ADA Title II for PDFs and Basic Accessibility Techniques

4th Thursday ADA Talks – September 2025

1. 4th Thursday ADA Talks Webinar 9

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Hosted by: University of Kentucky (UK) Human Development Institute,

Syracuse University Burton Blatt Institute,

Southeast ADA Center

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3. ADA Title II for PDFs & Basic Remediation Techniques

Meeting Requirements for Digital Accessibility

By Shawn Jordison

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4. About Shawn Jordison

- MS Degree in Assistive Technology and Human Services
- 5 Years as an Alternate Media Specialist
- 4 Years as Tenured Faculty teaching students with disabilities at Santa Monica College

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- 4 Years as a trainer and teacher in the area of Assistive Technology and Alternate Media
- Over 250k documents made accessible
- Over 15k YouTube Subscribers

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5. Agenda

- Understand ADA Title II Requirements for Documents
- Basic Remediation techniques for PDF Accessibility including The Accessibility Guy 8 step method to PDF Accessibility

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6. ADA Title II Requirements

7. Overview of ADA Title II

Title II of the Americans with Disabilities Act (ADA) is the part of the law that applies to state and local governments and any of their departments, agencies, or instrumentalities.

- Requires public entities to make sure that people with disabilities have equal access to all programs, services, and activities they provide.
- This covers things like transportation, courts, libraries, education, voting, and now digital services (websites, online documents, PDFs, apps).
- Public entities must provide effective communication, which can include accessible

formats, interpreters, captioning, or accessible digital documents.

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8. Who Must Comply

- State agencies (departments, boards, commissions).
- Local governments (cities, counties, townships).
- Public schools (K–12).
- Public higher education (colleges, universities, community colleges).
- Special districts (transportation, housing, libraries, water, fire, etc.).

9. What content is covered?

- **Any document shared with the public or required for participation.**

  Examples:

  - PDFs, Word docs, Excel spreadsheets, PowerPoints.
  - Public notices, reports, agendas, minutes, forms.
  - Training materials, policies, applications.

- **If someone needs it to engage, apply, learn, or participate → it must be accessible.**

Image: Anything posted online must be accessible.

10. New DOJ Regulations (2024 Final Rule)

- The Department of Justice (DOJ) issued new rules for ADA Title II in April 2024.
- Clarifies that websites, mobile apps, and digital documents
  must follow Web Content Accessibility Guidelines (WCAG) 2.1 AA.
- Creates clear compliance deadlines:
  - Large entities (50,000+ population): April 2026.
  - Small entities: April 2027.

- First time the federal gov has set specific accessibility deadlines for local/state governments.

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11. PDFs = The Most Common File Type

- Government agencies use PDFs to share forms, notices, reports, policies, brochures.
- PDFs are consistent across devices and are easy to distribute.
- But consistency for sighted users does not mean accessibility for all.

12. Example: Tax Forms

- A tax form PDF with no tags appears blank to a screen reader
- Screen reader user hears:

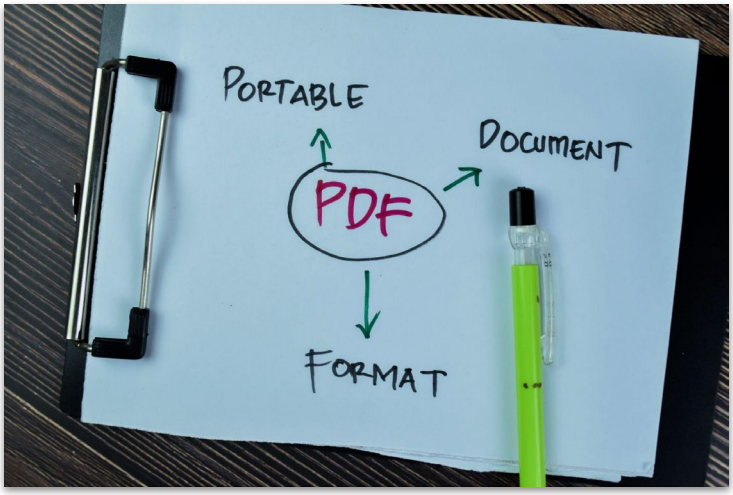
  “Empty document”
- Same tax form when tagged:
  - Fields announced properly
  - Instructions read in logical order
  - Fully usable with keyboard navigation

13. Why PDFs Are Challenging – Print Origins

- PDFs were designed for printing consistency, not accessibility.

