



Your City's Website Might Be ADA Compliant — But What About Your Documents?

October 28, 2025



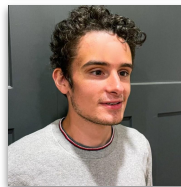
Mac Clemmens
Streamline



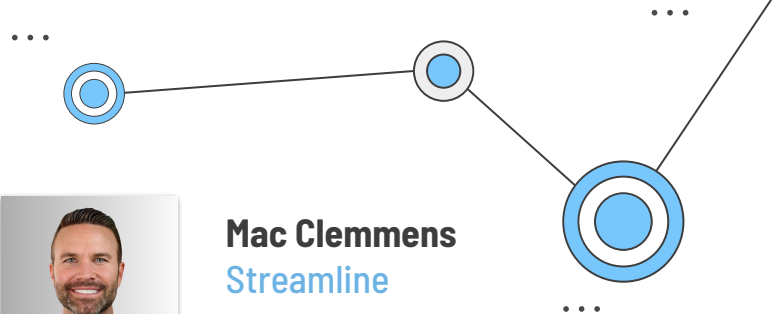
Stuart Tubis, Esq.
Jeffer Mangels
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Annelise Spargo
Streamline



Carter Temm
Accessibility leader
specializing in
compliance



What we'll cover

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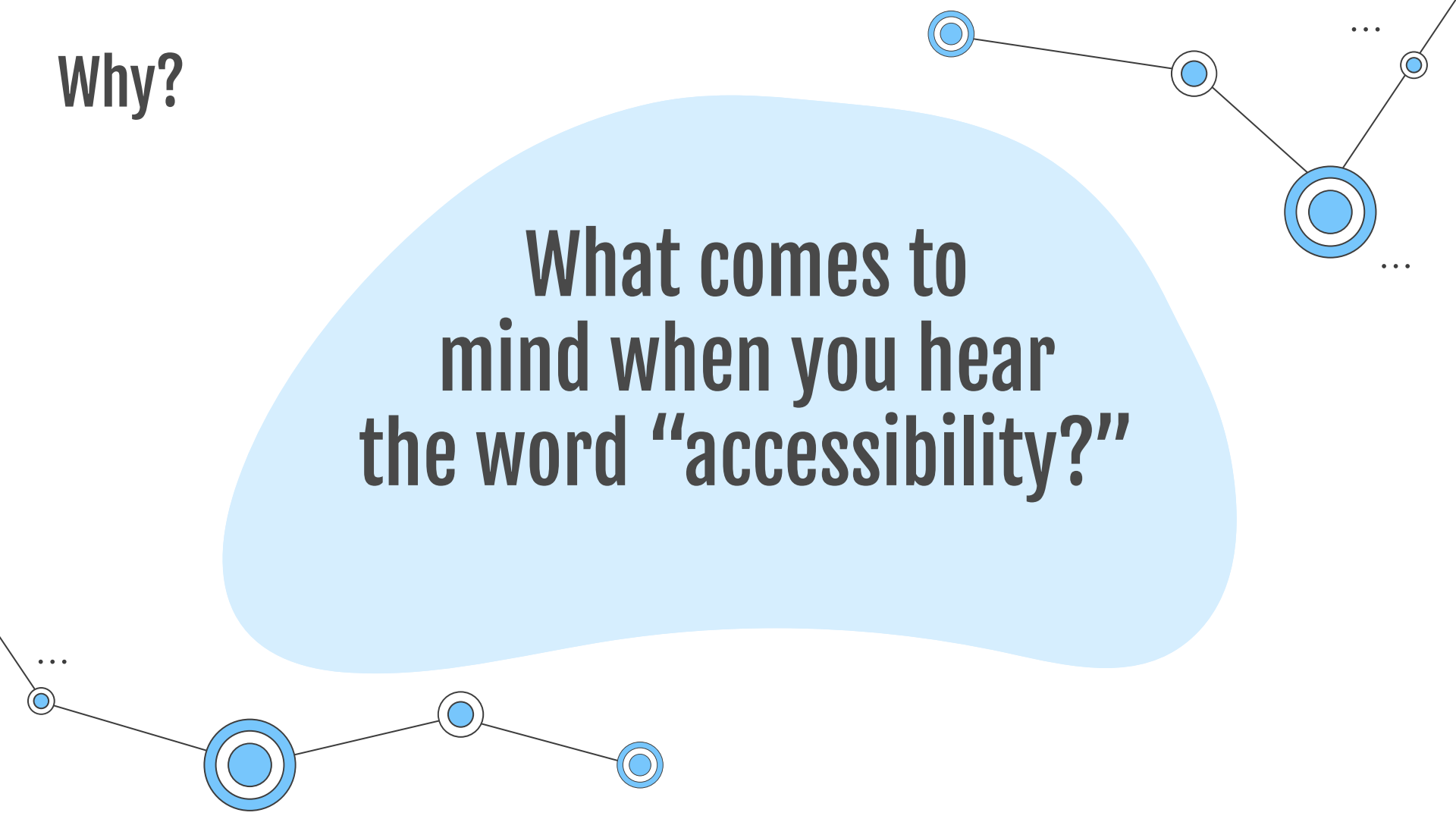
Real-World City Experiences

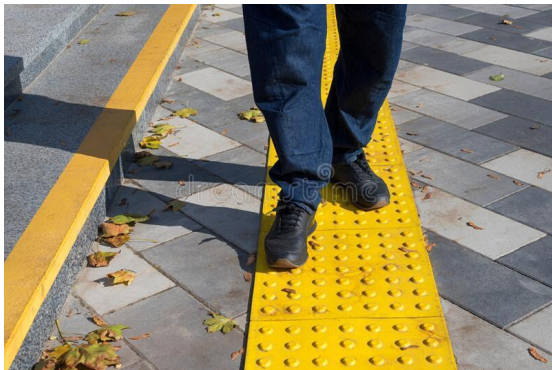
6 Actions to Get Compliant

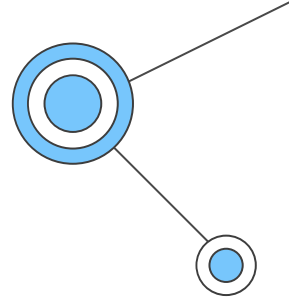
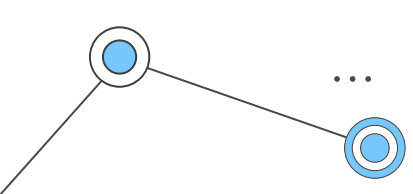


Why?

