



Labrador Transparency



ADA Digital Accessibility & ACFR Reporting
**What Cities, Counties,
and Special Districts
Need to Know Now**

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A joint publication of **Labrador Transparency & Harbor View Consulting**
Workiva Implementation & Financial Reporting Partners

The Convergence of Two Critical Mandates

If you are responsible for financial reporting at a city, county, special district, or other public sector entity, two converging realities demand your attention: **the new ADA Title II digital accessibility requirements** and the growing complexity of producing your **Annual Comprehensive Financial Report (ACFR)**. The intersection of these two challenges presents both a risk and an opportunity for government finance teams.

On April 24, 2024, the U.S. Department of Justice finalized a rule under ADA Title II that establishes enforceable technical standards—specifically WCAG 2.1 Level AA—for all digital content provided by state and local governments. The deadlines are approaching fast:

Entity Type	Compliance Deadline
Public entities with population 50,000+	April 24, 2026
Smaller entities & special districts	April 26, 2027

This rule applies to all public-facing web content and digital documents, and that explicitly includes your ACFR, budget books, and other financial reports published online—most of which are currently distributed as static PDFs.

Why ACFR Filers Should Pay Attention

Annual Comprehensive Financial Reports are among the most complex and lengthy documents that local governments produce. They are also among the most widely accessed by the public, bond rating agencies, investors, and oversight bodies. Yet the typical ACFR production process introduces significant accessibility barriers:

- **Static PDF formats** — Most ACFRs are published as PDFs that lack proper tagging, alt text, reading order, and navigational structure required for screen readers and assistive technologies.
- **Complex tables and financial data** — ACFRs contain hundreds of data tables that, without proper structural markup, are nearly impossible for users with disabilities to navigate or interpret.
- **Charts and graphs without alternative text** — Visual data representations in ACFRs often lack descriptive text, making them invisible to users relying on screen readers.
- **Manual, fragmented production workflows** — When ACFRs are stitched together from Word documents, Excel spreadsheets, and InDesign layouts, accessibility is typically an afterthought—if it is addressed at all.

The consequence is clear: most ACFRs published today do not meet WCAG 2.1 Level AA, and retroactive remediation of a 200+ page financial document is both costly and time-consuming.

What the New ADA Title II Rules Require

The DOJ's final rule is explicit: all web content and digital documents that a public entity makes available to the public must conform to WCAG 2.1 Level AA. For ACFR filers, this means:

1. **Proper document structure** — Headings, reading order, and navigational elements must be logically organized and tagged so assistive technologies can parse them.
2. **Accessible tables** — All financial data tables must include header associations, scope attributes, and summaries that enable non-visual navigation.
3. **Text alternatives for visual content** — Every chart, graph, infographic, and image must have meaningful alt text or long descriptions.
4. **Sufficient color contrast** — Text and visual elements must meet a minimum 4.5:1 luminance contrast ratio.
5. **Keyboard navigability** — All interactive elements (hyperlinks, bookmarks, form fields) must be operable via keyboard.

Importantly, the rule covers documents posted after the compliance date, as well as pre-existing documents that are still used to access government services or programs. An ACFR published before the deadline but still referenced by the public or bond markets may still need to comply.

A Closer Look at WCAG 2.1 and PDF/UA: The Standards Behind the Mandate

For government finance teams new to digital accessibility, the technical standards can feel overwhelming. In practice, two overlapping frameworks govern what your documents must do: WCAG 2.1 and PDF/UA.

WCAG 2.1: The Web Content Accessibility Guidelines

WCAG 2.1 is an ISO international standard developed by the World Wide Web Consortium (W3C)—the same body that governs HTML and CSS. It contains 13 guidelines organized around four core principles: content must be Perceivable, Operable, Understandable, and Robust. Each guideline includes testable success criteria that help developers and designers know specifically what to implement.

WCAG compliance is organized into three levels:

- **Level A (Minimum)** — The baseline requirements. A document that fails Level A is actively inaccessible to many users with disabilities.
- **Level AA (Mid-range)** — The standard required by the DOJ's ADA Title II rule. This is the target for all public sector digital documents, including ACFRs. It covers the most common and impactful barriers for users with visual, motor, cognitive, and hearing disabilities.
- **Level AAA (Highest)** — The most stringent level. WCAG does not require AAA conformance as a general policy because it is not achievable for all content types. It is worth noting that even full AAA compliance will not make every document usable for every disability—particularly in areas of cognitive and learning differences. The goal is to reach the broadest possible audience.

Labrador designs all financial communications to achieve WCAG 2.1 Level AA compliance—the standard the DOJ now requires of your entity.

