

This resource was created to provide a clear, practical WCAG 2.1 A/AA accessibility checklist designed specifically for Communications and IT teams in CHCs, PCAs, and HCCNs. It avoids unnecessary technical depth while making sure staff understand exactly what to check for in their day-to-day work to conform to Web Content Accessibility Guidelines (WCAG) 2.1 Level A and AA.

What is WCAG?

WCAG stands for Web Content Accessibility Guidelines. They are the international standards that explain how to make websites, mobile apps, documents, and digital content accessible to people with disabilities.

WCAG is developed and maintained by the World Wide Web Consortium (W3C), the global organization that sets web standards. WCAG 2.1 is a stable, referenceable technical standard designed to ensure that digital content is perceivable, operable, understandable, and robust for all users.

The guidelines cover accessibility needs related to vision, hearing, mobility, cognitive disabilities, and more. They also make websites more usable for everyone, not just people with disabilities.

The current legally referenced version for federally funded healthcare organizations (including CHCs, PCAs, and HCCNs) is WCAG 2.1 Level A and AA. HHS has formally adopted WCAG 2.1 AA as the required standard for web and mobile accessibility under updated Section 504 rules.

What WCAG Is Not

- It is **not** a law by itself.
 - It is the **technical standard** that laws like Section 508, Section 504, and the ADA now point to when defining what “accessible” means.
 - It is **not** just for websites—PDFs, apps, forms, and multimedia also fall under WCAG expectations.
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The Four Principles of WCAG (POUR)

WCAG is built on four big ideas:

- **Perceivable:** Users must be able to see or hear the content.

- **Operable:** Users must be able to navigate and interact using different methods (e.g., keyboard).
- **Understandable:** Content and interfaces must be clear and predictable.
- **Robust:** Content must work with assistive technologies, such as screen readers.

This framework ensures digital content works for as many people as possible.

Why WCAG Matters for CHCs

Because CHCs receive **HHS federal funding**, they must ensure that their websites, online forms, mobile apps, and digital documents comply with **WCAG 2.1 Level A/AA** a requirement under updated federal regulations.

Following WCAG reduces legal risk and supports equitable access to care.

What Are WCAG Level A and Level AA?

WCAG success criteria are grouped into **three levels of conformance**:

Level A, Level AA, and Level AAA.

These levels indicate **how strict** the accessibility requirements are and how many barriers they remove.

The W3C describes WCAG as a set of guidelines designed to make digital content accessible to people with disabilities, with requirements organized into success criteria and conformance levels.

Level A (Minimum Accessibility Requirements)

Level A is the **baseline** level.

A website or app that meets Level A addresses the **most basic, essential accessibility barriers**.

Level A covers things like:

- Providing alt text for non-text content
- Ensuring keyboard-only access
- Avoiding content that flashes and could trigger seizures
- Making sure forms have basic labels

These requirements are foundational—they prevent the most severe access failures but **do not guarantee a fully usable experience** for many people.

WCAG 2.1 Level A success criteria address the most basic barriers to accessibility and ensure that essential information can be perceived and operated by users with disabilities.

Level AA (Enhanced, Legally Required Accessibility Requirements)

Level AA is the level that most laws and regulations—including U.S. federal rules—require.

The new HHS rule explicitly requires **WCAG 2.1 Level AA** for recipients of federal funding, including CHCs, PCAs, and HCCNs.

Level AA expands on Level A by addressing **more subtle but widespread accessibility barriers**.

This includes requirements such as:

- Sufficient **color contrast** between text and background
- Captions for prerecorded videos
- Logical and consistent navigation
- Accessible error messages and clear instructions
- Avoiding content that requires complex gestures
- Making content usable at 200% zoom

Level AA is designed to create a **generally accessible and usable experience** for most people with disabilities across a wide range of devices and assistive technologies.

How the Levels Compare

Level	Description	What It Ensures
A	Minimum requirements; essential fixes	Prevents major failures that block access entirely
AA	Enhanced requirements; legal standard	Ensures usability for most people with disabilities
AAA	Highest level; not legally required	Optimizes accessibility but is not expected for most organizations

WCAG supports customizing guidance by levels, technologies, and user roles, and Level A/AA filtering is built directly into its implementation guidance.

Why CHCs Must Meet Level A and AA

HHS adopted WCAG 2.1 AA as the **mandatory** technical standard for:

- Websites
- Web content (including PDFs and documents)
- Mobile apps

Any CHC receiving federal funds must conform to these requirements unless doing so would impose a fundamental alteration or undue burden. ⁵

This ensures equitable access to:

- Appointment scheduling
- Patient education materials
- Sliding fee forms
- Telehealth
- Portals
- Public-facing websites

Level A = Must-do basics to avoid major accessibility failures.