**What comes to
mind when you hear
the word “accessibility?”**







Why is accessibility important?

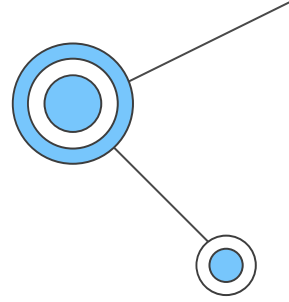
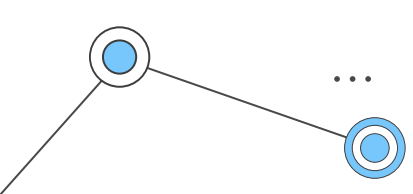
Social responsibility: providing accessible services for individuals with disabilities... is the right thing to do!

- 15 - 20% of the population has a physical or mental disability that may affect their ability to get the information they need from your site.
- Disabilities can be physical (vision, motor) or even cognitive.

Good business: Increases the ability for search engines to find / index your site.

Legality: it's not just for federal agencies!





Why is accessibility important?

Social responsibility: providing accessible services for individuals with disabilities... is the right thing to do!

- **25%** of the population has a physical or mental disability that may affect their ability to get the information they need from your site.
- Disabilities can be physical (vision, motor) or even cognitive.

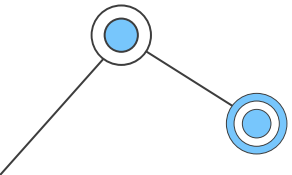
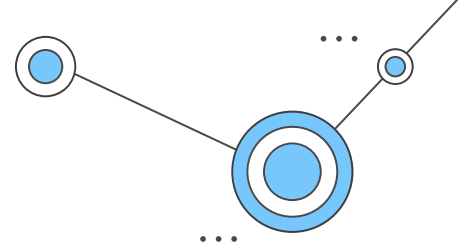
Good business: Increases the ability for search engines to find / index your site.

Legality: it's not just for federal agencies!



How does someone with a disability:

- Read about an evacuation notice or service outage?
- Report an issue with a playground using a form?
- Request a facility rental?
- Find a PDF about starting service?
- Understand a rate table in your annual report?
- Read your most recent board packet?



What?

The Legal Landscape: What's Required



Legal foundations for website accessibility

WCAG 2.1 AA Guidelines

The international web accessibility guidelines that are referenced (directly and indirectly) by both state and federal laws regarding web accessibility.

Section 508

A law referenced by the ADA that more specifically outlines how to meet accessibility standards for electronic content, including websites.

ADA Compliance

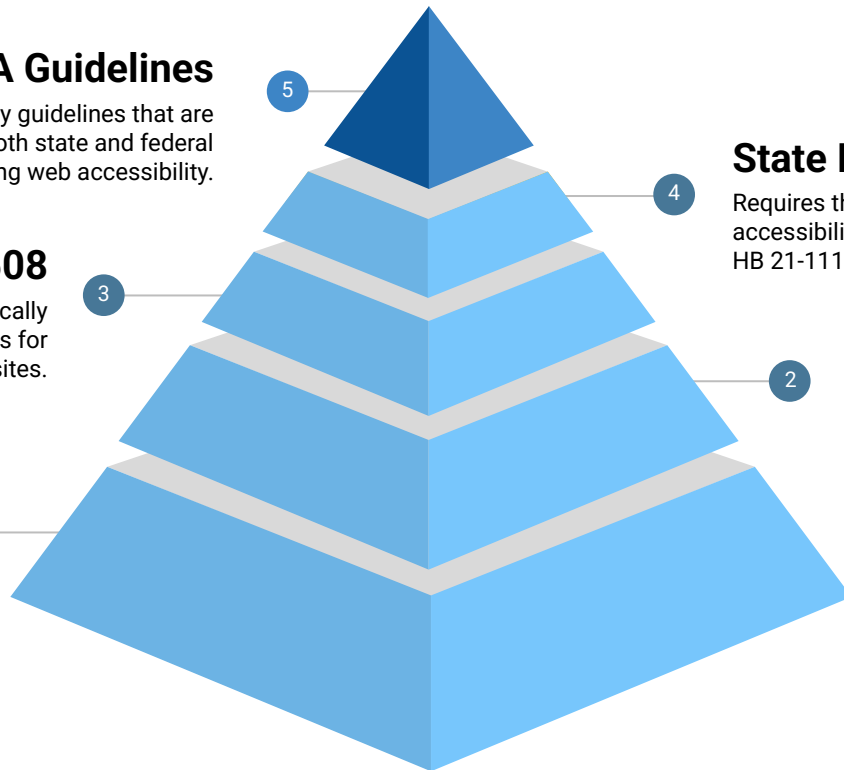
The Americans with Disabilities Act protects the rights of people with disabilities. It's broad reach extends to websites, but doesn't reference web accessibility specifically.

