

Website Accessibility Workshop

National Association of Secretaries of State - Winter 2026



**Rhode Island
Department of State**

Secretary of State Gregg M. Amore | January 30, 2026

Title II - Americans with Disabilities Act (ADA)

- Title II of the ADA
- Federal Register published DOJ's final rule in April 2024
 - Rule ensures web content and mobile apps are accessible to people with disabilities
- Effective dates
 - Govts. with 50,000+ people - April 24, 2026
 - Govts. with 0 - 49,000 people - April 26, 2027
 - Special district govts. - April 26, 2027



Website Accessibility

- Web Content Accessibility Guidelines 2.1 AA requirement
- Inaccessibility of government websites
- RI's Protection and Advocacy agency
- Accessibility task force
 - Online voter registration/mail ballot portals
- Legislative assistance



Siteimprove Improves Your Site

- Siteimprove
 - Measures, monitors, and remediates accessibility issues
 - Provides accessibility overviews of covered webpages
 - Scores levels of conformance
 - Issues daily reports
 - Identifies specific issues including where the issues are on your pages
- How we've improved
 - Changed the way we design our webpages
 - Consult accessibility organizations
 - At or approaching benchmarks
 - Daily review



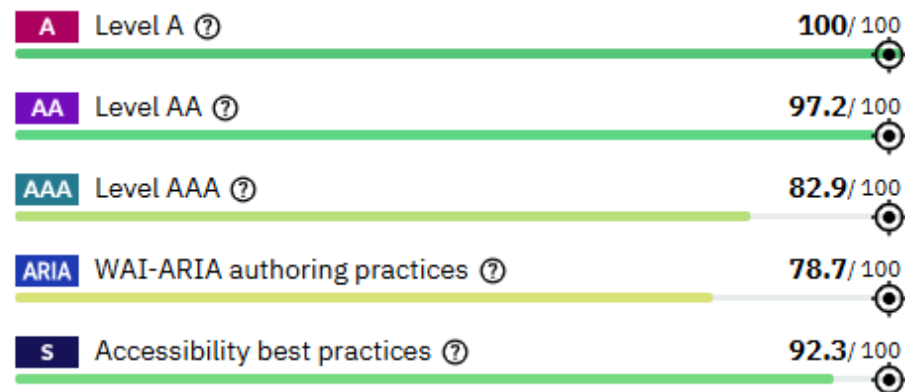
Accessibility overview

Accessibility overview

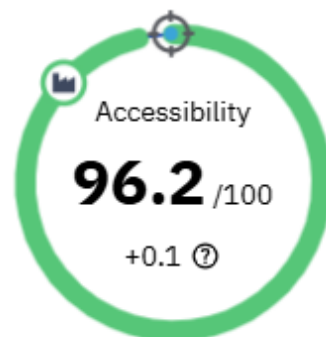
Site target:





Progress towards site target ?



Accessibility score ?








Fix these issues to improve your score

Issues	Occurrences	Points you can gain
 Interactive element does not meet enhanced size →	12	1.42 points
 Color contrast does not meet enhanced requirement →	4	0.63 points
 Color contrast does not meet minimum requirement →	3	0.55 points
 Skip to main content link is missing →	1	0.53 points
 Text not included in an ARIA landmark →	2	0.15 points

[View all issues →](#)



Resolved issues

Resolved issues	Occurrences	Points already gained
 Page missing a title →	1	1.50 points
 Link missing a text alternative →	25	1.50 points
 All roles are invalid →	12	1.50 points
 Interactive element does not meet minimum size nor spacing →	14	1.50 points
 Page title is not descriptive →	1	1.50 points

[View all resolved issues →](#)



Challenges

- Defining the exceptions
 - Archived web content
 - Pre-existing conventional electronic documents
 - Content posted by a third-party
 - Password-protected documents
 - Pre-existing social media posts
- Changes impact other portions of the website
 - Layout
 - Brand color
 - Font, size, style
- Content is always changing
- False positives



Contact Information

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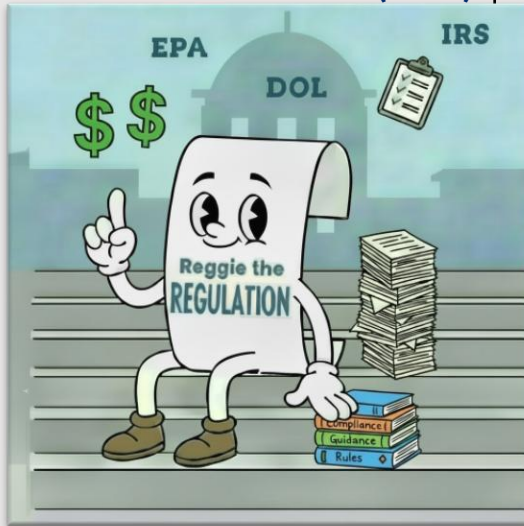
Law

Janis.Reyes@sba.gov

WHO IS THE OFFICE OF ADVOCACY?

- Created by Congress in 1976
- Independent voice for small business in the executive branch
- Watchdog of the Regulatory Flexibility Act (RFA)
- Source of small business statistics

WHAT IS THE REGULATORY FLEXIBILITY ACT (RFA)?



AI Image of Reggie the Regulation

- The Regulatory Flexibility Act requires that federal agencies consider the cost of their regulations on small businesses.
- Advocacy works in every step of the regulatory process!
- Advocacy writes comment letters on behalf of small businesses during an agency's comment period. We need your help & Input!
- FY 2024, we wrote 38 comment letters to federal agencies.