PDF/UA: The Accessibility Standard Specific to PDF Documents

Because ACFRs are almost universally distributed as PDFs, a second standard is equally important: PDF/UA (ISO 14289), also known as Universal Accessibility. Published in 2012, PDF/UA defines exactly *how* a PDF document must be structured to work with screen readers and other assistive technologies. WCAG tells you what to achieve; PDF/UA tells you how to achieve it within a PDF.

Key PDF/UA requirements that directly affect ACFR documents include:

- All meaningful content must be “tagged” with structural information—headings, paragraphs, tables, lists—so that assistive technology can understand and navigate it. Decorative elements must be explicitly marked as artifacts so screen readers skip them.
- The document’s “tag tree” must reflect logical reading order—critical for multi-column layouts, sidebars, and complex financial statements that are common in ACFRs.
- Every non-text element—charts, graphs, infographics, maps, logos—must have corresponding alternative text that conveys its meaning.
- A document title must appear in the file metadata, and information must never be conveyed through visual means alone—color, contrast, or position cannot be the sole carrier of meaning.

Bringing a typical ACFR into PDF/UA compliance after it has already been produced—a process known as “remediation”—is labor-intensive because it must be completed on a page-by-page basis. A 200-page ACFR with dozens of financial tables, charts, and complex layouts can take significant time and cost to remediate retroactively. This is precisely why building accessibility into the production workflow from the start is the only sustainable approach.

The Most Common Accessibility Failures in Government Financial Documents

The Civil Rights Division of the U.S. Department of Justice has identified the most frequent accessibility barriers in digital documents and websites. Government finance teams should review their own ACFRs and budget documents with these specific failure points in mind:

- **Insufficient color contrast.** Text must have a contrast ratio of at least 4.5:1 against its background; headers require at least 3:1. Many government reports use light-colored text on white or near-white backgrounds, particularly in charts and callout boxes, that fail this test entirely.
- **Using color as the only means of conveying information.** Charts and graphs that rely solely on color to distinguish data series—without labels, patterns, or shape differences—are inaccessible to readers with color vision deficiency and to anyone using a screen reader, which cannot interpret color differences within images.
- **Missing alternative text on images and graphics.** Every chart, graph, photograph, seal, and infographic in your ACFR requires descriptive alt text. Without it, screen readers either skip the element entirely or read out unhelpful file names. This is one of the most pervasive failures in current ACFR documents.
- **Inaccessible online forms.** Public-facing digital forms—including those used for public comment, financial disclosure, or grant applications—must include properly labeled fields, clear instructions, and error indicators that assistive technologies can communicate to users.
- **Lack of keyboard navigation.** Not all users can operate a mouse or trackpad. Web pages and interactive PDFs must be fully navigable using keyboard commands alone—a requirement that extends to the hyperlinks, bookmarks, and interactive tables of contents common in modern ACFRs.

The Cost of Inaction

Government entities that fail to address digital accessibility face tangible consequences:

- **Legal exposure** — DOJ enforcement actions, demand letters, and lawsuits from advocacy groups are increasing. Research indicates that approximately 6% of all districts have already received enforcement actions related to web accessibility.
- **Reputational risk** — Public entities are held to a higher standard of transparency and inclusion. Inaccessible financial reports undermine public trust.
- **Costly remediation** — Retrofitting a complex, static PDF for accessibility after publication is far more expensive than building accessibility into the workflow from the start.
- **Bond market implications** — Investors and rating agencies increasingly expect transparent, accessible disclosures. Reporting that fails to meet modern standards may impact how your entity is perceived by the market.

A Better Path Forward: Fix the Workflow, Not Just the Document

The most effective approach to ADA compliance for ACFR reporting is not to remediate documents after they are produced—it is to **build accessibility into the production process itself**. This is where the combination of the right technology platform, financial reporting expertise, and professional design capabilities becomes critical.

Compliance Pathways: Where Does Your Entity Stand?

No matter where your entity is in its reporting cycle, there is a practical path to compliance. Remediation—the process of retrofitting an existing PDF with proper accessibility tagging—often takes as little as 24 hours for a standard document, making it a viable bridge strategy while longer-term workflow improvements are implemented. Full compliance may always require some form of remediation as a final step, even for documents built with accessibility in mind from the start. The right approach depends on your timeline.

Pathway	Who This Applies To	Approach	Role of Remediation
Retroactive <i>Already-public documents</i>	ACFRs, budget books, and other financial documents already posted publicly that remain referenced by the public, bond markets, or government programs.	Submit existing PDFs for professional remediation. No changes to the original document or production workflow are required. The remediated file replaces the version on your website.	Remediation is the entire solution.

