

Resolution Agreement

Council Rock School District, Pennsylvania OCR Docket No. 03-25-1460

To resolve the above-referenced complaint investigation brought under Section 504 of the Rehabilitation Act of 1973 (Section 504), and Title II of the Americans with Disabilities Act (Title II), the Office for Civil Rights (OCR) of the U.S. Department of Education and the Council Rock School District (the District) enter into the following Agreement. This Agreement is entered into voluntarily, and it does not constitute an admission of liability, non-compliance, or wrongdoing by the District.

The District will engage in the following activities to ensure its programs, services, and activities communicated or facilitated online and through its digital mass notification system are accessible to people with disabilities:

Website, Social Media, and Video Hosting Services

1. Adopt an Accessibility Standard. Within 30 days of signing this Agreement, the District will adopt a widely-accepted accessibility standard, such as the Web Content Accessibility Guidelines (WCAG), version 2.1, level AA, or another standard that requires an equivalent level of accessibility for people with disabilities.
 - a. Reporting Provision: Within 30 days of signing this Agreement, the District will submit for OCR's review and approval its chosen accessibility standard.
2. Provide Notice. Within 30 days of the District's new website going live to the public, the District will prominently post a fully-accessible Notice on the District's website describing how people with disabilities can inform the District of any technology-based barriers to access they have encountered and how they can request access to the underlying District program, service, or activity.
 - a. Reporting Provision: Within 30 days of the District's new website going live to the public, the District will submit for OCR's review and approval the location and content of its Notice, as well as its protocols and timeframes for responding to reports of barriers.
3. Identify District Website and Social Media Contributors and Editors. By October 15, 2026, the District will identify the job titles of all employees who are authorized to add content to, or edit content on, the District's public-facing website, including District-level and school-level pages, and the District's official social media sites.
 - a. Reporting Provision: By October 15, 2026, the District will provide OCR a list with the job titles of employees authorized to add content to, or edit content on, the District's website and/or official social media accounts (including any school-specific accounts or others over which the District has authority). The list should specify which roles are primarily responsible for adding content to District-level web pages, which roles are primarily responsible for adding content to school-level web pages,

and which roles are primarily responsible for adding content to the District's social media accounts.

4. Provide Guidance to Website Contributors and Editors. By November 15, 2026, the District will provide written guidance to the District website contributors and editors whose roles were identified pursuant to paragraph 3 of this Agreement explaining: that assistive technology, or screen readers, used by people with vision impairments cannot read text within images or graphics; the importance of providing meaningful alternative text descriptions for important images and graphics that are posted on the District's website; and how to address informational images or graphics that contain too much information to meaningfully convey in an alternative text description.
 - a. Reporting Provision: By November 30, 2026, the District will provide OCR documentation showing it satisfied paragraph 4 of the Agreement.
5. Conduct an Audit. Within six months of the District's new website going live to the public, or no later than January 31, 2027, whichever is earlier, the District shall complete an Audit to identify barriers to access to its online programs, services, and activities. The Audit shall consist of taking an inventory and engaging in manual testing to identify barriers, as follows:
 - a. Undertake an Inventory of Pages to be Tested. The inventory will consist of: (1) URLs on the District's domain, including the District's homepage, first-level landing pages, at least 10 pages that utilize images to convey important information (such as the equivalents to the [Emergency & Weather Notifications](#), [Transportation Welcome](#), and [Gluten Free Menu](#) pages on the District's new website, once live to the public), and all web page templates not otherwise captured; and (2) all URLs outside of the District's domain, including those on all vendor-hosted or third-party-hosted sites, including social media sites and video hosting services used by the District to communicate or facilitate its programs, services, and activities to members of the public.
 - b. Engage in Manual Testing to Identify Barriers. For all pages (and associated electronic documents and videos) in the inventory undertaken pursuant to the preceding paragraph, the District will engage in robust manual testing to identify barriers to access for people with disabilities. The testing shall, at a minimum, meaningfully incorporate the protocols and address the questions set out in Appendix A. Vendor or third-party hosted pages in its inventory will be assessed alongside those over which the District has full operational control.
 - c. Reporting Provision: Within six months of the District's new website going live to the public, or no later than January 31, 2027, whichever is earlier, the District will submit for OCR's review and approval the results of its Audit, including the URLs for all inventoried pages, its testing protocols, and detailed testing results for each tested URL including associated electronic documents and videos.

