



Lost in the WCAG Woods?

An expedition guide to ADA Title II compliance

Brian Mitchell

PRESENTED BY



Speaker notes, slide 1 of 31

[~1 min]

1. Welcome

- a. If you've ever opened a WCAG report and felt like you walked into Mirkwood without a lantern, you're in the right room.

2. Today is a field guide

- a. Where to start
- b. Which road to take
- c. How to keep what you win



YOUR GUIDE

Brian Mitchell

- 📍 President, **interGen web solutions**
- 📍 Co-founder & CTO, **GYSTiq**
- 📍 Milwaukee · Oshkosh



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Speaker notes, slide 2 of 31

[~1 min]

1. interGen

- Founded 2006
- Government, nonprofit and small-business sites
- Joomla and other open-source platforms
- Focus: accessibility, security, performance

2. GYSTiq

- Builds operational systems for organizations
- Plant the seed: this matters later, when we get to governance

3. Last spoke at NAGW in 2022, Little Rock

4. Keep it short; the map is the real opener

Milwaukee Realms: The Good Land



Speaker notes, slide 3 of 31

[~2 min]

1. We're standing in one of the most Middle-earth-adjacent places on the planet
2. Oshkosh: Karen Wynn Fonstad
 - a. Moved to Oshkosh in 1971; her husband taught geography at UW–Oshkosh
 - b. Directed cartographic services at UW–Oshkosh; 24 years on the Oshkosh Plan Commission
 - c. Read *The Hobbit* and *The Lord of the Rings* about 30 times before drawing *The Atlas of Middle-earth* (1981)
 - d. Tolkien's world, mapped with real cartographic discipline
3. Lake Geneva: Gary Gyax
 - a. Grew up there from age 8
 - b. Started Gen Con there in 1968 and TSR in 1973
4. Milwaukee
 - a. Marquette's Raynor Library holds Tolkien's manuscripts: *The Hobbit*, *The Lord of the Rings*, *Farmer Giles of Ham*, *Mr. Bliss*
 - b. Gen Con itself was held here from 1985 to 2002
5. This map was drawn by EMD in that same tradition

Milwaukee Realms: The Good Land



Detail of the map by EMD; pins and route added.

THE THINNEST PLACE

Nowhere is the road to Middle-earth shorter

- **Oshkosh:** the cartographer
- **Lake Geneva:** the game master
- **Milwaukee:** the manuscripts

So if any room can treat compliance as a quest, it is this one.



GYSTIQ

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Speaker notes, slide 4 of 31

[~1 min]

1. Trace the triangle with your finger if the room is small enough
2. The three corners
 - a. Oshkosh: the person who mapped Middle-earth
 - b. Lake Geneva: the person who turned that kind of world into a game you could play
 - c. Milwaukee: the place that keeps Tolkien's original pages
3. That triangle is the thinnest place between our world and Tolkien's
4. Transition: so let's go on a quest. Ours just happens to involve the Department of Justice.

WCAG 2.1 AA

The standard for every state and local government website and app.



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Speaker notes, slide 5 of 31

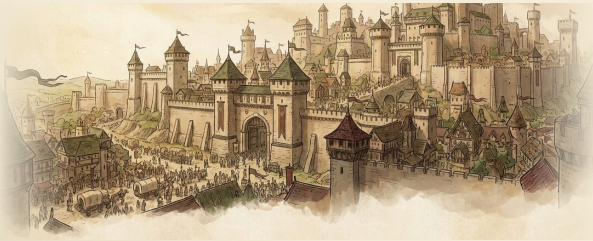
[~2 min]

1. Like Bilbo, most agencies didn't go looking for this adventure. It knocked on the door.
2. April 2024: DOJ publishes its final rule under ADA Title II
3. Who it covers
 - a. State and local governments: counties, cities, special districts
 - b. Schools, transit, libraries
4. What it covers
 - a. Web content and mobile apps
 - b. Including those your vendors provide on your behalf
5. The standard: WCAG 2.1 Level AA
 - a. 30 Level A + 20 Level AA = 50 testable success criteria
 - b. Not a feeling. Not a widget. A checklist you can be measured against.

The deadline moved. The inventory didn't.

