

Managing Digital Accessibility: Legal Compliance & Practical Implementation

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Agenda

- Why accessibility
- Legal landscape
- What counts?
- Web Content Accessibility Guidelines (WCAG)
- Demo
- Vendors and procurement
- Collaborative efforts

Learning Objectives

- Understand key elements:
 - European Accessibility Act (2025)
 - Title II ADA updates (2026).
- Identify services and digital assets covered
- Apply WCAG-based accessibility standards
- Evaluate vendors and procure processes for compliance
- Develop an accessibility action plan

Scope of Disability

- 1.3 billion people (16%) worldwide
- 14% in U.S. and growing
- Less than 10% of all published books are in accessible formats
- Inaccessible digital services are NOT a technical inconvenience
- Barrier to education, research, and civic participation

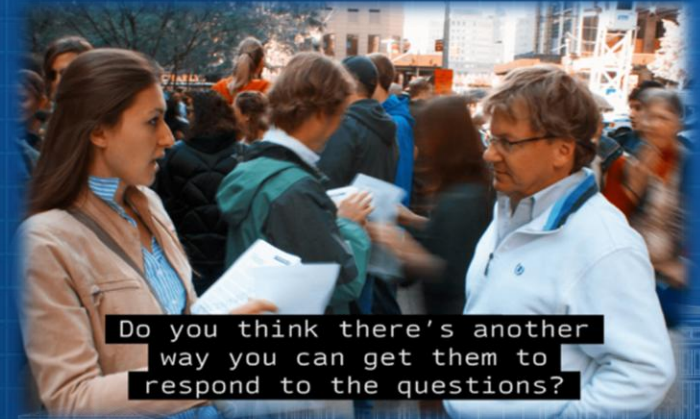
Why Accessibility?

- People with disability
- Legal mandates are expanding
- Increased enforcement
- Civil rights framing (not just compliance)
- Libraries as access institutions

Curb-Cut Effect

Disability accommodation can benefit everyone

- Audiobooks
- Automatic doors
- Captioning
- Curb cuts / ramps in buildings
- Remote working / flexible working
- Voice recognition & speech-to-text (e.g., Siri, Alexa)





Notable Cases



When Universities Got Sued ...

- Higher Ed Accessibility Lawsuits, Complaints, and Settlements
- Office for Civil Rights Resolution Search
- DOJ/DOE “Dear Colleague” letter on online accessibility (2023)
- Real cases
 - UC Berkeley
 - Harvard University & MIT
 - University of Southern California

University of California Berkeley

- Inaccessible free online content (videos, courses, podcasts)
- People who are deaf or hard of hearing
- DOJ *consent decree* under ADA Title II
- Settlement: accessibility remediation required; policies & audits implemented

Harvard University and MIT

- Online content
- Deaf and hard of hearing students
- Title III of the ADA (private institutions) and Section 504 of the Rehabilitation Act
- Harvard
 - Add high-quality captions or transcripts to all video and audio content
 - \$1,575,000 in attorneys' costs and fees

University of Southern California

- Digital assets
- Deaf and hard of hearing students
- Title III of the ADA (private institutions) and Section 504 of the Rehabilitation Act

Legal Landscape



2025 European Accessibility Act (EN 301 549)

- Applies to digital products and services placed on the EU market
- E-commerce functions (ATM, library shops, paid services)
- Self-service terminals (e.g., self-checkout kiosks)

Effective June 28, 2025

- Frontlist e-books must be available in an accessible format
- E-commerce interfaces must be accessible

By 2030

- backlist titles also need an accessible (may be handled on-demand)
- EAA includes an exception for “disproportionate burden” (e.g. financial)

2026 ADA Title II Updates

Effective April 24, 2026 – American with Disabilities Act

- Applies to all publicly funded entities
- Mandates “nondiscrimination on the basis of disability in State and local government services”
- Covers Websites, mobile apps, digital course materials
- Federal agencies covered by Sections 504 & 508 of the Rehabilitation Act of 1973
- California Accessibility Laws: Unruh Civil Rights Act (Civ. Code §51), the Disabled Persons Act (Civ. Code §54), and the California Building Code (Title 24) for construction

