

Business Case: Migration to ADA Compliant Webhost for Burnet County

Date: January 21, 2026 **To:** Burnet County Commissioners Court

Subject: Proposal for Migration to ADA Compliant Web Hosting Platform

1. Executive Summary

This business case outlines the critical necessity for Burnet County to migrate its official website to a new, ADA-compliant web hosting product. With the Department of Justice's (DOJ) recent Final Rule under Title II of the Americans with Disabilities Act (ADA), local governments face strict mandatory compliance standards for all digital content. Given Burnet County's population growth, recent legal precedents in Texas, and the fast-approaching federal deadline, immediate action is required to mitigate legal risk and ensure equitable access for all citizens.

2. Regulatory Requirements & Compliance Deadline

The Department of Justice has issued a **Final Rule** in April of 2024 mandating that all state and local government digital content—including websites and mobile apps—must strictly adhere to the **Web Content Accessibility Guidelines (WCAG) 2.1, Level AA**.

- **Compliance Deadline:** Based on population thresholds, Burnet County must achieve full compliance by **April 24, 2026**.
- **Population Threshold:** An email received from the Texas Association of Counties (TAC) County Information Resources Agency (CIRA) advised Burnet County to utilize the most recent census data from [census.gov](https://www.census.gov). Current Census Bureau estimates place Burnet County's population **well over the 50,000 threshold** (estimated at approximately 55,722 as of July 2024). This classification places the county in the tier of governments that must meet the earlier deadline of April 2026, rather than the 2027 deadline reserved for smaller entities.

3. Legal Risk Analysis: Recent Texas Settlements

The legal risks of non-compliance are immediate and significant. The DOJ is actively enforcing these standards in Texas. The Justice Department recently announced that the Civil Rights Division and U.S. Attorneys' Offices secured settlement agreements with **Colorado County, Runnels County, Smith County, and Upton County**.

These settlements resolved findings that these counties violated Title II of the ADA by maintaining election websites that discriminated against individuals with vision or manual disabilities.

Key details regarding these settlements include:

- **The Violation:** The election websites failed to provide accessible information regarding registration, identification requirements, and early voting details.
- **Settlement Terms:** Under the agreements, the counties were forced to:
 - Make all future and existing online content accessible.
 - **Hire an independent auditor** to evaluate accessibility.
 - Adopt new policies and training for personnel.
 - Designate an employee to coordinate accessibility efforts.
- **DOJ Stance:** Assistant Attorney General Kristen Clarke stated: *"Voting in the 21st century requires that officials make their websites accessible to people with disabilities. Discriminatory barriers on election websites can prevent people with disabilities from exercising their right to vote. These*

agreements should send a message to state and local officials across the country about the importance of ensuring that their election websites are accessible for voters with disabilities so that they can participate equally in our democratic process.”

These investigations are part of the DOJ's "Tech Equity Initiative," signaling a continued aggressive posture toward non-compliant government technology.

4. Financial Implications

To achieve compliance, the county must budget for the migration to a platform built specifically to meet WCAG 2.1 standards.

- **Estimated Cost:** The county has received specific advisement via email on July 18, 2025 from the Texas Association of Counties (TAC) recommending that the counties **budget a minimum of \$10,000 to \$15,000** per website for this project.
- **Cost of Inaction:** The cost of migration is significantly lower than the potential legal fees, settlement costs (such as hiring independent auditors as required in the Smith and Colorado County settlements), and remediation expenses associated with a DOJ investigation.

5. Recommended Resources

To assist in this transition, TAC and CIRA have provided specific guidance. We recommend the Court and IT staff review the following resource:

- **TAC CIRA Website Accessibility Tips and Resources:** [View Resource](#)
- **ADA.gov Website Guidance on Web Accessibility and the ADA:** <https://www.ada.gov/resources/web-guidance/>
- **DIR Website Digital Accessibility:** <https://dir.texas.gov/digital-accessibility>

6. Conclusion and Recommendation

Burnet County is currently liable for nine separate websites. Following TAC's advisement of \$10,000-\$15,000, getting all separate sites compliant would carry an expected cost of \$90,000-\$135,000. Working with the IT Department, and the respective department heads responsible for the eight subsites, Burnet County will immediately move five subsites under the main county domain, reducing the cost to achieve complete compliance by the federal deadline to less than \$40,000.

Recommendation: It is recommended that Burnet County immediately approve the allocation of \$36,642.67 (based off of the quotes received) to procure and implement a new ADA-compliant web hosting solution, ensuring full alignment with WCAG 2.1 Guidelines before the federal deadline.

Due to the fact that Burnet County currently has eight additional subsites with separate domains, we have asked for a quote to get all nine sites compliant by the deadline. Only one quote includes a path forward to get all subsites compliant by the April 2026 deadline.