Blackboard

Title II Strategy Guide & Playbook:

A Resource for Every Stage of the Accessibility Journey

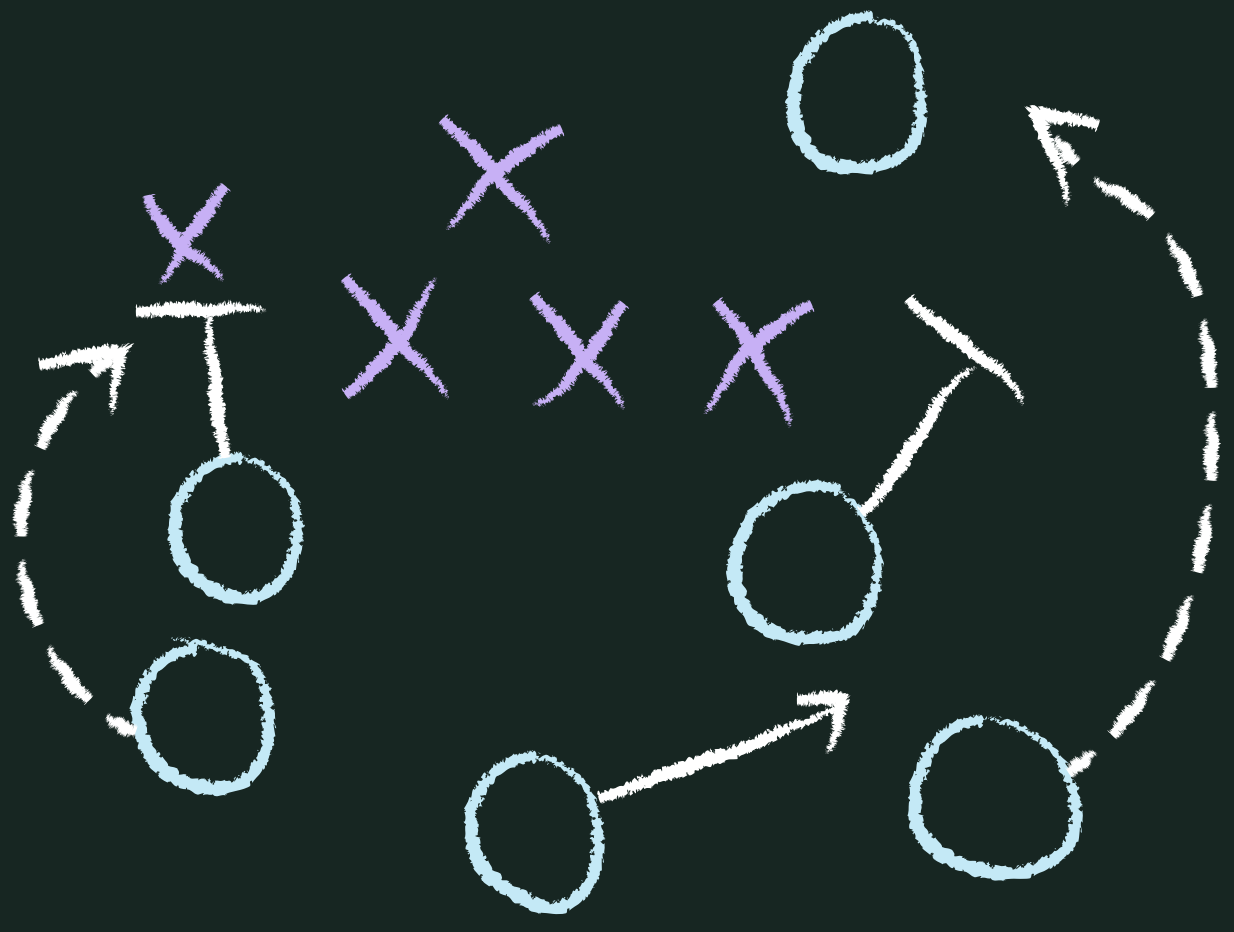


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Introduction

> "My provost asked me to put together a plan, and then a presentation of the plan to the entire leadership team; I found myself just sitting at an empty Word document not sure where to begin."

In April 2024, the U.S. Department of Justice issued a new ADA Title II rule with explicit expectations for public entities—including public colleges and universities—to make their digital content accessible in line with WCAG 2.1 Level AA. Following an extension in early 2026, compliance deadlines are now April 2027 for most institutions and April 2028 for those located in smaller populations of fewer than 50,000.

Across higher education, readiness for this deadline is all over the map. As the analyst Phil Hill wrote in late October of 2025, "higher ed in the US is not prepared for what's about to hit in April," and his informal polling at EDUCAUSE and WCET showed that the most common answer to "are you ready" was simply "no."

But across the country, campuses are digging in. This playbook is meant to support that work at any stage; whether you're tightening an existing program or just getting your arms around where to begin, we want to make the work feel less daunting when it comes to the largest inventory of content: the LMS.

We will walk through what the rule means for course materials and suggest a clear framework built around four phases: **Learn, Plan, Act, and Sustain.** Each phase includes practical guidance, examples, and resources we've created, along with best practices drawn from institutions already doing this work.

The goal is to help you visualize what success looks like, understand what to do frs t, and build confd ence in creating or scaling an accessibility program on your campus. Let's get started.

Please note

This playbook is informational only and does not constitute legal advice. Institutions should consult their own counsel for interpretations of Title II.