	European Accessibility Act (EAA)	ADA Title II Update
Effective Date	June 28, 2025	April 26, 2026
Who It Covers	Any org serving EU consumers; public bodies; 27 member states	U.S. state & local governments
Tech Standard	WCAG 2.1 Level AA / EN 301 549	WCAG 2.1 Level AA
Scope: Websites	Yes - all public-facing web content	Yes
Scope: Mobile Apps	Yes	Yes
Scope: Documents	Yes - PDFs, e-books, digital forms	Yes - PDFs, Word, spreadsheets
Scope: Kiosks	Yes - self-service terminals	Yes - digital kiosks
Scope: Multimedia	Yes - captions & audio descriptions required	Yes
Exceptions	Micro-enterprises (<10 employees); disproportionate burden	Archive content from before deadline; content not used for active services
Enforcement	Legal action, fines, procurement exclusion	DOJ complaints, civil rights lawsuits
Key Governing Body	EU Member State authorities	U.S. Dept. of Justice (DOJ)



What Counts?



Accessible or at Risk

- Library website homepage
- PDF of a program flyer
- Recorded tutorial video; interactive tutorial
- Social media post (e.g., Instagram event promo)
- Online catalog (OPAC)
- Email newsletter
- Third-party database (e.g., research platform)
- Event registration form
- Digital exhibit
- Internal staff-only document
- Chatbot
- Live chat
- Patron generated content (e.g., comments on blog)

Scope of Digital Asset

A. Public-Facing Digital Assets

- Main website
- Discovery layer / atalog
- LibGuides
- Institutional repositories
- Digital exhibits
- Streaming media
- Event registration forms

Scope of Digital Asset

B. Licensed Content

- E-book platforms
- Databases
- Journal interfaces
- Video platforms
- AI tools



Scope of Digital Asset

C. Internal and Backend Systems

- Intranet
- Staff training materials
- Internal PDFs
- HR systems (if public institution)
- Library management systems



Scope of Digital Asset

D. Physical-Digital Interfaces

- Self-check kiosks
- Public computers
- Wayfinding screens
- Vending machines, printing stations

Exceptions

- Archived web content if
 - Created before the compliance date
 - Retained only for reference/research/recordkeeping
 - Not altered after archiving
 - Clearly organized in a dedicated archive area
- Pre-existing conventional electronic documents
 - Posted before the compliance deadline
 - Not currently used to apply for or access services

Web Content Accessibility Guidelines

Technical Standard: WCAG

- W3C's Web Content Accessibility Guidelines (WCAG) – technical benchmark
- WCAG 2.1 AA – for both EAA and ADA Title II
- While publishers work towards frontlist and backlist compliance, users may request specific titles be prioritized for accessible versions

POUR - The Four Principles of Accessibility

- 1. Perceivable** - Alt text on images, captions on instructional videos
- 2. Operable** - Keyboard navigation across library website and e-resource portals
- 3. Understandable** - Plain language on forms, consistent navigation menus
- 4. Robust** - Compatibility with screen readers across ILS and digital collections

Principle	Stands For	Library Example
P	Perceivable	Alt text on images; captions on instructional videos; color contrast; accessible PDF
O	Operable	Full keyboard navigation; descriptive link text; clear focus indicator
U	Understandable	Plain language; form labels; clear headings; logical page structure
R	Robust	Compatible with screen readers; valid HTML; support multiple browsers

Demo

1. Missing alternative text
2. Poor color contrast
3. Improper headings structure
4. Keyboard navigation failure
5. Inaccessible form
6. Keyboard order
7. Inaccessible PDF

Perceivable

- Information must be presentable to users in ways they can perceive
- Alternative text
- Color contrast
- Caption or transcript for stream videos

Alt Text



Caption:

Figure 10.1 The Arctic route through Moscow to the North, 2015–2016.