Level AA = Required standard that ensures content is usable for most people with disabilities.

PCAs, HCCNs, and CHCs must meet both Level A and AA.

ARIA Attributes Explained (In Simple Terms)

ARIA stands for Accessible Rich Internet Applications.

Think of ARIA as a set of labels, signals, and instructions that help screen readers and other assistive technologies understand what's happening on a webpage.

Why ARIA Exists

Websites today use interactive features, menus that expand, pop-up alerts, tabs, sliders, buttons that look like text, etc.

These elements often look clear to sighted users but are invisible or confusing to someone using a screen reader. ARIA is a way to tell assistive technology what things are and how they behave, even if the code behind them isn't automatically accessible.

The Core Idea

ARIA helps fill in the gaps.

If a sighted person sees a button but the screen reader only sees "unknown object"...

ARIA makes sure the screen reader hears:

| "Button. Collapsed. Press to expand menu."

If a sighted person sees an error next to a form field...

ARIA ensures a screen reader hears:

| "Error: Email address is required."

ARIA doesn't change the visual appearance, it simply **adds meaning** behind the scenes.

Why ARIA Matters for CHCs

ARIA is crucial because many CHC sites and tools include:

- Appointment request forms
- Sliding banners
- Pop-up messages
- Dropdown menus
- Patient education modules
- Third-party widgets (e.g., survey tools, maps, portals)

If these elements don't use ARIA (or aren't built accessibly), screen-reader users cannot:

- Navigate your site
- Complete forms
- Read alerts
- Use menus
- Request services

This creates civil rights and compliance risks.

Accessibility Checklist for Communications & IT Teams

Aligned with WCAG 2.1 Level A & AA

For Communications Teams

Use this when creating or publishing website content, social media, PDFs, forms, flyers, newsletters, or patient-facing materials.

1. Content & Writing

- Use **plain language** (8th-grade reading level recommended where possible).
 - Avoid jargon, acronyms, and unexplained terms.
 - Write clear headings that describe what the section is about.
 - Avoid using **color alone** to convey meaning (e.g., “items in red are required”).
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2. Images & Graphics

- Include **alt text** for every meaningful image.
 - Describe the purpose, not just the appearance.
 - Decorative images should be marked as decorative (or left without alt text, if using a CMS that handles this).
 - Any text in an image (e.g., event flyer) should also appear in **actual text** below the image.
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3. Videos & Audio

- All videos must include **captions**.
 - Any speech or key sounds must be represented in captions (“doorbell rings,” “crowd cheering”).
 - Provide a **transcript** for audio-only materials (e.g., podcasts, announcements).
 - For important public videos, include **audio descriptions** or ensure all critical visual information is conveyed in spoken audio.
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4. PDFs, Docs, and Patient-Facing Print Materials

- Ensure PDFs are **tagged** (accessible structure).
 - Use real **headings**, not text with larger font sizes.
 - Ensure **logical reading order**.
 - Add alt text to images.
 - Avoid scanned-image PDFs of forms or flyers—use **selectable text**.
 - Check color contrast and font size (minimum 12–14 pt).
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5. Web Content & Social Media

- Ensure hyperlinks use **descriptive text** (e.g., “Download intake form” instead of “Click here”).
 - Provide text alternatives for charts and infographics.
 - Add captions on social media posts with images.
 - Provide alt text for images on LinkedIn, Facebook, Instagram, etc.
 - Use camelCase or PascalCase in hashtags:
 - Example: #HealthCenterWeek, not #healthcenterweek.
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For IT Teams

Use this during website maintenance, vendor evaluation, product implementation, and software updates.

1. Structure & Navigation

- Ensure every page has:
 - A clear, descriptive **page title**
 - Proper **heading hierarchy** (H1 → H2 → H3)
 - Consistent **navigation structure**
 - Verify that all content is available to assistive technologies (screen readers, text zoom, etc.)
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2. Keyboard and Screen-Reader Support

- All content must be usable **without a mouse**.
 - Check the visible **keyboard focus indicator**—it should be clearly noticeable.
 - Test pages with at least one screen reader:
 - NVDA (Windows, free)
 - VoiceOver (Mac/iPhone, built-in)
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3. Forms & Interactive Elements

- Every field must have an associated, programmatically attached **label**.
- Error messages must be:
 - Clear
 - Specific
 - Announced to screen readers
- Required fields must be marked clearly (not just using color).

