


CITY OF LOS ANGELES
INTERDEPARTMENTAL MEMORANDUM

Date: November 21, 2025

To: Civil Rights, Equity, Immigration, Aging and Disability (CREIAD) Committee

From: Stephen David Simon, Executive Director
Department on Disability 

Subject: **Special Study on the staffing needs for Department on Disability and Information Technology Agency to comply with the Americans with Disabilities Act Final Rule on web and mobile application accessibility requirements by the April 2026 deadline**

SUMMARY

During its May 2, 2025, hearing, the Budget, Finance and Innovation Committee requested a Special Study ([Council File #25-0600-S78](#)) on the staffing needs for the Department on Disability (DOD) and Information Technology Agency (ITA) to comply with the Americans with Disabilities Act Final Rule on web and mobile application accessibility requirements by the U.S. Department of Justice's April 24, 2026 deadline.

Before DOD and ITA can provide specific information about staffing needs to comply with the ADA Final Rule, the City must determine its approach to bringing its existing websites and mobile apps into compliance, and sustaining compliance thereafter.

DOD and ITA met several times to discuss the underlying policy implications of the Final Rule, and the potential roles of our respective departments. This memo reflects DOD's strategic recommendations for the City to comply with the Final Rule.

Specifically, this memo contains:

1. Actions and resources necessary to bring existing websites and mobile apps into compliance and to maintain compliance thereafter (Attachment A)
2. Compliance approach options, with a recommendation to pursue the following approaches:
 - **Initial Compliance Option 1A - Centralized approach for remediating** existing non-compliant websites and mobile apps
 - This approach is recommended because it is the most effective and efficient way for the City to meet its compliance obligations and reduce liability.
 - **Maintenance Option 2C - Hybrid approach for maintaining** compliance after remediation is complete
 - This approach is recommended because it most closely aligns with the City's

structure, while providing necessary resources to support ongoing compliance and a governance structure with accountability mechanisms.

3. Suggested funding approach options and cost saving measures
4. Recommendations for Council action

BACKGROUND

In 2024, the U.S. Department of Justice (US DOJ) published the [Final Rule on Web and Mobile App Accessibility](#), which established new Americans with Disabilities Act (ADA) compliance requirements for all website content¹ and mobile apps² that are made available to the public directly by state and local government or on behalf of state and local government through contracts, licensing, or other arrangements.

The Final Rule added new [Subpart H](#) to the ADA Title II regulations and established the internationally recognized standard for web accessibility, [Web Content Accessibility Guidelines \(WCAG\) 2.1](#), Levels A and AA (containing a total of 50 conformance criteria), as the technical standard for compliance.

The City of Los Angeles must come into compliance with the new ADA Title II regulations by April 24, 2026, while continuing to meet its existing obligation to provide people with disabilities equal access to City services offered via the web and mobile apps in the meantime. Failure to come into compliance by the deadline and maintain compliance after the deadline will present a significant risk for the City.

In October 2024, DOD and ITA notified City Departments and Council Offices of the new requirements, and provided them with several resources to help them remediate existing non-compliant assets, and plan for maintaining compliance thereafter, including a series of DOD-provided trainings throughout FY 2025.³ Several departments have begun taking action to ensure their web content complies, but a significant amount of work remains. This work includes addressing gaps in Citywide governance, strategy, and resources necessary to meet compliance requirements.

Now is the time to take action and use this unique opportunity to determine the most efficient and effective way to bring the City into compliance before enforcement for non-compliance begins. This, in conjunction with developing robust policies and procedures for maintaining compliance, will ensure the City can invest its limited resources in providing equitable access to people with disabilities, instead of litigation costs, as the City previously experienced in lawsuits related to ADA

¹ Web content is defined in the ADA Title II regulations as “the information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content’s structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents.”

² Mobile Applications (“apps”) are defined in the ADA Title II regulations as “software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.”

³ [October 15, 2024, Memo to Department Heads & City Council Offices regarding the Final Rule on Website and Mobile App Accessibility](#)

compliance for sidewalks, housing, emergency management, and park facilities.