Phase 1: Learn

Understanding and Communicating What Title II Means for LMS Content

Title II's updated digital accessibility requirements cover "web content and mobile apps" that public entities, such as public universities and community colleges, use to deliver their services. All course materials delivered through an LMS are treated as institutional services and must meet the Web Content Accessibility Guidelines (WCAG) Version 2.1 Level AA requirements (the "Requirements") unless a specifc exception applies. For the most part, institutions have until April 26, 2027 to meet the Requirements, while those servicing smaller populations of fewer than 50,000 have until April 26, 2028 to meet the Requirements.

HTML pages that make up course content, uploaded documents like PDFs, Word fl es, and PowerPoints, embedded or linked audio and video are all in scope, as they are integral to the learning experience. Even thirdparty tools used as part of instruction can create Title II risk and may be covered depending on how they're provided and integrated; procurement and accessibility review become critical.

Common accessibility requirements for documents include:

- **Headings and Structure:** Documents must use proper heading levels and logical structure (e.g., H1, H2, lists) to ensure that screen reader users can navigate content.
- **Alt Text for Images:** All meaningful images, charts, and graphics must include alternative text that conveys the purpose or essential information. Decorative images should be marked as such.
- **Links:** Hyperlinks should have descriptive link text that makes sense out of context (e.g., "View Accessibility Guidelines" rather than "Click Here").
- **Color and Contrast:** Text and background colors must meet minimum contrast ratios (4.5:1 for normal text, 3:1 for large text). Information cannot rely on color alone for meaning.
- **Tables:** Tables must use clear headers and markedup rows/columns so that screen readers can associate data correctly, and merged or split cells should be avoided, as these can disrupt logical reading order.
- **Document Language:** The default language of the document must be specife d (e.g., English, Spanish) so that screen readers use correct pronunciation rules.

Understanding the Archived Content Exception

Title II includes a narrow exception for archived content, but it's more limited than many realize. Content only qualife s as exempt if:

- The content was created before the date the state or local government must comply with this rule, or reproduces paper documents or the contents of other physical media (audiotapes, fl m negatives, and CDROMs, for example) that were created before the government must comply with this rule
- **AND** the content is kept only for reference, research, or recordkeeping
- **AND** the content is kept in a special area for archived content
- **AND** the content has not been changed since it was archived

For example, content does NOT qualify if the course was offered in the past two years, current students might need it, it's accessible through standard LMS search, or you're keeping it “just in case.”

Key questions to ask:

When was this last used? Could current students need it? Have we clearly marked it as archived and removed it from search? Are we keeping it for legitimate recordkeeping, or just avoiding deletion?

Many institutions fn d it simpler to delete truly obsolete content rather than maintain archived shells. For content that must be retained, we advise working with legal counsel to establish clear archival policies. When in doubt, remediate rather than archive, as the exception is not a strategy for avoiding accessibility work.

To learn more about these exceptions, we suggest reading this Archived Web Content Exception Under ADA Title II post prepared by the ACA Digital Accessibility Center staff at The Ohio State University.

From Legal Rule to Human Impact

The rule is rooted in a simple principle that is hard to argue with: All students, including those with disabilities, must have an equitable opportunity to participate in and beneft from programs and services, including online courses.

Consider that when course videos lack captions, deaf and hardofhearing students cannot fully engage. When PDFs are untagged or scanned as images, students using screen readers cannot reliably access readings or assignments. When navigation is inconsistent or unlabeled, students with cognitive, learning, or motor disabilities may struggle to complete learning tasks.

In this respect, institutions that approach Title II as a chance to remove barriers that make it harder for some students to engage—rather than to simply to avoid complaints—tend to see stronger alignment with their mission and student success goals.

That mindset reframes accessibility as a shared academic responsibility across faculty, instructional design, disability services, IT, and leadership, and communicating it as such is an important part of the work ahead that sets your program up for success.

Communicating Across Campus

Different audiences need different entry points into the accessibility conversation. Senior leaders want a clear picture of risk, expectations, return on investment, and strategic opportunity; faculty and staff need practical guidance grounded in teaching and daytoday work; and support units and staff require clarity on standards, workflows, and how their roles contribute to compliance along with a broader plan.

Communicating with Leadership

For leadership, a concise briefn g on the upcoming changes and compliance deadlines should emphasize three core points, most which we've touched upon already:

1. **The new Title II rule establishes WCAG 2.1 AA as the technical standard** for all covered web content and mobile apps, with April 2026 as the primary deadline and April 2027 for institutions serving smaller populations.
2. **LMS content is explicitly in scope.** This includes PDFs, PowerPoints, Word documents, HTML content, images, infographics, videos, audio, and thirdparty publisher or tool content used in instruction.

3. **Investment in accessibility reduces legal and reputational risk** while also advancing equity and supporting teaching and learning goals.

The **ask of leadership** typically includes:

- Endorsing a clear, institutionwide accessibility policy that sets expectations for academic units, faculty, and support teams
- Committing appropriate resources, such as staffn g, training, tooling, or crossfunctional coordination, to support sustained implementation
- Sponsoring a campuswide communication effort so that accessibility is understood as both a compliance requirement and an academic quality issue; in some instances, leadership may also need to be the face of this communication to reinforce urgency and shared responsibility

You can validate these requests by aligning an investment in an accessibility program with the metrics most topofmind for institutional leaders.

As **Jeremy Harper**, Employee Development Specialist at Boise State University, shared:

> "Student retention and faculty capacity are always top of mind for institutional leaders. Framing accessibility in that same conversation and highlighting how equitable access supports student success, and how it's far easier for faculty to build accessible content proactively than to remediate it later, helps build broad stakeholder buy-in and momentum for this work."

