



# **ADA Compliance for Town Websites and Digital Content**

## ***A Practical Guide for Town Officials***

### **What This Guide Is For**

New federal regulations under Title II of the ADA require local governments to make their websites and mobile apps accessible to people with disabilities by meeting specific technical standards.

This guide provides an overview what that means for your town. Please note this is an overview and not meant to be comprehensive. If you receive a complaint or request for accommodation from a resident, contact your town attorney before responding. You can also review this [fact sheet](#) from the Dept. of Justice about the new web accessibility rule.

### **Compliance Deadlines**

On April 20<sup>th</sup> 2026 the Department of Justice extended the compliance deadlines. The new deadlines are

Local government entities with a total population of 50,000: April 26, 2027.

Local government entities with a total population of less than 50,000: April 26, 2028.

This deadline applies to your town website and any mobile apps your town operates. Meeting the deadline means your digital content complies with the WCAG 2.1 Level AA standard (explained below).

### **What the Standard Actually Requires**

The technical standard is called WCAG 2.1, Level AA — Web Content Accessibility Guidelines developed by the World Wide Web Consortium. In plain terms, it means your website must be usable by people who are blind, deaf, have low vision, or have motor or cognitive impairments. Here are the most common things towns need to address:

*Every image needs a text description ("alt text")*

When someone using a screen reader encounters an image, the software reads the alt text aloud. If there's no alt text, the image is invisible to them.

- Town seal: "Town of Opha Springs official seal"
- Staff photo: "Town Clerk Jane Smith"
- Decorative image with no content: leave alt text empty (do not skip the tag)



*Text must have sufficient color contrast*

Text must be readable against its background. The required ratio is at least 4.5:1.

- Fails: light gray text on a white background
- Passes: dark gray or black text on a white background

*Color cannot be the only way you convey information.*

- Fails: Draft documents are indicated only by red links
- Passes: red + the word "draft"

*Links must say where they go*

A screen reader can pull up a list of every link on a page. If every link says "Click here," that list is useless.

- Fails: "Click here," "Read more," "Learn more," or a bare URL
- Passes: "2026 Town Budget (PDF)" or "Dog License Application"

Quick fix: Go through your town website and replace every instance of "click here" or "read more" with the actual name of the thing being linked.

*Documents posted to the town website, including PDFs, Word documents, and spreadsheets, must meet WCAG 2.1 Level AA accessibility standards. This means the document itself must be readable by screen readers, not just the webpage it's linked from.*

## **The Five Exceptions**

Five categories of content are exempt from the technical standard. Review these carefully as they are narrower than they may appear.

### 1. Archived Content

Content is exempt only if it meets ALL FOUR of the following:

- It was created or posted before your compliance deadline
- It is kept solely for reference, research, or recordkeeping
- It is stored in a clearly designated archive section of the website
- It has not been altered since it was archived

If the content has been edited since it was first posted, or if it's not in a dedicated archive, the exception does not apply.

### 2. Preexisting Conventional Electronic Documents

Word documents, PDFs, PowerPoint files, and spreadsheets that were posted to your website before your compliance deadline are exempt, but only if they are no longer being used as active forms or applications.



Exempt example: 2024 board minutes posted as a PDF

NOT exempt: A PDF dog license application still available for download and in active use

*The test: Is this document currently being used by residents to access a town service? If yes, it needs to be made accessible.*

### 3. Third-Party Content You Cannot Control

Content posted by the public or provided under a contract or license that prohibits the town from modifying it is exempt.

Exempt example: A public comment board where residents post their own messages

NOT exempt: Documents your website vendor creates for you

NOT exempt: Planning and zoning application documents, even if a third party originally prepared them

### 4. Password-Protected Individualized Documents

A document is exempt if it meets all three of the following:

- It is a Word document, PDF, presentation, or spreadsheet
- It is specific to one person, property, or account
- It is password-protected or otherwise secured

### 5. Preexisting Social Media Posts

Social media posts made by the town before your compliance deadline are exempt.

## **When Technical Compliance Isn't Enough**

Meeting the WCAG 2.1 standard does not end your ADA obligations. Title II's broader requirements, effective communication, reasonable modifications, and equal opportunity to participate, continue to apply regardless of website compliance.

What this means in practice: If a resident with a disability contacts your town and still cannot access a service or program, you need to help them, even if your website is fully compliant.

## **How to Handle Individual Accommodation Requests**

- Ask the resident what they need. Don't assume.
- Offer alternatives: a different file format, a phone call, an in-person appointment, or a staff walkthrough of the process
- Document the request and your response in writing

Example: A resident with an intellectual disability needs to apply for a dog license. The online application meets WCAG requirements, but the resident has difficulty reading dense



text and understanding what documentation is needed. A staff member walking through the application process by phone or in person is a reasonable accommodation.

### **Undue Burden**

A town does not have to take action that would result in an “undue burden” — meaning significant difficulty or expense. What qualifies as an undue burden varies by town based on resources and circumstances. **Do not make an undue burden determination on your own. This determination must be made in consultation with your town attorney.**

Even if an undue burden exists, you are still required to provide an alternative means of communication or access for the resident.

### **Practical Starting Checklist**

Use this as a starting point for reviewing your town’s digital content. This is not exhaustive, a full compliance review should involve your town attorney and, if needed, an accessibility consultant.

- Review your website for images without alt text.
- Check text contrast on your website. Pay attention to header text, sidebars, and any colored background areas.
- Audit all links. Replace “click here” and “read more” with descriptive text.
- Inventory your PDFs and documents. Identify which ones are active forms vs. archived records.
- Set up an archive area. Historic documents you want to keep online but not remediate should go in a clearly labeled archive section.
- Designate a contact. Someone at the town should be the point of contact for digital accessibility requests and complaints.
- Talk to your website vendor. Ask them what steps they are taking to bring your site into WCAG 2.1 AA compliance and get it in writing.
- Consult your town attorney before making any undue burden determination or responding to a formal complaint.

### **Resources**

Northeast ADA Center - [northeastada.org](http://northeastada.org) ; 607-255-6686 ; [northeastada@cornell.edu](mailto:northeastada@cornell.edu)

- [Make your Word documents accessible to people with disabilities](#) – Microsoft
- [Make your PowerPoint presentations accessible to people with disabilities](#) - Microsoft
- [Creating accessible PDFs in Adobe Acrobat](#) – Adobe
- [WebAIM: Contrast Checker](#)
- [WCAG 2.1 - Web Content Accessibility Guidelines 2.1](#)
- [How People with Disabilities Use the Web](#) - Web Accessibility Initiative