- What looks great on paper often doesn’t work for assistive tech.
- They “lock” layout visually instead of providing structure.

Image: Concept of PDF. The word PDF in a circle with three arrows pointing out to the words: Portable, Document, Format.



14. Why PDFs Are Challenging: Structural Barriers

Common problems:

- No tags
- Reading order broken
- Images without descriptions
- Tables marked incorrectly

Result: Assistive tech can’t navigate properly.

15. Accessibility Principle – Perceivable

Information must be presented in ways people can perceive.

Examples:

- Alt text for images
- Clear headings
- Sufficient contrast

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16. Accessibility Principle – Operable

- Content must be usable with keyboard and screen readers.
- Reading order matters.
- Forms should allow navigation without a mouse.

17. Accessibility Principle – Understandable

- Clear and consistent structure.
- Labels for forms and buttons.
- Headings that match content flow.

18. Accessibility Principle – Robust

- Works across current and future assistive technologies.
- Proper tagging ensures compatibility with JAWS, NVDA, VoiceOver, etc.
- Avoid workarounds or “visual hacks.”

19. What is WCAG for PDF?

WCAG, or Web Content Accessibility Guidelines, are guidelines developed by the World Wide Web Consortium (W3C) to ensure web content is accessible to people with disabilities.

WCAG is relevant to PDFs because it provides a framework for making digital documents, including PDFs, accessible.

Key points (POUR) about WCAG:

- **Perceivable:**

  Ensure all content can be perceived by users (e.g., alt text for images, readable text).

- **Operable:**

  Make content navigable and interactive (e.g., logical reading order, accessible forms).

- **Understandable:**

  Ensure information is clear and easy to understand (e.g., simple language, proper headings).

- **Robust:**

  Ensure compatibility with various assistive technologies (e.g., future-proof content).

20. TAG Method for Making PDFs Accessible

21. 8 Step Method for Accessible PDFs

1. Review Design. Ensure proper color contrast and meaning
2. Get tags into the document: AutoTag, Manual, Wizard
3. Walk the tags panel: Ensure all content you want to be tagged is visible
4. Edit the tags: ensure proper structure

5. Reading order: Ensure tags, reading order, and content panel all match up
6. Set Metadata: Title, subject, keywords, author and language
7. Accessibility Check: Acrobat check, PAC check
8. Test with Assistive Tech

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22. Step 1: Review Design

- Design is much easier to fix prior to remediation.
- Use color combinations for text/background that pass color contrast requirements
- Ensure your charts and graphs are visually accessible

- Use patterns
- Colors pass contrast
- Use data labels

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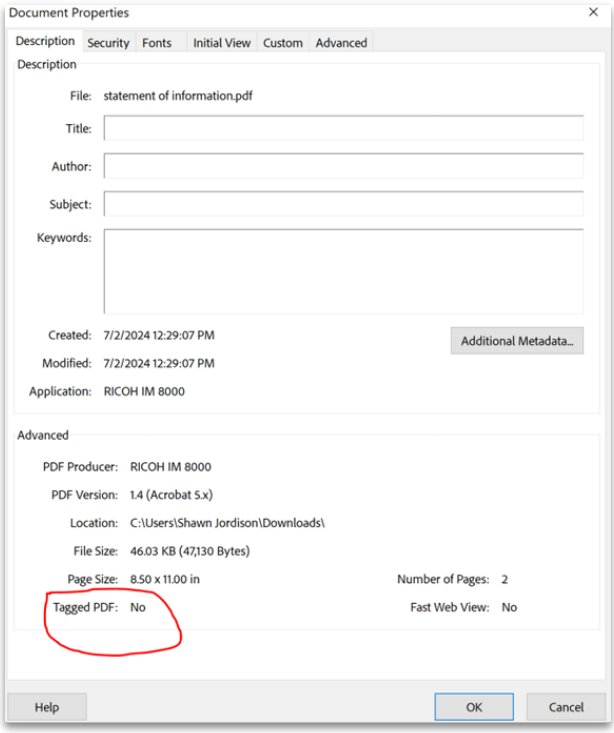
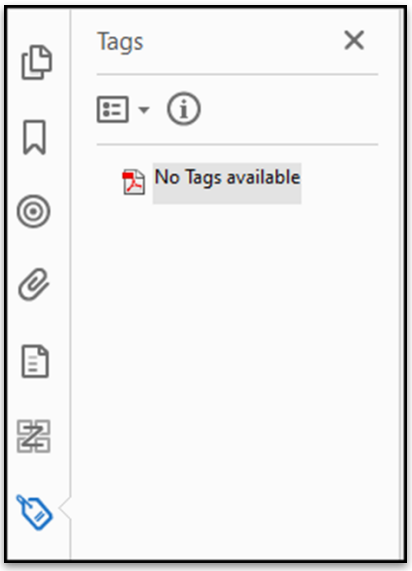
23. Step 2: Does your PDF have tags? (1)