Communicating with Faculty

For faculty, the emphasis should shift towards the things they care most about: teaching practice, student learning, and simple, sustainable workflows. Messaging should avoid technical jargon and instead connect accessibility to instructional quality, without making it seem like a huge lift.

Key points to emphasize include:

- **Accessible course materials help more students participate effectively** and reduce emergency accommodation requests since fewer barriers arise midterm

This saves faculty time in the long run and improves the learning experience for everyone, not just those with disclosed accommodation requirements

- **Remediation efforts will be prioritized based on need**, and appropriate tools, support, and training will be provided to help make this work easier
- **Many improvements ft na turally into existing workflows**, especially when supported by accessible course template shells and LMSintegrated tools such as Blackboard® Ally

The ask of faculty could include:

- Partnering in remediating course content identife d as noncompliant under Title II and integrating accessibility best practices into ongoing course design and updates
- Using the LMSintegrated accessibility tools provided by the institution to identify and address common issues during course prep, rather than retroactively
- Reaching out early to peers and other support systems when planning new courses or making substantial revisions, enabling proactive accessibility rather than retroft ting

Reaching Stakeholders Through Multiple Communication Channels

To ensure that all stakeholders see and understand the new or expanded accessibility strategy, institutions should use multiple communication channels and tailor their messages accordingly. Digital channels are especially valuable because they generate measurable engagement data.

As **Michael Mace**, IT Manager of Digital Accessibility at Indiana University, explained:

> "To start, you really need to know what channels you have. At Indiana University, we use our Center for Teaching and Learning and newsletters where we can actually see opens and clicks. That gives us a sense of what people are paying attention to, and it also helps avoid those moments when someone says they never heard about a tool or a training opportunity."

Every institution will be different, but channels you could leverage might include:

- LMS announcements visible to all instructors
- Teaching and Learning Center newsletters
- Provost or CIO communications
- Departmentlevel or deanlevel listservs
- Faculty Senate updates
- Staff and advisor networks
- Internal accessibility hubs or resource sites
- Workshops, open labs, and off ce hours
- Standing meetings that faculty *already* attend

This combination increases the likelihood that messages reach the right people and reinforces that accessibility is not an isolated technical initiative—it is a campuswide priority with leadership backing.

To support your communication planning and efforts, we invite you to utilize our communication plan, as part of the Ally Adoption Strategy Guide that currently lives in the Ally Communication and Adoption toolkit. While designed to drive the revitalization or creation of an institutionwide accessibility strategy, the communication plan can easily be used to deliver more intentional messaging surrounding your Title II strategy.

Leveraging Internal Champions and Existing Meetings

Faculty are most reachable when they are already gathered, and securing leadership approval to participate in established meetings can signifca ntly increase visibility and trust.

For example, presenting at allcollege meetings, departmental gatherings, program retreats, newfaculty orientations, or Faculty Senate sessions creates opportunities for dialogue, questions, and shared understanding.

> "It's incredibly helpful when you can get instructors as a captive audience, and the easiest way to do that is with leadership support and by joining the meetings they already attend. When we expanded our accessibility program [at The University of North Dakota], I presented at all-college and departmental meetings. It was a lot of meetings, but it gave instructors the chance to ask questions and understand what was being asked of them. And when a dean spoke on our behalf, it reinforced the importance of the work and signaled that this was a real institutional priority."

—Beth Valentine, former Equity Compliance and Education Manager at the University of North Dakota

Compliance as the Floor, Not the Ceiling

Regardless of the audience or communication channel, it's important to emphasize that the broader goal of these regulations is to foster an environment where *all* students have equitable access to learning materials. Meeting Title II requirements is essential, but it represents the *minimum*.

Framing compliance as "the floor, not the ceiling" is common on accessibility circles because it communicates the importance of continuous focus and encourages campus communities to see accessibility as integral to educational quality.

When institutions move beyond minimal compliance, courses become clearer, more usable, and more inclusive. Consistent navigation, readable documents, meaningful headings, accurate captions, and welldescribed images all support improved learning for *all* students, including multilingual learners and students accessing content on mobile devices or lowbandwidth connections.

One way to put this mindset into practice is by drawing on the **POUR accessibility framework**, which describes digital content as needing to be perceivable, operable, understandable, and robust. Used thoughtfully, POUR is less a checklist and more a practical way of thinking about how students encounter and work with course materials.

Anchoring accessibility conversations in straightforward questions such as, *"Can all students see, hear, navigate, and understand the materials using the tools they rely on?"* keeps discussions centered on real learners rather than abstract technical requirements, acronyms, or legal language that can feel disconnected from the daytoday teaching and learning

experience, and presents an opportunity to embed the POUR accessibility framework in practice.

Phase 1 resources

ADA Title II Ruling Factsheet

WCAG Guidelines

Ally Communication Adoption Toolkit

POUR Accessibility Framework Video Overview

Phase 2: Plan

From Shared Understanding to a Strategic LMS Accessibility Approach

Once your campus shares a common understanding of the updated Title II requirements, the next step is shaping a structured, realistic approach to remediating LMS content. Planning is equal parts selfassessment, prioritization, and preparing to use leadership support effectively.

Painting the Picture: LMS Inventory and Urgency

A clear view of the current LMS landscape helps institutions prioritize work and allocate resources wisely. Many campuses start by mapping:

- The platforms and tools in use
- Which departments rely on them most
- The types of content issues appearing across courses

LMSintegrated tools like Ally make this easier by surfacing accessibility patterns across thousands of courses. Dashboards highlight common issues, course scores, and trends that help institutions understand the scale and urgency of the work ahead.