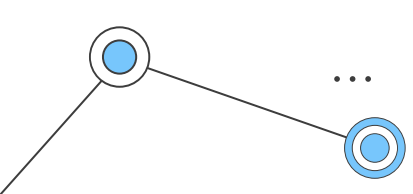
State Laws

Requires that state agencies comply with accessibility guidelines. Examples include HB 21-1110 in Colorado or AB 434 in California.

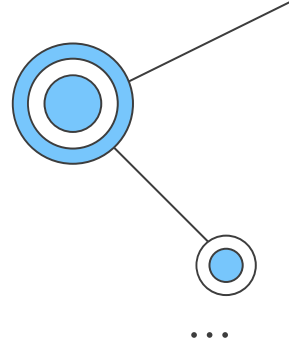
DOJ 28 CFR Part 35

New guidance released June 24, 2024 explaining how special districts must comply and how the Department of Justice will enforce website accessibility. [Full rule](#)

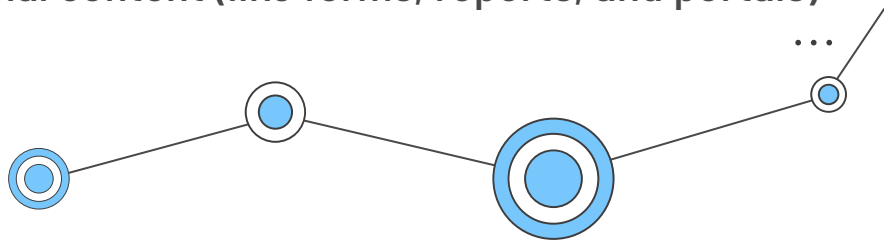




What does the 2024 DOJ update require?



Under the ADA Title II Final Rule, public entities must ensure that:

- All digital content — including websites, documents, and PDFs — is accessible to people with disabilities
 - Documents must meet WCAG 2.1 AA standards, the same accessibility benchmark used for websites
 - Accessibility covers structure, navigation, color contrast, alt text, and compatibility with assistive technology
 - Includes public-facing and essential internal content (like forms, reports, and portals)
- 

Who has to comply? By when?

> 50,000

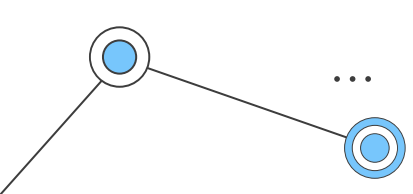
April 24, 2026

Public agencies serving
a population of 50,000+

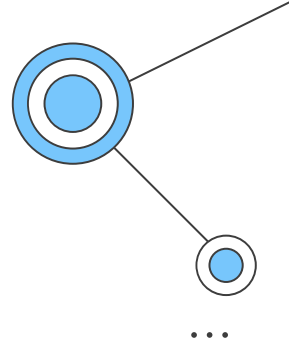
< 50,000

April 24, 2027

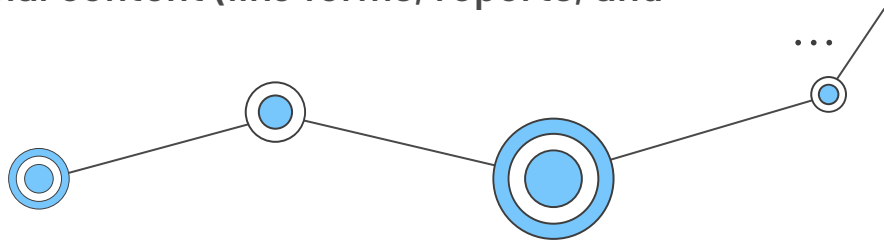
Public agencies serving
a population of less than
50,000
+
Special Districts

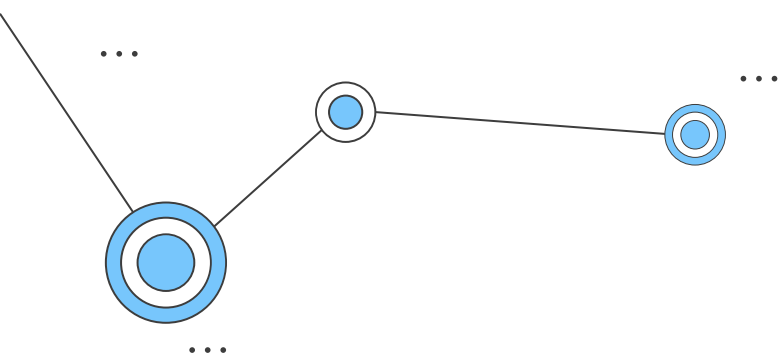


What does the 2024 DOJ update require?

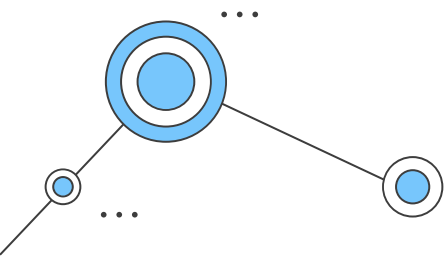


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- 



WCAG 2.1 AA Standards



Perceivable

- Text alternatives (alt text) for images and graphics
- Proper reading order and headings for screen readers
- Sufficient color contrast (4.5:1 for normal text)
- Content available in text form (not scanned images)

Operable

- All functionality available from a keyboard
- Clear navigation with logical tab order and bookmarks
- No time limits that prevent reading

Understandable

- Descriptive titles, headings, and links
- Consistent layout and language identified (e.g., English, Spanish)
- Form fields labeled clearly

Robust

- Compatible with assistive technologies (screen readers, magnifiers, voice control)
- Proper document tagging and metadata (title, language, author)
- Valid PDF/UA structure when applicable

History of ADA Actions

Miami resident Juan Carlos Gil, who is legally blind, has filed nearly 200 lawsuits in Florida and across the country accusing government agencies, restaurants and stores of violating the ADA by not taking steps to ensure that documents on their websites can be accessed by anyone's personal computers.



