

ADA Title II Digital Accessibility

What public school districts need to know about the current federal web and mobile application accessibility rule

Information, not legal advice

This sheet summarizes current federal sources and practical planning considerations. District counsel should review legal conclusions, policies, contracts, exception decisions, and formal compliance determinations.

The current rule at a glance

The U.S. Department of Justice's 2024 Title II rule establishes **WCAG 2.1 Level A and Level AA** as the technical standard for state and local government web content and mobile apps. Public school districts are covered. The rule also reaches covered content and services provided through contractual, licensing, or other arrangements.

Public entity	Current compliance date
Population of 50,000 or more	April 26, 2027
Population under 50,000	April 26, 2028
Special district government	April 26, 2028

School district population is not student enrollment

For a city school district, use the city population. For a county school district, use the county population. For an independent school district, use the latest Census Bureau Small Area Income and Poverty Estimates (SAIPE) population estimate. DOJ states that a public school district is not treated as a special district government for this rule.

What is covered

The rule applies to web content and mobile apps used to provide public services, programs, or activities. For a school district, the inventory may include:

- District and school websites, board agendas, meeting archives, calendars, policies, and public notices
- Documents and forms, including PDFs, Word files, presentations, and online applications
- Parent, student, employee, applicant, and community portals
- Learning, communication, payment, registration, emergency, and mobile services
- Vendor platforms and embedded services provided under district arrangements

The dates do not erase existing ADA duties

DOJ explains that existing Title II duties still apply, including effective communication, reasonable modifications, and an equal opportunity to participate in or benefit from services, programs, and activities.

Limited exceptions require careful review

DOJ identifies five limited exceptions. Each has conditions, and an exception does not automatically excuse all related accessibility responsibilities. District counsel should review fact-specific decisions.

Exception category	Planning caution
Certain archived web content	The content must meet the rule's archive conditions; labeling a folder 'archive' is not enough.
Some preexisting conventional electronic documents	The exception does not cover a document currently used to apply for, access, or participate in a service, program, or activity.
Some third-party content	The exception does not cover content posted under contractual, licensing, or other arrangements.
Certain individualized secured documents	The exception is specific and does not mean every password-protected portal or document is exempt.
Preexisting social media posts	Other ADA obligations and accessible alternatives may still be relevant.

Four WCAG principles

Perceivable	Provide text alternatives, captions, adaptable structure, sufficient contrast, and content that does not depend on color alone.
Operable	Support keyboard use, visible focus, logical navigation, no keyboard traps, and enough time to use content.
Understandable	Use clear labels, instructions, consistent navigation, predictable behavior, and useful error identification.
Robust	Use semantic HTML and correctly applied accessibility information so browsers and assistive technology can interpret the content reliably.

Each district determines its conformance

Each district is responsible for evaluating its digital content, documents, workflows, and third-party services and for determining its level of conformance. Districts should establish their own review, testing, procurement, remediation, and legal-review processes. schoolboard.net does not certify a district's compliance.

Common planning mistakes

- Using student enrollment instead of the rule's population method
- Treating an automated scan, overlay, certification, or vendor statement as complete proof of conformance
- Assuming that every old PDF, archive, secured document, or vendor page is exempt
- Remediating files without improving the authoring and procurement process that created them
- Waiting for the compliance date before responding to an accessibility request

Practical district action plan

1

Assign ownership

Identify who coordinates accessibility decisions, author training, vendor follow-up, public feedback, remediation, and progress reporting.

2

Inventory the digital experience

Include websites, documents, agendas and archives, forms, portals, mobile apps, embedded tools, and vendor platforms.

3

Prioritize current and essential content

Start with active agendas, emergency information, enrollment and employment content, forms, calendars, policies, and high-use services.

4

Use structured HTML when practical

Publish frequently updated information as accessible HTML. Do not assume that a PDF is accessible because it opens or contains selectable text.

5

Train content authors

Require useful headings, descriptive links, alternative text, accessible tables, sufficient contrast, keyboard-operable content, and meaningful form labels.

6

Combine automated and human testing

Include keyboard use, focus visibility, zoom and reflow, forms and errors, document testing, and screen-reader review where appropriate.

7

Build accessibility into procurement

Establish district requirements for evaluating third-party services, known limitations, remediation commitments, update practices, testing, and contract terms before purchase or renewal.

8

Provide a feedback and assistance path

Make accessibility support easy to find. Respond promptly and provide an accessible alternative or assistance when needed.

9

Document and monitor

Maintain the inventory, testing results, priorities, vendor responses, training, completed work, and recurring review schedule.

How schoolboard.net supports the work

schoolboard.net uses an HTML-first approach for agenda content and provides authorized district administrators with guides, workflows, and best practices for preparing accessible agendas and related materials. These resources support a district's accessibility program, but each district remains responsible for evaluating its content, documents, processes, third-party services, and overall level of conformance.

District readiness questions

- ☐ Have we confirmed the correct population measure and compliance date?
- ☐ Is one person or team accountable for the district accessibility program?
- ☐ Does our inventory include websites, documents, portals, mobile apps, agendas, archives, and vendors?
- ☐ Have we prioritized current, essential, and high-use content?
- ☐ Do procurement and renewal reviews require meaningful accessibility evidence and remediation commitments?
- ☐ Are content authors trained and given an accessible publishing workflow?
- ☐ Can the public easily report a barrier and request an accessible alternative?
- ☐ Are exception decisions and formal compliance positions reviewed by district counsel?

Authoritative references

DOJ Title II rule page

ada.gov/title-ii-web-rule/

DOJ plain-language fact sheet

ada.gov/resources/2024-03-08-web-rule/

2024 Final Rule - 89 FR 31320

federalregister.gov/d/2024-07758

2026 Interim Final Rule extending compliance dates

federalregister.gov/d/2026-07663

Current 28 CFR Part 35, Subpart H

ecfr.gov/current/title-28/chapter-I/part-35/subpart-H

W3C Web Content Accessibility Guidelines (WCAG) 2.1

w3.org/TR/WCAG21/

Confirm current requirements

Digital accessibility requirements can change. Check current DOJ guidance and consult district counsel before adopting deadlines, contract language, policy language, exception decisions, or a formal compliance position.

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