

Web Accessibility and ADA Title II: What libraries need to know

For public-sector librarians, web managers, communicators,
and vendor partners

Texas State Library and Archives Commission
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Texas Department of Information Resources

Transforming How
Texas Government
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About me...

- 25 years in Technology
- 14 years at DIR
- 4 years in current role
- CPACC and PMP

“ADA protections are for people who have a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment.”

- The Americans with Disabilities Acts (ADA)

Objectives

- Title II Standard
- Scope and Governance
- Exceptions
- Procurement Practices
- High Risk Areas
- Executing a Plan



ADA Title II Rule Standard and Timeline

WCAG 2.1 Level AA

Applies to websites and mobile apps that a public entity provides or makes available.



- The obligation is ongoing; new or updated content after the deadline must stay accessible.
- Vendor-managed content is still your responsibility when it is provided through contractual, licensing, or other arrangements.
- Libraries should treat Title II as operational work: content, design, development, procurement, and support.

Mobile applications (“apps”)

Software applications that are downloaded and designed to run on mobile devices, such as **smartphones** and **tablets**.



Title II Rule: Websites & Mobile Applications

For libraries, the safest interpretation is to use exceptions to prioritize work, not to avoid it.

Governance Resources

- [ADA Title II State and Local Government](#)
- [Title II rule change: Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities](#)
- [Fact Sheet](#)
- [DOJ Rule \(ADA Title II\) Toolkit for State and Local Government](#)
- [WCAG 2.1](#)

Determining Population Size

- If the library is a state agency or part of a university, use the state population.
- If the library is part of a city or a community college within the city, use the city population.
- If the library is a county or junior college within the county, use the county population.
- If the library is in a school district, it will depend if the district is in a city or county. If it's an independent district, use the most recent Small Area Income and Poverty Estimate.

[American Library Association \(ALA\) Website for Training and Resources](#)

What is in scope for a library?

Think beyond the homepage: if the library uses it to deliver service, assume it belongs in the inventory.

- **Main website content:** hours, locations, policies, contact information, navigation, and search
- **Catalog and discovery layers:** account login, holds, renewals, databases, e-books, and research guides
- **Transactions and interactions:** event registration, room booking, volunteer forms, payments, and chat
- **Media and documents:** PDF flyers, annual reports, board packets, videos, and story time recordings
- **Digital collections and exhibits:** finding aids, scanned materials, and online exhibits that are part of library services



If a patron depends on the website to get information, complete a task, or use the library online, put it on the remediation roadmap.

Five exceptions

Document methodology for determining an exception.

Exceptions to know

- Archived web content that meets all rule conditions
- Preexisting conventional electronic documents such as older PDFs, Word, PowerPoint, and spreadsheets
- Third-party user-posted content that is not posted on the library's behalf
- Individualized password-protected documents tied to a person, property, or account
- Preexisting social media posts

What still remains true

- Current service documents do not get a pass just because they are PDFs.
- Vendor content is covered when the vendor posts or runs it for the public entity.
- Effective communication and reasonable modification obligations still apply, even where a specific exception applies.
- Conforming alternate versions are limited to technical or legal limitations and not convenience or aesthetics.

The library needs to provide justification for financial burden, administrative burden, and fundamental alteration.

Archived Web Content

Must meet all four (4) conditions:

1. Was created before the date the public entity is required to comply with this rule, reproduces paper documents created before the date the public entity is required to comply with this rule, or reproduces the contents of other physical media created before the date the public entity is required to comply with this rule;
2. Is retained exclusively for reference, research, or recordkeeping;
3. Is not altered or updated after the date of archiving; and
4. Is organized and stored in a dedicated area or areas clearly identified as being archived.



Conventional Electronic Documents



Web content or content in mobile apps that is in the following electronic file formats:

- portable document formats (“PDF”),
- word processor file formats,
- presentation file formats, and
- spreadsheet file formats.

Social media platforms

This rule does not require public entities to ensure that platforms themselves conform to WCAG 2.1 Level AA.



Posts provided or made available by public entities through those platforms must conform to WCAG 2.1 Level AA.



All social media posts made when the rule goes into effect are covered, not just emergency and time-sensitive information.

Procurement Practices

Procurement is one of the fastest ways for libraries to reduce risk and improve outcomes.

- Update templates (solicitation language, SOW language, evaluation sheets)
- Amend (if applicable) contracts, service agreements, memorandums of understanding, etc.
- Require accessibility conformance reports (ACR/VPAT) and ask questions for development services
- Ensure accessibility requirements are clear in new contracts.
- Test the product with keyboard-only navigation, screen reader output, zoom/reflow, and mobile orientation changes.