REQUEST FOR ACCOMMODATION

Dear Maria Waldrop;

On 3/18/19 I went to your information site (the website www.itsmymaitland.org) trying to learn about the governmental functioning of Maitland, Florida through the documents you provide within your site.

I am legally blind, so I depend on a screen reader to help me understand electronic documents. My screen reader would not work with your electronic documents. I was specifically interested in documents related to the budget of the City of Maitland, Florida (electronic documents) for 2018, 2017, 2016 and 2015 and all City Commission agendas and back up material for year 2018, 2017 and 2016. Would you please make these documents accessible in your site so that they will work with screen readers?

I have visited www.itsmymaitland.org in the past and I continue to desire to visit www.itsmymaitland.org in order to become an active participant in the Maitland, Florida governmental process and to become informed about the programs, services and activities offered by Maitland, Florida as related to my intended future visits to Maitland, Florida.

Your site has many other electronic documents other than the specific ones which I have asked for above. In addition to the specific documents listed here, can you also make the other electronic documents within your site accessible so that they will work with screen readers so I don't have to take the steps to ask for each document in a mail request?

I appreciate your reply as soon as possible.

Thank you,

X
Juan Carlos Gil

We propose that the parties engage in negotiations on an expedited basis, with the goal of achieving an enforceable agreement providing for injunctive relief and reasonable attorney's fees and costs. We would be willing to pursue these negotiations either directly or with the assistance of a mutually acceptable mediator.

The remedial measures would include, at a minimum, the following:

- Designate one or more individuals to manage web accessibility testing, repairing, implementation, maintenance and reporting for a WCAG 2.0 compliant website within a reasonable time period;
- Create, adopt and maintain a web accessibility policy consistent with prevailing standards;
- Initiate a needs assessment and subsequent training for web and content development personnel on WCAG 2.0 accessibility programming, functionality and design;
- Contractually require that services procured and performed by third-party developers and other relevant service providers conform to prevailing WCAG 2.0 compliant accessibility standards and your web accessibility policy;
- Conduct independent third-party monthly automated and disabled end-user testing of website; and
- Implement other related policy, technology and programming, monitoring, and training measures as they are identified and needed.
- Pay compensation to our Client within 10 days in the amount of: \$6500.00

Whether the Claimant secures your Website's compliance through pre-suit resolution and remediation or protracted litigation rests solely within your discretion. To that end, in the unfortunate circumstance that your Company fails to respond to this demand within **thirty (30) days** after the date of this correspondence, then we reserve the right to seek judicial enforcement, without further notice.

This letter is a confidential settlement communication and cannot be used in any action before any court. The statements of either party in these settlement negotiations cannot be considered admissions nor are they binding upon parties if no settlement is reached.

An actual
demand
letter sent...
(and paid!)

Enforcement Trends

90% of cases were filed by 10 firms

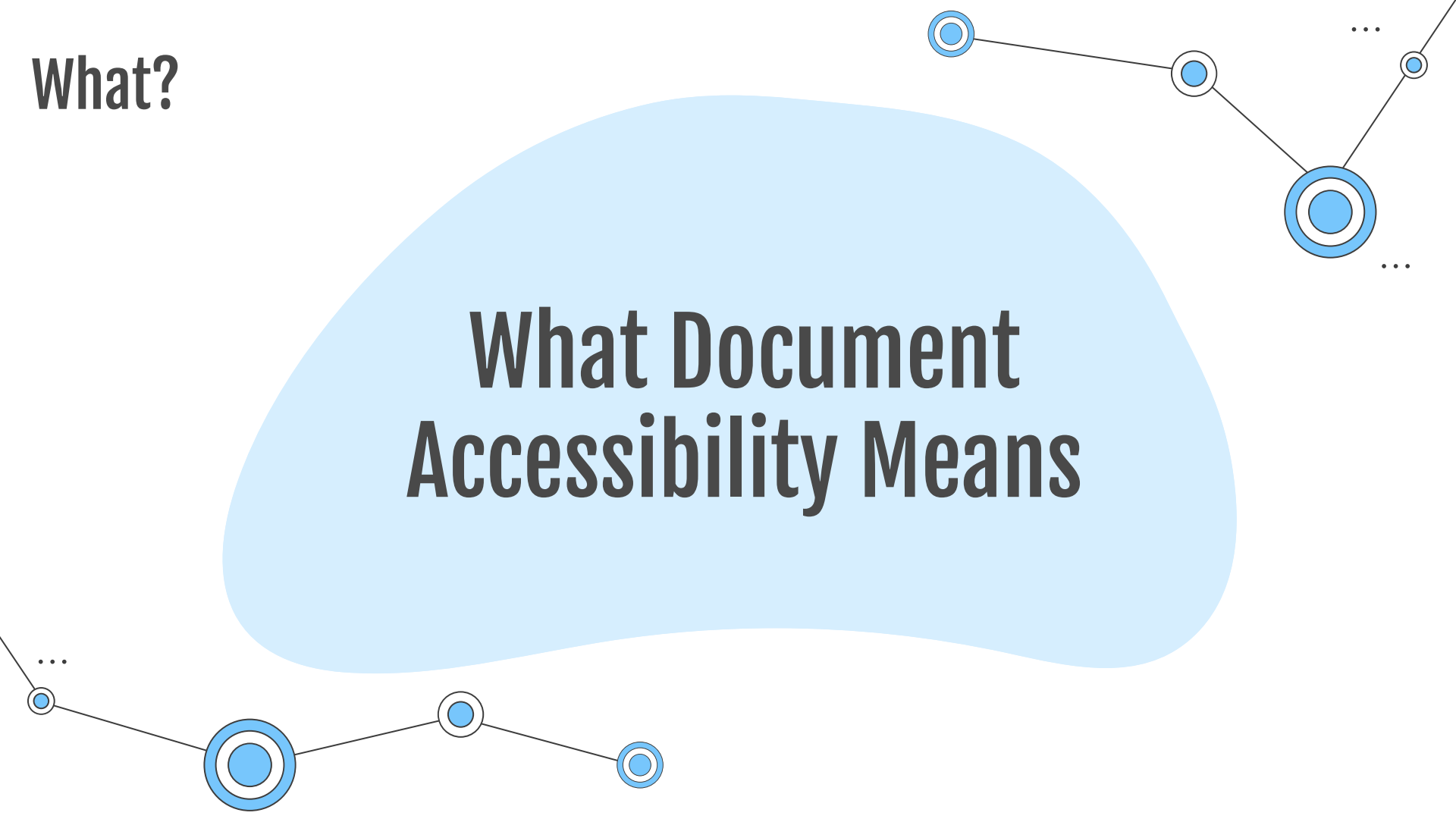
Plaintiff Name	Firm Name	Total Lawsuits	Percentage	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Perla Mageno	Manning Law, APC	172	4.45%	1	0	12	27	22	22	14	20	14	11	20	9
Jose Casillas	Custodio & Dubey LLP	95	2.46%	1	0	0	0	17	0	1	54	21	0	0	1
Alejandro Espinoza	Mendez Law Offices, PLLC	87	2.25%	5	5	13	5	15	7	6	12	3	7	6	3
Jenny Hwang	Mars Khaimov Law, PLLC	83	2.15%	6	5	16	22	11	8	8	7	0	0	0	0
Victor Ariza	Roderick V. Hannah, Esq., P.A.	80	2.07%	3	8	13	7	6	4	4	4	8	5	11	7
Luis Licea	Pacific Trial Attorneys, APC	78	2.02%	2	0	11	6	7	11	9	9	2	4	10	7
Andrew Toro	Mars Khaimov Law, PLLC	75	1.94%	9	18	14	25	6	3	0	0	0	0	0	0
Luis Toro	Mars Khaimov Law, PLLC	70	1.81%	0	0	15	8	17	16	12	2	0	0	0	0
James Watson	J. Courtney Cunningham, PLLC	69	1.69%	7	7	6	14	6	3	4	7	2	5	0	8
Rusty Rendon	Pacific Trial Attorneys, APC	66	1.71%	4	0	5	8	12	10	3	10	4	5	2	3
Nelson Fernandez	Roderick V. Hannah, Esq., P.A.	63	1.63%	1	4	11	6	5	6	6	4	4	7	3	6

