California Community Colleges

TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers
Chief Business Officers
Academic Senate Presidents

FROM: James Todd, Vice Chancellor of Academic Affairs
Stacey Shears, Vice Chancellor of Student Services

RE: Accessibility Standards and Revised ADA Title II Regulations

Purpose

This memorandum provides guidance regarding the U.S. Department of Justice (DOJ) final rule updating Title II of the Americans with Disabilities Act (ADA), which establishes enforceable technical standards for digital accessibility across all state and local government entities. The revised regulations take effect April 24, 2026, and formally adopt Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as the minimum technical standard for digital content and services.

As a follow-up to the Feb. 3, 2026 Accessibility in Online Learning system webinar, this memorandum clarifies regulatory requirements, outlines institutional implications, and establishes systemwide implementation expectations in advance of the new standard. From our online classrooms to our virtual student support systems, executing these updates requires coordinated planning at the college and district levels to support faculty, classified professionals, administrators, and students. This work directly supports Vision 2030's commitments to equitable access, inclusive excellence, and student success for all learners.

Regulatory Context, Scope, and Key Updates

California Community Colleges must comply with Section 508 of the Rehabilitation Act of 1973 (as amended), California Government Code sections 7405 and 11135, and the updated ADA Title II regulations. While Section 508 remains an important federal standard and is incorporated into state law, the revised ADA Title II rule establishes WCAG 2.1 Level AA as the enforceable minimum technical standard for digital accessibility under Title II.

On April 24, 2024, the DOJ issued a final rule introducing Subpart H to Title II, formally adopting WCAG 2.1 Level AA. The revised rule makes clear that accessibility obligations apply to the institution's entire digital landscape, including student and public-facing websites, learning

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management systems (e.g., Canvas), password-protected environments, internal communication platforms such as SharePoint and email systems, employee-facing systems such as HR portals, digital documents (PDF, Word, Excel), audio and video content, mobile applications, and institutional social media accounts.

The revised ADA Title II rule includes the following significant clarifications and expanded expectations:

- **Updated Technical Standard.** The rule formally adopts WCAG 2.1 Level AA as the minimum technical standard for all digital content under Title II.
- **"Separate Is Not Equal."** Providing a separate accessible version of a document or webpage is no longer an acceptable substitute for making the original content accessible.
- **Third-Party Responsibility.** Institutions remain legally responsible for the accessibility of vendor-provided products and services and may not delegate or contract away these obligations. Accessibility must be embedded in procurement review and contracting processes.
- **Proactive Design Standard.** Institutions are expected to design digital environments with accessibility in mind regardless of disability disclosure. The standard shifts from reactive accommodation to proactive inclusion.
- **Entire Digital Landscape.** Accessibility standards apply across institutional systems, including internal communication tools (e.g., SharePoint and email), learning management systems (e.g., Canvas), password-protected environments, employee-facing systems (e.g., HR portals), websites, and digital instructional materials.
- **Institutional Responsibility.** Accessibility is an institutional obligation requiring executive leadership, cross-functional coordination, and sustained governance. It is not limited to a single office or individual.
- **Mobile Applications and Assistive Technology.** Digital content must be accessible via mobile devices and compatible with mobile assistive technologies, reinforcing accessibility across platforms.
- **Social Media Content.** Beginning April 24, 2026, all newly created content representing the institution on social media platforms must meet WCAG 2.1 Level AA standards.
- **Limited Exceptions.** Narrow exceptions apply to archived web content not used for active program participation, content posted by unaffiliated third parties without contractual relationship, and student-submitted work. These exceptions should be applied cautiously.

Institutional Responsibility and Governance

The updated regulations require executive oversight and coordinated implementation across divisions. Sustainable compliance must be embedded within governance structures, procurement

practices, curriculum development, instructional design, communications, and employee systems rather than addressed through isolated remediation efforts.

Title 5 § 55001 reinforces that curriculum committees must maintain documented procedures to guarantee accessibility for every student. Course outlines of record should reflect Universal Design for Learning principles, including multiple means of representation, engagement, and expression to support learner variability and diversity. Colleges and districts should ensure that accessibility expectations are integrated directly into curriculum review processes, course development workflows, faculty professional learning, and the responsible use of AI-supported instructional tools.

Institutions should ensure cabinet-level visibility, align accessibility with strategic planning and budgeting processes, and establish documented accountability mechanisms that support long-term sustainability.

Implementation Framework: Accessibility Capability Maturity Model

To support institutions in managing this transition, the CCC Accessibility Center utilizes the Accessibility Capability Maturity Model (ACMM), a structured framework designed to promote proactive risk mitigation and continuous improvement.

The ACMM operates through a four-stage iterative cycle: assessment of institutional accessibility practices against established benchmarks; development of an integrated annual accessibility plan aligned with institutional priorities; implementation of improvement strategies, strengthened business processes, and training efforts; and annual reassessment to measure growth and ensure long-term sustainability.

This maturity-based approach aligns with Office for Civil Rights guidance and supports sustained institutional integration rather than reactive remediation. For institutions that choose to participate, the ACMM team provides training and conducts a baseline assessment to inform planning and continuous improvement.

Resources, Support, and Next Steps

Colleges are encouraged to undertake accessibility compliance without delay supported by the guidance and resources made available through the Chancellor's Office, including the CCC Accessibility Center. While accessibility compliance can feel daunting, our goal is to empower institutions to become informed, ask questions, engage in the process, and make steady progress to inclusively serve our students and communities. The following resources are available to support your efforts:

- Accessibility in Online Learning (Feb. 3, 2026, webinar recording)
- Shift Your Strategy for ADA Title II Update: Focus on Training and Future-Proofing

- [Navigating the 2026 ADA Title II Deadline: California Community Colleges Websites](#)
- [From Awareness to Action: A Five-Phased Approach to Web Accessibility](#)
- [ACMM Visit Preparation: What Colleges and Districts Need to Know](#)
- [Steps for Colleges to Get Ahead](#) in preparing for ADA Title II updated regulations

Accessibility Webinar, March 4, 2026: In addition, you may [register](#) for "**Using Accessibility-Aligned AI to Move Courses Toward the Revised ADA Title II**" a system webinar scheduled for Wednesday, March 4, 2026 at 11 a.m. The webinar will provide a hands-on demonstration of AI-powered tools that support accessibility-aligned remediation.

Early and coordinated action will position institutions not only to meet regulatory requirements, but to reduce institutional risk, strengthen civil rights compliance, and advance Vision 2030's commitment to universal access and inclusive excellence across the California Community Colleges system.

Colleges seeking clarity, more information, or support are encouraged to contact the CCC Accessibility Center at Accessibility@CCCTechCenter.org to learn more about available resources and next steps.

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