- Check document properties.
  - Image: Document Properties box of PDF. On the first tab Description, under the Advanced section, circled in red is the property: Tagged PDF: No.
- View the Tags Panel to determine if your document has Tags applied.
  - Image: Tags Panel in PDF. This example shows: No Tags available.

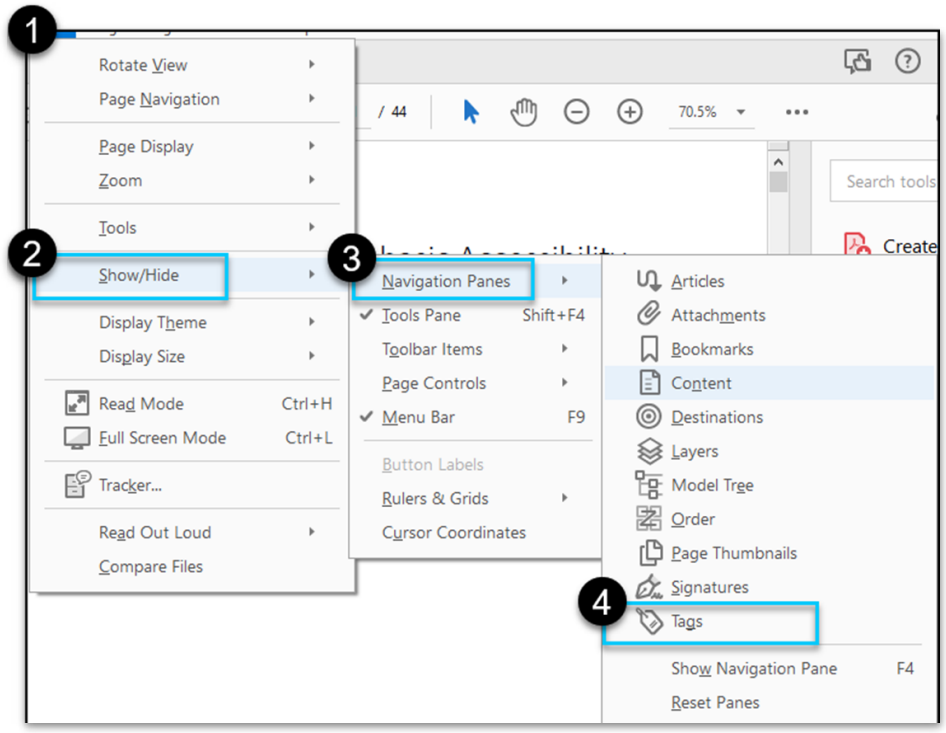

Document Properties
Description
Security
Fonts
Initial View
Custom
Advanced
Description
File: statement of information.pdf
Title:
Author:
Subject:
Keywords:
Created: 7/2/2024 12:29:07 PM
Modified: 7/2/2024 12:29:07 PM
Application: RICOH IM 8000
Additional Metadata...
Advanced
PDF Producer: RICOH IM 8000
PDF Version: 1.4 (Acrobat 5.x)
Location: C:\Users\Shawn Jordison\Downloads\
File Size: 46.03 KB (47,130 Bytes)
Page Size: 8.50 x 11.00 in
Number of Pages: 2
Tagged PDF: No
Fast Web View: No
Help
OK
Cancel


Tags
No Tags available

24. How to view the tags panel

1. Choose View >
2. Show/Hide >
3. Navigation Panels >
4. Tags.

Image: The four steps of menu selections to make view the tags panel.



