



GUIDE

# Accessible by design

How state and local agencies can achieve accessibility for all with Adobe.



More than 1 in 4 US adults have some type of disability and require accessible services<sup>1</sup>. Disabilities come in many forms—there are visual, auditory, physical, psychological impairments, etc.—regardless of whether these disabilities are visible or invisible, affected individuals can face many challenges on a day-to-day basis with online and in-person interactions.

Over half of Americans with disabilities believe that having a disability creates barriers to civic engagement<sup>2</sup>, which means the onus falls on government agencies to ensure it's as easy as possible for impacted residents to participate fully in the democratic process and access government services. The mandate for government agencies is to serve their entire constituency—no one should be denied access or left behind from a government experience based on their abilities. Today, there is a lot of progress to be made—in Adobe's most recent 2025 Digital Government Index (DGI) report, 26 out of 50 states had 10+ accessibility issues on their website<sup>3</sup>.

“ If you build a house and you're forcing some of your people to come into your house through the window, they can't use the front door, and they're not all going to fit. We want everybody to be able to come through that front door equally<sup>4</sup>.

**Marie Cohan**

Digital Accessibility Coordinator  
Texas Department of Information Resources

On April 24, 2024, the Federal Register published the Department of Justice's final rule updating its regulations for Title II of the Americans with Disabilities Act (ADA). State and Local governments with > 50,000 residents must conform to Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA by April 24, 2026. Beyond the fact that investing in accessibility improves constituent engagement, reach, and participation, we can also recognize that the cost of nonconformance for agencies that don't abide by the DOJ's most recent mandate is high. The number of ADA-related digital accessibility lawsuits continues to rise every year<sup>5</sup>, with legal penalties ranging up to 150k<sup>6</sup>. But more importantly, the cost of digital exclusion is extraordinarily high.

NASCIO's 2025 member survey results found disparate efforts across the states. While two-thirds of states have hired a technology accessibility coordinator, only 46% have the funding for accessibility improvements. Even more concerning is that only one state reported that it had fully implemented its accessibility plan<sup>4</sup>.

## What do accessible websites and mobile apps look like today?

The WCAG states that there are four main principles you'll need to follow to create an accessible website:



**Perceivable.** Information should be perceivable to people using 1 or more of their senses.



**Operable.** Users must be able to interact with all interface components and elements.



**Understandable.** Users must be able to understand web page content that is available to them.



**Robust.** They should be able to be interpreted by a wide range of users, including assistive agents, and evolve as technology advances.

## Automating the challenge

Adobe can help state and local agencies ensure their digital services are compliant and usable for everyone—including people with disabilities. With advanced content management and accessibility features, agencies can stay in compliance while saving costs and improving outcomes for their residents.

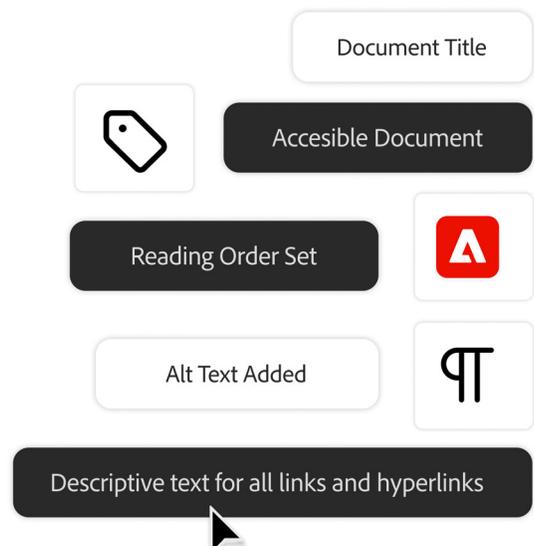
Adobe's document services provide an automated way to more easily meet common accessibility standards—including WCAG guidelines—while providing a much more cost-effective experience. In fact, licensing expenses for AEM Sites come in at about 10% of the labor costs of manually tagging documents. For states, that could mean a savings of more than \$2 million.

Beyond the time and cost savings, Adobe's automated services provide exceptional accuracy. AEM Sites tracks 80% WCAG compliance on the first pass and can then become the go-forward standard for accessibility.

## Estimating the cost of manual processes

States are finding that they will need to tag more than 100,000 documents manually after archiving a portion of the documents on their public websites. And with manual tagging taking about 2-3 hours per document, that means up to 300,000 hours of manual labor to complete DOJ's mandate for most states.

The challenge—both logistically and financially—is even greater for small jurisdictions when you factor in that the DOJ has met with some cities and counties and levied fines for localities that have made no progress.



According to the ADA, aligning with accessibility standards like WCAG 2.1 could save agencies ~\$192.6 million per year in time savings<sup>7</sup>.

To put the task into clearer context, it's instructive to see a cost breakdown for each level from large states to small counties.