REQUIRED ACTIONS AND PROJECTED COMPLIANCE COSTS

Attachment A details the actions necessary to achieve and maintain compliance with the ADA Final Rule on web & mobile app accessibility, and provides cost estimates for specific resources needed to perform those actions. The City's actual costs are unknown at this time and will not be able to be determined until a compliance approach is selected and the City's current and future resource needs are more thoroughly assessed.

As part of publishing the Final Rule on Web and Mobile App Accessibility, the US DOJ performed a regulatory impact analysis which found that ***"The costs for each government entity type and size are generally estimated to be below 1 percent of revenues ..., so the Department does not believe the rule will be unduly burdensome or costly for public entities."***⁴

Because LA's general fund revenues are projected to approximately \$8 billion in FY 2025-26, 1% of that would be \$80 million. Even if estimated costs are as low as 0.1% of \$8 billion, that would be \$8 million in implementation, testing, remediation and ongoing costs after implementation. Over 10 years, that means costs could range from \$800,000 to \$8 million per year, which the US DOJ does not believe is unduly costly for the purpose of compliance.

COMPLIANCE APPROACH OPTIONS

Set forth below are compliance approach options for Council's consideration for 1) remediation of the City's existing non-compliant websites and mobile apps and preparing the City to maintain compliance thereafter; and 2) maintaining compliance of the City's websites and mobile apps.

1. Remediation of Existing Websites and Mobile Apps & Preparing to Sustain Compliance

Bringing the City into compliance requires ensuring all **existing** websites, mobile apps, and digital content posted to them comply with the ADA Web & Mobile App Accessibility requirements by the compliance deadline, and developing a plan to sustain compliance thereafter. If done properly, this is a one time activity that provides the City with a solid compliance foundation.

1A. Centralized Approach *(recommended approach)*

Under a centralized approach, a single department will be identified to lead Citywide efforts to bring the City into compliance by the deadline, including developing and implementing an enterprise solution using staff and contracted services, including a consultant with subject matter expertise in web and mobile app accessibility compliance implementation.

⁴ <https://www.federalregister.gov/d/2024-07758/p-167>

The solution should include, but is not limited to addressing:

- Remediating the following existing assets to bring them into compliance:
 - Websites and web applications
 - Mobile applications
 - Documents, images, and videos
- Updating Citywide IT policies
- Updating Citywide procurement policies and procedures
- Providing Citywide staff training
- Developing Citywide and department procedures to maintain compliance after the deadline, including providing ongoing staff training and establishing control and accountability mechanisms to prevent non-compliance.

This approach would be most effective due to using consultants with expertise and experience leading such efforts, and would best align with the funding anticipated by the US DOJ. Additionally, the City may realize cost savings from centralizing services, as opposed to having each department establish separate service agreements. It will also ensure consistency in compliance and user experience across the City, thus reducing risk, while allowing for tailored strategies to meet department specific needs.

These outcomes would support the collective efforts within City Council and the Mayor's office to improve the City's overall fiscal health and the quality of constituent services through increased coordination between departments and streamlining processes.

This approach is similar to the approach used for the Citywide Language Access Plan in which a consultant developed the Citywide plan, and departments were subsequently responsible for developing a department level plan in alignment with the Citywide plan. The Community Investment for Families Department, which leads the Citywide Language Access Plan, has two full time staff and one part time staff assigned to the project.

Given the experience of ITA with developing and implementing enterprise solutions for the City's digital space, for example cybersecurity, DOD believes ITA is best suited to serve as the lead department and providing them with the resources they deem necessary to lead these efforts would be the most effective and efficient approach.

DOD would continue to provide guidance, training, and technical assistance with understanding how the ADA Web & Mobile App Accessibility requirements apply to the City's digital assets, as well as addressing complaints and grievances that arise related to these assets, as it does for all other types of City service, programs, and activities.

1B. Decentralized Approach *(current approach)*

Under a decentralized approach, each Department is responsible for facilitating their

own efforts to bring their websites and mobile apps into compliance by the deadline and there is no dedicated Citywide effort to ensure all Departments meet the deadline. Departments have the flexibility to choose how to achieve compliance, and what staff and funding to invest in the effort. This approach aligns with the City's Web Policy & Standards which provides guidance, but not a mandate, for the design and development of City websites.