Enforcement Trends

77% of cases in 2023 targeted entities
with a **revenue under \$23 million**

What?

What Document Accessibility Means



What makes a document accessible?



An accessible doc allows everyone – including people with disabilities – to read and navigate it effectively.

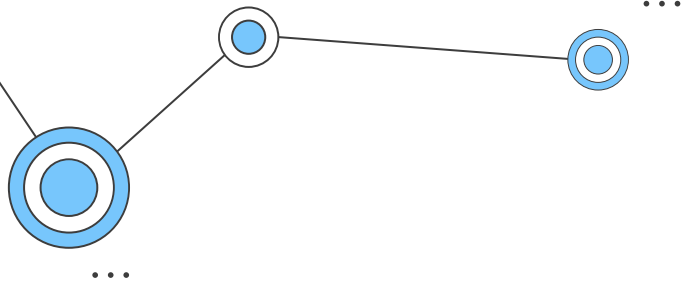
To be accessible, a doc must:

- Be properly tagged so screen readers can interpret text, headings, and reading order
- Include alternative text for images, charts, and graphics
- Contain real, selectable text (not scanned images of text)
- Have logical structure and navigation – headings, lists, tables marked up correctly
- Provide sufficient color contrast and avoid using color alone to convey meaning
- Include document properties like title, language, and metadata

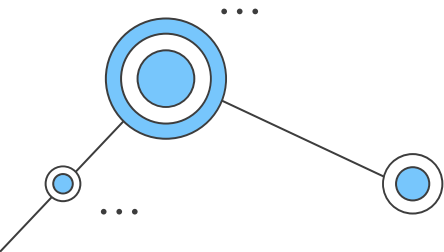
People with disabilities often rely on assistive technology (AT) – screen readers, braille readers, browser zoom, etc...

What is it like to use to
a screen reader with a
PDF?





**You can technically make PDFs
accessible — but it's expensive and
fragile at scale.**



There are more ways to comply!

How?

Real-World City Experiences



City of Quincy, MA



Gordon Jones

Information Technology

How?

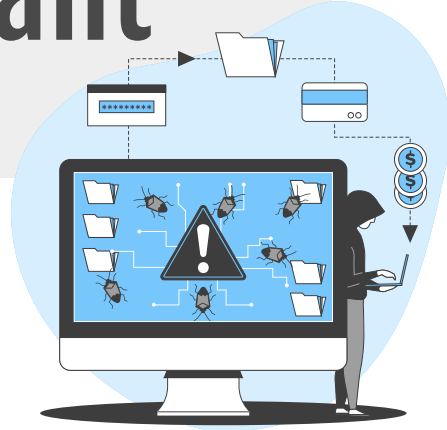
No need to fear!
Accessibility is achievable.

6 Steps to Achieve *(and Maintain)* Compliance



No need to fear!
Accessibility is achievable.

5 Steps to be Compliant



1

Designate an Accessibility Officer

Someone must be responsible — not necessarily an “accessibility expert,” but a clear point of contact.

- ✓ Select a person in your organization to handle accessibility needs (*usually the person who updates your website*)
 - Acts as the bridge between IT, communications, legal, and vendors.
 - Keeps track of accessibility plans, documentation, and timelines.