**State with greater than 2,000,000 residents:**

- 100,000+ public-facing documents
- Archive 25,000
- Remaining 75,000 documents will need to be accessibility tagged
- 150,000 hours to tag manually
- Final price tag: \$2,500,000 in-house project cost at \$25/hr

**Large city or county with around 1,000,000 residents:**

- 50,000 public-facing documents
- Archive 15,000
- Remaining 35,000 documents will need to be accessibility tagged
- 70,000 hours to tag manually
- Final cost: \$1,500,000 in-house project cost at \$25/hr

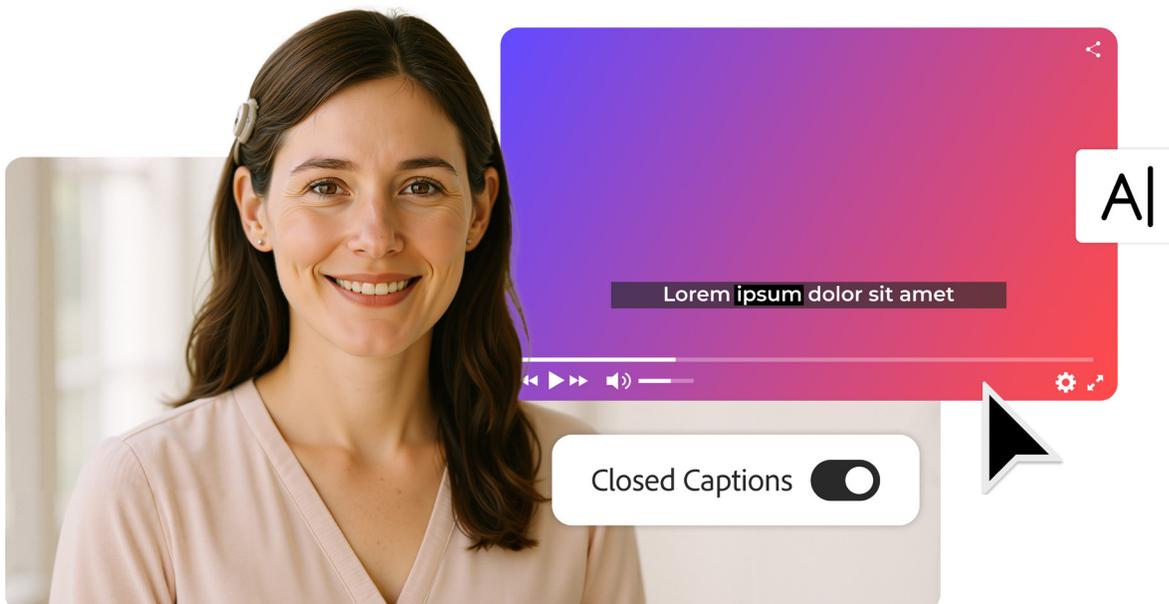
**Small city or county with about 500,000 residents:**

- 15,000 public-facing documents
- Archive 3,000
- Remaining 12,000 documents will need to be accessibility tagged
- 24,000 hours to tag manually
- Final cost: \$400,000 in-house project cost at \$25/hr

In a time when so many state and local governments are facing constrained budgets<sup>8</sup>, it will be a challenge to absorb the millions of dollars it would cost to comply with the WCAG guidelines using a manual process. Thankfully, governments don't have to choose between accessibility and other important budget priorities. By automating accessibility tagging, they can drastically cut costs associated with manual labor while increasing accuracy and efficiency.

## Four tracks for accessibility and future-proof compliance

- 1 Remediating documents:** Adobe capabilities allow for automatic identification and tagging, remediation at scale, and the creation of LLMs from PDFs using the API interface. These use cases have a number of impacts, including streamlining WCAG 2.1 Level AA conformance, improved productivity and reduced time and operational costs, and consistency and flexibility of document workstreams.
- 2 Monitoring and assessing website accessibility issues:** Adobe tools not only allow continuous accessibility checks, but also provide recommendations and execution mechanisms for quick fixes that can be taken to address these issues. Agencies can get notified immediately if their site isn't conformant to WCAG and understand what actionable next steps to take to avoid repercussions of nonconformance.
- 3 Maintaining accessibility compliance with digital assets:** Adobe capabilities empower agencies to check the accessibility of new webpages and images created to route the asset to the appropriate people for approval, automatically generate descriptive titles and ALT text with AI, and automatically generate closed captioning transcripts from videos. The impact here is substantial—our customers have seen reduced time needed to rectify and approve assets, and we've found that when assets meet accessibility standards, sites perform much stronger in areas of usability, reach, and loyalty. Accessible sites have also proven to have better SEO.
- 4 Creating accessible sites:** For agencies that are looking to replatform or modernize their tech stack, accessibility should be at the forefront of their priorities. Adobe capabilities ensure agencies publish websites where the site elements have proper role markers and semantic structure, and enforce required author input like ALT text. This makes for more streamlined, disciplined processes for creating and publishing accessible content.



## Accessibility in action

To better understand how this works in the real world, look at how the State of Illinois utilized Adobe solutions to improve its website accessibility and begin complying with the WGAC guidelines.