Apr 26, 2027

Serving **50,000 or more**



Apr 26, 2028

Under 50,000, and
special district governments



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Speaker notes, slide 6 of 31

[~2 min]

1. The original dates were April 2026 and April 2027
2. April 2026: DOJ's Interim Final Rule pushed each back one year
3. The extension changed the calendar, not the work
 - a. Years of agendas, PDFs, forms and pages are still on your site
 - b. One more year. Not one less page.
4. The extra year is a gift only if you spend it

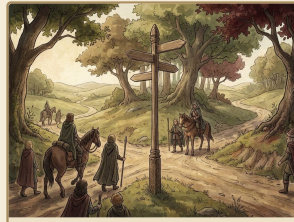
One Standard to Rule Them All

**Perceivable**

See it. Hear it.

**Operable**

Use it.

**Understandable**

Make sense of it.

**Robust**

Works with
assistive tech.



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Speaker notes, slide 7 of 31

[~2 min]

1. One standard to rule them all, and unlike the Ring, this one actually wants you to succeed
2. Perceivable: alt text, captions, contrast
3. Operable: keyboard access, visible focus, time limits
4. Understandable: labels, clear error messages, plain language
5. Robust: clean code; names and roles that assistive tech can read
6. Every one of the 50 criteria lives under one of these four
 - a. When a criterion confuses your team, ask which of the four it protects

Riders in the Night

*Enforcement starts with a **complaint**, not an audit.*

- Resident complaints
- Demand letters
- DOJ / OCR complaints
- Lawsuits

*Good faith is proven on **paper**.*



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Speaker notes, slide 8 of 31

[~2 min]

1. The Black Riders don't send a calendar invite. They show up at the inn at night.
2. How it actually arrives
 - a. A complaint from a resident who couldn't pay, apply or register
 - b. A demand letter from a law firm or advocacy group
 - c. A DOJ or OCR complaint
 - d. A lawsuit
3. What changes the outcome
 - a. A documented plan, a current audit, a remediation log, visible progress
 - b. Agencies with that on paper are treated very differently from agencies with nothing
4. We'll come back to what that paper looks like at the end of the route

The Road Goes Ever On



Basecamp

1. Audit

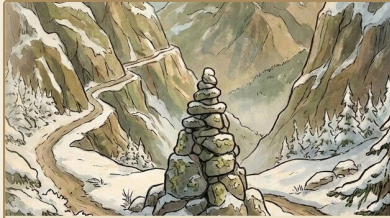


Chart the Route

2. Workflows
3. Templates
4. Documents



Permanent Outpost

5. Monitoring
6. Ownership
7. Reporting
8. Vendors

Route adapted from Hounder (March 2026).



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Speaker notes, slide 9 of 31

[~1 min]

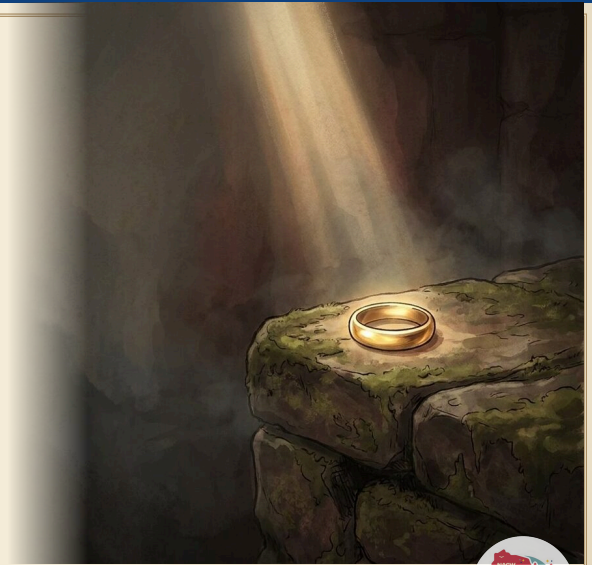
1. Eight steps, three phases
2. Credit: the eight-step outline comes from Hounder, "What ADA Title II Requires for Public Agencies by April 24th, 2026"; the phases are ours
3. Point out the route strip along the bottom of upcoming slides: it shows where we are on the road

The One Ring

*An overlay doesn't fix your code,
your documents or your vendors.*

April 2025:

The FTC ordered accessiBe to pay **\$1 million**.



