

WEB ACCESSIBILITY GUIDANCE

To: USG Institution Legal Affairs, VPAAAs, VPSAs, CBOs, and CIOs
From: University System Office of Legal Affairs and Information Technology Services
Date: May 28, 2025
Subject: ADA Title II Website & Mobile Application Accessibility Guidance

A new U.S. Department of Justice Rule will require all state entities to make their web content and mobile applications accessible to individuals with disabilities by April 24, 2026. This guidance outlines the requirements of the rule and provides steps that USG institutions should take to ensure timely compliance and implementation.

Overview

Who should be involved?

At minimum, institution leadership, information technology staff, and disability coordinators should be involved in developing and implementing your institution's compliance plan. In addition, anyone who can post online content for the institution (including course material) or who manages website or application content should be trained in how to make content accessible.

What does the Rule require?

The rule requires that state and local government services, programs, and activities that are available on websites and mobile applications satisfy the website accessibility standards in Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA. The rule applies to web content and mobile applications that USG and its institutions provide, whether directly or through contractual, licensing, or other arrangements. Web content includes the content on institution websites, academic course material, institution content posted elsewhere on the web, and mobile applications. In other words, all content your institution or its employees make available that does not fall into one of the limited exceptions described below must be made accessible to individuals with disabilities.

When is the compliance deadline?

April 24, 2026 is the compliance deadline for USG and its institutions.

How should institutions begin implementing this rule?

Follow the action steps summarized below and outlined on the ADA.gov website, develop a compliance team and plan, train staff on the requirements, identify content that must be compliant, and track compliance milestones as your institution works toward completion. Additional guidance and resources are available at the bottom of this memo under "Resources."

Summary of the Requirements

All USG and institution web content (including text, images, sounds, videos, controls, animations, and documents) and mobile applications must meet WCAG 2.1, Level AA requirements by **April 24, 2026**, unless one of the limited exceptions outlined below applies. Note that this includes all online course content that is provided, even if password protected.

WCAG 2.1 includes fifty Level A and Level AA success criteria. The DOJ rule adopts Level AA, which means that both Level A and Level AA standards must be met. WCAG 2.1 Level AA includes twelve new success criteria for perceivable, operable, and robust web and mobile application content beyond those contained in WCAG 2.0. As examples, the new criteria cover device orientation, non-text contrast, text spacing, form completion, keyboard shortcuts and controls, and visual labels for controls. The full guidelines are available here: [Web Content Accessibility Guidelines \(WCAG\) 2.1](#). WCAG's webpage contains the entire guideline publication, which is incorporated by reference into the rule, as well as tutorials and other support.

Exceptions:

1. *Archived web content* that, while outdated or no longer needed, is maintained unaltered in a dedicated archived area for reference, research, or recordkeeping. To qualify, the content must meet all four of the following criteria:
 - a. Content was created before April 24, 2026 or reproduces paper records or other media created before that date; AND
 - b. Content is kept only for reference, research, or recordkeeping; AND
 - c. Content is kept in an online area for archived content; AND
 - d. Content has not been changed since it was archived.
2. *Preexisting conventional electronic documents* that are available on an institution or USG website or mobile app before April 24, 2026, unless the documents will continue to be used to apply for, gain access to, or participate in the institution's services, programs, or activities after the compliance deadline. The following file types qualify:
 - a. Word processing
 - b. Presentations
 - c. PDFs
 - d. Spreadsheets
3. *Content posted by a third party* if the third party is not posting under a contractual, licensing, or other arrangement with USG or an institution (e.g., comments on institutional social media posts by non-institutional users).
4. *Individualized conventional electronic documents* that are word processing, presentation, PDF, or spreadsheet files about a specific individual, their property, or their account and are password protected or otherwise secured. Note that if the specific individual requests the document in an accessible format, your institution likely will need to provide accessible access to the document.
5. *Preexisting institutional social media posts* that were posted before April 24, 2026.

Alternative Situations:

Conforming alternate versions of web pages may be used in very limited circumstances and only where it is impossible to make web content directly accessible due to technical or legal limitations (e.g., an immersive virtual reality experience that cannot be made fully accessible yet). Conforming alternate versions are separate web pages that are accessible, current, and contain the same information and functionality as an inaccessible web page.

