On June 20, 2022 the University of Michigan issued the <u>U-M EIT Accessibility Standard Practice</u> <u>Guide (SPG 601.20)</u> which codifies U-M's commitment to creating and maintaining electronic and information technology ("EIT") that strives to be comprehensively accessible. On April 24, 2024, the U.S. Department of Justice released a <u>new rule on digital accessibility</u> under Title II of the Americans with Disabilities Act. This rule requires a university's web content, including academic course content and mobile applications, to conform to WGAG 2.1 Level AA standards, with few exceptions, by **April 24, 2026**.

Key Components of the Rule

<u>Title II of the ADA</u> prohibits discrimination against individuals with disabilities by state and local government entities, ensuring that those individuals have equal access to all services, programs and activities provided by these entities.

The <u>WCAG 2.1 Level AA</u> is the technical standard for web and mobile app accessibility used by the University of Michigan. This rule sets a specific standard that must be followed to meet the obligations under Title II of the ADA.

Requirements: What's in Scope

What is required to meet WCAG 2.1 AA by April 2026 and after?

- Web content, websites, web applications provided by U-M.
- Vendor-created or vendor-licensed web content, websites, web applications that U-M makes available.
- Course materials provided by U-M.
- Electronic documents (PDF, word-processor docs, presentations or slide decks, spreadsheets) provided by U-M.
- Video or multimedia content.
- Social media posts.
- Mobile apps provided or made available by U-M.

Exceptions

What is not required to meet WCAG 2.1 AA by April 2026 and after?

- Archived web content provided by U-M before April 2026.
- Pre-existing electronic documents provided by U-M before April 2026.
- Social media posts before April 2026.
- Content posted by independent third parties.
- Password-protected individualized documents.

Please refer to the <u>U-M ITS Executive Summary: Updated ADA Title II Regulations</u> for more details on the requirements, exceptions and goals to meet compliance.

Compliance Timeframe

Public entities with populations of 50,000 or more persons, including U-M, must comply with the federal regulations by **April 24, 2026**.

We're Here to Help

As the university progresses with its ADA compliance initiatives, more details will be communicated. If you have any questions or concerns regarding the ADA Title II regulations on digital accessibility, please contact flint.accessibility@umich.edu or visit https://umflint.edu/accessibility.

Resources

- IT Accessibility at the University of Michigan
- Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments (ADA.gov)
- Official Federal Register Rule
- Press Release (DOJ April 8, 2023)
- WCAG 2.1 Level AA Quick Reference Guide
- Making Online Instruction Accessible
- Register for an ODE-led Accessibility Workshop

Thank you for your commitment to accessibility.

Scott Arnst
Chief Information Officer
sarnst@umich.edu
www.umflint.edu/its

Nick Gaspar
Director, Online and Digital Education
ngaspar@umich.edu
www.umflint.edu/ode

Robb King
Director of Marketing and Communications
rwking@umich.edu
www.umflint.edu/mac