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Speaker notes, slide 10 of 31

[~2 min]

1. It promises power and makes you invisible to the problem, right up until it doesn't
2. Overlay widgets promise compliance with one line of code
 - a. They don't fix the underlying code, documents or vendors
 - b. Many disabled users block them
 - c. Courts and the DOJ judge the site, not the widget
3. FTC v. accessiBe
 - a. Final order April 22, 2025: \$1 million
 - b. Over claims that its widget could make any website WCAG-compliant
4. A widget can be a temporary aid while you remediate; it is not a compliance strategy
5. Transition: so, no magic rings. We walk the road ourselves, starting at home with the map.

PHASE ONE

Bad End



Know where the roads go before you set out.



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Speaker notes, slide 11 of 31

[~30 sec]

1. Every good adventure starts at home, with a map spread out on the table

Baseline audit

- 🔍 **Scan** the whole site
- 🔍 **Test** by hand
- 🔍 **Keep** the report



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Speaker notes, slide 12 of 31

[~3 min]

1. Scan the whole site, not just the home page
 - a. WAVE, axe, Lighthouse, a site-wide crawler
 - b. Fast and repeatable, but automated tools catch only part of WCAG; the rest needs a person
2. Test by hand
 - a. Keyboard only: Tab through every key workflow
 - b. Screen reader spot checks: NVDA, VoiceOver
 - c. Zoom to 200% and 400%
3. Keep the report: that's your baseline
 - a. What's broken, where, and how often
 - b. If your last audit is more than a year old, it isn't a baseline any more
4. Optional live moment: run WAVE on a volunteer's home page

What the scanners miss

- 🚩 Wrong alt text
- 🚩 PDFs
- 🚩 Decentralized publishing
- 🚩 Third-party vendors



Speaker notes, slide 13 of 31

[~2 min]

1. Wrong alt text: present, but useless ("image123.jpg"); a scanner sees alt text and passes it
2. PDFs: often outside the crawl entirely
3. Decentralized publishing: 40 editors, 40 habits
4. Third-party vendors: payments, permits, agendas, video, all on someone else's domain
5. Questions to ask during the audit
 - a. Who can publish?
 - b. What do they publish?
 - c. Which services leave our domain?
6. A green score with a broken payment portal is still a broken payment portal

PHASE TWO

Chart the Route



*Choose the road that matters most
to the people walking it.*



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Speaker notes, slide 14 of 31

[~30 sec]

1. You can't fix everything at once
2. The next three steps decide where the effort goes first

Start where residents must get through



Pay

Apply

Agendas

Register

Contact

1. Audit



2. Workflows

3. Templates

4. Documents

5. Monitoring

6. Ownership

7. Reporting

8. Vendors



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Speaker notes, slide 15 of 31

[~3 min]

1. Moria or the Gap of Rohan: the choice of road decides the journey
2. The workflows residents can't avoid
 - a. Pay a bill, tax or fine
 - b. Apply for a permit, license or job
 - c. Find meeting agendas and minutes
 - d. Register for programs
 - e. Contact the agency or report a problem
3. Rank them by
 - a. Traffic
 - b. Consequence of failure
 - c. No alternate path
 - d. Legal exposure
4. A complaint almost always starts with a task someone couldn't finish; fix those tasks first

Fix the template, fix every page

1 → 1,000



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Speaker notes, slide 16 of 31

[~2 min]

1. At Helm's Deep, one breach in the wall endangers everyone behind it
2. One fix in the template repairs every page that uses it
 - a. Header, navigation, footer
 - b. Page layouts and article templates
 - c. Forms and form components
 - d. Theme colors and typography
3. A focus style fixed once in the template is fixed on a thousand pages
4. This is where a remediation budget gets the most leverage

The common breaches



Navigate

- Skip links
- Headings
- Keyboard focus

See

- Contrast
- Reflow
- Not color alone

Act

- Labels
- Errors
- Button names



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Speaker notes, slide 17 of 31

[~2 min]

1. Navigate

- a. Skip links
- b. Logical heading order
- c. Visible keyboard focus
- d. Menus that open by keyboard

2. See

- a. Text contrast 4.5:1; UI component contrast 3:1
- b. Content reflows at 400% zoom
- c. Meaning never carried by color alone

3. Act

- a. Every form field labeled
- b. Clear error messages
- c. Accessible names on buttons and icons

4. These show up on nearly every audit we run, and most are template fixes, not content fixes

Into the Mines: PDFs

Inventory first: how many, how old, how used?



