# **WEB ACCESSIBILITY ROADMAP**

## Introduction

The following roadmap[[1]](#footnote-1) serves as recommendations from the Office of Technology Services (OTS) and Office of the State Americans with Disabilities Act Coordinator (OSADAC). It gives you a step-by-step plan for how to get your agency ready for compliance with the new Web Accessibility Compliance Policy and Procedure Memorandum (PPM 74). PPM 74 is based, in part, on the final rule issued by U.S. Department of Justice (DOJ), which establishes technical standards for web and mobile app accessibility under Title II of the Americans with Disabilities Act (ADA).

For technical support regarding WCAG and vendors:

OTS Accessibility Team: a11y@la.gov, (225) 342-7105

For administrative support regarding this roadmap:

OSADAC Point of Contact: Rikki Nicole David, rikki.david@la.gov, (225) 342-1243

We know that accessibility can seem daunting at first. But with the right plan, the right people, and some hard work, we can ensure people with disabilities are able to access our government services without unnecessary obstacles.

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## DEADLINE: By March 31, 2025

### Step 1: Learn about the new requirements for web accessibility

It may seem obvious, but your first step should be to learn everything you can about the Web Accessibility Content Guidelines (WCAG) 2.2, PPM 74, and the DOJ final rule in order to understand what they say you need to do. Here are some helpful resources in order to expand your knowledge:

1. DOJ Final Rule: [Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities](https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state)
2. DOJ Fact Sheet: [New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments](https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state)
3. WCAG Overview: [Accessibility Fundamentals Overview](https://www.w3.org/WAI/fundamentals/)
4. WCAG Requirements: [Web Content Accessibility Guidelines (WCAG) 2.2](https://www.w3.org/TR/WCAG22/)
5. PPM 74: [Web Accessibility Compliance Policy](https://www.doa.la.gov/doa/osr/policy-and-procedure-memoranda/)

Before moving onto other Steps of the Roadmap, now is the time to make sure that your agency’s leadership and legal teams are aware of the DOJ Final Rule and PPM 74. They need to be involved in this process from the very beginning.

Other than reviewing the above resources, do not worry too much about specifics yet. Accessibility is a process, not a destination. Learning the basics will be enough to move on to the next steps of the roadmap, and your knowledge will continue to grow from there.

### Step 2: Assign roles, to include designating a Web Accessibility Coordinator

Now that you know what is expected of your state agency, it is time to figure out who is going to have a role in making sure your agency complies with PPM 74. Here are some things to consider:

1. Think broadly about who should be involved: While web developers or information technology (IT) staff play an important role, they are not the only ones who should be thinking about accessibility. For example, procurement staff play a key role in ensuring your agency buys or licenses accessible technology. Communications staff serve as a last line of defense to protect against inaccessible content and/or documents from being posted to your agency’s website. It is important to clearly identify who is responsible for what, so that there is no confusion.
2. Designate a web accessibility coordinator: Of those involved in your agency’s accessibility efforts, which person has the expertise in web accessibility (or ability to gain such expertise) to serve as your agency’s web accessibility coordinator. This individual must be a full-time employee of your agency and exercise appropriate control to enforce accessibility requirements. Appropriate control does not necessarily mean the individual must be the Executive Director (or other high-level administrator) of the agency, but that the individual must be authorized to direct other agency personnel in what must be done before web content is approved to be posted.

**Once determined, you must notify the Office of State ADA Coordinator of your agency’s Web Accessibility Coordinator by submitting the Designation of Agency Contacts form to** **rikki.david@la.gov** **by March 31, 2025.**

1. Consider vendor assistance: Your agency should consider whether its web accessibility needs exceed what your staff can do between now and April 24, 2026. But be aware: working with vendors does not mean your agency is off the hook! If you decide to have an outside person or group handle some of your agency’s accessibility work, you are still required to have a full-time employee of your agency designated as the web accessibility coordinator who will oversee and coordinate that work. Moreover, your agency is still responsible for ensuring the accessibility of its web content and mobile apps, even if it outsources the accessibility work to somebody else.