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WHAT IS A SMALL ENTITY UNDER THE REGULATORY FLEXIBILITY ACT (RFA)?

- **Small Businesses as Defined by the NAICS Codes:** Can be by revenue or employee size.
- **Small Nonprofits:** Independently Owned and Not Dominant in their Class
- **Small Governmental Entities** – cities, counties, towns, townships, villages, school districts, or special districts with a population of less than 50,000.

COMMENT LETTERS

STEP 1

**Comment to
Agencies on
Regulations.gov, or
provide input to
Advocacy.**

STEP 2

**Comment on how
much the rule will
cost your small
business.**

STEP 3

**Tell the agency
what other options
or alternatives it
should consider.**

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DEREGULATORY FOCUS



- **Executive Order: 10 to 1 Initiative**
- **Agency Requests for Information (RFI):**
- In the first year of the Trump 47 presidency, Advocacy's efforts led to a reduction in regulatory burdens on small businesses by **\$110 billion**.

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DOJ’S FINAL ADA WEBSITES RULE

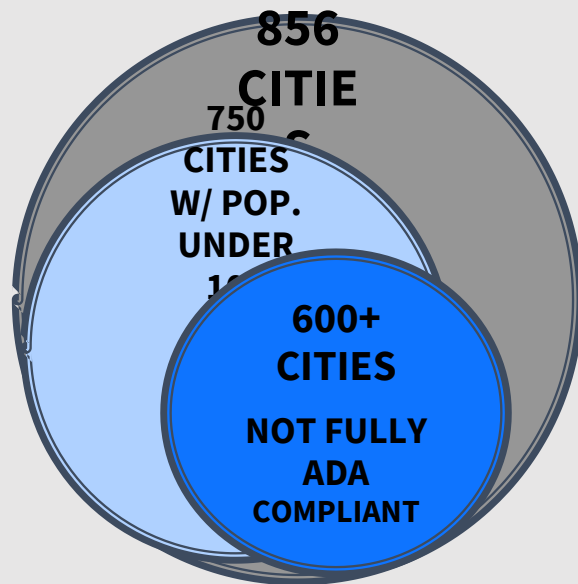
On April 24, 2024, the Department of Justice’s Civil Rights Division (DOJ) issued a final rule revising Title II of the Americans with Disabilities Act (ADA). The rule requires state and local governments to make their websites and mobile applications accessible for people with disabilities.

**ADA WEBSITE
ACCESSIBILITY
RULE**

Public Entity Size	Compliance Date
50,000 or more persons	April 24, 2026- <i>Two years after publication of the final rule</i>
Fewer than 50,000 persons/ special district governments	April 24, 2027- <i>Three years after the publication of the final rule</i>

DOJ'S FINAL ADA WEBSITES RULE (EXAMPLES)

**MINNESOTA
ADA WEBSITE
COMPLIANCE**



SMALL CITY COMPLIANCE COSTS

\$6K-12K upfront costs/city + \$1K + Staff Time

-new or upgraded Content
Management Systems (CMS)
-accessibility tools
-initial staff training

-PDF licenses
for staff per
year

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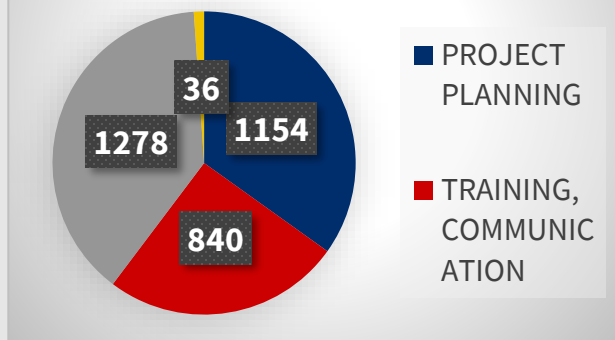
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DOJ'S FINAL ADA WEBSITES RULE (EXAMPLES)

LARGER CITY (300K Full-time residents)

2025 IT STAFF HOURS



• 2025 DIRECT COSTS

- Web audits- \$22,500
- Training for staff- \$5,000
- IT Staff Hours- 3,308 hours

• 2026 BUDGET

- project and remediation: \$200,000
- Each agency has content managers (100 total), this estimate does not include their hours updating websites for accessibility.

DOJ'S FINAL ADA WEBSITES RULE

- We need your feedback on the data below (costs/staff time):

JANIS.REYES@SBA.GOV

	YOUR ESTIMATE	DOL ESTIMATE
Government Type		Small Municipality
Population		Under 50,000
Reading Rule		3 hours
Testing Costs		\$15,661
Website Remediation		\$74,634
PDF Remediation		\$6,646
Video & Audio Captioning		\$3,203
Initial Costs Per Entity		\$100,145
Annual Cost		\$21,305

DOJ ADA FINAL RULE: RESOURCES

- [DOJ's Final Rule](#)
- [Small Entity Compliance Guide](#)
- [DOJ Webinar](#)
- [Fact Sheet](#)
- DOJ Hotline:
800-514-0301 (voice)
1-833-610-1264 (TTY)
- [Southeast ADA Center](#) – Hotline +Training Guides
National Toll-Free:
1-800-949-4232
- Southeast Region Phone:
404-541-9001 (voice and Spanish)
- Email:
ADAsoutheast@syr.edu

STAY IN TOUCH!

- Advocacy site:
<https://advocacy.sba.gov>
- LinkedIn:
<https://www.linkedin.com/company/u-s-small-business-administration-office-of-advocacy/>
- Janis Reyes, Assistant Chief Counsel.
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