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Speaker notes, slide 18 of 31

[~2 min]

1. Moria: dark, deep, and full of things buried long ago. Don't wake the Balrog by trying to remediate ten thousand PDFs in one sprint.
2. What's down there
 - a. Years of agendas, minutes, budgets, ordinances, forms
 - b. Often untagged scans: a picture of text that a screen reader can't read
 - c. Uploaded by everyone, owned by no one
3. The inventory tells you what to fix, what to convert and what to retire

A strategy for the deep

1. HTML first
2. Remediate what residents use
3. Archive carefully
4. Fix upstream



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Speaker notes, slide 19 of 31

[~2 min]

1. HTML first: publish as a web page wherever possible
2. Remediate the high-use and service-critical documents
3. Archive carefully
 - a. The rule has exceptions for archived web content and some preexisting documents
 - b. They're narrow: if residents need a document to apply for, access or take part in a service, it's in scope
4. Fix upstream
 - a. Accessible Word templates and export settings
 - b. New PDFs are born accessible, so the archive stops growing faster than you can clean it

PHASE THREE

The Permanent Outpost



A project ends. A website doesn't.



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Speaker notes, slide 20 of 31

[~1 min]

1. Project compliance: audit, fix, done, and twelve months later you're back where you started
2. Governance compliance: ownership, monitoring, reporting and procurement built into how the agency runs
3. Compliance that isn't governed slides back within a year

Recurring monitoring

- Scheduled scans
- Quarterly checks
- Trends, not snapshots



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Speaker notes, slide 21 of 31

[~2 min]

1. A palantír shows you what's happening across the realm. It shows problems; it doesn't fix them.
2. Scheduled scans: automated, weekly or monthly
3. Quarterly checks: test the key workflows by hand
4. Alerts when new content introduces errors
5. Trends, not snapshots
6. Goal: catch a regression the week it's published, not the month a complaint arrives

A Stronghold Built for the Watch



- Templates designed to **WCAG 2.1 AA**
- Built toward **ATAG 2.0**

Feb 15, 2022

Joomla 4.1 puts an accessibility checker in the article editor.



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Speaker notes, slide 22 of 31

[~2 min]

1. Monitoring catches problems after they ship; a good platform stops many of them before they ship
2. Joomla treats accessibility as a core requirement
 - a. Admin template (Atum) and site template (Cassiopeia) designed to WCAG 2.1 AA
 - b. Built toward ATAG 2.0, the W3C standard for authoring tools: the CMS should help authors create accessible content
 - c. That's the decentralized-publishing problem from the audit, solved at the source
3. February 15, 2022: Joomla 4.1 added the Jooa11y accessibility checker to com_content
 - a. Authors check an article with a button next to Preview, before it's published
 - b. It flags issues and explains how to fix them
4. Careful phrasing: "designed to WCAG 2.1 AA," never "compliant." No platform makes a site compliant by itself; the content still has to be accessible.

A log, and an owner for every issue

An owner is a person, not a department.



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Speaker notes, slide 23 of 31

[~2 min]

1. Nine walkers, one quest. Everyone carries something, and Frodo can't carry it all.
2. For every issue, the log records
 - a. What, where and severity
 - b. Owner: a named person
 - c. Target date and status
 - d. How the fix was verified
3. Shared burden
 - a. Web team: templates
 - b. Departments: their own content
 - c. Procurement: vendors
 - d. Leadership: priorities
4. The log is also your best evidence of good faith
5. GYSTiq tie-in: governance as a system. A remediation log is a workflow with owners, dates and status, the same operational plumbing GYSTiq builds for organizations every day.

Report up, every quarter

Plain language. Trend lines. Decisions needed.



