



CivicCertain

Guiding districts and businesses through compliance

Board Memo: The Federal Website Accessibility Rule

To: Board of Directors
From: _____
Organization: _____
Date: _____
Re: Federal requirement that our public website meet accessibility standards

What happened

In April 2024, the U.S. Department of Justice finalized a rule under Title II of the Americans with Disabilities Act. It requires state and local government entities — including special districts — to make their websites and mobile apps accessible to people with disabilities, measured against a specific technical standard: WCAG 2.1, Level AA. This is a binding federal regulation, not guidance.

When it applies to us

April 26, 2027 — governments serving 50,000 or more people.

April 26, 2028 — governments under 50,000 people and all special district governments, regardless of size.

These dates reflect the one-year extension DOJ issued in April 2026. DOJ stated it fully anticipates implementing the regulation at the new deadlines — and the underlying ADA obligation exists today: residents can bring accessibility claims now, deadline or not.

What it covers

Essentially everything the public can reach: our web pages, online forms and payments, posted documents such as agendas, minutes, budgets, and board packets (scanned PDFs are a common failure), and video or audio content, which generally needs captions.

Why it matters to the board

- **Legal exposure.** Residents can file complaints with the Department of Justice, and the ADA also allows private lawsuits. Website accessibility is already among the most active areas of ADA enforcement nationally.
- **Public service.** Roughly one in four American adults lives with a disability. If our website is how residents pay bills, find meeting notices, or request services, inaccessibility means some residents cannot use their own government's services.
- **The record matters.** An entity with a documented assessment and a remediation plan in progress is in a far stronger position than one that cannot show it ever looked.

Recommended next steps

- Obtain a baseline assessment of our current website against the WCAG 2.1 AA standard.
- Budget for remediation of the failures identified, prioritizing the pages and documents residents use most.
- Adopt a written accessibility policy and a stated way for residents to request information in an alternate format.
- Document each step — the assessment, the plan, and the fixes — so the organization can demonstrate good-faith progress at any point.

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