For your convenience, there are several remediation vendors that have a proven track record and are highly respected in the accessibility industry, including [TPGi](https://www.tpgi.com/), [Deque](https://www.deque.com/), and [Usablenet](https://usablenet.com/).

CAUTION! We urge you to avoid vendors selling a group of products known as “accessibility overlays.” These vendors often greatly exaggerate the capabilities of their products. For example, the [Federal Trade Commission](https://www.ftc.gov/news-events/news/press-releases/2025/01/ftc-order-requires-online-marketer-pay-1-million-deceptive-claims-its-ai-product-could-make-websites) required software vendor accessiBe to pay $1 million for deceptive claims that its web accessibility tool could make any website compliant with WCAG. And even worse, overlays often introduce accessibility barriers that you did not have to begin with! Read the [Overlay Fact Sheet](https://overlayfactsheet.com/en/) for more information.

For more assistance with this step, the World Wide Web Consortium (W3C) offers resources for [assigning responsibilities](https://www.w3.org/WAI/planning-and-managing/plan/#assign-responsibilities) and [using combined expertise to evaluate web accessibility](https://www.w3.org/WAI/test-evaluate/combined-expertise/).

## DEADLINE: By June 30, 2025

### Step 3: Ensure training completion by Web Accessibility Coordinator

Web accessibility coordinators must complete web accessibility training within 90 days of hire or designation to the role. The training materials may be determined by the agency head. Some options include:

* State Civil Service is currently working on development of a Web Accessibility course that will be made available through Louisiana Employees Online (LEO) or for download by non-LEO agencies. The course is anticipated for release by the end of April 2025.
* Another great option is the [Digital Accessibility Foundations Course](https://www.w3.org/WAI/courses/foundations-course/) offered by W3C. This is a free, self-paced course for technical and non-technical learners. It generally takes 16-20 hours to complete.
* There are also free, online courses available through other state governments that can teach you how to get started. Check out the [Minnesota IT Services Accessibility Training](https://mn.gov/mnit/about-mnit/accessibility/training/) and [Oklahoma ABLE Tech’s Self-Paced Accessibility Courses](https://www.okabletech.org/core-programs/digital-accessibility/courses/).
* For more training options, check out the W3C’s searchable list of [Course List – Digital Accessibility Education, Training, and Certification](https://www.w3.org/WAI/courses/list/).

### Step 4: Conduct an inventory of major web properties

The next step is to start doing an inventory of your agency’s web content from a 30,000-foot level. Recall from PPM 74, web properties are “the various points on the web that an agency uses to represent itself.” Depending on the size and nature of your agency, there may be a dozen or more major web properties that it uses.

For example, does your agency have multiple websites, such as one for general information, another dedicated to a long-term special project, and a third specifically for the public to electronically file for your services? Does your agency have a mobile app? Does it use various social media platforms such as Facebook, Instagram, or X to promote the agency? Each of these examples represent a major web property.

Once identified, the next thing to do is to determine who manages each of the major web properties for the agency. Generally, there are two kinds of “managers”: technical and content. Technical managers are usually information technology staff or vendors that handle the more complex issues related to web design and hosting. Content managers tend to be communications or other agency-specific staff that have access to add, edit, or delete content from the agency’s website, mobile app, and/or social media accounts.

**An inventory of your agency’s major web properties, as well as the name and contact information for the technical and content managers for each web property, must be submitted to** **rikki.david@la.gov** **by June 30, 2025.**

### Step 5: Familiarize yourself with the Exceptions

Now that you have a handle on all of your agency’s major web properties, you are ready for the next step: familiarize yourself with the Exceptions to the DOJ Final Rule. The overall purpose of the Exceptions is for your agency to focus its remediation efforts on the content that matters most instead of wasting a bunch of time, effort and money fixing things that people are not even using. Work smarter, not harder!

The [DOJ Fact Sheet](https://www.ada.gov/resources/2024-03-08-web-rule/) does a good job of summarizing the five (5) Exceptions. Nonetheless, there are additional clarifications provided in each “What this means for you” section below to help better understand and apply the Exceptions, if appropriate.