Key tasks:

- ✓ Maintain accessibility policy
- ✓ Coordinate training and audits
- ✓ Ensures content and vendor tools meet WCAG 2.1 AA

2

Approve an Accessibility Statement

- ✓ Formally adopt an Accessibility Policy approved by leadership, council, or the board.
- ✓ Outline your agency's intent to comply with WCAG 2.1 AA and the ADA Title II rule.
- ✓ Define roles, reporting lines, and contact info for accessibility requests.
- ✓ Post it publicly on your website (often linked in the footer).
- ✓ Review annually to reflect new technologies, vendors, or laws.

Here's a sample to start: getstreamline.com/accessibility-policy

3

Scan and Assess Your Current Status

- ✓ Run an accessibility scan across your website and document library.

Identify:

- ✓ How many PDFs and public documents you have
- ✓ Which are accessible vs. not
- ✓ What issues appear most often (missing tags, alt text, etc.)

Tools:

- ✓ Free accessibility checkers (WAVE, PDF Accessibility Checker, etc.)
- ✓ DocAccess — scans, categorizes, and estimates remediation effort, 15-day trial.

DIY: Manually Remediating PDFs

Remediating PDFs: Adobe Acrobat vs. Other Tools

- While Adobe Acrobat has some accessibility features, it does not test your document against the full suit of WCAG requirements.

[View Full Comparison »](#)

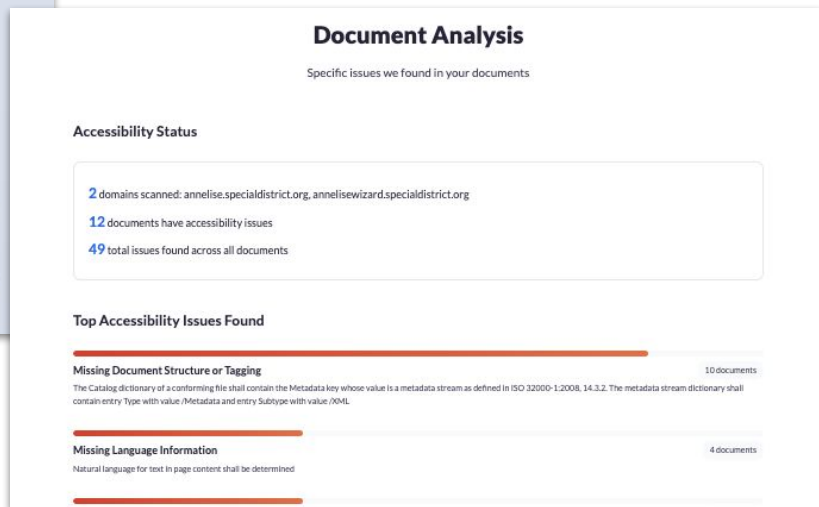
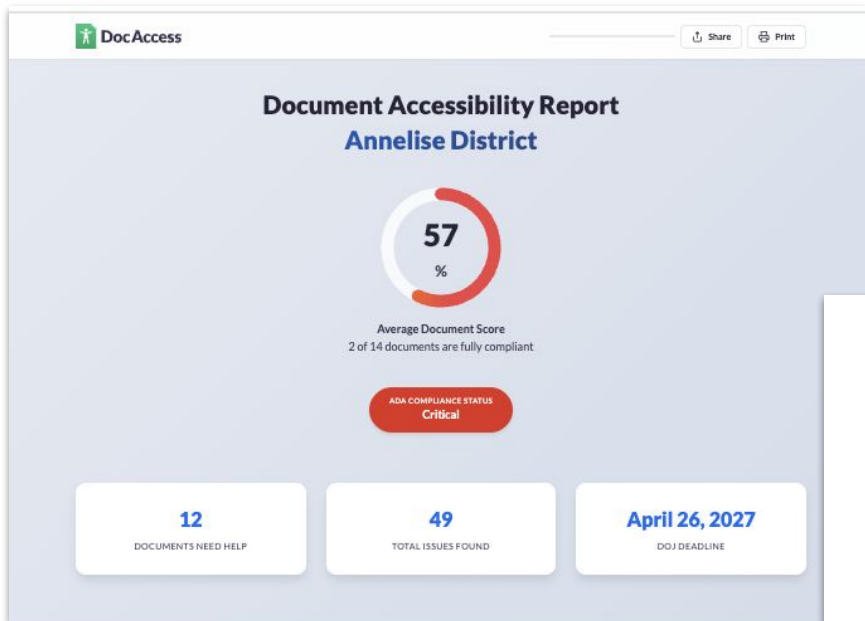
WCAG Checkpoint

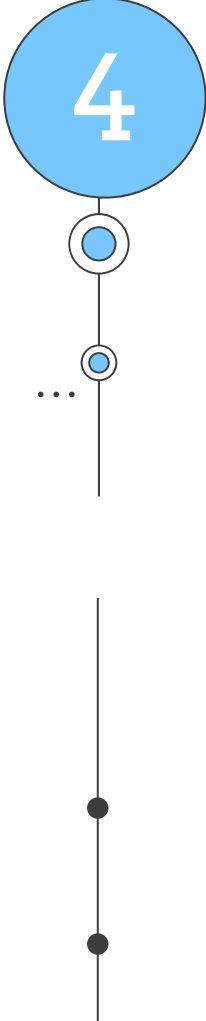
Adobe

PAC 2024/2026
ABBYY FineReader
CommonLook

General	Displays tags and physical representation of PDF	Yes	Yes
	Displays physical view for reference	Yes	Yes
	Split text runs	Yes	Yes
	Physical view and Tags tree display together	Yes	Yes
	Physical view and Tags tree selection synchronized	Use "Show tag from Selection"	Yes
	Display only untagged Elements in a separate view	No	Yes
	Multiple selection modes (Exact, Text Only, Images Only, Tags Only, etc.)	No	Yes
	Selection reordering (Logical/Physical)	No	Yes
	Level up tags	No	Yes
	Level up children of tags	No	Yes
	Change tag order up/down	No	Yes
	Unlimited Undo/Redo for all operations	No	Yes
	Automatically calculate bounding boxes for Figures, Formulas and Tables	No	Yes
	Support for Named Destinations	Yes	Yes