6. Engage in Remediation. As barriers are identified, the District will remediate those barriers; all barriers will be remediated fully by March 31, 2027. Barrier remediation will conform to the District's chosen accessibility standard.
 - a. Where barrier removal would impose an undue burden or fundamental alteration under Section 504 or Title II, the District will provide alternate measures that, at a minimum, afford a person with a disability the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services, programs, and activities as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.
 - b. Where the District does not have the ability to effectuate immediate, full remediation of a vendor's or third party's technology, the District will request that the vendor complete its remediation of all barriers by March 31, 2027, and the District will immediately offer appropriate interim alternate measures until the technology has been verified to be barrier-free including, but not limited to, prominently posting a way for people with disabilities to request access to the same information using an alternative method. If the vendor or third party fails to remediate timely all barriers, the District will exercise all avenues for compliance, including seeking to replace the vendor or moving or duplicating the programs, services, and activities to a digital venue within the District's control. The District will continue to provide interim alternate measures until the barriers have been remediated.
 - c. If the District replaces a technology vendor, or moves from an in-house technology to a vendor-hosted technology, the District will follow these steps, at a minimum, during its procurement process to achieve compliance:
 - i. In any requests for proposals, the District will require bidders to commit to remediate noted barriers so the technology conforms to the District's adopted accessibility standard prior to delivery and throughout the life of the contract.
 - ii. Before determining a winning bidder, the District will select the product that most closely conforms to the District's adopted accessibility standard; if there are two or more products that equally conform to such standard, the District may employ other factors to decide the winning bid. The District will engage in independent testing or otherwise confirm the validity of any vendor-offered accessibility assessment of its own product.
 - d. Reporting Provision: Each time the District determines alternate measures are required in lieu of immediate barrier removal, it will immediately submit those proposed measures to OCR for review and approval. If the alternate measures are being proposed to overcome a perceived undue burden or fundamental alteration, the District will clearly indicate the factors it considered in making such a determination, for OCR's review and approval. No later than March 31, 2027, the District will notify OCR that it has fully remediated all barriers identified on the inventoried pages, including associated electronic documents and videos.

7. Update Testing and Remediation Protocols. Upon receipt of the notice provided in the preceding paragraph, or earlier if requested by the District, OCR will assess the effectiveness of the District's testing protocols and remediation steps by conducting its own testing on a representative sample of the web pages, electronic documents, and videos identified by the District pursuant to paragraph 5(c), using the District-adopted standard as an appropriate measure of compliance. The District will then participate in all video conferences requested by OCR, and, when appropriate, request that relevant vendors participate in such conferences, so OCR can share concerns or violations regarding any remaining barriers that impede the ability of people with disabilities to have equal opportunities to enjoy the District's underlying programs, services, and activities. These video conferences may also address any noted deficiencies regarding the District's Notice.
 - a. Based on OCR's concerns or violations shared during the video conferences, the District will:
 - i. Make appropriate changes to its testing and remediation protocols, and may require its vendor(s) to engage in appropriate barrier removal;
 - ii. Re-test or engage in additional remediation tailored to address OCR's concerns as appropriate; and
 - iii. Within 45 days of the relevant video conference, notify OCR that the District is ready for OCR to re-test the original pages, along with a list of any additional URLs that the District believes are representative of barrier-free web pages, electronic documents, and videos, as appropriate, from which OCR may select for additional testing.

This process shall continue until, in OCR's judgment, the District's testing and remediation protocols result in equal opportunities for people with disabilities.

Mass Digital Notification System

8. Identify Mass Digital Notification System Issuers. By October 15, 2026, the District will identify the job titles all employees who are authorized to issue mass District-wide or school-wide emergency communications to parents and guardians of students, students (if applicable), and/or District employees via email or text message, including, but not limited to, communications about snow days, weather-related late starts or early releases, student transportation changes, lockdowns, and other security issues.
 - a. Reporting Provision: By October 15, 2026, the District will provide OCR a list with the job title of each employee who is authorized to issue mass District-wide or school-wide emergency communications to parents and guardians of students, students, and/or District employees via email or text message. The list should specify which employees are primarily responsible for issuing District-wide emergency communications, and which employees are primarily responsible for issuing school-wide emergency communications.