But raw data by itself rarely motivates action. It is far more effective to frame the data around three guiding questions:

1. Where are we now?
   (e.g., accessibility scores by college or program, or how many courses fall below a defn ed threshold)
2. What is most affecting students?
   (e.g., PDFs that are images, missing alt text, or colorcontrast issues)
3. What happens if we do nothing?
   (e.g., continued barriers, increasing accommodation needs, and heightened legal exposure along with potential fn es and lawsuits)

Reviewing your accessibility data can reveal trends, gaps, and opportunities that make the case for how to prioritize your remediation strategy. To turn these insights into actionable goals, a SWOT analysis can be helpful. By identifying your strengths, weaknesses, opportunities, and threats, you can set focused goals and create a roadmap that aligns with both institutional priorities and Title II compliance requirements.

Below is an example of a SWOT analysis using data points available with Ally, illustrating how Ally's key data points can be organized to highlight strengths, weaknesses, opportunities, and threats. Each quadrant is further elaborated with a brief description that explains the signifca nce of the data and how it can inform accessibility strategy and decision-making.

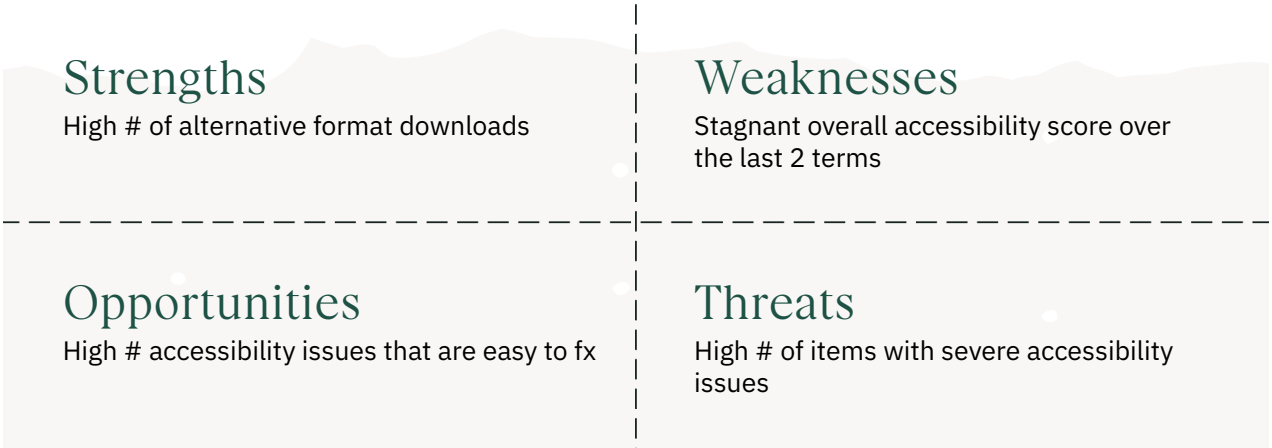


Image description: *A fourquadrant SWOT analysis chart showing strengths, weaknesses, opportunities, and threats related to accessibility. Strengths, in the top left quadrant, contains the text: High # of alternative format downloads. The top right quadrant labeled "Weaknesses" states: "Stagnant overall accessibility score over the last 2 terms." The bottom left quadrant labeled "Opportunities" reads: "High # accessibility issues that are easy to f x." Lastly, the bottom right quadrant labeled "Threats" indicates: "High # of items with severeaccessibility issues." The quadrants are laid out on a cross framework with horizontal and vertical arrows separating them.*

Strengths

A high number of alternative format downloads shows strong student engagement with Ally. This reflects instructors' effective communication with students about available support, something worth applauding. To sustain this positive trend, provide instructors with ongoing resources and messaging templates, such as those available in **Ally's Communication & Adoption Toolkit**, to keep that communication consistent.

Weaknesses

The overall accessibility score has remained stagnant across the last two terms, suggesting limited progress in remediation. This points to the need for a more intentional communication plan and a stronger faculty engagement strategy to encourage progress and action.

Opportunities

A large number of accessibility issues that are easy to fx, such as missing alternative text or insuff cient color contrast, represents a chance for quick, high impact improvements. Focusing campus efforts on these low barrier fx es can rapidly raise scores and build momentum. Consider targeted training and readytouse training resources focused on the top three most common, easy to fx issues, and integrate them into your broader communication efforts.

Threats

A high volume of items with severe accessibility issues poses signifca nt risk, as these complex barriers require more expertise and time to resolve. If left unaddressed, they can undermine student experience and institutional compliance efforts. Promote Ally's PDF Quick Fixes as an eff cient way for instructors to quickly address scanned PDFs, a common sever issue.

For additional support and guidance on conducting a SWOT analysis of your own Ally data, refer to our version **Administrator Adoption Strategy Guide** as a model to help frame your evaluation and guide your next steps.

Framing the data through these questions helps build shared urgency without shaming individual instructors or departments, although a little friendly competition can also be motivating.

As **Sadie R. Gregory**, Ph.D., dean of the School of Business at Coppin State University, explained:

> "[Years ago] when I frs t saw our Ally scores, it was a wake-up call. I knew our faculty cared deeply about student success and equity, but the data showed a gap between what we valued and what we were prioritizing day to day. **Ally helped bridge that gap by making accessibility visible and measurable—without adding extra work.** It gave us a clear way to see progress, celebrate improvement, and ensure that what we say matters to us is reflected in how we teach. I also know my department is competitive, so having a benchmark of peers doing better than us helped get things moving along!"