See [Understanding Conformance](#) | [Understanding WCAG 2.1](#).

Higher Standards: Implementing accessibility standards that provide the same or more accessibility and usability than WCAG 2.1, Level AA, such as WCAG 2.2 or Level AAA (referred to as “equivalent facilitation” in the rule).

Undue burden and fundamental alteration: Institutions are not required to take actions that would result in:

- i. A fundamental alteration of a service, program, or activity; OR
- ii. Undue financial and administrative burdens. HOWEVER: whether a particular action counts as an undue burden depends on the resources of the university system and/or state, not on the resources of the institution.

Under the regulations, the decision that compliance would result in a fundamental alteration or undue burden must be made by a high level official who has budgetary authority and responsibility for making spending decisions, and only after considering all resources available for the funding and operation of the service, program, or activity and must be accompanied by a written statement of reasons for reaching that conclusion. The institution must also take any other action that would not result in such an alteration or burden but would ensure that individuals with disabilities receive the benefits of services it provides to the maximum extent possible.

Noncompliance that has a minimal impact on access: Noncompliance that has a minimal impact on access means:

- i. Individuals with disabilities can do the same things as individuals without disabilities;
AND
- ii. Individuals with disabilities can do these things in the same way: quickly, independently, privately, and easily.

An example would be word spacing that does not meet the criterion but also does not impair an individual’s ability to read the content.

Next Steps

1. Build a team to implement the requirements and include all relevant stakeholders. The ADA.gov and World Wide Web Consortium (W3C) links below provide helpful training tools.
2. Identify an institution Point of Contact (POC) for upcoming guidance and training programs. **Please provide the name and contact information for your institution's POC to usg-legal@usg.edu by June 15, 2025 to receive updates on future training and resources.**
3. Develop and post an accessibility statement for your institution's websites and applications and include contact information for reporting accessibility issues. Access to this statement and contact information should appear in the footer of all institution webpages.
4. Train faculty and staff regarding the requirements of the new rule.
5. Identify what web content and mobile apps your institution has and determine which will need to meet the new standards and which will be exempt. Consider all websites the institution has, pages within the websites, social media, content the institution posts on other sites, mobile applications, who can post on the institution's website, and third-party vendor content.
6. Determine how to make web content and mobile apps accessible to comply with the rule and prioritize accessibility efforts considering whether the content:
 - a. Relates to key tasks
 - b. Is frequently accessed or important for essential programs
 - c. Was previously flagged as inaccessible by individuals with disabilities
 - d. Is currently under development, providing an opportunity to avoid compliance issues
 - e. Appears in multiple places across webpages, such as navigation menus, search features, and standardized footers
 - f. Is based on templatesSee additional suggestions and support on W3C's pages on prioritizing issues and interim repairs at the links below under "Resources."
7. Add "accessibility compliance" to your institution's IT procurement process
8. Review contracts with vendors to ensure the content they provide or post for the institution is accessible.
9. Revise institutional policies to reflect the rule's requirements. Policies must include a requirement for regular review and testing for accessibility

Resources

This guidance and other resources are available on the USG Accessibility webpage: <https://www.usg.edu/siteinfo/accessibility>.

A. Technical requirements:

W3C WCAG 2.1 Level AA Guidelines: [Web Content Accessibility Guidelines \(WCAG\) 2.1](#)

W3C Website Accessibility Initiative guidance on creating accessibility statements: [Developing an Accessibility Statement](#) | [Web Accessibility Initiative \(WAI\)](#) | [W3C](#)

W3C WCAG 2.1 Level AA Interim Repairs: [Web Accessibility First Aid: Approaches for Interim Repairs](#) | [Web Accessibility Initiative \(WAI\)](#) | [W3C](#)

W3C WCAG 2.1 Level AA Prioritizing Issues: [Implement](#) | [Web Accessibility Initiative \(WAI\)](#) | [W3C](#)

B. Rule and implementation support:

ADA.gov full rule with Appendix: [Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities](#)

ADA.gov Webinar: Americans with Disabilities Act Title II Web & Mobile Application Accessibility Rule: [Webinar: Americans with Disabilities Act Title II Web & Mobile Application Accessibility Rule](#) | [ADA.gov](#)

ADA.gov State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility: [State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule](#)