This is another good time to remind you that we still are not lawyers! Please have your Legal Team review the full text of the DOJ Final Rule before moving forward with this step on the roadmap.

1. Archived web content
* What the Rule says: Web content that meets **all four** of the following points would not need to meet the WCAG standard:
1. The content was created before the date the state or local government must comply with this Rule, or reproduces paper documents or the contents of other physical media (audiotapes, film negatives, and CD-ROMs for example) that were created before the government must comply with this rule, **AND**
2. The content is kept only for reference, research, or recordkeeping, **AND**
3. The content is kept in a special area for archived content, **AND**
4. The content has not been changed since it was archived.
* What this means for you:
1. If you want to use this exception, you must create and clearly label a section of your website as “Archived.” You cannot just label the content itself as archived. It must be kept in a separate place that is easy to identify.
2. Content does not qualify as “archived” just because you put it in the Archived section of your website. All four of the points above must apply to the content for it to qualify for this exception.
3. After 4/24/2026, any content for which you want to use this exception can never be updated. As soon as you change it in any way, it no longer qualifies for this exception and would need to be made accessible at that time.
4. Any content created after 4/24/2026 can never qualify for this exception. This is because all content created after 4/24/2026 must be accessible from the beginning. You can still put that new content in the Archived section of your website, but it will already be accessible at that point, so the exception would be useless.
5. Preexisting conventional electronic documents
* What the Rule says: Documents that meet **both** of the following points usually do not need to meet the WCAG standard, except in some situations:
1. The documents are work processing, presentation, PDF, or spreadsheet files, **AND**
2. They were available on the state or local government’s website or mobile app before the date the state or local government must comply with this rule.
* What this means for you:
1. You do not have to make all of your old documents accessible.
2. You do have to make any old documents that people are still using “to apply for access, or participate in services, programs, or activities” accessible.
3. After 4/24/2026, any documents for which you want to use this exception can never be updated. As soon as you change it in any way, it no longer qualifies for this exception and would need to be made accessible at that time.
4. Any documents created after 4/24/2026 can never qualify for this exception. This is because all content created after 4/24/2026 must be accessible from the beginning, so the exception is useless at that point.
5. Content posted by a third party
* What the Rule says: Content that is posted by third parties on a state or local government’s website or mobile app would not need to meet the WCAG standard.
* What this means for you:
1. This exception does not apply to content posted by your vendors (or anyone that has a contractual or licensing arrangement) to post on behalf of your agency. In this case, “third parties” means “members of the public.”
2. Any of the tools and platforms that allow members of the public to post content onto your website do need to be accessible. However, the content that the public posts using those tools does not. Basically, you cannot force a member of the public to create accessible content, so that means you are not responsible for it. For example, if you have a message board on your website, the message board itself must be accessible. Any posts you or any of your vendors make on your message board must also be accessible. But any posts that members of the public make on your message board do not need to be accessible.
3. Individualized documents that are password-protected
* What the Rule says: Documents that meet **all three** of the following points do not need to meet the WCAG standard:
1. The documents are word processing, presentation, PDF, or spreadsheet files, **AND**
2. The documents are about a specific person, property, or account, **AND**
3. The documents are password-protected or otherwise secured.
* What this means for you:
1. This exception does not apply to documents just because they are behind a password.
2. This exception can never apply to documents that are distributed for public use.
3. This exception only applies to the 4 specific types of documents listed. If you provide documents to people in other formats, such as HTML, those documents do need to be accessible.
4. Preexisting social media posts
* What the Rule says: Social media posts made by a state or local government before the date the state or local government must comply with this rule do not need to meet the WCAG standard:
* What this means for you:
1. Any of your social media posts created before 4/24/2026 do not need to be made accessible.
2. Any of your social media posts created on or after 4/24/2026 do need to be accessible.

IMPORTANT NOTE: Even if certain web content, documents, or social media posts qualify for an exception, if someone requests an accessible version of it, the agency must make it accessible for them. This is a requirement found in other provisions within Title II of the ADA.