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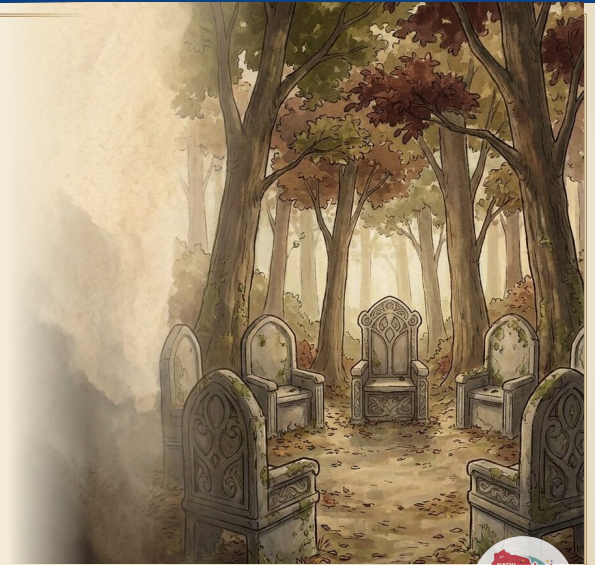
Speaker notes, slide 24 of 31

[~2 min]

1. The beacons of Gondor: the signal has to reach leadership before the crisis does, not after
2. Each quarter, in plain language
 - a. Issues found, fixed and still open, as a trend
 - b. High-impact workflows: pass or fail
 - c. Documents remediated vs. remaining
 - d. Vendor status
 - e. Risks and decisions needed
3. Why: leadership funds what it can see; reporting turns accessibility from an IT task into an agency commitment
4. GYSTiq tie-in: governance as a system again. When the remediation log feeds a dashboard, the quarterly report writes itself instead of becoming a scramble.

Hold vendors to the standard

*A vendor's portal is still **your** service.*



1. Audit 2. Workflows 3. Templates 4. Documents 5. Monitoring 6. Ownership 7. Reporting 8. Vendors



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Speaker notes, slide 25 of 31

[~2 min]

1. At the Council of Elrond, every people had a stake and every one sent someone. Your payment processor, agenda platform and video host all need a seat at the table.
2. Under Title II, a vendor's inaccessible portal is still your service
3. In contracts and RFPs
 - a. Require WCAG 2.1 AA
 - b. Ask for a current ACR / VPAT, then test it
 - c. Define who fixes what, and how fast
 - d. Build accessibility into renewals

If it isn't written down, it didn't happen

- Policy
- Remediation log
- Feedback
- Audit
- Monitoring
- Vendor reviews
- Priorities
- Training
- Executive reports



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Speaker notes, slide 26 of 31

[~2 min]

1. Bilbo and Frodo wrote it all down in the Red Book. That's why we know the story. Your documentation is how anyone else will know yours.
2. Defensible documentation, all nine
 - a. Accessibility policy
 - b. Current audit
 - c. Prioritization framework
 - d. Remediation log
 - e. Monitoring records
 - f. Training records
 - g. Complaint and feedback process
 - h. Vendor reviews
 - i. Executive reports
3. This is what a demand letter, a DOJ inquiry or a new director will ask to see

There and Back Again



Basecamp

1. Audit

Chart the Route

2. Workflows
3. Templates
4. Documents

Permanent Outpost

5. Monitor
6. Own
7. Report
8. Vendors



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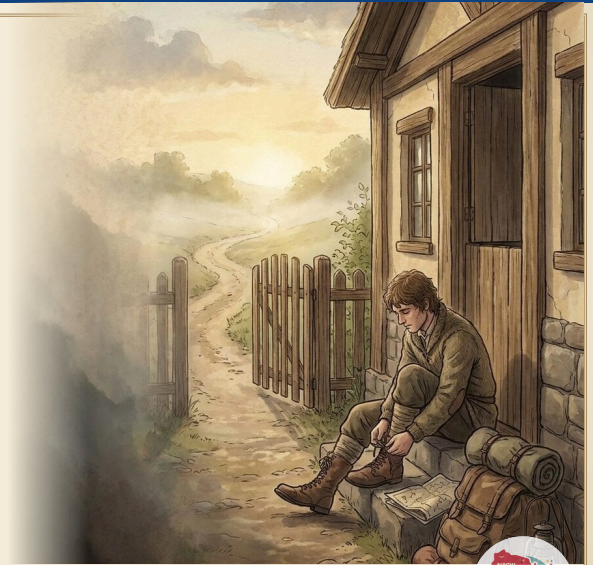
Speaker notes, slide 27 of 31