Sample Document Accessibility Report





4

Identify the Compliance Route That Works for Your Agency

The most common options are:

- A) DIY Document Remediation
 - B) Third-Party Manual Services
 - C) Automated or AI-Assisted Software
- 

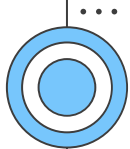
4

(A) DIY Document Remediation

- ✓ Best for agencies with internal staff capacity.
- ✓ Tools like Adobe Acrobat Pro or CommonLook PDF can be used.
- ✓ Works for very small document volumes.

⚠ **Challenges :**

- ✓ Labor-intensive
- ✓ Requires technical training
- ✓ Hard to scale



Common PDF Remediation Tasks

Making PDFs accessible typically involves these key steps:

1. **Tagging:** Adding tags to define the structure of the document (headings, paragraphs, lists, tables) so assistive technology can interpret it.
2. **Reading Order:** Ensuring the content flows in a logical order for screen readers.
3. **Alternative Text for Images:** Providing text descriptions of images so people who cannot see them understand their content.
4. **Hyperlinks:** Making sure links have descriptive text (not just "click here").
5. **Tables:** Adding proper table headers and data structure.
6. **Forms:** Ensuring forms are interactive and usable with assistive technology.
7. **Color Contrast:** Checking that text and background colors have sufficient contrast for people with low vision.

Other Resources for DIY Remediation

- **The Accessibility Guy**: This is a great YouTube channel with a focus on not only how to remediate your documents, but also create accessible documents going forward. He has two videos going into detail on creating accessible agendas that utilize Streamline to verify!
- **DOJ's Small Entity Implementation Guide**: This gives detailed legal requirements for local governments on how to comply with the ADA online. (Such as the definition of [archived content](#).)



Part 1: [Make a simple agenda fully compliant](#)

Part 2: [Make a more complex document fully compliant](#)

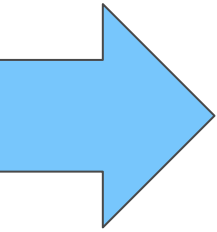
4

(B) Third-Party Manual Services

- ✓ Best for large, one-time backlogs or high-stakes public documents.
- ✓ Specialists manually tag and repair each PDF.

⚠ Challenges :

- ✓ High cost (\$7-\$25 per page)
- ✓ Not sustainable for ongoing uploads or compliance updates



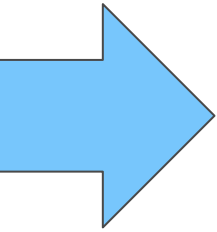
What to Look For in a Third-Party Manual Vendor

1. Proven Accessibility Expertise
2. Quality Assurance & Certification
3. Secure and Confidential Handling
4. Transparent Pricing and Turnaround
5. Support and Ongoing Relationship

4

(C) Automated or AI-Assisted Software

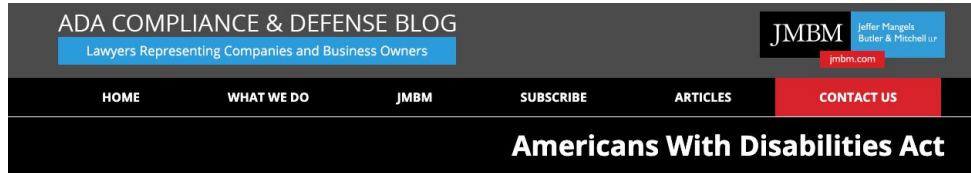
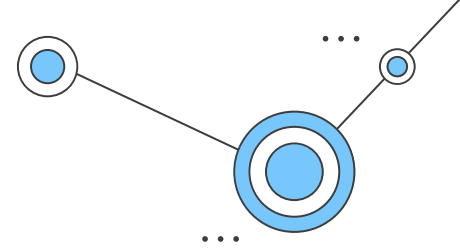
- ✓ Ideal for agencies with ongoing document publishing.
- ✓ Automatically converts PDFs into WCAG-compliant format (like HTML, DocAccess).
- ✓ Scales to large document libraries quickly and cost-effectively.
- ✓ Cost effective.
- ⚡ What we like: Sustainable, continuous compliance.



How to Evaluate Software/AI Tools

1. Does it produce truly accessible output (passes screen-reader testing)?
2. Is it designed for public-sector compliance (WCAG 2.1 AA, Title II)?
3. Does it combine AI speed with human QA?
4. Can it handle large, ongoing document uploads automatically?
5. Does it meet your data-privacy and security requirements?

Are Automated Tools Legally Compliant?



Making PDFs Accessible Under Title II of the ADA: A Guide for Public Entities

October 23, 2025 | by [Stuart Tubis](#)



Public entities, from state and local governments to special districts like water or fire departments, rely on PDFs to convey information and communicate with the public. But inaccessible PDFs can exclude individuals with disabilities, risking noncompliance with Title II of the Americans with Disabilities Act (ADA). With new accessibility rules in effect, the clock is ticking—larger entities face an April 24, 2026, deadline, while smaller ones and special districts have until April 26, 2027.

Below we discuss the legal requirements and highlight possible solutions to ensure compliance, including Streamline's new DocAccess tool.