Building an Accessibility Improvement Plan

An accessibility plan works best as a living document rather than a onetime project plan. Because Title II covers *all* instructional digital content, the plan needs a comprehensive scope—but it should also break the work into manageable, achievable phases. Core elements of your improvement plan may include:

Clear scope: Acknowledge that LMSbased materials, along with other institutional documents, media, and integrated tools, fall under Title II, and outline how remediation will be phased (e.g., by term, program, or content type) and supported by web accessibility tools (such as Ally for Web) to extend coverage beyond the LMS.

Course inventory and audit: Document the volume of content and the most common issues—especially those affecting student access.

Roles and Responsibilities: One of the biggest mistakes institutions make is thinking accessibility can live in a single off ce or depend on one person's heroic effort. But the programs that work and scale distribute responsibility clearly across teams, ensuring that everyone understands how their piece ft s into the bigger picture.

Here's how successful institutions typically divide the work:

- **Instructional design (ID) teams** become the frontline coaches. They're supporting faculty with course development, building accessible templates, troubleshooting tricky accessibility challenges, and often fe lding the daytoday questions that come up during course prep. In many schools, IDs are the ones who make accessibility feel achievable rather than overwhelming.

- **IT and LMS administrators** keep the infrastructure running. They are often working closely with instructional designers, managing tools like Ally, captioning services or tools for video, pulling reports, making sure faculty have the right permissions, and handling the technical side so instructors can focus on teaching. When something breaks or faculty can't access a feature, IT is often the frs t call.

- **Accessibility specialists or coordinators** are the glue holding everything together. They interpret WCAG standards (so faculty don't have to become experts), develop training, coordinate efforts across departments, answer questions, and track whether the institution is actually making progress. They connect academic teams, IT, and leadership—and often do the translation work between technical requirements, teaching realities, and the lived experience of students.

- **Disability services brings a perspective that's easy to overlook.** Yes, they process accommodations, but they also see patterns that nobody else does: Which courses generate the most requests, which content types cause problems semester after semester, and where students are hitting walls trying to access materials. When you include disability services in planning and share accessibility data with them—like Ally's courselevel scores—you create a feedback loop that helps everyone prioritize better.

- **The goal here is partnership.** Disability services staff bring realworld student perspective on barriers that complicate their learning experience, while instructional teams work to eliminate those barriers at the source. Done right, proactive accessibility reduces the volume of preventable accommodations that disability services has to process, frees up the team to focus on other meaningful work, and improves the experience for all students.

- **Faculty and department leaders** own the course content. That's not negotiable. However, they shouldn't be expected to become accessibility experts overnight. What makes this work is giving them clear expectations, practical support, tools that streamline the remediation process and teach them best practices, and course templates that are accessible by default, so they can build accessibility into normal course prep instead of treating it like a separate technical project they don't have time for.

- **Academic leadership** including deans, chairs, and provosts, set the tone. They allocate resources, communicate priorities, and signal the importance of this accessibility program. When leadership shows visibly behind accessibility work, it

tells everyone this is a strategic academic priority rather than something being managed quietly in a back off ce.

Document these responsibilities clearly in your plan, regardless of formal titles or how roles are structured at your institution. Clarity around who is responsible for what creates accountability prevents critical work from falling through the cracks and makes it clear that accessibility is a shared institutional responsibility, not one person's (impossible) job. Students should also be treated as key contributors, with regular checkins to ensure that their perspectives shape decisions and improvements.

Resource and capability mapping: Identify existing staff capacity, training resources, accessibility tools, and external partners who can help with course reviews or remediation.

Importantly, the plan should set the expectation that the institution will make steady progress, not sprint towards perfection. Framing accessibility as an ongoing process helps teams stay focused on forward movement, creates opportunities to celebrate achievement along the way, and lays the foundation for a more sustainable approach which we'll detail later in Phase 4.

> "At [the University of Hartford], accessibility is truly a shared effort across teams—spanning web content, the LMS, and all of our digital systems. While I focus on the LMS, the work succeeds because it's part of our institutional strategy and supported by leadership, faculty, students, and our campus partners. Together, we've created a culture that goes beyond compliance, with initiatives like our Mission Accessible Challenge and weekly microsessions on practical skills. We take a stepbystep approach so faculty never feel overwhelmed, and we've built accessibility into onboarding and Blackboard training for new instructors. Ally is an important part of that shared commitment, helping everyone stay aligned."

—Bevin Rainwater, Assistant Director, Offce of Academic Technology & Digital Innovation, University of Hartford

Prioritization Through an Impact–Effort Lens

The volume of LMS content at most institutions is massive, which means you can't fx everything at once. An impacteffort framework helps you fg ure out where to start. For example:

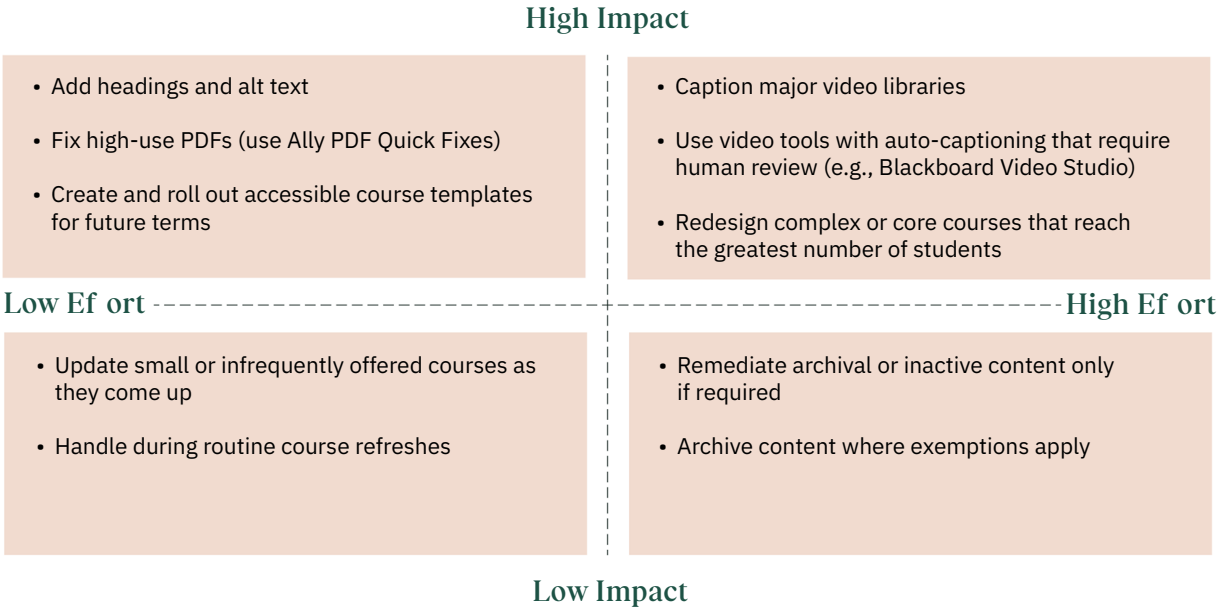
High impact, lower effort: These changes affect many students and are not a huge lift. This can show momentum quickly and help demonstrate progress to your stakeholders. Add headings to documents, write alt text for images, fx heavily used PDFs, and roll out accessible course templates for future terms. For institutions using Ally, PDF quick fx es can streamline this work considerably. Learn more about PDF quick fx es here.

High impact, higher effort: This includes largescale remediation of core program materials. Caption major video libraries with tools such as Verbit or Trint, and utilize video tools that provide autocaptioning with caption review and approval capabilities, such as Blackboard® Video Studio, to reduce this effort going forward. Redesign complex legacy courses. These efforts are very important but take real resources and may even require their own separate plans of attack.

Lower impact, lower effort: Consider updates to small or infrequently offered courses as immediate effort, handled when they come up naturally instead of being prioritized now, while deadlines are tight.

Lower impact, higher effort: Fix archival content or inactive course shells. These often make more sense to archive properly than to remediate, but be sure to confrm that these can fall under an exemption to accessibility requirements.

Example impact/ef ort matrix



Whatever priorities you choose, especially the ones tied directly to student access, take time to document why you made those calls. It helps with transparency

internally and prepares you to answer questions from leadership or potentially even auditors down the road.

Be Prepared When Leadership Says Yes

You might expect pushback when you ask for accessibility resources, or maybe you've had a tough time in the past. But considering the new regulations, once leadership understands the stakes—legal exposure, reputational risk, litigation or fn es, and the real barriers affecting students—the conversation should shift rather quickly to, "What do you need?"

Don't let that moment catch you unprepared. Having a clear picture of your needs means you can turn a "yes" into actual progress.

Consider what you might need:

Time and people: Faculty stipends or release time can support remediation work, while student workers help manage high volume tasks. Temporary staff provide cover during peak remediation periods. Additional instructional design capacity can support faculty and create reusable templates. Determine the likely costs and frame these resources as strategic investments and cost avoidance, rather than regular expenses.

Budget and tools: Captioning services for video libraries. Professional remediation for complex PDFs. LMSintegrated tools like Ally that can scan content, guide course remediation efforts, and help train instructors on best practices for accessible content creation.

Structures and policies: A steering committee with real decisionmaking authority. Clearly defn ed roles with regular reporting cycles. Updates to course approval processes, program reviews, and procurement policies, so that accessibility becomes baked into standard practice rather than an afterthought.

Having these elements scoped out in advance means leadership support can actually go to work instead of sitting in limbo while you fg ure out the details. Your document or slide deck could be structured as follows, clearly communicating the sense of urgency and acting as a "leave behind" for additional socialization or approval processes:

- What we need
- Why now
- Risks of waiting

- Budget requested
- Expected outcomes in 30-60-90 days

Note: For institutions using Ally, the strategy setting section in the Ally Communication and Adoption Toolkit offers a tangible framework for building a comprehensive accessibility strategy that includes Ally. This framework can and should be modif ed to suit your needs, but hopefully it provides a solid springboard.

Choosing Tools for a Sustainable Approach

Planning is also crucial when you need to get clear about how technology ft s into your overall strategy. LMSintegrated tools like Ally can do a lot of the heavy lifting: assessing content across courses, giving faculty contextual guidance as they build materials, and generating reports that help you prioritize and allocate resources.

But be skeptical of anything promising to be a quick fx for everything. Tools that offer remediation through automation or AI *without* human oversight can mask deeper problems and create false confd ence about content quality. Automated remediation often misses what matters—context, instructional intent, and the real needs of diverse learners.

Darren Denham, assistant director of Digital Accessibility at the University of Central Oklahoma, put it well:

“AI-powered tools can do so much to help us—scanning for issues, generating suggestions, and streamlining routine tasks that would otherwise overwhelm faculty. But accessibility is about meaning and context. Technology can point the way, but it can't decide what an image represents to a learner, how content should flow for understanding, or what message is most important to convey. That's where human oversight and intentionality are indispensable. The real promise of AI is not in replacing educators, but in freeing them to focus on the judgment, empathy, and creativity that make content truly inclusive.”