<p>Immediate Term <i>Releasing shortly after the deadline</i></p>	<p>Entities whose next ACFR or budget publication is imminent—too close to the deadline to redesign the production workflow before release.</p>	<p>Continue your existing production process. Upon completion, submit the finished PDF for remediation before or immediately after publication. Begin planning an accessible workflow redesign in parallel for the following cycle.</p>	<p>Remediation bridges the gap. Turnaround as fast as 24 hours means compliance does not have to delay publication.</p>
<p>Short to Long Term <i>Building compliance into every future cycle</i></p>	<p>Entities planning ahead for next year’s ACFR or those adopting a connected reporting platform who want accessibility built into the process, not added afterward.</p>	<p>Develop accessible document templates and design systems that embed WCAG 2.1 AA compliance into your standard production workflow. Accessibility becomes a default output, not a post-production task—preserving team efficiency while eliminating recurring remediation scope.</p>	<p>Remediation as a final quality check. Even documents produced with accessibility in mind benefit from a final remediation pass to catch edge cases and confirm full WCAG 2.1 AA conformance.</p>

Connected Reporting Platforms: What They Make Possible

Cloud-based connected reporting platforms—Workiva being the most widely adopted in government financial reporting—offer capabilities that directly address the accessibility challenge by changing how the ACFR is built from the ground up:

- **Connected data** — Link financial data directly from your ERP or GL system, eliminating manual rekeying and ensuring accuracy across the entire document.
- **Structured document authoring** — Build your ACFR within a controlled, structured environment where headings, tables, and reading order are consistently maintained.
- **Parallel collaboration** — Enable multiple team members to work simultaneously with granular permissions, reducing bottlenecks and version control issues.
- **Digital-first output** — Move beyond static PDFs toward web-native publishing formats that are inherently more accessible and easier to maintain.

Government entities that have adopted connected reporting platforms for ACFR production have reported dramatic efficiency gains—in some cases cutting preparation time by 75%—while simultaneously improving data accuracy, audit readiness, and the accessibility of final outputs.

The Role of Accessible Design in Financial Reporting

Technology alone doesn't solve the accessibility problem. The design and structure of the final report matters just as much. This is where specialized financial reporting design firms play a critical role. Labrador Transparency, for example, has spent over 30 years helping organizations transform complex financial documents into clear, accessible communications—and brings specific expertise in:

- **ADA-compliant information design** — Building reports that meet WCAG 2.1 Level AA standards from the ground up, with proper structure, contrast ratios, and alt text built into every element.
- **Professional visual storytelling** — Transforming dense financial data into intuitive, well-branded reports that enhance readability for all audiences, including those using assistive technologies.
- **Workiva platform integration** — Deep familiarity with optimizing Workiva's capabilities for document production, ensuring that accessibility is baked into the workflow rather than bolted on after the fact.
- **Digital and web-native publishing** — Delivering reports in formats that are inherently more accessible than traditional PDFs, including interactive online reports with built-in navigation and responsive design.

In practice, Labrador's approach to accessible financial reporting is built on three interconnected design principles that apply directly to government financial documents like ACFRs.

Predictability: Consistency That Helps Every Reader Navigate

A consistent design vocabulary—a defined color palette, clear iconography, and a standard layout architecture—allows every reader to navigate a complex report more easily, not just those using assistive technologies. When recurring information and structural elements look and behave the same way throughout a document, readers develop expectations that reduce cognitive load. For users with cognitive or learning disabilities, this predictability is a functional requirement, not a stylistic preference. For your ACFR, this means that heading levels, table formats, and callout treatments must be rigorously consistent from the financial statements through the statistical section.

Perceptibility: Making Information Visible and Distinguishable

Perceptibility encompasses the visual choices that determine whether a reader can receive the information being presented. Labrador integrates three techniques to ensure ACFR content is perceptible to the broadest possible audience: optimized font sizing and line spacing for both digital and print formats; color contrast verification built into the design process (not a final checklist item) to ensure body text meets a 4.5:1 ratio and headers meet 3:1; and redundant visual cues in charts and graphs—patterns, shape outlines, and direct labels alongside color coding—so that readers with color vision deficiency receive the same information that all other readers do.

Comprehensibility: Data Visualizations That Clarify, Not Obscure

Complex financial data is best understood when well-designed visuals reinforce the text narrative—not replace it. Critically, material information must always be articulated in text and shown visually; a reader who cannot perceive a graphic must still have access to the underlying substance. Labrador applies a high signal-to-noise standard to all data visualizations: data labels are connected directly to the elements they describe, and decorative design elements that add visual complexity without adding meaning are deliberately removed. For ACFR-specific visualizations—fund balance trends, debt service schedules, revenue mix charts—this approach ensures that the story your data tells is accessible to every member of the public who reviews your report, regardless of how they access it.