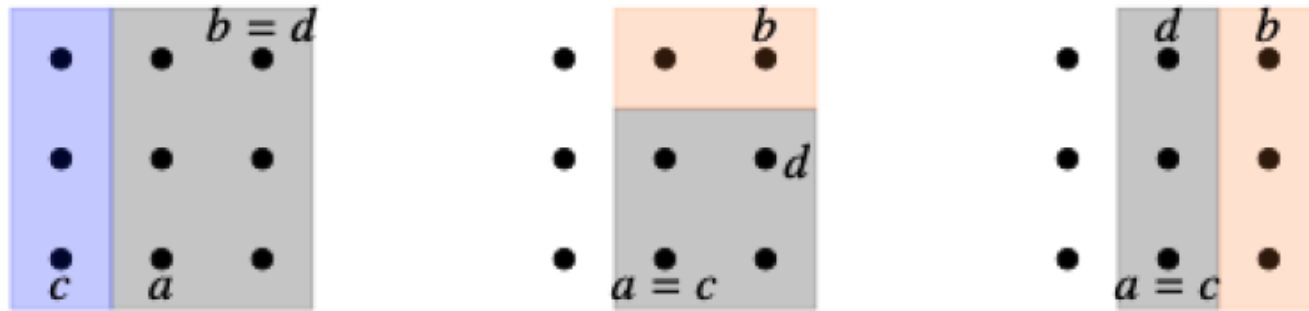
Alt Text:

A 200 Kilometer scale map of eastern Europe, the western part of Russia, and Scandinavia; entries for Syria, Afghanistan, Nepal, India, etc. have lines pointing to Moscow, which has a line going to Murmansk in the far north, and to Saint Petersburg in the mid-west, which then follows onto Murmansk as well. From Murmansk arrows go to the Finland border the crossing points of Storskog in the far north, Raja-Jooseppi a bit further south, and Salla further south but still in the top one-quarter of the Finnish territory.

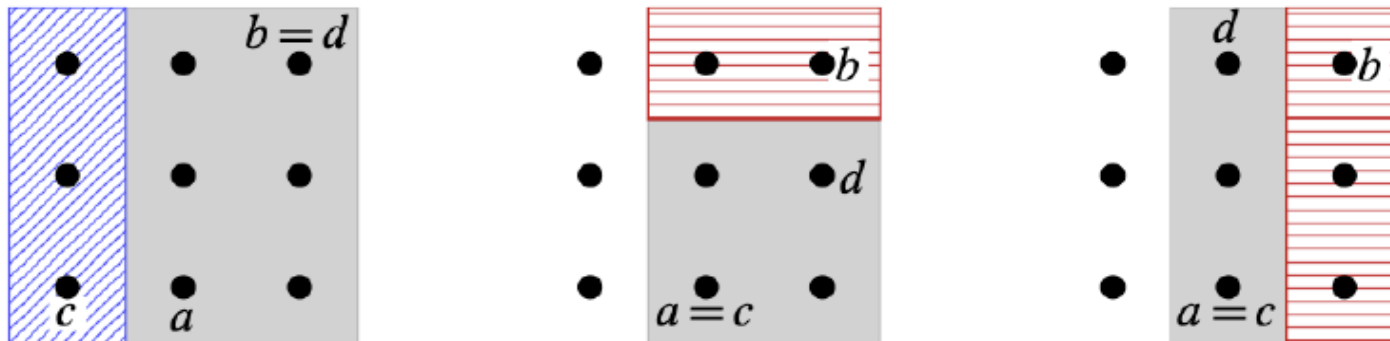
Source: Taylor & Francis. [Accessible content in Asian Studies](#)

Color Alone Is Not Sufficient

Original version:



Revised accessible version:



Color Alone Is Not Sufficient



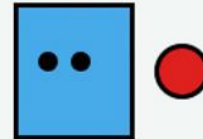
Accessible



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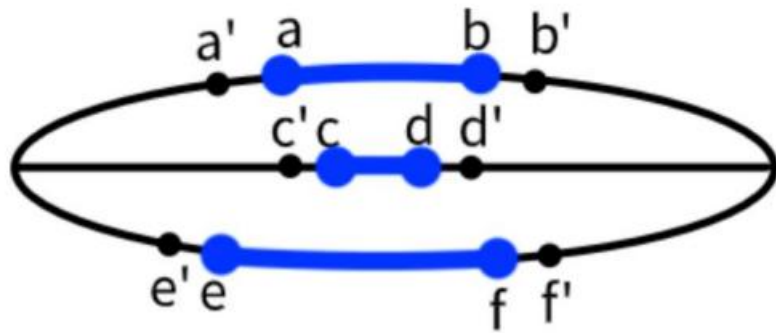