The Legal Landscape: Title II and Subpart H Requirements

Title II of the ADA (42 U.S.C. §§ 12131–12165) prohibits public entities—state and local governments, their agencies, and special districts—from denying individuals with disabilities access to services, programs, or activities (42 U.S.C. § 12132). The Department of Justice's (DOJ) regulations at 28 CFR Part 35 enforce this mandate, with Subpart H (effective June 24, 2024) specifically requiring digital access such as website and PDF accessibility (89 FR 31320).

Key Provisions of Subpart H

Search

About the Authors



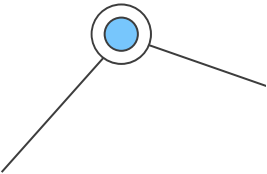
Martin H. Orlick

Martin H. Orlick

Marty Orlick is the Chair of the ADA Compliance & Defense Group at Butler & Mitchell LLP, and a partner in JMBM's Real Estate Department. Marty and his team of lawyers have represented more than 600 businesses in ADA issues – helping them comply with the ADA, defending them in litigation, and representing them in Department of Justice investigations. His clients include



[Read Article »](#)



4

How to decide your approach?

Approach	Best For	Strengths	Challenges
DIY	Small agencies, limited budgets	Control, no vendor cost	Time-consuming, error risk, hard to reach 100% compliance
Third-Party	Large backlogs, key reports	Accuracy	Expensive, not ongoing, slow turnaround
Software / AI	Ongoing publishing and compliance, community experience	Scalable, fast, cost-efficient	Needs setup & oversight, indemnity

Evaluate Accessibility Indemnity / Insurance

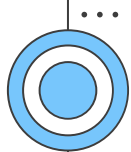
Some liability insurers now offer coverage for digital accessibility claims. And some companies offer indemnity.

- ✓ Check whether your policy includes:
- ✓ Defense costs for ADA/Section 508 claims
- ✓ Coverage for remediation expenses
- ✓ Especially valuable for large or high-traffic agencies.
- ✓ Note: Insurance complements—not replaces—compliance efforts.

6

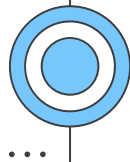
Consider a Third-Party ADA Audit

- ✓ If larger agency, consider 3rd party test
- ✓ Use software that is audited, ask for copy of last report or VPAT
- ✓ Especially if manual testing was performed, you can include in your plan



Accessibility Is a Journey — Not a One-Time Project

- ✓ Ongoing publishing = ongoing compliance
- ✓ Build accessibility into workflows and training
- ✓ Partner when needed for scale and expertise



Things to watch for in the future

Technologies

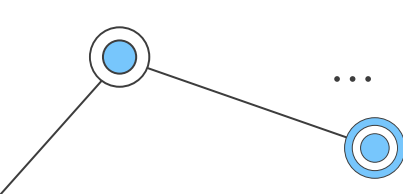
How will new technologies make remediation and accessibility easier?

Liability

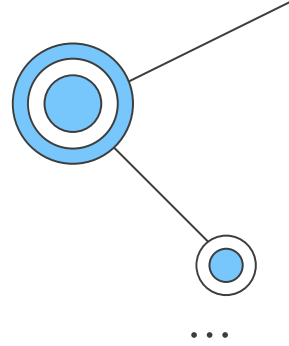
Who will be responsible for liability—the website vendors or the cities?

Transparency

Will agencies stop communicating online out of fear?



Questions?



Can we just have our older docs listed on an archive section? Then post compliant docs as usual?

Are ARC GIS maps an exception to the rule?

What do you do about past board meeting minutes and agendas that are in PDF format? Do you need to worry about those?

Do all attachments in an agenda need to be compliant if they are from a third party? What strategy do you use for compliance? If they aren't compliant, do you leave them off? Or only attach compliant documents?

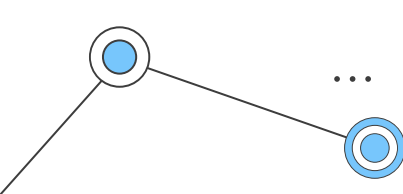
Several items I've read said you don't have to be 100% compliant, but somewhere around 80% compliant will be OK. What does that mean? What is not as important?

How do other municipalities make sure that comprehensive graphs and charts in their budgets are accessible?

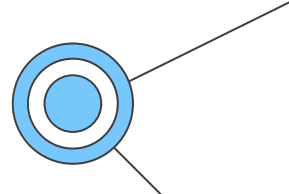
Does the original document need to be ADA compliant if using DocAccess translated view? What is the recommendation for replacing the application forms that the community downloads, fills out, and email back to meet the DOJ ADA?

Is HTML a compliant format?

Any other questions?



Questions?



- Also what or how much detail is needed for the tags and the metadata.
 - What if our vendor doesn't have a VPAT, or if their document indicates it has poor conformance. Will any VPAT address our exposure?
 - Is there a place where we can see some before and after examples? Examples of "not ADA compliant" and how it got fixed?
 - Is there a practice or method of increasing accessibility while enhancing the experience for all users? (win/win?)
 - Is there a checklist for formatting PDFs?
 - Can you describe how to make things like headings properly? Is that just in Word and using bold or bigger font? Or is it something we have to add manually after exporting a document to PDF and done in Adobe?
 - What are the limitations for alt text for images/graphics? I've heard conflicting information on syntax and word/character count to best communicate an image's content.
 - Also, what are the differences between alt text, captions, and descriptions? What are best practices for using these fields?
 - What would you do for images? For example, a planning commission packet with various maps, photos, etc. included.
 - What about applications received from external parties that are included in board or commission packages? Do cities need to reformat an application to be ADA compliant?
 - In lieu of all the recreation of PDFs to make them accessible, is it possible to create audio presentations offered aside of PDFs to satisfy requirements?
 - Any AI tools available?
- 

Any other questions?

Contact us!
We're here to help!

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