Under this approach, the following resources are currently available to assist Departments with coming into (and maintaining) compliance:

- [ITA provided resources](#)⁵
 - Technical support regarding WCAG technical compliance
 - Bench contracts for IT Professional Services and Application Professional Services
 - Automated website content accessibility testing for primary websites
 - Staff training:
 - Accessible Websites and Inclusive Content
 - Introduction to Acrobat Pro Accessibility
- [DOD provided resources](#)
 - Information about the ADA Web & Mobile App Accessibility regulations
 - Guidance materials to assist with compliance, such as Sample ADA Web & Mobile App Accessibility Compliance Policies and Procedures
 - Staff training and technical assistance regarding:
 - Understanding and applying the ADA Title II regulations
 - Creating accessible PDF, Word, Presentation, and Spreadsheet files
 - Social media accessibility
 - Curated list of 3rd party web and mobile app accessibility trainings and professional certifications

Departments would each be responsible for funding services obtained through ITA's bench contracts, and procuring and funding additional services that are not currently available, such as accessibility testing and remediation for secondary websites and mobile apps.

While this approach provides Departments with the greatest flexibility to develop a plan tailored to meet their needs and aligns with ITA's authority as stated in the City's City's Web Policy & Standards, it is the approach with the greatest risk because it lacks accountability and erroneously assumes all Departments have existing staff that understand how to implement the technical requirements, can manage and implement technical work and/or

⁵ In addition to the listed resources, ITA also provides the Userway Website Widget, a type of "overlay" that allows the user to customize their experience on the website. It is not listed as a resource to assist with compliance because overlays cannot be used to meet the ADA Web & Mobile App Accessibility requirements. There have also been several successful lawsuits against private entities attempting to use overlays to provide website accessibility.

funding for contracted services to perform the work. It also does not take into account the broad scope and complexity of the work that must be completed in a short period of time. Several departments that have started the work of remediating existing non-compliance have already reported difficulty due a lack of resources and technical expertise to perform the necessary work.

This option may present cost savings in the short term because it omits contractual services costs associated with the centralized approach, however the cost savings may be perceived as an underinvestment in compliance with federal law, and are likely to result in greater long term costs due to the significant risk and liability from non-compliance.

2. Maintaining Compliance

Maintaining compliance includes ensuring that **existing** websites, mobile apps, and digital content posted to them remain in compliance with the ADA Web & Mobile App Accessibility requirements and all **new** websites, mobile apps, and digital content comply with the ADA Web & Mobile App Accessibility requirements before making them available to the public online.

While it is the responsibility of each City department and office to provide its programs, services, and activities in compliance with the ADA, including the ADA Web & Mobile App Accessibility requirements, there are multiple options on how to most effectively and efficiently support Departments in meeting this obligation.

2A. Centralized

Under a centralized approach, a single lead department would have primary responsibility for maintaining compliance with the ADA Web & Mobile App accessibility requirements.

The lead department would likely need to identify a dedicated Chief Information Accessibility Officer with experience and expertise in website and mobile app accessibility and establish an Information Accessibility Office with IT staff assigned to each City department and office to facilitate their compliance. Large departments may require the assignment of multiple IT staff, while micro departments could possibly share IT staff.

Additionally, all resources to support Citywide compliance would be consolidated into the lead department and all departments and offices would be required to work closely with the lead department on the development and implementation of all websites, mobile apps, web applications, and digital content (images, videos, documents, etc.).

This approach would deviate significantly from the current City structure where each department is responsible for the accessibility of their own assets, but is likely to result in the greatest level of compliance and, therefore, the least risk to the City.

2B. Decentralized *(current approach)*

Under a decentralized approach, each Department and office has primary responsibility for maintaining its own compliance with the ADA Web & Mobile App accessibility requirements.

