



COMMUNITY  
HEALTH CARE  
ASSOCIATION  
of New York State

## **Web Content Accessibility Guidelines (WCAG) 2.1 Level AA Conformance**

Deadline May 11, 2026



# HHS Section 504 Final Rule & WCAG 2.1 Level AA Conformance

- 2024 Section 504 final rule - HRSA grantees that receive HHS funding must make covered web content and mobile apps conform to Web Content Accessibility Guidelines (WCAG) 2.1 level AA
- Deadline for recipients with > 15 employees – May 11, 2026, recipients with < 15 employees – May 10, 2027
- During "phase-in" period recipients have existing obligations around effective communication, reasonable modifications, and equal access
- Rule covers web content and mobile apps including tools used to convey information, schedule appointments, and provide services online (e.g., patient portal) even if provided through a vendor or contractor





# HHS Section 504 Final Rule & WCAG 2.1 Level AA Conformance

- Assume that websites, patient portals, online forms (intake, bill pay), telehealth entry points, scheduling, and mobile apps need to meet these accessibility standards
- Responsible for assuring conformance through 3rd party portal, apps, or digital front door
- Things to be thinking about now:
  - What patient-facing digital tools exist?
  - Who owns accessibility internally?
  - Do your contracts require accessibility?
  - Has the experience been tested for real end users?
  - What is the remediation plan prior to May 2026?





# HHS Section 504 Final Rule & WCAG 2.1 Level AA Conformance- Recommended Next Steps

- Recommending a three-part approach- inventory, testing, and documentation
  - Step 1: **Identify and inventory** which digital tools are in scope (every patient-facing digital tool)
  - Step 2: **Assess** whether these tools meet WCAG 2.1 Level AA standards through a combination of testing the actual user experience against WCAG criteria
  - Step 3: **Gather evidence and maintain auditing results**, remediation plans, retest results, and dates; request an accessibility conformance statement (or VPAT/ACR) from vendor products

The Accessible.org WCAG 2.1 AA Checklist: <https://accessible.org/wcag/>

The Accessible.org WCAG 2.1 AA Video: <https://youtu.be/uaEgknyA5BY?si=gFLB5LZsrFgGuii3>