Not Accessible

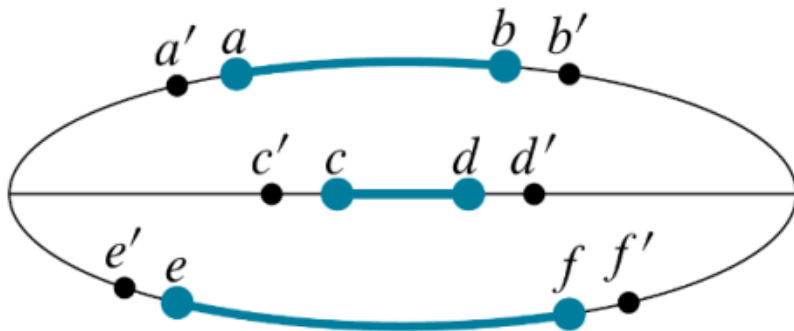


Color Contrast Matters

Original version:



Revised accessible version:



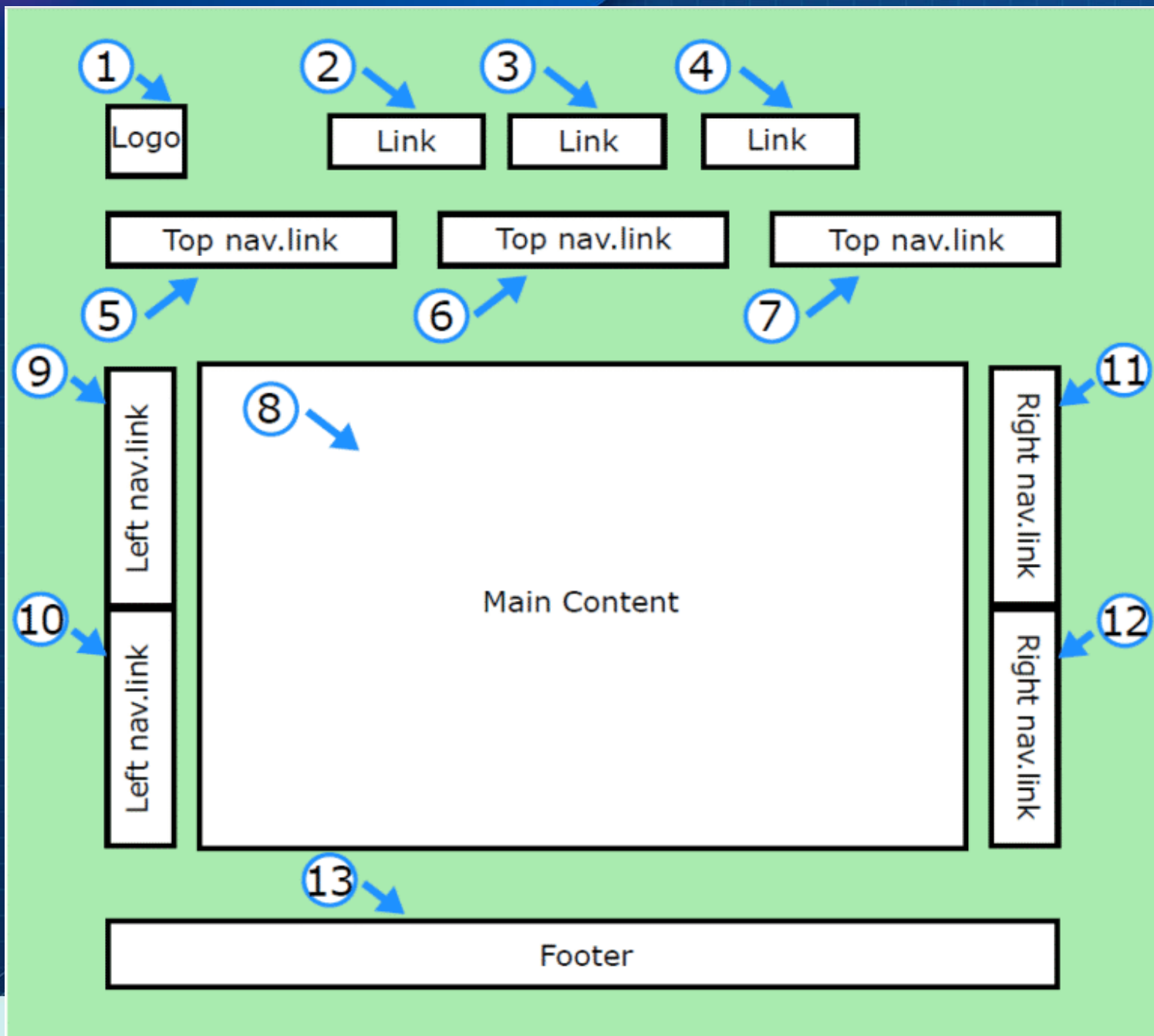
Revised Accessible Version

- Always check color contrast of figure elements against adjacent color(s)
- Use tools like [WebAIM: Color contrast checker](#)
- Minimum contrast ratio: 4.5:1 for text colour contrast against background colour
- Original contrast: 2.44:1
- Revised contrast: 4.61:1

Operable

- User interface components and navigation must be operable
- Keyboard focus & trap
- Clear, descriptive link text
- Enough time
- Navigable