Each department would need to assign at least one staff who is responsible for developing a comprehensive understanding of the ADA Web & Mobile App Accessibility requirements and ensuring the compliance of all existing and new websites, mobile apps, web applications, and digital content posted to them. Functionally, this would be similar to appointing a Chief Information Accessibility Officer for each department with robust knowledge of web and mobile app accessibility regulations and technical requirements, in addition to the requisite authority, knowledge, and skills to provide compliance coordination and oversight.

Additionally, under this approach, all departments and offices would need IT professional staff and/or contracted IT professional services to perform accessibility testing and remediation. Some departments may have existing IT staff who can perform this work, however most departments will require new or expanded resources.

While this approach aligns with the City's overall approach to how it manages and maintains digital assets and provides departments with flexibility to choose how to maintain compliance, it is the option with the greatest risk because, in a climate where departments are consistently being asked to do more with less, it will be entirely reliant upon departments choosing to prioritize this work, and will result in inconsistent approaches to compliance across the City. Additionally, the City will not have the opportunity to realize cost savings from implementing an enterprise solution for contracted services because each department will be required to establish and negotiate many of their own services.

2C. Hybrid *(recommended approach)*

Under a hybrid approach, departments and offices will be responsible for maintaining compliance with the ADA Web & Mobile App accessibility requirements, with dedicated support from a lead department.

- **Each department** and office would be responsible for establishing and implementing policies and procedures for maintaining the compliance of their websites and mobile apps. Each department and office would need to assign a lead staff with the requisite authority and knowledge to liaise with the lead department and ensure all relevant staff in the department have a basic understanding of the compliance requirements and resources available to meet them, but would not necessarily require that every department and office have the functional equivalent

of a Chief Information Accessibility Officer. Depending on the scale of web presence and type of web based services, some departments may need new or expanded IT staff resources, which could be provided through the Information Accessibility Office (similar to how personnel services are consolidated in the personnel department for some departments).

- The **lead department** would be responsible for providing the governance, citywide policies and procedures, staff training, technical assistance, and services that departments and offices need to comply, as well as have responsibility for monitoring and reporting on non-compliance. Similar to option 2A, the lead department would likely need to identify a Chief Information Accessibility Officer and establish an Information Accessibility Office, however the staff in this office would support departments with performing the necessary work, rather than doing it on their behalf. This would allow the City to leverage existing IT staff assigned to departments and offices.

This approach more closely aligns with the City's current structure, where the departments and offices remain the "asset owners" with responsibility for maintaining compliance, but it adds a more robust governance, support, and oversight mechanism than would exist under option 2B, thus making it more likely to result in compliance.

This approach would also provide the opportunity for cost savings by centralizing contracted services necessary for compliance, presenting the potential for lower service rates and less administrative burden across departments. And it would support consistency in compliance and user experience across the City, thus reducing risk, while allowing for tailored strategies to meet department specific needs.

This is similar to the approach of ED 6, which calls for a MyLA311 governance structure to hold departments accountable for delivering excellent customer service, including establishing standard performance measures, streamlining processes, and improving interdepartmental coordination.

Similar to option 1A, above, if this approach is selected DOD believes ITA is best suited to serve as the lead department and providing them with the resources they deem necessary to lead these efforts would be the most effective and efficient approach.

DOD would continue to provide guidance, training, and technical assistance with understanding how the ADA Web & Mobile App Accessibility requirements apply to the City's digital assets, as well as addressing complaints and grievances that arise related to these assets, as it does for all other types of City service, programs, and activities.

FUNDING APPROACH & COST SAVING MEASURES

Because compliance with the ADA Web & Mobile App Accessibility regulations is not optional and

non-compliance by any one department or office presents a significant risk to the City as a whole, determining the most effective mechanism for funding to meet and maintain compliance is crucial. An option such as a special use fund may help to provide departments and offices with the resources they need to comply, while ensuring that any unused funds are returned to the general fund. Additionally, departments may be required to integrate the cost of ADA Web & Mobile App Accessibility compliance into any applicable non-general funded projects and services in order to minimize the impact on the general fund.

If moving forward with option 1A as the Citywide plan to come into compliance, the consultant may work with the lead department and CAO to develop a formula to project costs that will inform the amount of the special use fund, as well as a minimum percent of funding for non-general funded digital assets that must be allocated to meeting compliance requirements.

