

ADA Web Accessibility: A Practical Checklist for Cities

On April 24, 2024, the United States Department of Justice (DOJ) established a final rule requiring all state and local governments to ensure their public-facing websites and mobile applications meet Web Content Accessibility Guidelines (WCAG) 2.1, Level AA. Compliance timelines vary by population size and begin between 2026 and 2027.

What the New ADA Rule Requires



- Web and digital content must meet WCAG 2.1 AA standards
- Applies to websites, documents and multimedia
- Enforced by the U.S. Department of Justice
- Compliance deadlines vary by population size

Compliance Deadlines



April 24, 2026 – Public entities (other than special districts) serving populations of 50,000 or more.

April 26, 2027 – Public entities serving populations of fewer than 50,000.

These deadlines apply to all digital content, including websites, mobile apps and electronic documents, unless covered by an exemption

At-Risk Areas for Cities



- PDFs (agendas, minutes, reports, etc.)
- Websites
- Images without alt text
- Videos without captions
- Online forms
- Archived content still publicly available
- Archived content that has been modified after comply date

Alt Text & Images



- All images should include descriptive alt text
- Logos include alt text identifying the organization
- Charts and graphics should include text descriptions
- Text is not embedded in images alone, include captions (example: a social media post)

Alt text should describe meaning, not appearance.

DOJ has developed a fact sheet recommending first steps for state and local governments available at www.ada.gov/resources/web-rule-first-steps - The summary is designed to provide introductory information about the rule's requirements, summary of exceptions and other information about complying with the rule.

PDF & Documents (new content)

**For pdf documents moving forward after comply deadline*



- PDFs are not scanned images of text
- Documents use built-in heading styles
- Reading order is logical
- Links describe the destination (not "click here")
- Tables include proper headers
- Document title is set in properties
- Accessibility checker has been run on document to ensure compliance

PDF & Documents (existing content)

**For pdf documents currently existing on website and/or website archives*



- Prioritize content that is still public and in use
- Focus first on high-traffic or required documents such as meeting minutes and online forms
- Remediate to standards content when it is updated or revised after comply date
- Remove content that is no longer needed
- Document decisions and progress as good-faith efforts.

First Steps Every City Can Take



- Designate an internal accessibility point person
- Create a plan of action
- Inventory public-facing digital content
- Prioritize high-use or required materials
- Use basic accessibility checkers
- Document good-faith efforts

Responsibility & Ownership



- An accessibility point person is identified
- Roles are defined across departments and understanding of basic expectations
- IT, communications & leadership are aligned
- Accessibility is built into workflows going forward
- **ADA has long required public entities with 50 or more employees to designate an ADA coordinator.**

Prepared by: Missouri Municipal League - Learn more: mocities.com

*This checklist is intended for awareness and planning purposes and does not constitute legal advice.

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