Navigation Order



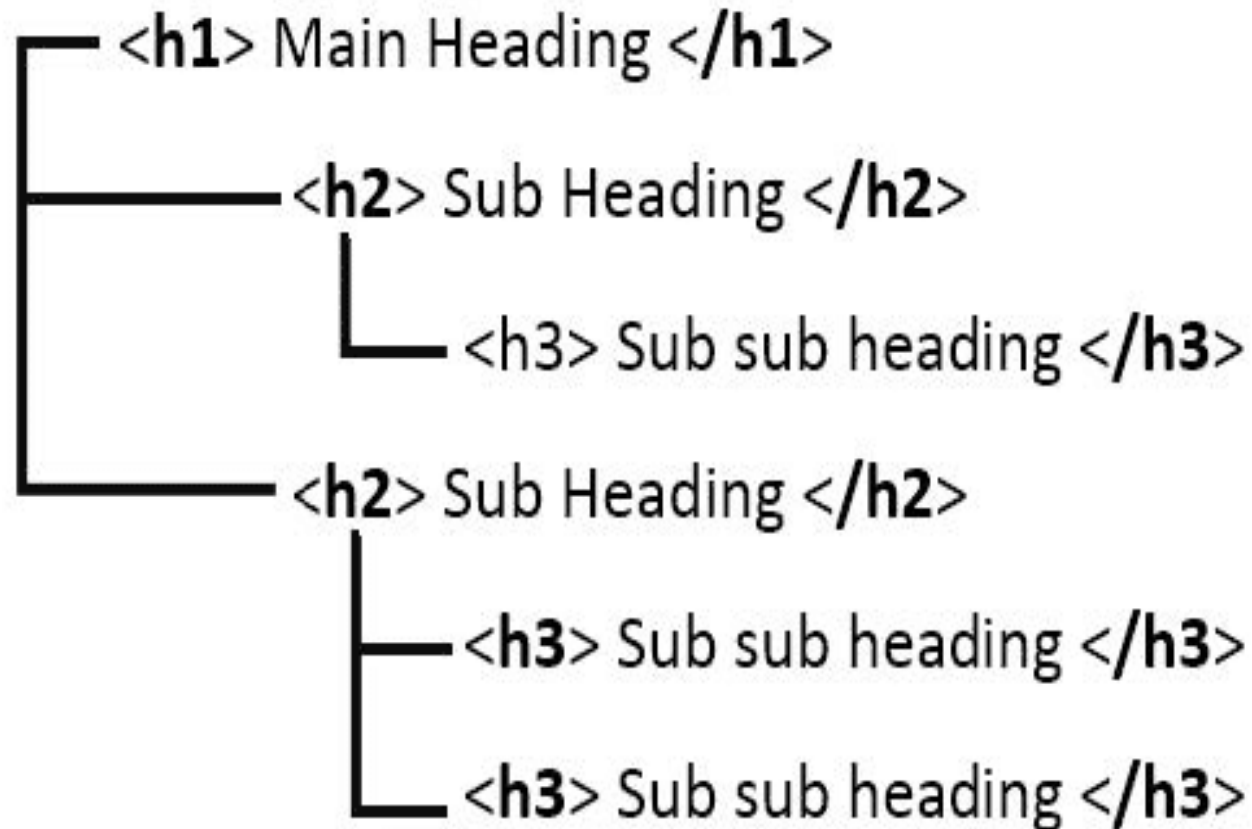
Clues with Hyperlinks

1. Example **HR Service Center** **X** Not Accessible
2. Example <https://ooc.usc.edu/compliance-programs/ada/> **X** Not Accessible
3. Example [Learn More](#) **X** Not Accessible
4. Example [Office of Institutional Accessibility and ADA Compliance](#) **✓** Accessible

Understandable

- Information of the user interface must be understandable
- Plain language
- Error messages
- Field labels

Understandable



Robust

- Content must be robust enough to be interpreted by user agents
- Clean, valid HTML
- Testing across multiple browsers

Accessibility Testing Tools

- WAVE
- Windows Narrator
- Chrome DevTools
- Lighthouse
- WebAIM: Color contrast checker

PDF File

This content may contain URLs/links that would redirect you to a non-EBSCO site. EBSCO does not endorse the accuracy or accessibility of these sites, nor of the content therein.

1174 McLEAN AND OTHERS: RUBELLA VIRUS INFECTIONS

Canad. Med. Ass. J.
Dec. 3, 1966, vol. 95

SUMMARY

An analysis has been made of the increase in lung cancer mortality in Canada for the period 1936-1964. The general mortality increases sharply for both sexes up to age 50, after which the rate of increase tends to slacken. Over the years the increases in mortality have been more pronounced at the older ages; the greatest of these increases occurred between 1936 and 1952.

Cohort analysis of the mortality data shows that there has been a relatively constant increase for the

male cohorts born between 1861 and 1901 but after 1901 a much slower rate of increase occurred. It is predicted that the male death rate from lung cancer in Canada will become stable within the next 10 to 15 years.

REFERENCES

1. PHILLIPS, A. J.: *Canad. Med. Ass. J.*, 71: 242, 1954.
2. *Idem: Ibid.*, 93: 63, 1965.
3. *Idem: Ibid.*, 84: 795, 1961.
4. KORTEWEG, R.: *Brit. J. Cancer*, 5: 21, 1951.
5. CLEMMENSEN, J.: The epidemiology of cancer in Denmark, *In: Cancer*, vol. 3, edited by R. W. Raven, Butterworth & Co. (Publishers) Ltd., London, 1958, p. 241.

Rubella Virus Infections During Pregnancy, Toronto, 1963-66

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Accessibility Audit of Library's Digital Presence