## DEADLINE: By September 30, 2025

### Step 6: Test your current content for accessibility

Having reviewed the Exceptions, you are ready to test the accessibility of your current content. Good accessibility testing usually combines the use of automated evaluation tools with manual checks, such as keyboard testing and color contrast.

Many enterprise-level automated tools, such as those from [Siteimprove](https://www.siteimprove.com/), [Pope Tech](https://pope.tech/), and [Deque](https://www.deque.com/) can expedite the process by checking the accessibility of many webpages at once. However, no automated tool can fully judge whether a website or document is accessible on its own, and you should beware of any vendor that claims their product can! But these tools are still very valuable and can help speed up testing significantly. For help finding the most appropriate automated tool for your agency, check out the W3C’s [Selecting Web Accessibility Evaluation Tools](https://www.w3.org/WAI/test-evaluate/tools/selecting/).

1. Checklists: Accessibility testing has a lot of steps, which increases the chances of something being forgotten or overlooked. Given this, it is important to use some kind of checklist to make sure that everyone is checking the things they need to every time. There are many accessibility checklists available online, but here are a few:
* The A11Y Project: [Check Your WCAG Compliance](https://www.a11yproject.com/checklist/)
* W3C WAI: [WCAG-EM Report Tool](https://www.w3.org/WAI/eval/report-tool/)
* Deque: [Web Accessibility Checklist](https://dequeuniversity.com/checklists/web/)
* WebAIM: [WCAG 2 Checklist](https://webaim.org/standards/wcag/checklist)
1. Sort and Evaluate: In-depth testing will reveal the content that is the most inaccessible. This will help you to sort and prioritize your work even more. Consider categorizing your inaccessible content into these four (4) buckets as follows:

Bucket 1: Remove

* Any obsolete or redundant content that you can safely remove or delete goes in this bucket. You will want to remember to take your agency’s Record Retention policies into account, but the more content you can delete now, the less content you have to fix later.

Bucket 2: Ignore

* Any content you need to keep that qualifies for Exceptions 2, 3, 4, or 5 goes in this bucket. Since this content qualifies for an exception, you can safely ignore the requirement to make it accessible (unless requested).

Bucket 3: Archive

* Any content you need to keep that qualifies for Exception 1 goes in this bucket. All five of the exceptions eliminate the need for you to make the content accessible by 4/24/2026, but Exceptions 2, 3, 4, and 5 do not have any extra requirements for the content like Exception 1 does. That is why this content gets its own bucket.

Bucket 4: Update

* Any remaining content that does not belong in the other buckets will end up in this bucket. It should contain any content you need to keep but does not qualify for an Exception. The content in this bucket is what you will need to make accessible by the 4/24/2026 compliance deadline!

### Step 7: Develop an action plan

The next step is to develop an action plan! The action plan must provide:

1. A summary regarding the quantity, nature and severity of accessibility issues identified for each major web property. The summary should be based on the content in Bucket 4 from Step 6.
2. Specific information regarding who, when and how the accessibility issues for each major web property will be brought into compliance.

For example, let’s say your agency has one website and uses one social media platform, LinkedIn. A sample action plan could be:

The Department manages two major web properties. Based on the results of our accessibility testing, the action plan is as follows:

1. Website: The website is located at [www.department.la.gov](http://www.example.la.gov/). Overall there were approximately 70 accessibility issues identified. The majority of issues can be resolved by our web accessibility coordinator by adding alternative text to images and updating PDF forms to be accessible. However, there are certain programming issues, such as lack of keyboard navigation and header structure, that require assistance from our vendor, XYZ Inc. All corrective actions are expected to be completed by December 31, 2025.
2. LinkedIn: Our LinkedIn account is located at [www.linkedin.com/in/department](http://www.linkedin.com/in/department). Under Exception 3, all social media posts prior to 4/24/2026 are not required to be accessible, unless requested. Therefore, no corrective action is needed at this time.

If you have any questions regarding this action plan, please contact our web accessibility coordinator, NAME, at EMAIL ADDRESS or PHONE NUMBER.