25. Step 2: Does your PDF have tags? (2)

When exporting from Word or PowerPoint, styles usually carry over if done properly. InDesign can also work if set up correctly. But platforms like Canva or Google often break accessibility and create major issues—avoid them when possible.

3 ways to get tags into your PDF using Adobe Acrobat Pro DC

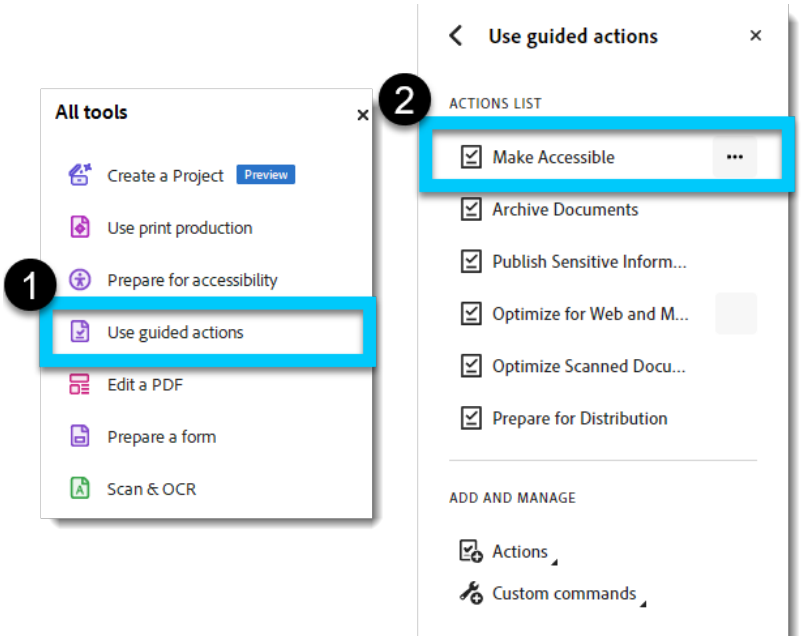
- Guided Actions
- AutoTag
- Manually tag using the reading order tool

26. Step 2a: Get tags into PDF: Use Guided Actions

Use the Guided Actions to Make Accessible

- Set the metadata
- Recognize Text
- Form fields
- Set Reading Language
- Apply alternate text to images
- Accessibility checker

Image: The two steps of menu selections to use guided actions to make accessible.



