elementary education.

- **Joanne Hawley, M.Ed.,** holds a special education certification and has a history of advising at-risk K-12 students, as well as performing high school-level career and academic counseling. She has also previously served as an accessibility subject matter expert for a state agency that oversees primary and secondary public education.
- **Robin Eckelberry's** experience includes more than five years engaging with students with disabilities, families, and faculty to set up accommodations for equitable access to higher education. She performed student-centered assistive technology evaluations and trained students with disabilities on the use of technologies to enhance their skills, increasing student access to and success in the areas of reading, writing, organization, and listening. In addition, Robin evaluated the accessibility of new curricular materials considered for procurement and remediated student textbooks and academic materials to be accessible with screen reader and text-to-speech technologies.
- **Wendy Trottier** brings experience in elementary education, specifically working with children with many types and levels of disabilities in a public-school setting. Her work for a

county agency's complex preschool through grade 12 Step Up for Students program included enhancing learning outcomes by using specialized teaching methods for children with disabilities to deliver educational services tailored to the unique needs of each student.

In addition to these team members' experience and qualifications, our greater organization has a foundation in education services and continues to provide services to K-12 and higher education institutions, including solutions for financial aid management, loans, cybersecurity and information technology (IT) compliance, and secure payments. Nelnet, Inc.'s experience includes:

- **45-plus years** partnering in education with K-12 faith-based schools, colleges and universities, and the U.S. Department of Education.
- **12.4 million federal student loan borrowers** served—and among the highest-rated servicers.
- **Nearly 1,000 higher education institutions** and **more than 8 million students and families** served.

This deep industry knowledge provides additional insights and access to resources when creating and providing solutions throughout the education industry.