

# ADA Title II Digital Accessibility FAQ and Resource Document

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### Purpose:

*This document aims to answer frequently asked questions about ADA Title II Digital Accessibility regulatory changes taking effect **April 26, 2027** (newly extended deadline). It provides answers to questions from the basics of what Title II is to specific topics within the regulatory changes. This document also provides various resources for preceptors to utilize in updating their educational materials.*

### FAQs:

#### Broad/Background Information:

##### 1. What is Title II and why do I need to care about it?

Answer: The American with Disabilities Act (ADA) was originally approved in 1990 with the purpose of prohibiting discrimination against individuals with disabilities. It was intended to apply to all areas of public life including employment, transportation, education and state and local government. The ADA was separated into two different Subchapters (or Titles). Title I covers Employment and Title II covers Public Services. The original act has been amended several times. The regulations associated with ADA have undergone revisions as well. In April 2024, the Department of Justice (DOJ) issued a revised ruling under the Americans with Disabilities Act (ADA) related to Title II, requiring that all student-facing web and digital content be accessible. The new standards are designed to ensure that individuals with disabilities are not excluded from participating in, or denied the benefits of, services, programs, and activities of public entities. Colleges of pharmacy must comply with these requirements by **April 26, 2027**. There are numerous sites that can provide background to the Title II initiative: <https://www.ada.gov/resources/2024-03-08-web-rule/>.

##### 2. What pharmacy educators are included in Title II policies and what does it mean for them?

Answer: Title II of the American with Disabilities Act has been in place for some time. The digital and mobility requirements are what have changed. The rule applies to entities and employers rather than individual people. Frequently, the rule will refer to State and Local governments; however, this

includes a long list of organizations including public universities and those who provide services to them - including experiential preceptors for APPE and IPPE rotations.

### **3. What is digital accessibility?**

Answer: Digital accessibility refers to making digital content such as websites, applications, electronic documents, and electronic communications accessible to everyone, including those with disabilities. Its focus is on removing digital barriers so that everyone can participate in the digital world. The core principles of digital accessibility emphasize that content should be perceivable, meaning information can be experienced regardless of sensory ability. Examples include providing alternative text for images, adding captions to videos, and using sufficient color contrast so users with visual or hearing impairments can access the information. Content must also be operable, ensuring all users can effectively interact with it. This includes designing websites and documents that can be navigated using a keyboard and avoiding flashing elements or small, difficult-to-click buttons that limit usability. In addition, content should be understandable in both presentation and function. This can be achieved by providing clear instructions, maintaining consistent navigation, and including helpful error messages that guide users in completing tasks successfully. Finally, digital materials must be robust, meaning that they are structured in ways that can be reliably interpreted by a variety of technologies, including assistive tools such as screen readers. For example, documents should use proper heading structures and accessible tables so assistive technologies can interpret the content correctly. Digital accessibility allows for more inclusive participation in education, work, and daily life by ensuring digital information can be accessed and used by the widest range of people possible.

Resource: [North Carolina Department of Public Instruction - Introduction to Digital Accessibility](#)

### **4. What does it mean to make a document accessible?**

Answer: A digitally accessible document ensures that the information in the document is accessible to everyone, including those with disabilities. For example, digitally accessible documents are specifically formatted to enable the use of screen readers to allow an individual with visual impairment to use and understand the document contents. Documents and other digital content must be formatted to comply with the technical standard "Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA" to ensure that the digital content meets the newly updated ADA Title II requirements for digital accessibility. This includes the use of heading structures, alternative text for images, captions on videos and proper color contrast.

Resources:

[Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments, Highlights of the Requirements in the Rule](#)

[Web Accessibility Initiative – WCAG 2 Overview](#)

**5. What are the types of digital content that need to be accessible by everyone, including people with disabilities?**

Answer: The types of digital content that need to be accessible by everyone, including people with disabilities, include websites, electronic documents (such as PDFs, word-processor documents, presentation or slide decks, and spreadsheets), course materials, videos or other multimedia content, mobile apps and social media posts.