9. Revise Mass Notification Policies. The District, in consultation with OCR, will review and, if needed, revise its procedures or guidelines (“regulations”) regarding its mass digital notification system process, or draft new regulations if none exist, to ensure that the process is conducted in a manner that is accessible to people with disabilities. At a minimum, the District will:
- a. Ensure that the District’s mass email and text communications comply with the accessibility standard the District selected to comply with paragraph 1 of this Agreement;
 - b. Ensure that the District’s emergency mass email and text notifications comply with the District’s selected accessibility standard;
 - c. Identify the job titles of the District employee(s) who will be responsible for receiving and resolving reports and complaints of inaccessible mass notification emails or text messages sent to parents or guardians of students, students, and employees; and
 - d. Ensure that the District includes an accessibility statement in its mass notification emails informing individuals with disabilities how to report technology-based barriers to access they have encountered and how they can request access to the underlying District program, services, or activity.
 - i. Reporting Provision: By November 1, 2026, the District will submit to OCR for its review and approval a draft copy of the regulations it revised or developed pursuant to paragraph 9(a)-(d) above. If OCR requires any changes to the draft regulations, the District will resubmit them to OCR within 30 days of receiving notice of the required changes. OCR and the District will continue this process until OCR approves the regulations.
 - ii. Reporting Provision: Within 30 days of OCR’s approval of the regulations, the District will submit a report to OCR demonstrating that it has begun implementation of the revised regulations.
 - iii. Reporting Provision: Within 90 days of OCR’s approval of the regulations, the District will submit a report demonstrating that its mass digital notification system communications are consistent with the regulations and its chosen accessibility standard. The report will include, but not be limited to, a description of: the District’s methods for implementing the regulations; benchmarks used to measure progress; and ongoing efforts to ensure the District’s mass email and text notifications are accessible. The report will also include electronic copies of all mass emergency email notifications the District issued to parents or guardians of students, students, and/or employees between the day this Agreement was signed and 10 days before the report is submitted to OCR.

10. Notice or Training. Within 60 days of OCR’s approval of the regulations revised or developed pursuant to paragraph 9(a)-(d) above, the District will provide written notification or training regarding the regulations and its chosen accessibility standard to all District employees responsible for implementing the regulations, and all District employees responsible for issuing emergency mass notifications to parents and guardians of students, students, and/or District employees via email and/or text message.
- a. Reporting Provision: Within 30 days of providing the notice or training required by paragraph 10 above, the District will submit documentation to OCR showing it was provided. If written notification of the regulations was provided, the documentation will include a copy of the notification and a list of all job titles of employees who received the notification. If training regarding the regulations was provided, the documentation will include: the title(s) of the training presenter(s); a copy of the training materials; documentation of the date(s) and location(s) of the training session(s); and a list with the job title of each employee who attended the training.

Accessibility Planning

11. Develop a Plan to Maintain Accessible Features. The District will develop a Plan regarding how it intends to maintain the accessibility of its services, programs, and activities communicated or facilitated online, and through its digital mass notification system, including updated testing and remediation protocols; revised procurement protocols and language; ongoing training for web developers, procurement officials, and content creators; designations of responsibility; and appropriate levels and sources of funding to support ongoing efforts.
- a. Reporting Provision: Within one year of signing this Agreement, the District will submit for OCR’s review and approval its Plan to Maintain Accessible Features.
12. Disclaimer. Nothing in this Agreement should be construed to mean that any content and functionality – including lower-priority content and functionality – is not subject to the requirements of Section 504 and Title II.

The District will comply fully with Title II, including Subpart H, as revised by the Interim Final Rule issued by the U.S. Department of Justice on April 20, 2026. *See* 28 C.F.R. §§ 35.200 *et seq.*, and 91 Fed. Reg. 20,902 (April 20, 2026). The regulatory language will supersede the terms of this Agreement, to the extent there are any conflicts or inconsistencies.

By signing the Agreement, the District agrees to provide data and other information in a timely manner in accordance with the reporting requirements of this Agreement. During the monitoring of the Agreement, if necessary, OCR may visit the District, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has fulfilled the terms of the Agreement.

The District understands that OCR will not close the monitoring of the Agreement until such time as OCR determines that the District is in compliance with the terms of the Agreement and the statute(s) and regulation(s) at issue in the case.

The District understands that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings in the event of breach. Before initiating such proceedings, OCR will give the District notice of the alleged breach and 60 calendar days to cure the alleged breach.

This Agreement will become effective upon the signature of the representative for the District, set out below.

/s/

7/13/2026

Andrea Mangold
Director of Educational Innovation and
Strategic Engagement
Council Rock School District

Date

Appendix A

For the purposes of this Agreement, testing must address these protocols and questions, which only represent a starting point, rather than a comprehensive set, for assessing digital technology to ensure access to people with disabilities. See [OCR's video series](#) for more information.