**Once developed, the action plan must be submitted to the Office of State ADA Coordinator at** **rikki.david@la.gov** **by September 30, 2025.**

## DEADLINE: By December 31, 2025

### Step 8: Work through your action plan

It is finally time to do something with your web content! Of all the steps in the roadmap, this is the one that will take the most time and effort to complete. It is also the step that is most critical to get right. The whole roadmap has been leading up to this step.

How to work through Bucket 1: Remove

* This bucket is the “fun” bucket. Simply delete this content and you’re done!

How to work through Bucket 2: Ignore

* This bucket may be less fun than Bucket 1, but it is even easier to deal with because you are already done, so you can move onto the next bucket.

How to work through Bucket 3: Archive

* This is where the real work begins. To satisfy the conditions of Exception 1, you need to complete the following:
1. Create an “Archived” section on your website. It does not have to have this exact name, but it should be obvious this content is not currently in use.
2. Clearly label that the content in this section is “archived,” which means it is not likely to be accessible unless specifically requested.
3. Provide people with disabilities an easy way to ask you to make specific archived content accessible.
4. Archived content can never be updated or changed in any way. If you make any changes to a piece of archived content, then that entire piece of content must be made accessible.

How to work through Bucket 4: Update

* This is where you should spend most of your time and effort while working through the roadmap. Start by identifying and prioritizing which content you should make accessible first. This process will help ensure you are impacting the largest groups of people as quickly as possible.
1. Identify your critical content:
* Within your Update bucket, determine which content is the most important to your agency by identifying what processes, web pages, and/or documents are critical to your organization’s daily operations. If you have access to any analytics for your agency’s website (or in your Content Management System), this data may help you to see what content people are accessing most often.
1. Fix your content:
* From here, the process itself is fairly straight-forward: fix all inaccessible content in Bucket 4 in order of most-to-least critical. Unfortunately, there is no “magic accessibility wand” that can fix your content for you. This part of the process will require a lot of good old-fashioned hard work (or money!) to complete. Depending on the amount of content you have – and let’s be honest – it is probably A LOT – you might need to consider looking for a vendor to help you fix your content to be able to meet the 4/24/2026 compliance deadline.

### Step 9: Develop a status report

Give yourself a hand! You’ve made it through the most difficult step of the roadmap. Now it’s time to acknowledge all that your agency has accomplished by developing a status report. The status report should provide:

1. A summary of the corrective actions that have been completed for each major web property.
2. If applicable, specific information regarding who, when and how any remaining accessibility issues for each major web property will be brought into compliance.

Based on the example action plan in Step 7, a sample status report may be as follows:

The Department manages two major web properties. The following serves as a status report of our efforts to bring these web properties into compliance with PPM 74:

1. Website: The website is located at [www.department.la.gov](http://www.example.la.gov/). As indicated in our action plan, the website had approximately 70 accessibility issues identified. The majority of issues have now been resolved by our web accessibility coordinator by adding alternative text to images and updating PDF forms to be accessible. However, there are certain programming issues, such as lack of keyboard navigation and header structure, that have yet to be completed by our vendor, XYZ Inc. These outstanding corrective actions are now expected to be completed by March 31, 2026, but shall not exceed April 24, 2026.
2. LinkedIn: Our LinkedIn account is located at [www.linkedin.com/in/department](http://www.linkedin.com/in/department). Under Exception 3, no corrective action was required for this major web property.

If you have any questions regarding this status report, please contact our web accessibility coordinator, NAME, at EMAIL ADDRESS or PHONE NUMBER.