Bridging the Gap: Implementation Expertise for Government Finance Teams

Even the best platform requires the right implementation approach—particularly in governmental accounting, where GASB standards, multi-fund structures, and complex note disclosures make ACFR production uniquely challenging. This is where implementation partners with specific government finance experience become essential. Harbor View Consulting, Labrador’s implementation partner for Workiva engagements, brings a team led by former national practice leadership with over 200 Workiva implementations across financial reporting, audit, controls, and data integration—including ACFR-specific work for state retirement systems, one of the most specialized segments of public sector reporting.

In practice, this means the implementation partner doesn’t just configure the platform—they understand the reporting substance behind it. Harbor View brings direct expertise in GASB standards, ERP-to-Workiva data integration via Wdata, and the financial close processes that drive ACFR production timelines. They’ve helped government finance teams move from manual, spreadsheet-driven ACFR workflows to connected, automated environments where a single data change flows through the entire report—across financial statements, note disclosures, and statistical sections.

For entities already using Workiva, implementation partners like Harbor View also provide optimization and health check services to identify untapped capabilities in existing configurations—particularly around data connectivity, accessibility output, and collaboration workflows that may have been set up years ago and haven’t kept pace with the platform’s evolution or the new ADA requirements.

Why This Combination Matters

The challenge facing ACFR filers is that accessibility compliance sits at the intersection of several disciplines that rarely coexist within a single team or organization. Your finance department understands the reporting substance and GASB requirements. Your IT team may understand data systems and ERP integration. But neither is likely to have deep expertise in WCAG accessibility standards, ADA-compliant document design, or the nuances of how a connected reporting platform can solve all of these problems simultaneously.

This is precisely why Labrador and Harbor View work together. Labrador’s design and compliance teams ensure that the report itself—its structure, visual presentation, and digital output—meets the accessibility bar. Harbor View’s implementation team ensures that the Workiva platform beneath it is properly configured, connected to your data sources, and set up so that accessibility isn’t a one-time fix but a repeatable outcome built into every reporting cycle.

The result is an ACFR that is not only compliant, but genuinely better: faster to produce, more accurate, easier to audit, and more useful to every stakeholder who reads it—regardless of ability.

What Government Finance Leaders Should Be Thinking About Now

With compliance deadlines fast approaching, there are several practical steps that ACFR filers can take today to assess their readiness and begin making progress:

- 1. Audit your most recent published ACFR for accessibility gaps.** Run it through a WCAG evaluation tool to understand where you stand today. Pay particular attention to table structure, reading order, and alt text for charts and graphs. The results will likely be eye-opening.
- 2. Take an honest look at your production workflow.** If your ACFR is still being assembled across Word, Excel, and a design tool with manual data entry, the accessibility problem will recur every single reporting cycle. The workflow is the root cause—not the final PDF.
- 3. Understand what “digital-first” publishing actually means.** Moving to web-native formats doesn’t mean abandoning your ACFR’s structure or rigor. It means producing the same content in a format that is inherently more accessible, searchable, and useful to stakeholders than a flat PDF.
- 4. Map out who owns accessibility in your organization.** ADA compliance for financial reports doesn’t live neatly in IT, finance, or communications. It spans all three. Clarifying ownership and shared responsibility early avoids finger-pointing when the deadline arrives.
- 5. Build accessibility into your next ACFR timeline—not after it.** The most expensive and disruptive path is waiting until a report is finished and then trying to remediate it. The most effective path is choosing tools and partners that produce accessible output by default.

Looking Ahead

The new ADA Title II accessibility requirements are not a burden to be feared—they are a catalyst for overdue modernization in how government entities produce and publish their most important financial communications. The entities that treat this as an opportunity rather than a checkbox exercise will come out the other side with reporting workflows that are faster, more accurate, and more transparent for everyone.

The technology exists. The expertise exists. The question is whether government finance teams will get ahead of the deadline or find themselves scrambling to remediate documents after the fact—at far greater cost and with far less control over the outcome.



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About This Publication

This thought piece is a joint publication of Labrador Transparency and Harbor View Consulting.

Labrador Transparency is a global leader in corporate and financial reporting with over 30 years of experience. As a certified Workiva partner, Labrador specializes in accessible design, disclosure optimization, and digital publishing for complex financial documents across industries and the public sector.

Harbor View Consulting is a Workiva implementation and advisory firm led by former national practice leadership with over 200 implementations across financial reporting, audit, controls, and data integration. Harbor View brings deep governmental accounting expertise and has supported Workiva ACFR engagements for state retirement systems and other public sector entities.

Together, Labrador and Harbor View partner to deliver end-to-end ACFR solutions on the Workiva platform—from data integration and financial reporting through accessible design and digital publication.

To learn more or discuss how your entity can prepare for the upcoming ADA compliance deadlines, contact Labrador Transparency or Harbor View Consulting.

Disclaimer: This document is intended for informational purposes only and does not constitute legal advice. Organizations should consult with legal counsel regarding their specific ADA compliance obligations.

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