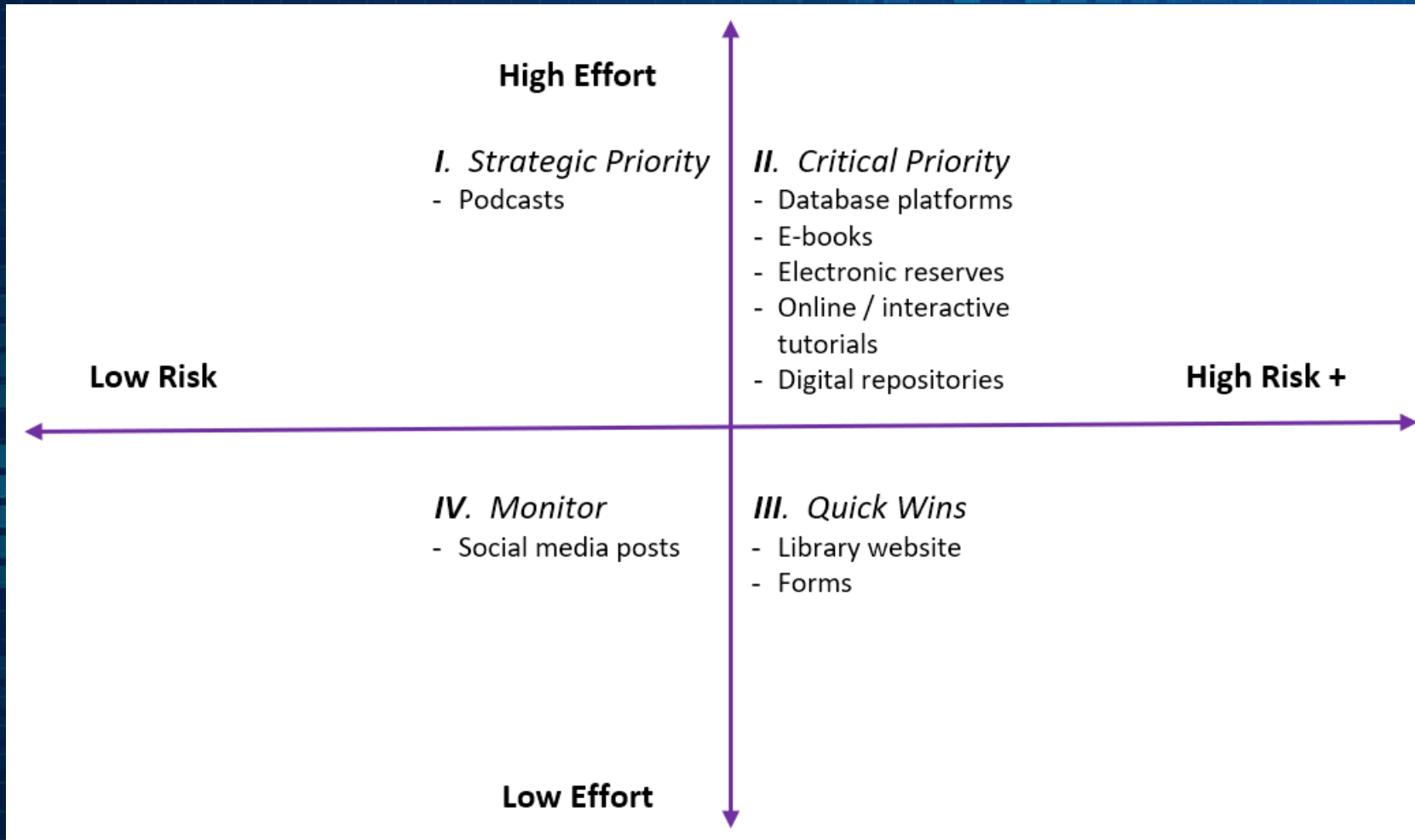
Accessibility Audit

- Inventory
- Tools: WAVE, Windows Narrator, Chrome DevTools, Lighthouse, WebAIM: Color contrast checker
- Setting Priorities
- Accessibility Literacy
- Library Policies and Services
- Working with vendors

Building a Sustainable Framework

- Policy & governance
- Accessibility statement and form
- Services
- Accessibility literacy & capacity building
- Integration into workflows

Risk / Efforts Matrix



Working with Vendors

Working with Vendors

- Vendor Accessibility Documentation
 - Accessibility policy / statement
 - VPAT (Voluntary Product Accessibility Template)
 - ACR (Accessibility Conformance Report)
- Contract Language
 - Accessibility warranties
 - Indemnification clauses
 - Remediation timelines
 - Ongoing compliance commitments
- Risk Prioritization Framework

Vendors	Accessibility Statement	Confirmation Standards	VPAT / ACR Reports
Clarivate (Ex Libris, ProQuest)	Site	WCAG 2.1 AA, Section 508 of the U.S. Rehabilitation Act	Report
EBSCO	Site	WCAG 2.2 AA, Section 508, EN 301 549 standards	Report
Elsevier	Site	WCAG 2.1 AA	Report
JSTOR	Site	WCAG 2.2 AA, Section 508	Report
OCLC	site	WCAG 2.2 AA, ADA (US), Sections 504/508, UK's Equality Act, European Accessibility Act / EN 301 549, AODA (Canada)	Request form at its accessibility portal
SAGE	Site	WCAG 2.1 AA	Report
SIAM	Site	WCAG 2.1 AA	Contact support
Springer Nature	Site	WCAG 2.2 AA	Report
Springshare	Site	WCAG 2.1 Level AA	Report
Taylor & Francis	Site	WCAG 2.2 AA; EAA, UK Equality Act, ADA	Report