**Once developed, the status report must be submitted to the Office of State ADA Coordinator at** **rikki.david@la.gov** **by December 31, 2025.**

## DEADLINE: By March 31, 2026

### Step 10: Submit your agency’s Web Accessibility Policy

It has taken a lot of work to get to this point, but it is time to stop looking back at your existing content and start looking forward at how to manage your new content as it is created. This means drafting your agency’s Web Accessibility Policy in accordance with PPM 74. The Web Accessibility Policy is an internal document that establishes controls necessary to ensure compliance with web accessibility requirements on an ongoing basis. At a minimum, the policy shall include the following:

1. CONTENT STANDARDS: Adopt the most recently published version of WCAG as the content standards utilized by the agency.
2. RESPONSIBILITIES: Web accessibility responsibilities assigned to various agency staff and vendors (as determined in Step 2).
3. AUTHORITY: A list of positions that will have access to each of the agency’s major web properties, including the website’s Content Management System (CMS), mobile apps and/or social media accounts for purposes of publishing web content on behalf of the agency.
4. APPROVAL: Approval procedures for how web content will be screened for accessibility prior to publication. For document accessibility, potential options may include requiring use of built-in Accessibility Checkers available in Microsoft Word, Excel and Adobe Acrobat. For web and mobile app content, options include requiring use of an automated testing tool and/or manual testing by the agency’s web team.
5. ACCESSIBILITY STATEMENT: Per PPM 74, the policy must include a requirement to have an Accessibility Statement linked directly from the agency home page. The statement must include the name, email address and telephone number of the agency’s web accessibility coordinator.

Be sure to place the Accessibility Statement in an easy-to-find place on your agency home page, such as a link in the footer.

For your convenience, a sample Accessibility Statement may be:

“[Agency Name] is committed to providing an inclusive and accessible experience for everyone. This includes ensuring that people with disabilities have full and equal opportunities to access and benefit from the government services offered by our agency.

We strive to meet the requirements of the most recently published Web Content Accessibility Guidelines, which is currently WCAG 2.2, Level AA, in accordance with state and federal accessibility laws.

Please let us know if you have any accessibility issues. Our designated web accessibility coordinator is [Name], who may be reached at [Email Address] or [Phone Number]. We try to respond to accessibility issues within five (5) business days. Thank you!”

**Once drafted, the agency’s Web Accessibility Policy must be submitted to the Office of State ADA Coordinator at** **rikki.david@la.gov** **by March 31, 2026.**

## DEADLINE: On/After April 24, 2026

### Step 11: Maintain the accessibility of your content

As you can see, accessibility is a continuous process. You will need to constantly adapt and grow your methods to ensure any new content you create from here on out is accessible too. Below are a few more ways to keep the momentum going!

1. Fully embed accessibility into your organization
* From this point on, any document or web page your agency creates or edits should be fully accessible. Most of this roadmap specifically deals with PPM 74 and DOJ Final Rule, but there are other accessibility considerations you should be thinking about too. For example, any event you host should have captioning and sign language available for participants (upon request). The policies, practices, and oversight created in the steps above should provide support for ensuring these things are done as well. Don’t lose all the progress you have made by letting accessibility go to the backburner after the initial remediation is complete!
1. Establish patterns for testing content
* Test web content and documents for accessibility on a regular basis. Include this as a requirement in your agency’s Web Accessibility Policy at various points throughout the lifecycle of your content, such as: when a new feature for a website is being developed; when new products are being evaluated for purchase or use; and when any web or document content is being created or updated.
1. Continue accessibility training
* It is important to keep learning about accessibility, especially because accessibility features and standards continue to change with technology. There are lots of organizations that provide great trainings, webinars, and other types of learning, too. Here are a few that you can check out: [WebAIM Training](https://webaim.org/services/training/); [Deque Training](https://www.deque.com/training/); [Level Access Academy](https://www.levelaccess.com/academy-and-training/).
1. Sign up for newsletters
* Did you know that lots of accessibility organizations have newsletters? They are a great option for staying on top of what is going on in the accessibility world, and they usually contain lots of tips, tricks, and other resources, too! Here are a few that may be helpful: [A11y Weekly](https://a11yweekly.com/); [WebAIM Newsletter](https://webaim.org/newsletter/); [Minnesota IT Services Accessibility News](https://mn.gov/mnit/about-mnit/accessibility/news/); [Oklahoma ABLE Tech eNewsletter](https://www.okabletech.org/resources/publications/).
1. Special thanks to Oklahoma ABLE Tech for “inventing the wheel” that became a main source for this roadmap! [↑](#footnote-ref-1)