

ADA Title II Accessibility Checklist

A practical self-assessment for public agencies

Digital accessibility is now a governance issue, a service delivery issue, and an operational issue. The U.S. Department of Justice’s 2024 final rule under ADA Title II requires all state and local government entities to bring their public-facing web content and mobile applications into conformance with WCAG 2.1 Level AA.

This checklist helps leadership and compliance teams quickly assess current readiness, identify gaps, set priorities, and plan next steps. It is organized around nine areas that reflect the operational, technical, and governance dimensions of Title II digital accessibility compliance.

Who is the covered entity?

State and local governments are the covered entities under the DOJ’s Title II rule. AEC firms, technology vendors, and other contractors that produce digital content for public-sector clients play a critical supporting role. If your deliverables appear on a covered entity’s website or serve the public on their behalf, accessibility conformance is part of the engagement.

Key Requirements at a Glance

Technical standard: WCAG 2.1 Level AA

Scope: Public-facing web content and mobile apps used to deliver services, programs, and activities

Large-entity deadline: April 24, 2027 — public entities serving populations of 50,000 or more

Smaller-entity deadline: April 26, 2028 — public entities serving populations under 50,000 and special district governments

How to Use This Checklist

For each item, mark one response: **Yes**, **In Progress**, **No**, or **Not Sure**.

Suggested scoring: Yes = 2 points | In Progress = 1 point | No = 0 points | Not Sure = 0 points. The “Not Sure” column is just as valuable as the others. It identifies blind spots and knowledge gaps that need attention before compliance work can begin.

Total your score and divide by the maximum possible (72 points) to find your readiness percentage. Use the scoring guide on the final page to interpret your results.

Disclaimer: This checklist is for informational and planning purposes only. It does not constitute legal advice and is not a certification of ADA compliance. Organizations should consult qualified professionals for compliance determinations.

1. Leadership and Ownership

Checklist Item	Yes	In Progress	No	Not Sure
We have identified a single point of ownership for digital accessibility across the organization.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility responsibilities are defined across communications, IT, procurement, legal, HR, and program-delivery teams.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leadership understands that digital accessibility is an organization-wide obligation, not solely an IT function.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A named lead or coordinator is responsible for tracking compliance progress and reporting to leadership.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Digital Asset Inventory

Checklist Item	Yes	In Progress	No	Not Sure
We have a current inventory of all websites, microsites, and web applications we manage or fund.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We know whether we operate or sponsor public-facing mobile apps.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We have cataloged public-facing forms, portals, maps, dashboards, and interactive service tools.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We have identified where PDFs, Word files, presentations, spreadsheets, videos, and image-based content are published.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We know which digital assets are produced by contractors, vendors, or partner organizations on our behalf.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Requirements and Scope

Checklist Item	Yes	In Progress	No	Not Sure
Our team understands that covered web content and mobile apps must conform to WCAG 2.1 Level AA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Our team understands that the rule’s limited exceptions should not be treated as a broad exemption strategy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We have reviewed whether archived or older PDFs are still actively used by the public to apply for, access, or participate in services or programs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We understand that content produced by contractors or vendors on our behalf remains our compliance responsibility as the covered entity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. Current Authoring and Publishing Practices

Checklist Item	Yes	In Progress	No	Not Sure
New web pages are reviewed for accessibility before publishing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Images include meaningful alternative text appropriate to their context.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Online forms are labeled correctly and usable with keyboard navigation and assistive technology.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public-facing PDFs and documents are authored accessibly or remediated before posting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Video and multimedia content includes captions and, where required, audio description.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. Testing and Remediation

Checklist Item	Yes	In Progress	No	Not Sure
We use both automated scanning and manual review methods to evaluate accessibility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Our team understands that automated tools alone catch only a fraction of WCAG conformance issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We test for keyboard access, form usability, content structure, reading order, and color contrast.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We document issues by severity, location, and content type, and track remediation status over time.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Prioritization and Workflow Integration

Checklist Item	Yes	In Progress	No	Not Sure
We prioritize high-traffic, high-impact digital content first.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We prioritize content tied to essential services: applications, payments, public participation, hearings, and comment periods.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We prioritize templates, reusable components, and newly created content to prevent introducing new barriers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We have a written remediation plan with assigned owners and target completion dates.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. Vendors, Procurement, and Contracted Content

Checklist Item	Yes	In Progress	No	Not Sure
Accessibility requirements are included in procurements for websites, apps, CMS platforms, and document production.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contracts and scopes of work explicitly require accessible deliverables and define the applicable standard (WCAG 2.1 AA).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Our team reviews vendor-delivered work for accessibility rather than assuming conformance is handled.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Firms supporting our public-sector projects understand how digital accessibility applies to documents, websites, forms, outreach materials, and mapping tools they produce on our behalf.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8. Training and Staff Capacity

Checklist Item	Yes	In Progress	No	Not Sure
All staff receive basic awareness training on digital accessibility requirements and their role in compliance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Content authors, designers, developers, and communications staff receive role-specific training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Staff who produce PDFs, reports, presentations, and other public-facing documents are trained on accessible authoring practices.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training is recurring, not one-time, and is part of onboarding for relevant positions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. Public-Facing Accessibility Information

Checklist Item	Yes	In Progress	No	Not Sure
Our website includes a published accessibility statement describing our commitment and conformance target.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There is a visible, easy-to-find method for users to report accessibility barriers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We have a documented internal process for receiving, triaging, and responding to accessibility complaints or requests.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We track and can demonstrate response times and resolution actions for accessibility-related feedback.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Scoring and Readiness Assessment

Total items: 36 | Maximum possible score: 72 points

Calculate your percentage: $(\text{Your total points} \div 72) \times 100 = \text{Your readiness percentage}$.

Score Range	What It Suggests
85% - 100%	Strong foundation in place. Focus on sustaining workflows, closing remaining gaps, and monitoring vendor-delivered content.
60% - 84%	Moderate readiness. Prioritize high-use content, tighten production workflows, and assign clear remediation owners.
35% - 59%	Early-stage readiness. Establish ownership, complete your digital asset inventory, and begin targeted testing and remediation.
Below 35%	Significant work ahead. Start with governance, asset inventory, issue triage, and a focused plan for essential public-facing services.

Recommended Next Steps

1. Assign a single point of ownership for digital accessibility.
2. Complete a digital asset inventory: websites, apps, PDFs, forms, maps, videos, and vendor-produced content.
3. Test current public-facing content using both automated tools and manual review methods.
4. Prioritize high-traffic, high-impact content tied to essential services and public participation.
5. Build accessibility into production workflows, training programs, procurement requirements, and vendor expectations.
6. Turn this checklist into a 30-, 60-, and 90-day action plan with assigned owners and measurable milestones.

Ready to Move from Assessment to Action?

Accessible Organizations Group LLC helps public agencies and the AEC firms that serve them turn compliance gaps into actionable, prioritized remediation plans. Whether you need a digital asset inventory, a WCAG 2.1 AA audit, staff training, or ongoing compliance support, we bring deep regulatory knowledge and real-world practitioner experience in transportation, public involvement, and environmental review workflows.

Schedule a consultation: aogaccess.com/contact

Source note: This checklist is informed by U.S. Department of Justice Title II web and mobile app guidance, including the April 2024 final rule, the small entity compliance guide, and the 2025 First Steps guidance document.