For web pages: Check the following across different browsers using different types of hardware (for documentation, please specify the browsers by version and different desktop/laptop configurations):

- Keyboard access: Can users access all functions and content, and complete all tasks, independently by using only the keyboard (<tab>, <enter>, <spacebar>, <esc>, and arrow keys)? Verify in particular:
 - There are no keyboard traps that would prevent a user from advancing through the entire page, such as an automatically-refreshing social media embedded feed (*tip: try to tab very, very slowly through any such feed to observe whether a user can close it, or move past it, at a reasonable point; if the feed keeps refreshing by automatically adding additional entries to be shown, it causes a trap for those who are unable to use quick keyboard strokes – or a mouse – to navigate*); and
 - Expandable elements can not only be expanded, but can also be collapsed automatically or with a keyboard command, so they do not block other content.
- Logical reading order: Does keyboard navigation follow a logical, predictable order?
- Skip links: Can keyboard-only users bypass long navigation menus, embedded social media feeds, etc., without having to use excessive tabbing?
- Visual focus indicator: Can users visually track where they are located on the page while navigating with a keyboard?
- Alternative (Alt) text: Are all important images and graphics labelled with meaningful text, associated captions, or adjoining descriptions so, for example, people who are blind and use assistive technology will have access to the relevant information contained in the image or graphic? For linked images, does the alternative text tell users where the link will take them, rather than describe the image?
- Links: Are links well-named and unambiguous so users who are blind– without having to read nearby content – will understand the purpose and destination of each link? Common examples of ambiguous link names include “click here,” “read more,” “see all,” “http://...”-type, or “event notice,” and other ambiguous phrases.
- Color alone: Are there any instances where color alone distinguishes an object or state? If so, add another way to distinguish the object or state. For example, make sure color is not

the only way to distinguish link text from the surrounding paragraph text, and ensure color-coding is not the exclusive way used to convey important calendar dates (e.g., “no school” dates are marked in purple).

- Color contrast: Using an eyedropper tool or other manual method (automated testing is generally insufficient unless manually verified), is there at least a 4.5:1 contrast ratio for normal size text and a 3:1 contrast ratio for large scale text, comparing foreground and background colors of all text elements and text inside graphics? Text inside logos can be ignored for these purposes.
- Tables: Does the page avoid using layout tables? If data tables are present, are they necessary to convey information, or could a more accessible means of presentation be considered instead? If a data table is used, is it simple, so no cells span multiple columns or rows? Are column and row headers programmatically labelled?
- Buttons, form controls, and other operable elements: Are they labelled appropriately, both programmatically and visually? Do the visual labels continue to be properly associated with the elements when the screen is enlarged? If the elements have different states (such as form fields that are required for successful submission), are those conveyed by something other than color alone?
- Heading structure: Are headings programmatically labelled with a meaningful hierarchy, so people who are blind and using a screen reader can navigate a page according to its headings, listen to a list of headings, and skip to where they want to begin reading?
- Embedded videos and slide carousels: Where there are embedded videos or carousels, if they launch or rotate automatically, is that behavior necessary? If so, can a user pause or stop the video or carousel, and later replay the video or carousel, with keyboard commands? The ability to stop the video or carousel rotation can be important, not just while users are on the video or carousel, but while they are in other parts of the page.
- Magnification: Have you re-tested everything when content is magnified to the “point of reflow,” or in “responsive mode,” when the formatting changes to be more mobile-friendly (typically around 200% on standard laptop screens)? Are all contents and all functionality preserved and useful?
 - Paying particular attention to any “hamburger menus,” or expandable menus, can they be opened, navigated (including any sub-level items), and closed automatically or easily with the keyboard?
 - Is logical reading order on the page preserved, without the need to scroll right to left? If vertical scrolling is required inside windows or objects, can it be done with the keyboard?
 - Do elements meant to be together (such as form labels and text entry boxes) stay together upon magnification?

For electronic documents: In addition to addressing the questions above, have you conducted an accessibility review of your documents using the software's accessibility checker (e.g., "Check Accessibility" feature in Microsoft Word, "Accessibility Check" feature in Adobe Acrobat Pro DC, etc.)?

For videos:

- Is captioning present or is a transcript available? Transcripts should only be used when the audio can be fully understood separately from viewing the video and does not reference video content.
- Does the captioning or transcript meaningfully convey the contents of the audio track (not just phonetically)?
- Does the captioning or transcript indicate the names or appropriate descriptions of the speakers, if more than one person is speaking?
- Does the captioning or transcript use capitalization and punctuation appropriately, if that is important to understanding the contents?
- Is important on-screen information also conveyed audibly, so people who are blind or have low vision have access to the contents?

For social media posts:

- If graphic images are used, are they accompanied by text that conveys the same information?
- If videos are used, are they accessible as described above?