Alternatively, Departments could be required to each individually project and report on the costs of compliance for their digital assets to inform a base budget allocation, however this will likely lead to an inconsistent approach with some Departments overfunded and some underfunded.

Cost savings measures that may be considered regardless of what compliance and funding approach is selected:

- Move all City websites onto a single platform and prohibit the use of other platforms
- Require use of a few standardized web page design templates that meet compliance requirements
- Remove web and mobile app content that is no longer needed
- Establish Citywide design/brand standards that build in compliance requirements
- Minimize PDF remediation costs:
 - To the maximum extent possible, provide information as text (html) instead of uploading a PDF
 - Create compliant templates for frequently used documents (such as agenda templates for Brown Act meetings)
 - Establish an in-house team of well-trained staff who can perform PDF remediation

RECOMMENDATIONS

1. Adopt options 1A⁶ and 2C as the City's approach to achieving and maintaining compliance with the ADA Web & Mobile App Accessibility requirements in order to minimize costs, increase compliance, and reduce liability.
2. City attorney and CAO report back on the financial risk of non-compliance, including case law on the use of a website overlay (sometimes referred to as a "widget") to meet compliance with the Final Rule.

⁶ This recommendation was first submitted to the City Council on May 5, 2024. [FY 2024-25 All CAO Budget Memos](#), page 655.

FISCAL IMPACTS

There will be an initial General Fund impact in preparation for meeting the April 24, 2026, compliance deadline, then an ongoing General Fund impact to sustain compliance after the deadline. However, it is DOD's contention that this investment will decrease the City's risk of non-compliance, resulting in savings that would otherwise be expended on litigation costs.

Attachment A

Actions and Resources Necessary to Achieve and Maintain Compliance with the ADA Final Rule on Web & Mobile App Accessibility

The actions and resources⁷ necessary for the City to remediate existing assets that do not comply with the ADA Web & Mobile App Accessibility requirements, and to maintain compliance thereafter include, but are not limited to:

- Every piece of content uploaded to websites and mobile apps (PDFs, presentations, spreadsheets, images, videos, etc.) must be evaluated for compliance and any areas of non-compliance remediated, unless an exception applies, or the non-compliant content is removed. Resources needed:
 - IT staff or IT professional services⁸ to evaluate content and remediate non-compliance
 - PDF document remediation cost per page: \$4.50-\$12.00
 - Fillable form remediation cost per page: \$15.00 - \$60.00
 - Microsoft Office document remediation cost per page: \$5.50 - \$18.00
 - InDesign document remediation cost per page: \$16.00 - \$22.00
 - Scanned document remediation cost per page: \$6.50 - \$22.00
 - Video captioning
 - Human captioning cost per minute: \$4.50
 - AI transcription and captioning cost per page (does not include cost of verifying accuracy of AI): \$2.50 - \$3.75
 - Subscription service for AI-powered video captioning tool monthly cost: \$10-\$150
 - Video audio description cost per minute: \$7.00 - \$14.00
 - Image remediation: staff time of 1-5 minutes per image
 - Project management staff to oversee content review and remediation projects and workflows
 - Administrative staff to establish and monitor the contract, budgets, invoicing, and expenditures for contracted services
- Every website, mobile app, and web application (such as the council file system and systems for customers to obtain permits) must be evaluated for compliance and any areas of non-compliance remediated, unless an exception applies. Resources needed:

⁷Costs provided in this section are estimates based on advertised prices. Additional costs may apply for faster turnaround, special requests, and other circumstances. Cost savings may be realized from centralizing service contracts.

⁸ITA currently provides some of these services through bench contracts that provide short-term hiring solutions to augment existing staff, and as needed accessibility remediation services. Departments are required to go through the process of hiring through the bench contract, or requesting a task order solicitation, and to have funding available to access these services.