[~1 min]

1. Recap all eight in under a minute
2. Basecamp: know the terrain
3. Chart the route: workflows first, fix templates, tame the documents
4. Permanent outpost: monitor, own, report up, hold vendors to it

Your first 30 days

1. Name an owner
2. Run a scan
3. Test your top five
4. Count your PDFs
5. List your vendors
6. Start the log
7. Brief leadership



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Speaker notes, slide 28 of 31

[~2 min]

1. Name an accessibility owner: one person
2. Run a site-wide scan and keep the report
3. List your top five resident workflows and test each one by keyboard
4. Count your PDFs
5. List every vendor that touches residents
6. Start the remediation log, even as a spreadsheet
7. Put a 15-minute accessibility update on leadership's quarterly agenda
8. None of these needs a budget line, and all of them start the documentation trail

Resources

- 🔊 **WCAG 2.1 quick reference:** [w3.org/WAI/WCAG21/quickref](https://www.w3.org/WAI/WCAG21/quickref)
- 🔊 **ADA.gov:** the Title II web rule and fact sheets
- 🔊 **WAVE:** wave.webaim.org
- 🔊 **Hounder:** “What ADA Title II Requires for Public Agencies” (March 2026)



29



Speaker notes, slide 29 of 31

[~30 sec]

1. Leave this up while people take photos
2. The Hounder article is the source of the eight-step route; worth reading in full
3. FTC v. accessiBe (April 2025) is worth forwarding to anyone still pitching an overlay
4. Joomla 4.1+ users: the Jooa11y checker is already in your article editor

Credits

- **Map of Wisconsin** drawn by EMD
- **Illustrations** generated with Google Gemini (Nano Banana Pro)
- **Karen Wynn Fonstad** (1945–2005), *The Atlas of Middle-earth*
- **Raynor Memorial Libraries**, Marquette University
- **Typefaces:** Uncial Antiqua, Atkinson Hyperlegible (SIL OFL)
- Eight-step route adapted from **Hounder**

Tolkien names and places are used here in affectionate reference. No affiliation with the Tolkien Estate is implied.



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Speaker notes, slide 30 of 31

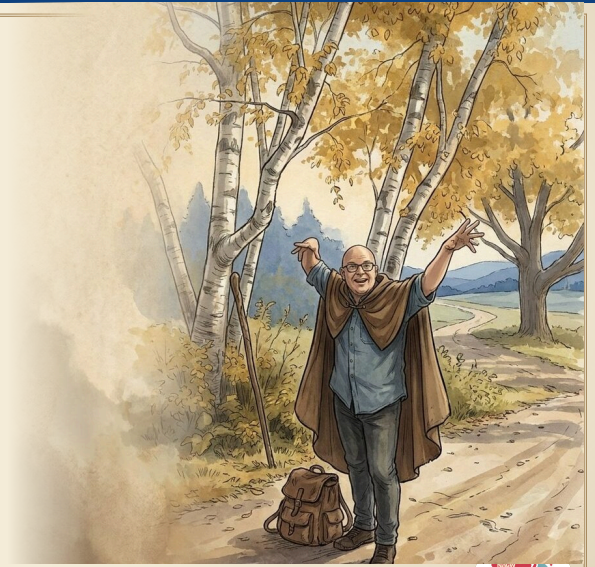
1. Gary Gygax (1938–2008) of Lake Geneva is honored on the Wisconsin slides
2. Typefaces: Uncial Antiqua by Astigmatic; Atkinson Hyperlegible by the Braille Institute

Not All Who Wander Are Lost

...especially with a map. Questions?

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31



Speaker notes, slide 31 of 31

[15 min]

1. Open the floor

2. If it's quiet, seed a question: "What's the one workflow on your site you're most worried about?"