A responsible approach to utilizing technology looks like:

- Using automation to flag issues at scale and prioritize efforts as described above in the impacteffort framework
- Relying on human judgment for decisions that require context—like what an image actually means to a learner
- Providing accessible course templates so new courses start on solid footing

- Providing tools that educate faculty and staff and build accessible habits that last.

Read more about AI, accessibility, and the “risk of easy answers” here.

Phase 2 resources (*for institutions using Ally):

Ally Communication and Adoption Toolkit*

PDF Remediation Options*

Administrator Adoption Strategy*

AI, Accessibility, and the Risk of Easy Answers: Why Human Oversight Still Matters

Phase 3: Act

Turning Plans into Tangible Change in the LMS

With a plan in place, the next step is to translate the strategy into visible progress.

This phase is about making improvements real—addressing highimpact issues, supporting faculty, and weaving accessibility into everyday teaching and coursebuilding practices.

From Data to Decisions

Accessibility reports and dashboards are only useful if they actually lead to action. Organizing your LMS accessibility data so that leadership and departments can quickly see where to focus makes a world of difference. Most institutions fn d it helpful to look at three views when reviewing their data:

Current status: What are average accessibility scores across departments or programs? How many courses fall into low, medium, or high bands?

Top barriers: Which issue types are causing the most student impact? Inaccessible PDFs? Missing alt text? Color contrast problems?

Movement over time: Are courses and programs improving term to term? How many issues have been resolved since your last review?

Pair these views with the narrative you developed during planning: “Where are we now? What’s affecting students most? What happens if we do nothing?” Then you can identify a focused set of priorities for the next term.

For institutions using Ally, instructors have access to the Course Accessibility Report, which summarizes accessibility data for an individual course. In addition to including the course’s overall accessibility score and a content breakdown, it provides three guided remediation approaches to help instructors determine a remediation path forward. The three guided remediation approaches include content items with the easiest issues to fx (i.e. missing image description), content items with the lowest score, and all remaining issues, which can be fl tered in order of severity, frequency, and individual issue.

Quick Wins that Build Credibility

Demonstrating early momentum is one of the most effective ways to build trust and engagement, particularly with faculty. Quick wins help instructors feel success is possible and help leadership see progress aligned with institutional goals.

Common starting points include:

- Improving highenrollment or highvisibility courses where changes beneft many students at once
- Creating and rolling out accessible course templates or models for new or redesigned courses, so all new courses begin on an accessible foundation
- Fixing common, addressable issues flagged by LMSintegrated tools—such as headings, alt text, link text, and frequently used PDFs

These improvements are often achievable within a single term when instructional designers, accessibility specialists, and faculty collaborate with support from leadership.

Supporting Faculty and Course Teams

Because instructors and instructional designers create and maintain most LMS content, meaningful progress depends on making accessibility practical, guided, and a normal part of course preparation rather than an addon task done after the fact.

Institutions can support faculty by:

- Communicating clearly and empathetically about expectations, timelines, and available support, grounded in the realities of teaching workloads
- Offering handson opportunities, such as workshops, clinics, open labs, or off ce hours, where instructors work directly on their course shells with expert guidance
- Leveraging "justintime" tools like Ally, which provide contextual tips and remediation guidance as instructors build or update content

These supports help faculty build skills and conf dence while keeping remediation aligned with the natural rhythms of course development.

Phase 3 resources:

Ally Course Accessibility Report

Alternative Formats in Ally

Phase 4: Sustain

Embedding Accessibility as Culture and Practice

Obviously, compliance deadlines matter, but longterm success depends on building accessibility into the institution's ongoing habits and systems. This phase focuses on keeping momentum, refn ing practices, and ensuring that accessibility remains a shared commitment after the Title II deadline.

For further guidance on building a sustainable culture and practice of accessibility, please refer to the evaluate and iterate section in the Ally Community and Adoption Toolkit. It includes suggestions for setting review timelines, collecting feedback from key stakeholders (including faculty, students, and support staff), and using data from Ally reports and engagement metrics.

Measuring What Matters

Regular review cycles help keep accessibility visible and actionable. While cadence will vary depending on the size, structure, and resources available at your institution, many institutions adopt a rhythm such as:

- Term based reviews of LMS accessibility data at the institutional, college, or program level
- Annual reflections that assess whether efforts are ad hoc, developing, established, or optimized
- Periodic planning cycles that ref ne goals, resource needs, and expectations

Meaningful measurement blends quantitative and qualitative indicators, such as:

Quantitative examples:

- Average course accessibility scores
- Proportion of courses meeting defn ed thresholds or bands
- Number of issues resolved or improvements logged
- Faculty participation in trainings
- Downloads of alternative formats (when using Ally)

Qualitative examples:

- Faculty and student feedback about their experience accessing course materials
- Inclusion of accessibility in strategic plans or accreditation narratives
- References to accessibility in program reviews or annual reports

The usage data section included in Ally's Institutional Report is a gold mine of data. This downloadable report looks at engagement with alternative format and instructor fx es during a specifc period of time. Consider including this as part of your larger sustain strategy.

Together, these metrics help leadership see accessibility as a strategic priority rather than a onetime compliance exercise, and they offer an opportunity to iterate upon your accessibility program as needed. Communicating progress with this balance of data and

narrative reinforces that accessibility is ultimately about the student experience, and it is central to the institutional promise of equity.

Governance and Shared Ownership

Sustaining progress requires structures that persist beyond individual projects or personnel. Many institutions establish crossfunctional committees or task forces that bring together IT, disability services, instructional design, faculty, compliance staff, and— where possible—students whose lived experience and stories keep decisions grounded in real barriers.