- Automated compliance testing tools for websites⁹
 - IT staff or IT professional services⁶ to perform manual testing for tools, platforms, and elements that cannot be tested with automated tools, and to remediate non-compliance
 - Initial website accessibility review/audit and remediation cost per page: \$200–\$250 per page
 - Manual compliance and usability testing by people with disabilities per hour: \$60–80
 - Ongoing website editing and maintenance cost per month: \$3,000–\$3,500
 - Project management staff to oversee website, mobile app, and web application review and remediation projects and workflows
 - Administrative staff to establish and monitor the contract, budgets, invoicing, and expenditures for contracted services
- Applicable Citywide IT policies must be updated to align with the new ADA Web & Mobile App Accessibility regulations. Resources needed:
 - Lead department and designated staff to identify all applicable IT policies and review and update them to align with the new regulations, including collaborating with other staff and departments for input as needed
 - Citywide contracting requirements must be reviewed and updated as needed to facilitate compliance with the ADA Web & Mobile App accessibility requirements, and corresponding processes and templates updated accordingly. Resources needed:
 - Lead department and designated staff to review and update contracting requirements, processes, and templates to align with the new regulations, including collaborating with other staff and departments for input as needed.
 - Department Contract Coordinator training and implementation of department level changes necessary to integrate updated contracting requirements, processes, and templates.
 - City staff must be trained on the ADA Web & Mobile App Accessibility requirements, as applied to their specific scope of work. Resources needed:
 - Lead department to provide training (directly and/or through contractors) for staff responsible for any of the following:
 - Website development and maintenance
 - Staff training on website remediation provided by contractor cost per hour: \$150–\$200
 - Web application development and maintenance
 - Mobile app development and maintenance

⁹ ITA provides automated testing for each department's primary websites. Departments are responsible for identifying other resources to test secondary sites, and to perform manual testing. Primary and secondary websites are defined on page 5 of the City's [Web Policy & Standards](#).

- Creating and/or posting content on websites, mobile apps, and/or social media
 - Staff training on document remediation provided by contractor cost per hour: \$150 - \$275
 - Reviewing and approving the compliance of website, mobile app, and/or social media content
 - Creating design and brand standards
 - Monitoring City contractors that manage and/or create websites, web applications, mobile applications, and/or digital content
 - Lead department project management staff to oversee the Citywide training program
 - Lead department administrative staff to establish and monitor the contract, budgets, invoicing, and expenditures for contracted services
- Contracted services must be established to provide rapid access to services necessary to facilitate compliance (for example: services to remediate PDF documents provided as part of City Council meeting agendas, prior to posting the PDFs online). Resources needed:
 - Lead department and designated staff to establish and maintain service contracts that meet Citywide needs, and to train applicable staff citywide on how to obtain the services¹⁰
- City agencies must establish and consistently implement, in perpetuity, policies and procedures to ensure ongoing compliance with the ADA Web & Mobile App Accessibility requirements. Resources needed:
 - Lead department to:¹¹
 - Develop Citywide policies and procedures for ensuring all new websites, web apps, and mobile apps comply. For example, this may include a centralized review and approval process, similar to the City's permitting process for construction projects in the public right-of-way, before a new website, web, app, or mobile app is published.
 - Develop model department/office level policies and procedures to maintain compliance, then assist departments and offices with drafting, implementation, and staff training on the new policies and procedures.
 - All City departments and office to:
 - Designate lead staff to oversee compliance with the ADA Web & Mobile App Accessibility requirements, including monitoring to ensure consistent implementation of Citywide and department policies and procedures
 - Ensure staff receive training and maintain skills relevant to their scope of work

¹⁰ City staff may also be trained on PDF remediation, which may decrease reliance on contracted services over time.

¹¹ This work may be performed by staff of the lead department or through a contractor. If the work will be performed by a contractor, the lead department will still require project management staff.

- Citywide accountability mechanisms must be established to ensure ongoing compliance after the compliance deadline.
 - Lead department and designated staff to develop and implement accountability mechanisms.
- Sufficient funding must be allocated to support the cost of compliance, including remediating existing non-compliant content and maintaining compliance thereafter

These actions are necessary for **all** websites and mobile apps covered by the new regulations which, as noted in the introduction, include those that are made available to the public directly by the City or on behalf of the City through contracts, licensing, or other arrangements.