Digital Accessibility applies to products and services procured, developed, and acquired.

Procurement Checklist

- Clearly state the laws and rules required
- List the required supporting documents and include templates
- Detail the requirements for accessibility documentation, e.g., ACRs (products) or VADSIR (development)
- Scoring criteria – Pass or Fail
- Requirements for development, testing, and remediation
- State how gaps will have alternate accommodation and target date for compliance
- Deliverable expectations and acceptance

Vendor Partnerships for Best Value



- Train your vendors
- Importance of accessible technology
- Partnership serving citizens
- Burden of proof belongs to the vendor
- Credible evidence
- Do you have options?

Highest-risk content areas for libraries

Translation for library leaders: prioritize, document, and keep the patron path accessible.

PDFs

Flyers, policies, agendas, and forms are often hard to use on mobile and inaccessible when untagged. Prefer HTML for routine content.

Forms & Booking

Event registration, room reservations, and account workflows need keyboard support, labels, error messaging, and focus management.

Media

Recorded storytimes, tutorials, and event clips need captions, transcripts, and accessible players.

Maps & Hours

Hours, branches, closures, and directions must be readable, searchable, and not locked inside images or inaccessible widgets.

Vendor platforms

Catalogs, research guides, discovery layers, database launch pages, and ebook portals belong in procurement and testing conversations.

Digital exhibits

Scanned materials, metadata, alt text, transcripts, and navigation all shape access for archives and special collections.



If it is frequent, transactional, or mission-critical, move it to the front of the queue.

Optics on optional educational course materials

ADA covers all educational materials required to complete an academic program.

Faculty may provide optional educational materials that are not in compliance with ADA. However, there may be issues regarding optics.

Students with disabilities who are repeatedly unable to participate with their peers can use these inaccessible educational materials as evidence of discrimination.



- Some students are **benefiting** from the optional knowledge while others **repeatedly cannot**.
- Some students can **participate** in class conversations while others **repeatedly cannot**.

No WCAG 2.1 exceptions for live captions



The Department understands that live-audio captioning technology has developed in recent years and continues to develop. As a result of these developments, live-audio captioning has become even more critical for individuals with certain types of disabilities to participate fully in civic life.

The Department believes that requiring conformance to all success criteria by the same date (according to entity size) will address the need for both clarity for public entities and predictability for individuals with disabilities.

Steps to Compliance

Identify Stakeholders and assemble a working group

The working group can establish policies, assign accountability, and determine metrics to measure success.

Inventory digital assets and identify critical gaps in accessibility

Prioritize critical public facing websites, applications, documents, and digital forms

Develop a plan to address accessibility gaps

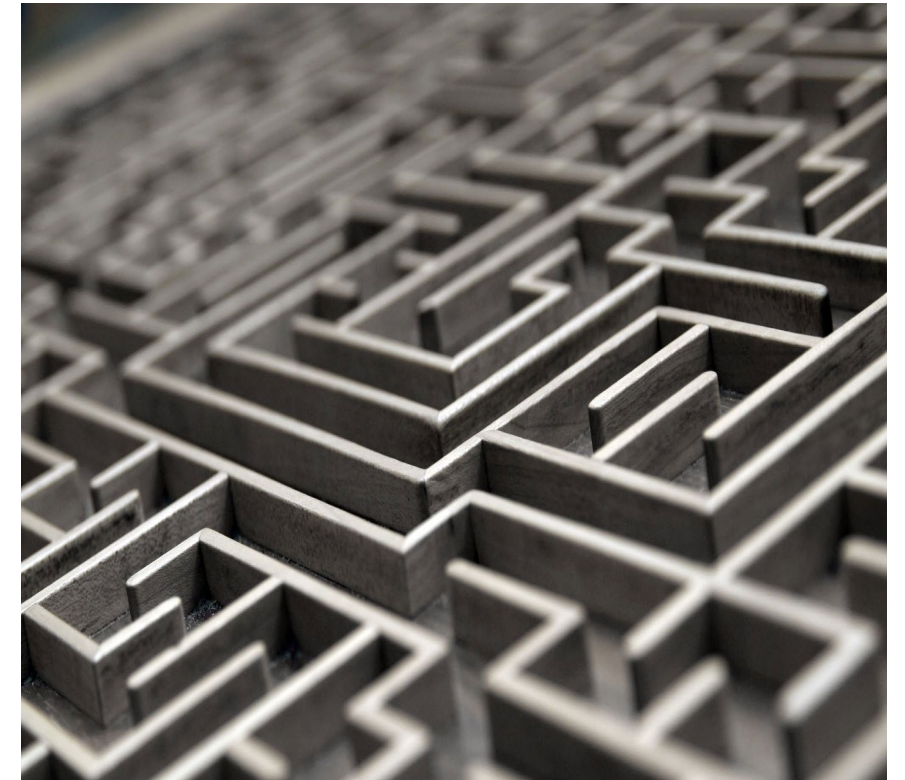
Cost & Budget, Evaluation methodology & tools, Remediation & Documentation, Tools Needed for Maintenance and Development, and Training Needs