- Buttons must have labels that describe their action (“Submit Appointment Request”).
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4. Color, Contrast & Typography

- Minimum contrast ratio:
 - **4.5:1** for normal text
 - **3:1** for large text
 - Don’t use light gray text, pale colors, or low-contrast buttons.
 - Ensure text can be resized up to 200% without breaking layout.
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5. ARIA (Accessible Rich Internet Applications) & Code Practices

(IT Teams don’t need to be experts, but they should spot obvious issues.)

- ARIA used sparingly and correctly.
 - Avoid “div soup”—use semantic HTML for:
 - Buttons
 - Links
 - Headings
 - Lists
 - Validate code where possible (HTML validators, accessibility scanners).
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6. Third-Party Tools & Vendors

- Require a current **VPAT/ACR** showing WCAG 2.1 A/AA coverage.
 - Confirm the vendor tests for accessibility before releases.
 - Ensure integrations (e.g., patient portals, chat widgets) are keyboard accessible.
 - Avoid vendors using overlays as their “accessibility solution” (these do not achieve compliance).
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7. Maintenance & Continuous Monitoring

- Run periodic automated checks (e.g., WAVE, Axe).
 - Review pages regularly as new content is added.
 - Add accessibility checks to your CMS publishing workflow.
 - Provide yearly accessibility refresher training for staff.
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Additional Resources for Accessibility & Compliance

1. HRSA / HHS Requirements for Federally Funded Healthcare Organizations

These links explain the [legal requirements](#) CHCs must follow regarding website and mobile accessibility.

HHS Final Rule: Web & Mobile App Accessibility Requirements (Section 504 Update)

This rule requires recipients of HHS federal funding (including CHCs, PCAs, HCCNs) to conform to WCAG 2.1 AA. [HHS Final Rule PDF](#)

ADA Title II Rule on Web & Mobile Accessibility

Explains deadlines and obligations for public entities to meet WCAG 2.1 A/AA.

[ADA.gov Summary](#)

eCFR: 28 CFR 35.200 – Web & Mobile Accessibility Requirements

Codified legal requirements for WCAG 2.1 A/AA compliance. [eCFR: Web & Mobile Accessibility](#)

These three resources establish the [legal foundation](#) for why CHCs must meet WCAG 2.1 AA.

2. WCAG 2.1 A/AA Standards & Guidance

WCAG 2 Documents Overview (W3C)

The official entry point for WCAG standards, How-To guides, and checklists.

[WAI WCAG Overview](#)

WCAG 2.1 Technical Recommendation (W3C)

The complete WCAG 2.1 standard (authoritative source). [WCAG 2.1 W3C Recommendation](#)

WCAG 2.1 Guidelines Summary (WCAG.eu)

A readable summary useful for staff who want plain-language descriptions.

[WCAG 2.1 Guidelines Summary](#)

MDN: Understanding WCAG (Beginner-Friendly)

A practical, accessible introduction to WCAG concepts. [MDN: Understanding WCAG](#)

3. ARIA (Accessible Rich Internet Applications)

These resources help IT staff understand ARIA roles, states, and properties.

ARIA Authoring Practices Guide (W3C)

The official guide for correct ARIA usage, including examples and design patterns.

[WAI-ARIA APG](#)

WAI-ARIA 1.3 Technical Specification (W3C)

The formal standard describing all ARIA roles, states, and properties. [WAI-ARIA 1.3 Spec](#)

MDN: Accessibility Information for Web Authors

Includes ARIA guidance, roles, properties, and best practices. [MDN ARIA Resources](#)

4. Section 508 & Federal Digital Accessibility Standards

CHCs often interface with federal partners, these resources help understand 508 alignment.

Section508.gov – Applicability & Conformance Requirements

Explains how WCAG 2.0/2.1 are applied to federal and non-web content.

[Section508.gov Overview](#)

5. Additional Context & Healthcare-Specific Accessibility

Accessible.org: Summary of New HHS Rule (WCAG 2.1 AA Required)

A clear explanation of deadlines and obligations for healthcare organizations.

[Accessible.org Summary](#)

Healthcare Website Accessibility Guide

Deep-dive specifically for healthcare systems, including patient portals, telehealth, and forms.

[Healthcare Accessibility Guide](#)

6. Tools for Testing Accessibility

WAVE Web Accessibility Evaluation Tool

Free browser-based evaluation for common WCAG issues.

Axe DevTools

Developer-focused accessibility testing directly in Chrome/Firefox.

Lighthouse (Chrome)

Built-in accessibility scoring tool.

Accessibility Insights

Microsoft's accessibility testing tool for manual + automated checks.