VPAT & ACR

- Developed by Information Technology Industry Council and U.S. General Services Administration
- Vendor VPAT:
 - VPAT issued within the past 18 months
 - VPAT covers WCAG 2.1 Level AA (not only 2.0 or Section 508)
 - VPAT was produced by a qualified third-party auditor, not solely self-reported
 - Known conformance gaps are documented with remediation timelines
- EDS VPAT
- EDS Roadmap

HCVAT

- Higher Education Community Vendor Assessment Toolkit
- Questionnaire for third-party solutions
- Cybersecurity, IT, data, privacy, **accessibility**, and procurement
- Meet regulatory requirements
- Streamline vendor assessment process
- HCVAT 4

Procurement Process

Supplier survey

- Provide supplier accessibility statement
- Meet WCAG2.1 AA standards?
- a recent (preferably within 1 year) VPAT, HECVAT, o ACR report?
- accessibility roadmap?
- Documented process for reporting and tracking accessibility issues?
- What types of accessibility testing?
- USC Digital Accessibility Procurement Survey

Procurement Process

Equally Effective Alternate Access Plan (EEAAP) – Three E's

- Equally Integrated
- Equally Effective
- Equivalent Ease of Use

Alternative Ways

- What additional resources will be necessary
- What additional training is required,
- how use of the EEAAP will be communicated to users
- How will the accessibility issue be addressed with the Supplier

USC EEAAP

EBSCO Remediation Request

Dang, L. Q. (2024). Women and urban flooding vulnerability: A case study from Can Tho City in the Vietnamese Mekong Delta. *Asia Pacific Viewpoint*, 65(2), 231–247.

Huynh-Van, B., Vuong-Thao, V., Huynh-Thi-Thanh, T., Dang-Xuan, S., Huynh-Van, T., Tran-To, L., Nguyen-Thi-Thao, N., Huynh-Bach, C., & Nguyen-Viet, H. (2022). Factors associated with food safety compliance among street food vendors in Can Tho city, Vietnam: implications for intervention activity design and implementation. *BMC Public Health*, 22(1), 94.

ProQuest Scanned Image Request

Crane, S. (1999, 03). Water, Water Everywhere: SEE HOW PLANTS "DRINK" WATER. *Parents*, 74, 185-186.

Dickens, R. L. (1960). Income from charitable contributions. *New York Certified Public Accountant (Pre-1986)*, 30(000001), 39.

HEILBRONER, R. L. (1970). On the possibility of a political economics. *Journal of Economic Issues*, 4(4), 1.

ASPIRElist

- Accessibility Statements Promoting Improved Reading Experience
- Ranking of the accessibility of digital content and platforms
- Measure how transparently publishers and their platforms communicate their accessibility features
- ASPIREpublisher
- ASPIREplatform

Collaborative Efforts & Alliance

- BTAA Library Accessibility Collaboration
- ELUNA Accessibility Community of Practice
- Library Accessibility Alliance
- SUNY EIT Accessibility

BTAA Library Accessibility Collaboration

- Composition
 - IT Accessibility Group
 - ADA Coordinators
 - Learning Technology Leaders
 - Library Accessibility Group
- Resources
 - Library initiatives standardized agreement language.
 - Library e-resource standardized accessibility – License language.
 - Digital Accessibility Vendor Cookbook
 - Webinars

Accessibility as a Journey

- A civil rights obligation, not just technical compliance.
- WCAG 2.1 AA is the legal benchmark
- Vendor management is a core professional competency.
- From reactive to proactive governance
- Build a community

“Design amplification”

- “Innovations created for users with accessibility needs can be amplified to unlock universal value”
- Examples:
 - Walk-In Tubs
 - Alternative text
 - PDF Accessibility: The Ohio State University

How Designing with Disability in Mind Sparks Innovation

by Vijay Govindarajan, Kinya Seto, Tojin T. Eapen and Christine Moorman

February 9, 2026



Jayne Burrows/Stocksy

Three Actions

1. Embed accessibility constraints into innovation process and workflows
2. Invest in amplification-ready technologies
3. Restructure your customer research

BEYOND BOUNDARIES: New Modes of Access and Accessibility through Emerging Technologies Symposium

Thank You!

Organised by:

