

DIGITAL ACCESSIBILITY AT TULANE

TITLE II UPDATES TO THE AMERICANS WITH DISABILITIES ACT

JULY 15, 2026 DRUPAL MEETUP SESSION

SYDNEY CONE, ADA/504 COORDINATOR

Tulane

UPDATES TO TITLE II OF THE ADA

JULY 1990: The Americans with Disabilities Act (ADA) is a civil rights law that addresses discrimination on the basis of disability.

1996: DOJ issued an advisory opinion stating that public accommodations must make their websites accessible to individuals with disabilities.

2022: DOJ issued guidance on making websites accessible without providing any technical standard.

APRIL 2024: DOJ issued new rule for improving the accessibility of web content & mobile applications. Set specific requirements to ensure digital content is accessible to people with disabilities via technical standards called the Web Content Accessibility Guidelines ("WCAG"). Original compliance deadlines set for April 2026 and April 2027.

WCAG – WEBSITE REQUIREMENTS

- Easily navigate without a mouse
- Content magnified to 200%
- No broken or non-descriptive links
- Proper color contrast
- Alternative text for images



Alt Text: A student walks on a sidewalk at Tulane University, illuminated by sunlight filtering through the trees.

OPEN OCR INVESTIGATIONS

March 2026: OCR has approximately 60 open investigations re: web content accessibility, including with Brown University, Texas A&M, Carnegie Mellon, University of Michigan, University of Colorado at Boulder, and University of Alabama

APRIL 2026 UPDATE

DOJ issues an Interim Final Rule **extending** the compliance dates for implementing Title II of the ADA:

- Institutions reported that "that such preparation [for the 2026 compliance date] requires significant resources and staff time."
- "the Department underestimated the costs and burden of the 2024 final rule"
- Institutions have "limited resources and a lack of staff with technical expertise necessary for compliance"

NEW COMPLIANCE DEADLINES

APRIL 2027: State & local governments, large public universities, public hospitals, state and local courts, etc. must comply

APRIL 2028: Smaller institutions – **like Tulane** – must comply



Tulane

RECENT DIGITAL ACCESSIBILITY CASES

- "By extending the 2024 final rule's compliance dates, covered entities can avoid spending time and resources assessing the application of these defenses and developing written analysis, and they can instead **specifically focus on compliance efforts. This will ultimately lead to greater accessibility for individuals with disabilities** because more time and resources will be devoted directly to compliance with the substantive requirements of the 2024 final rule."
- 04/15/2026: PepsiCo ordered to Pay \$270,000 in EEOC Disability Discrimination lawsuit for failing to provide accessible information to a recently-hired blind employee
- Jones v. Moscot.com (SDNY, March 5, 2026): Judge dismissed proposed class action lawsuit because defendant demonstrated documented, ongoing, good-faith accessibility efforts

TO MEET THESE REQUIREMENTS...

- **CREATE WORKPLANS** for 18+ departments and 9 schools to **IMPLEMENT** an accessibility audit framework and **REMEDiate** digital real estate, tailored to each office's needs
- **INVEST** in large-scale programs that remediate content in pre-existing software, like DubBot and Drupal (websites) and Panorama and Canvas (learning management system)
- **CONDUCT** trainings & **PROVIDE** resources to continuously monitor and remediate Tulane's digital footprint