Implementation and monitoring

Proactively Design and Develop for Accessibility, Remediation, Train Employees & Vendors, Monitor with Auditing & Testing, Implement Tools & Resources, Documentation

A practical 12-month roadmap for libraries

0–30 days	Mobilize	Name an owner, define scope, and identify your top patron journeys and highest-traffic pages.
30–90 days	Inventory & Prioritize	Catalog websites, apps, PDFs, videos, forms, and vendor touchpoints. Score by traffic, criticality, and remediation effort.
3–6 months	Fix and procure	Remediate top tasks first, update templates, and review contracts so vendors can produce accessible content.
6–12 months	Sustain	Train staff, move routine content to accessible-by-default workflows, establish testing, and monitor new content.



Stakeholder: Library leadership, web/content owners, IT, procurement, General Counsel, Vendors

Statewide Program: Services

Statewide Leadership

- State and local public sector
- Research/Best Practices
- Regulatory review
- Cooperative Contracts Evaluations

Compliance

- Website Scanning
- Required Accessibility Survey (IRDR)
- Exceptions/Exemptions
- Ensure state agencies have an officer

Education and Outreach

- Academy Courses
- Individualized training
- Vendor Outreach
- Tools and Resources
- Conferences
- Monthly Statewide Coffee Chat
- Weekly office hour
- Community of Collaboration

Takeaways for library leaders

- Title II gives libraries a clearer digital accessibility baseline: WCAG 2.1 AA for web and mobile services.
- The work is not just technical. It is content strategy, procurement, workflows, and staff practice.
- Scope includes websites, web and mobile applications, web content, electronic documents, social media, and third-party content.
- Implementation of WCAG 2.1 AA starts April 24, 2026*. Auditing and remediation could take a year to address prior web content and documents.
- DIR's Statewide Digital Accessibility Program provides community support for state and local governments.

* Based on population size

Thank You

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Resources

ADA Southwest Region 6



Arkansas, Louisiana, New Mexico, Oklahoma,
Texas

[Southwest ADA Center\(link is external\)](#)

TIRR Memorial Hermann Research Center
1333 Moursund St.
Houston, TX 77030

Phone:713-797-7171 (V)*

Fax:713-520-5785

Website: <http://www.southwestada.org>(link is
[external](#))



[U.S. Census Bureau](#)

[Small Area Income and Poverty Estimates
\(SAIPE\)](#)

State of Texas Resources



[Statewide Digital Accessibility Coffee Chat Registration Link](#)

Texas Teams community of practice: Email statewideaccessibility@dir.Texas.gov to register

Subscribe to the [Digital Accessibility mailing list](#)

[DIR Digital Accessibility Website](#)

DIR Digital Accessibility Resources

- [Roles and Responsibilities](#) - Learn about agency and statewide roles and responsibilities
- [Digital Accessibility Coordinator](#) - learn more about this important role
- [Statewide Accessibility Program and Groups](#) - Learn about program services and connect with local groups
- [Tools and Resources](#) - Explore resources to help your agency with digital accessibility
- [Requirements, Exceptions, and Exemptions](#) - Learn about Digital Accessibility requirements in Texas government
- [Procurement and Vendor Resources](#) - Discover resources related to accessible technology procurement

Tools & Training

- [Accessibility Conformance Checklists](#)
- [WCAG Voluntary Product Accessibility Template \(VPAT\)](#)
- [Section 508 Voluntary Product Accessibility Template \(VPAT\)](#)
- [Information Technology Industry Council VPAT training videos](#)
- [Information Technology Industry VPAT Training](#)
- [Vendor Accessibility Development Services Information Request](#)

National Association of State Chief Information Officers (NASCIO) Articles and Resources