Illinois faced several challenges in delivering accessible service to its residents, including declining trust in the state's digital experience, lack of consistent access to services online or on mobile devices for more than 12 million residents and no standard, scalable environment to rapidly deploy content.

To address this, state technology leaders turned to Adobe. Illinois utilized Adobe Experience Cloud and Document Cloud tools to optimize state websites, mobile apps and overall digital experience. With Adobe Analytics and Adobe Target, Illinois was then able to personalize and update content in real-time. Illinois migrated 64 web properties to Adobe Experience Manager to provide a seamless, dynamic platform that increased content output while reducing error rates.

The process revolutionized the state's ability to deliver an efficient and accessible experience for all residents. The results speak for themselves:

**25%**

average increase in website traffic after deploying 45,000 new site pages.

**23%**

greater digital certainty and 7% increase in UX maturity.

**62%**

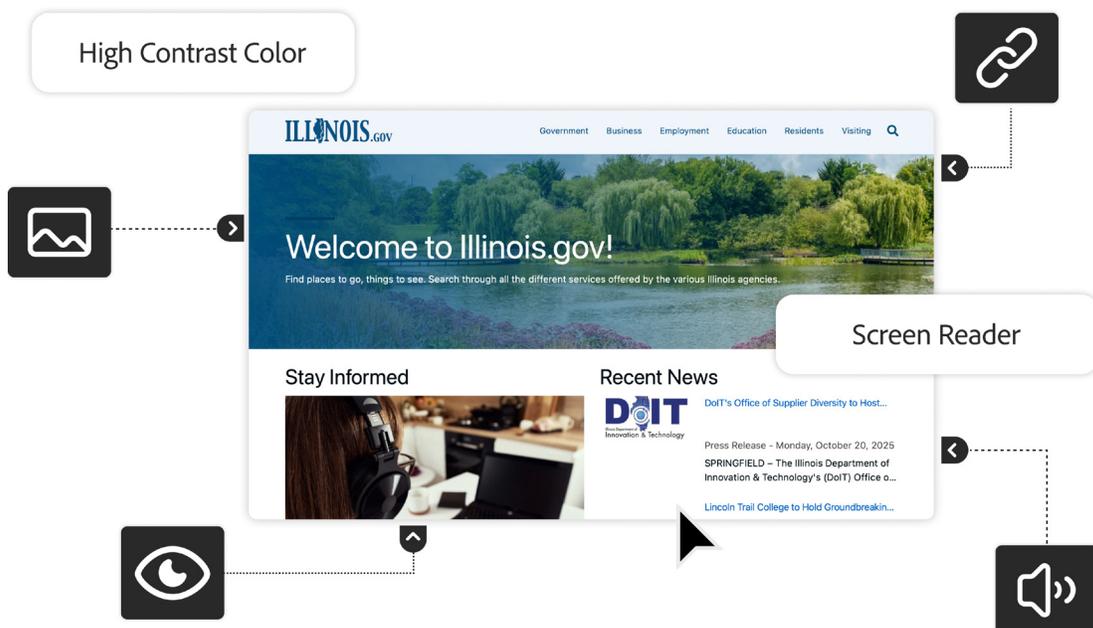
increase in quality assurance and readability.

**25%–63%**

improved website accessibility and quality scores.

**200+**

health programs available to residents by the Illinois Department of Public Health.



Accessibility is vital for state and local government (SLG) websites and mobile apps because it ensures equal access to information and services for all residents, including those with disabilities. Now, with DOJ compliance deadlines coming next year, meeting WCAG guidelines isn't just a nice-to-have for residents, it's central to legal compliance, equitable access, public trust and digital efficiency. And while it might seem a daunting task to take on, with a partner like Adobe to help along the way, it can turn from being a monumental challenge to a golden opportunity.

## Resources

- 1 <https://www.cdc.gov/disability-and-health/media/pdfs/disability-impacts-all-of-us-infographic.pdf>
- 2 <https://www.nationalcivicleague.org/making-civic-engagement-easier-for-people-with-disabilities/>
- 3 <https://business.adobe.com/resources/reports/digital-government-index-for-united-states.html>
- 4 <https://statescoop.com/accessibility-nascio-state-priority-2025/>
- 5 <https://www.adatitleiii.com/2025/03/ada-title-iii-federal-lawsuit-numbers-rebound-to-8800-in-2024/#:~:text=In%202024%2C%20plaintiffs%20filed%208%2C800,first%20started%20compiling%20these%20numbers>
- 6 <https://www.audioeye.com/post/ada-compliance-fines/>
- 7 <https://www.ada.gov/assets/pdfs/web-rule.pdf>
- 8 <https://itep.org/state-rundown-8-20-states-to-face-serious-conformity-revenue-issues-as-summer-ends/>

## Next steps.

Discover how Adobe can improve your website's accessibility and help you comply with the WGAC guidelines today.

Contact us at [government@adobe.com](mailto:government@adobe.com) or visit [adobe.com/gov](https://adobe.com/gov).

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