An effective governance structure should expand upon the roles and responsibilities outlined earlier and:

- Defn e a clear scope, including LMS content and other digital assets
- Set shared goals and milestones aligned with institutional mission and regulatory expectations
- Establish a consistent reporting cadence to senior leadership, faculty governance, and other stakeholders
- Ensure accountability across units, not just in a single off ce

Institutions can use a set of working questions to clarify roles and build a foundational RACI model, such as:

- **Who is the executive sponsor?**Typically a provost, CIO, or senior leader who communicates progress to leadership and removes barriers
- **Who is the functional lead?**Often an accessibility administrator or expert who manages your accessibility tools and resources, interprets data, and coordinates implementation
- **Who provides program or project support?**The person or team who coordinates meetings, tracks goals, and keeps institutional efforts on schedule

This clarity ensures that accessibility work is anchored to intentional processes rather than dependent on individual enthusiasm.

Listening to Faculty and Student Voices

Course accessibility is fundamentally a student and instructor experience issue. Maintaining progress requires continuous listening, and to support this, institutions can:

- Run faculty pulse surveys to understand comfort with accessibility practices, perceived barriers, and areas where more support is needed
- Gather student feedback through focus groups, disability services consultations, or short surveys built into courses
- Share back what was learned to demonstrate responsiveness and build trust
- Add targeted questions into existing evaluation mechanisms, such as course evaluations or annual instructor selfassessments

This feedback helps identify gaps early and highlight what's working well, and tools like Ally can complement these insights by showing where adoption is strong, as well as where additional communication or support may have the greatest impact.

Keeping the Journey Visible

Sustaining accessibility depends on continually making progress visible across the institution. This can include:

- Sharing regular updates with leadership, academic councils, and instructional communities
- Celebrating departments or instructors who demonstrate strong improvements or model accessible practices, and recognizing excellence in accessibility with badges and certifca tes
- Participating in sector conversations through associations, consortia, and peer networks
- Showcasing the human impact of accessibility improvements on student experience through student, faculty, and staff stories

Although this playbook focuses on Title II readiness, the cultural shift that follows can be even more transformative, and it must be nurtured over time.

Coppin State University offers a **strong example** of how to build structures that reinforce accessibility as an ongoing, shared responsibility rather than a onetime remediation push. Established well ahead of Title II, its accessibility program includes:

- **Department Level Engagement:**
  Deans receive monthly Ally score reports, fostering friendly competition and increasing awareness across colleges.
- **Faculty Focused Training:**
  Group sessions, oneonone meetings, and a selfpaced **Blackboard LMS** course offer badges and certifca tes for faculty who demonstrate mastery, including "Accessibility Champion" status.
- **A Digital Accessibility Hub:**
  This central Blackboard resource provides short "howto" videos, templates, and checklists to make accessible design simple and repeatable.
- **Storytelling and recognition:**
  Student and faculty testimonials highlight the human impact of accessible materials, reinforcing that accessibility beneft s everyone—not only students with disclosed needs.

Coppin State's work shows that when accessibility is woven into institutional identity and daily practice, Title II readiness becomes not just achievable, but sustainable over the long term.

Phase 4 resources:

Instructor and Student Surveys

Course Evaluation Survey Questions

Message Template for Instructors – Ally Alternative Formats

Message Template for Administrators – Reintroducing Ally, Accessibility Best Practices and more

Conclusion

If you're reading this playbook, you're likely facing a signifca nt undertaking of remediating years of course content, shifting institutional culture, and meeting an aggressive deadline with limited resources.

That staringatanemptyWorddocument feeling from the opening quote? It's real, and the anxiety behind it is also real.

But here's what we've learned from institutions already deep into this work: Progress is possible, and you don't need perfection on day one. When accessibility becomes a shared priority, backed by leadership, supported with practical tools and training, and framed as central to the teaching mission, institutions make real progress even under tight timelines.

The framework in this playbook gives you a path forward. **Learn** what Title II actually requires and why it matters, and then share this understanding across campus. **Plan** a realistic strategy that f ts your institution's reality. **Act** on improvements that will beneft students most. And **sustain** the work so it doesn't depend on sacrifc ing a single individual on the altar of Title II. Each phase moves you closer not only to compliance, but to a learning environment that genuinely serves all students.

And remember: Title II establishes the floor—the minimum every public institution must meet. But the work outlined here can take you well beyond that. When course materials are designed with all learners in mind, students with disabilities don't need to request accommodations for barriers that shouldn't have existed in the frs t place.

Accessible courses are clearer courses. Accessible content is better content. Disabled students, multilingual learners, students on mobile devices, and those juggling coursework alongside work and family all beneft from accessible, equitable learning environments. This honors the fundamental promise of higher education: Every student, regardless of ability, deserves the opportunity to engage fully with course materials, demonstrate their learning, and thrive.

Title II gives us a deadline and some technical standards, but this promise was already woven into mission statements, strategic plans, and is probably part of the reason most work in higher education in the frs t place. Most importantly, you're not alone—we're here to help.

See how your institution can put these ideas into action. Schedule a demo today.

This guide was created by a crossfunctional team of accessibility strategists and product experts at Blackboard and was informed by feedback from the Blackboard Accessibility Advisory Board. We'd like to send a special thank you to the Board for each member's thoughtful contributions to this guide, as well as for all the work they do to elevate accessibility at Blackboard and in the world.

About Blackboard

Blackboard delivers the digital environment for transformational teaching and learning. We serve thousands of institutions with the industry's most AI-advanced LMS, Blackboard® Ally for accessibility, and institutional effectiveness solutions that put educators and learners at the center. We're an education company that builds technology. Learn more at **blackboard.com**.

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