- [Accessibility and Procurement 101](#)
- [Accessibility in IT Procurement](#)

Policy Driven Adoption for Accessibility

- [PDAA Components](#)
- [PDAA Maturity Matrix](#)
- [Policy Driven Adoption \(PDAA\) Self-assessment](#)
- [Policy Driven Adoption FAQs](#)

Digital Accessibility 101

- [The A11y Project Checklist](#)
- [The A11y Project - Resources](#)
- [ADA National Network – Office of Civil Rights](#) (training videos)
- [Deque](#)
- [WAI Digital Accessibility Foundations Course](#)
- [Digital Accessibility Foundations](#) (edX)
- [Teach Access Accessibility Courses](#)

Document Accessibility - PDFs

- [PDF Accessibility \(webAIM\)](#)
- [PDF Fillable form \(Laura Hopkins, UT Arlington\)](#)
- [Create and verify PDF accessibility \(Acrobat Pro\)](#)
- [Adobe Acrobat Pro: Create and verify PDF accessibility](#) (opens in new window)

HTML v. PDF

HTML

- **Dynamic and Responsive:** HTML content is designed to reflow and resize based on the screen size and browser used, making it ideal for websites, blogs, and other online content.
- **Interactive:** HTML supports interactivity through links, forms, and other web elements, allowing users to engage with the content.
- **SEO Friendly:** HTML is easily crawled and indexed by search engines, making it a good choice for content that needs to be found online.
- **Accessibility:** Well-structured HTML can be more accessible to users with disabilities through semantic elements and proper structuring.
- **Versatile:** HTML can handle various media types, including text, images, video, and sound.

PDF

- **Fixed Layout:** PDFs are designed to maintain the exact appearance of a document, regardless of the viewing environment, making them suitable for documents that need to be printed or presented with a consistent look.
- **Not Dynamic:** Unlike HTML, PDFs are not designed for dynamic content or interactivity. They are essentially snapshots of a document as it would appear when printed.
- **Good for Printing:** PDFs are well-suited for documents that need to be printed or shared as a final, polished version.
- **File Size:** PDFs can be larger than HTML files, especially if they contain high-quality images or complex designs.
- **Requires Specific Software:** Viewing and editing PDFs often requires specialized software like Adobe Acrobat.

Document Accessibility - Other

- [Alt Text Guidance from John Hopkins University](#)
- [Microsoft Accessibility Fundamentals](#)
- [Microsoft Word: Accessibility Checker](#)
- [Microsoft Word](#) (opens in new window), Microsoft Support
- [Microsoft Word and Accessibility Best Practices- Section508.gov](#)
- [Excel](#) (opens in new window), Microsoft Support
- [PowerPoint Accessibility](#) (opens in new window), WebAIM
- [Accessible PowerPoint Training](#) (MN)
- [Microsoft PowerPoint: Accessibility Checker](#)
- [Google Docs](#) (opens in new window), Google Support
- [Google Slides: Present slides with captions](#) (opens in new window), Google Support
- [Google Workspace user guide to accessibility](#) (opens in new window), Google Support

LMS and Media Accessibility

Learning Management System (LMS) Remediation

- [Blackboard Ally](#)
- [UDOIT](#)
- [PopeTech](#)

Media

- [Audio Description: The Visual Made Verbal- If eyes could speak](#)
- [Video Accessibility 101](#)

Accessibility Policy

- [Disability Rights Guide](#)
- [ADA National Network – Office of Civil Rights](#) (training videos)
 - The ADA National Network provides a clear set of [guidelines for writing about people with disabilities](#).
- [International Association of Accessibility Professionals](#)
- [Information Technology Council VPAT Training](#)
- [Section 508 Training](#)
- [US Access Board - past webinars & trainings](#)
- [Web Accessibility Initiative \(WAI\)](#)
- [WebAIM](#)

Web Accessibility Resources

- [Introduction to Web Accessibility \(W3C\)](#)
- [W3Cx: Introduction to Web Accessibility \(edX\)](#)
- [WCAG Standards and drafts](#)
 - [WCAG 2.1](#)
 - [WCAG 2.2](#)
- [W3C Rules for Accessibility \(video\) – Axe-con 2021](#)
 - [Evaluation Tools List](#)
- [W3C Web Accessibility Initiative](#)
- [Overlay Fact Sheet \(Overlays are bad!\)](#)
- [Wave Web Accessibility Checker](#)
- [WebAIM Color Contrast Checker](#)