

**ADA COMPLIANCE FOR
WEB INFORMATION AND MOBILE APPS**

TO: ICRMT Members
FROM: IFMK Law
DATE: August 20, 2025
RE: Final Rule Re. ADA Requirements for Web and Mobile Apps¹

The Department of Justice issued a [Final Rule](#) last year implementing Title II of the Americans with Disabilities Act and setting standards for state and local government to ensure that their web content and mobile applications are accessible to persons with disabilities. Public bodies must comply with a web content accessibility guideline, known as [WCAG 2.1, Level AA \(June, 2018 version.\)](#).

Public bodies with a total population of 50,000 or more must comply with the accessibility requirements by **April 24, 2026**.

Public bodies with populations of less than 50,000 and “special district governments” must comply by **April 26, 2027**. A special district government is defined as a public entity, other than a county, municipality, township, or independent school district, authorized by State law to provide one function, or a limited number of designated functions, with sufficient fiscal autonomy to qualify as a separate government and whose population is not calculated in the most recent Census.

Generally speaking, web content includes government websites, webpages, video, audio, web applications, social media, documents and other content published on the web. Mobile apps include any application that is sponsored by the public body, such as apps to pay for parking, report a pothole, or connect with the government for some other reason.

WCAG 2.1 sets guidelines to make content perceivable, operable, understandable, and robust, and includes specific criteria for achieving accessibility. As an example, to make non-text content perceivable, a text alternative that serves an equivalent purpose must be provided. To make content operable, all functionality must be available using a keyboard. Content must be understandable to users and must be language programmable. Content must also be robust, meaning that it can be interpreted by a wide variety of assistive technologies.²

The accessibility requirements apply whether the public body’s website or mobile applications are maintained by the public body itself or through a contract with a third party.

¹ This memo is not an exhaustive summary of the Final Rule or WCAG 2.1 standard. It was prepared by IFMK Law for informational purposes only. It is not to be considered as legal advice. Member entities should consult their State’s Attorney, Corporation Counsel, or other legal advisor before taking any action or revising any policy based on this memo.

² These are just a few examples of the types of guidelines in WCAG 2.1.

To ensure compliance by the deadline, budgeting and planning for the necessary changes should begin as soon as possible. Public bodies should consult with a qualified IT professional now to evaluate the current accessibility of their web and mobile applications and determine where improvements are needed to comply with WCAG 2.1, Level AA (2018 version) before the deadline.