27. Step 2b: Get tags into PDF - Autotag document

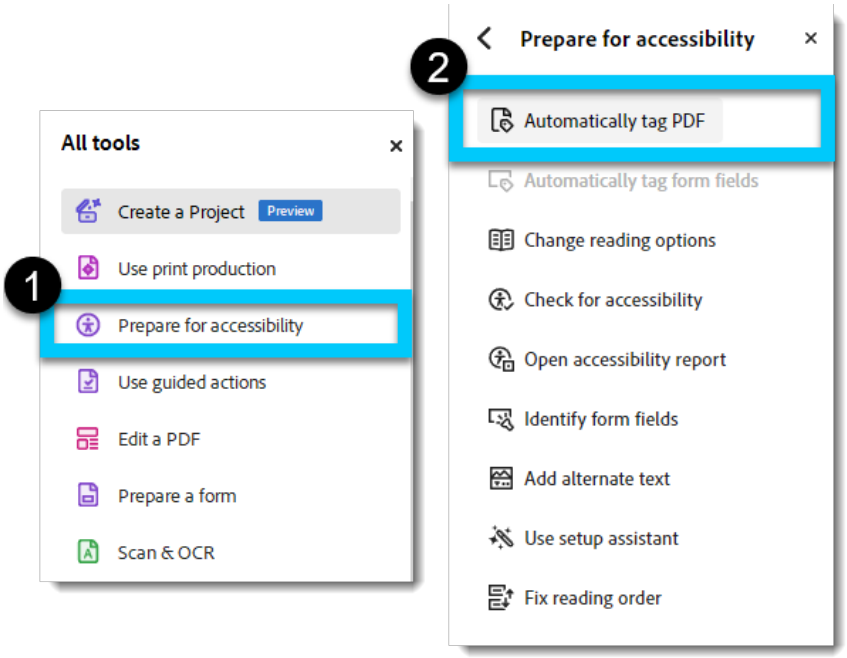
Use Autotag Document

- Really good at tables
- Pretty good at headings
- Not great at graphics

- Sometimes can group content funny in the tags panel

Pro Tip: Make sure you have the auto tag API set!

Image: The two steps of menu selections to prepare for accessibility and autotag PDF.

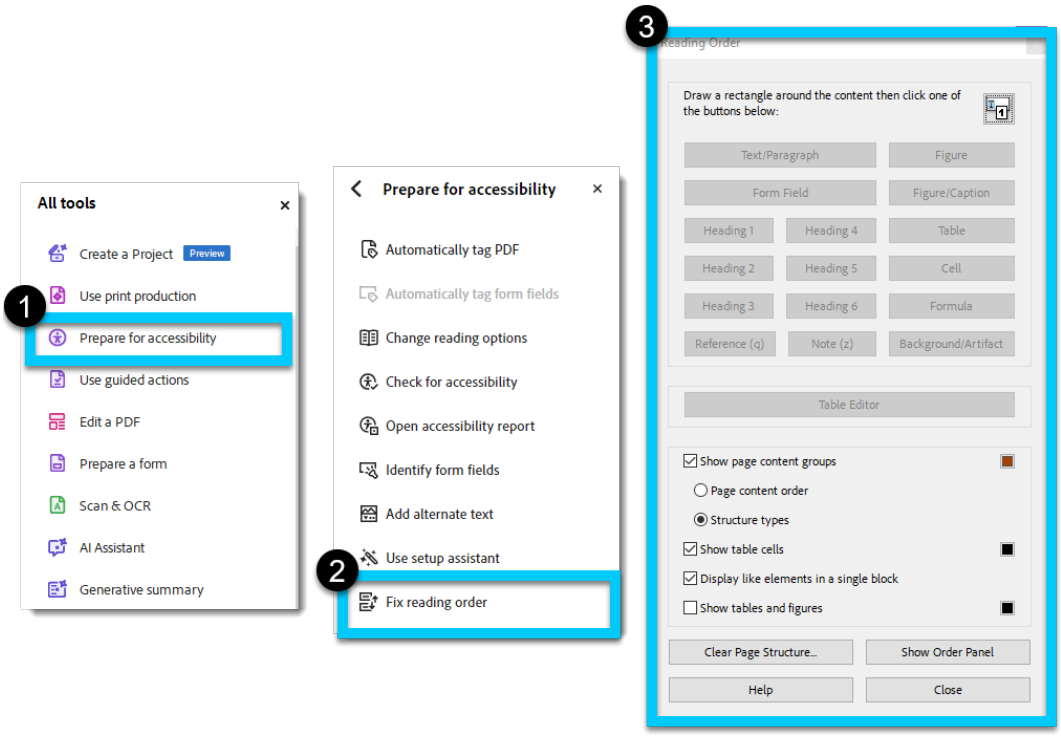


28. Step 2c: Get tags into PDF - Manually Tag

Use Reading Order Tool

- Limited tags to choose
- Can feel clunky and buggy
- Useful for tagging untagged content
- Useful for breaking up ‘chunked’ together pieces of content

Image: The three steps for menu selection to prepare for accessibility, fix reading order, and display the reading order tool.

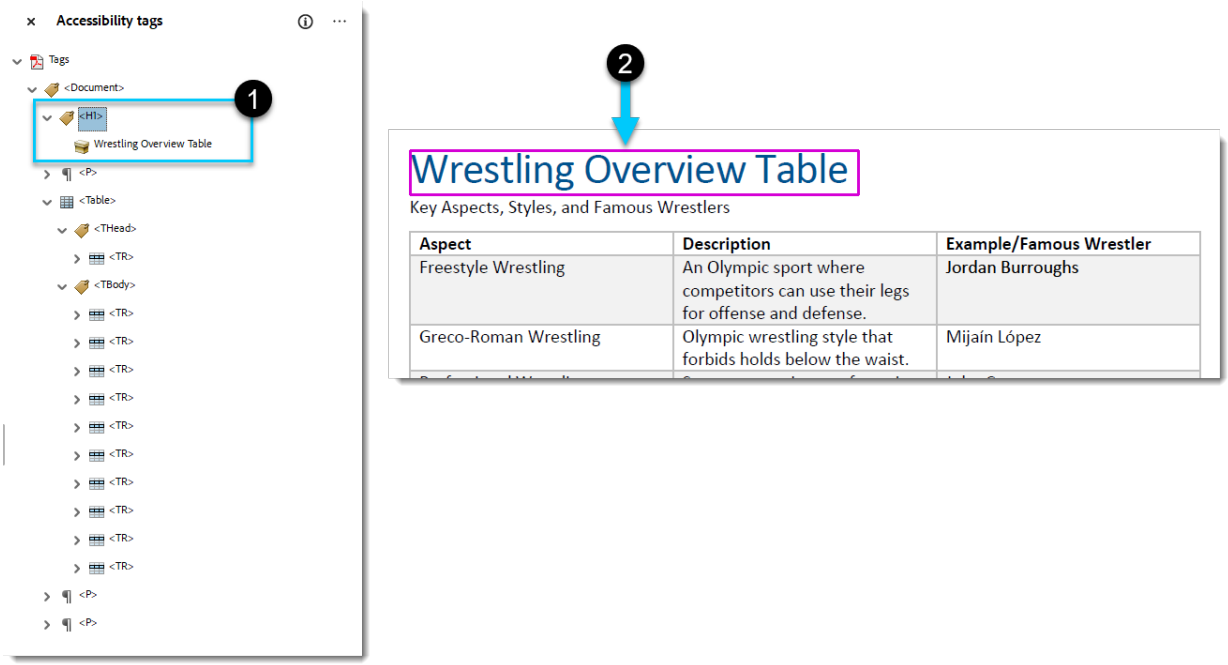


29. Step 3: Walk the Tags Panel

- Select a tag and use your keyboard to navigate
- The goal is to ensure everything is in fact tagged
    - Use your arrow keys!

Image: Accessibility tags for an example PDF. The focus is on the tag <H1> and the content of that

tag, which is the title of the PDF: Wrestling Overview Table.



30. Step 4: Edit the Tags

- Ensure all tags are nested inside of a Document tag
- Validate headings, lists, tables, links, etc.
- Add alternate text to all Figure tags
    - Right click, properties, edit alt text

- Ensure tables have headers applied
- If using forms, ensure they are correct

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31. Tag Breakdown

If a tag is not properly categorized it will fail accessibility checks and be confusing to its users. Here is a brief explanation of what each tag represents:

- <P> = Body Text
- <H1>, <H2>, <H3>, <H4>, <H5>, <H6> = Heading text
- <L>, <LI>, <Lbl>, <LBody> = List elements
- <Figure> = Images
- <Table>, <TR>, <TH>, <TD> = Table content
- <Link>, Link - OBJR = Hyperlink

- <Reference> & <Note> = Footnotes
- <Section>, <Part>, <Art> = purely decorative
- <TOC>, <TOCI> = table of contents elements

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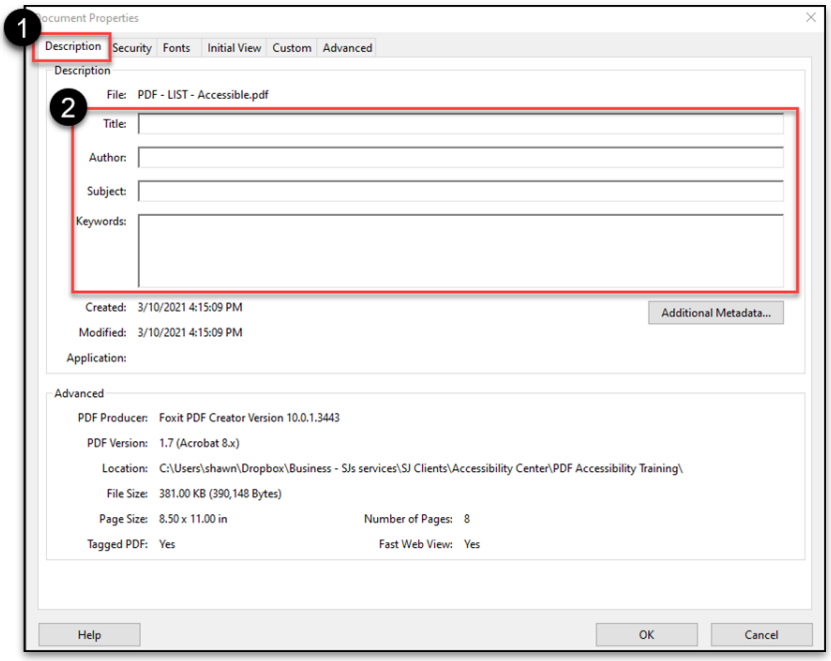
32. Step 5: Set Meta Data

Select File > Properties

1. Select Description
2. Fill out Meta Data
    - Title
    - Author
    - Subject
    - Keywords

Image: Document Properties box on the first tab Description and the four properties / meta data.



33. Step 6: Reading Order

Three different panels to look at:

- Read order panel
- Content panel
- Tags panel

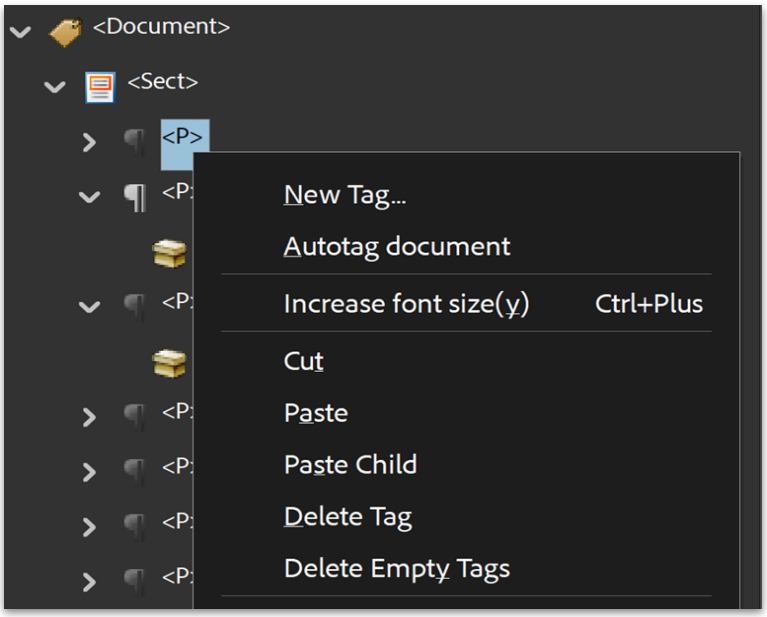
All of them should match!

34. Step 6a: Adjust Read Order of Tags

Cut and Paste

- Move the tags into the correct order
- Most Assistive Technology follows the tags panel for reading order
- Cut and Paste is one option

Image: Tags panel with selected <p> tag and a submenu of options to adjust or remove that <p> tag.

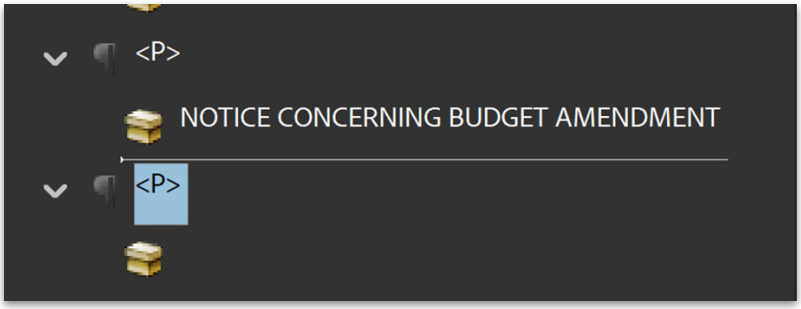


35. Step 6b: Adjust Read Order of Tags

Click and Drag tags panel

- Move the tags into the correct order
- Click and drag – pay attention to the little line as you hold your mouse
- The white line placement determine where the content will go. Parent or Child

Image: Tags panel with a white line above the selected <p> tag.



36. Step 6c: Adjust Read Order of Tags

Cut and Paste - Keyboard

- The Accessibility Guy uses mostly the keyboard to adjust read order
- Once you do it enough – It becomes second nature

37. Step 7: Accessibility Checkers

- Adobe Acrobat
- Adobe Acrobats built in accessibility checker does not adhere to Section 508, ADA, PDF UA or WCAG. It can be ok for checking some structure elements, but does not check against the standards!
- PAC 2024 (PDF Accessibility Checker
- PDF/UA
- WCAG 2.1
- HHS / Section 508
- CommonLook PDF Validator

38. Step 8: Review with AT

- The final step is to review with a screen reader to validate

39. You should now have an accessible PDF!

YAY :)

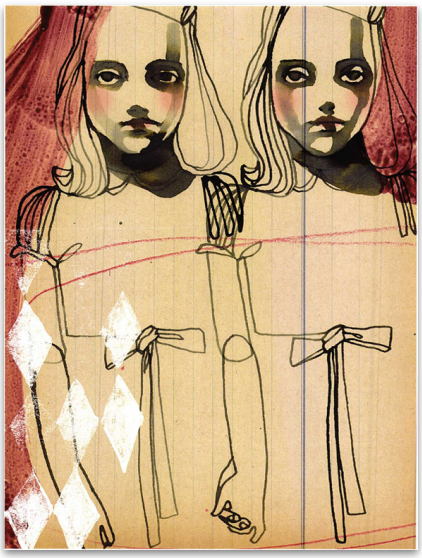
40. Cool Alt Text Example

Drawing Example

- Artistic illustration featuring two identical female figures with pale faces and hollow eyes, shown from the waist up. Both figures wear dresses with bows at the shoulders and waists,

and have soft, shoulder-length hair. The illustration uses a combination of ink and watercolor, with deep shadows around the eyes and light blush on the cheeks, giving the figures a haunting expression. The background is a textured, lined paper with red brush strokes and white diamond shapes, adding a surreal, dreamlike quality to the composition.

Image:



41. Just Checking

What is step 2 for making an accessible PDF?

Remember your answer!!

42. Questions?

43. Southeast ADA Center

Project of the Burton Blatt Institute – Syracuse University

Phone: 404-541-9001

E-mail: ADASoutheast@syr.edu

Web: ADASoutheast.org

Connect and Follow

- **Facebook** @SoutheastADACenter
- **BlueSky** @SoutheastADA
- **Instagram** @SoutheastADA
- **LinkedIn** @southeast-ada-center

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44. ADA National Network

1-800-949-4232

Web: ADAta.org

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45. University of Kentucky (UK) Human Development Institute (HDI)

Web: hdi.uky.edu

Connect and Follow

- Instagram @uk_hdi
- YouTube @humandevelopmentinstitute8482
- Facebook @ukhdi
- X (formerly Twitter) @uk_hdi

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46. University of Kentucky (UK) Human Development Institute (HDI) Center for Assistive Technology Services (CATS)

Web: hdi.uky.edu/HDICATS

Connect

- Regional AT center of the KATS Network
- Lending Library, Training and Demonstration

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47. Certificate, Post Test & Archive

4th Thursday ADA Talks 2025 - Webinar 9:

ADA Title II for PDFs and Basic Accessibility Techniques

Certificate of Participation

- Register and complete the Post Test Eval.
- Submit Confirmation of Attendance for the entire webinar (1 hour).

  Attendance will be verified.

Post Test Eval for Webinar 9 – ADA Talks 2025

Web: bit.ly/adatalks9-2025

Archive: Recording will be available at:

DisabilityWebinars.org

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