**6. The school of pharmacy hasn't told me anything about Title II, do I still need to do anything for my rotation?**

Answer: More and more universities are including information on their websites about the Title II changes. This applies to the whole university rather than just colleges of pharmacy. Title II has always applied to experiential pharmacy students - what is new is the requirement to provide a digitally accessible environment for learners. Asking your college or school of pharmacy about ADA Title II as it applies to your rotation would likely be the best way to get additional information on what they would like you to do for their students.

Resources:

[University of Connecticut Office for Inclusion and Civil Rights, Accessibility](#)

[University of Illinois Chicago – ADA Title II Changes: What to Know](#)

**7. What are the most common accessibility barriers in pharmacy education, and how can faculty address them?**

Answer: Each institution, program, site, and individual will have different issues to address with their legacy content. Providing content in various formats and considerations for a variety of audience/learner needs like visual, audio, and tactile may be new to the facilitator or instructor. Preceptors should consider various types of disabilities and what actions should be taken to accommodate learner needs (eg, autism, health-related barriers, learning disabilities, visual disabilities, mental health disabilities, physical disabilities). Content format, levels of learner engagement, and content delivery methods are all potential elements for adjustment. Tips for preceptors to make content accessible include: 1. audit current rotation content for accessibility barriers, 2. create a plan to make rotation content accessible, prioritizing the most time-sensitive content and biggest accessibility barriers, and 3. remediate and redesign content as needed.

Resources:

[Online Learning Consortium – New Federal Digital Accessibility Requirements: What Higher Ed Needs to Know and Do Now](#)

[Texas A&M University Faculty Guide: Teaching & Interacting with Students with Disabilities](#)

[Online Learning Consortium – Top Recommendations to Increase the Accessibility & Inclusiveness of Your Presentation](#)

## Tools:

### **8. How should preceptors evaluate and update their current digital content to ensure accessibility?**

Answer: There are number of accessibility checkers that preceptors can use to ensure that digital content is accessible. The most readily available checkers are part of the programs/applications that are used to create digital content (eg, Microsoft Office suite programs, Google apps). Free webpage accessibility checkers include [WAVE by WebAIM](#), [Axe DevTools browser extension by Deque](#), and [ARC Toolkit browser extension by TPGi](#). Free PDF accessibility checkers include [PAC by Axes4](#) free download and [PAVE web-based PDF validator](#). There are accessibility tools within Adobe Acrobat Pro ([Adobe Guide - Create and verify PDF accessibility](#)) that are subscription-based.

### **9. What tools are available to help preceptors transition current digital content into accessible digital content?**

Answer: Most accessibility checkers provide guidance about how to make content accessible if non-accessible content is identified. For example, there are various tools and templates available for creating new content or remediating content within Microsoft Office suite programs, Google apps, or Adobe programs. Individual institutions may have preferred resources, so check with the school or college before starting to change content. If the school does not have specific guidance for preceptors, general resources for templates and specific document remediation tips such as this one can be used: [Online Learning Consortium - Creating Accessible Documents](#)

Alternatively, if you are reviewing/auditing content for accessibility or have already remediated content and would like to ensure that it meets accessibility requirements, an accessibility checker can be used. [Online Learning Consortium - Accessibility Evaluation Tools](#)

### **10. How do I know if the accessibility changes that I have implemented fulfill the Title II requirements?**

Answer: No one person or department is solely responsible for implementing Title II requirements for all educational content. While the preceptor may be responsible for the rotation content, the institution is available to help and support. Some institutions may have a specific plan for implementation which involves internal review and others may have specific resources that should be used to ensure compliance. However, some institutions may not provide this guidance. Many tools and resources are available to help preceptors evaluate the accessibility of various forms of digital content (eg, webpages, PDFs, documents, presentation slides) to ensure compliance.

## Resources:

[Online Learning Consortium - Accessibility Evaluation Tools](#)

[Instructional Designers' Perception of Accessible and Inclusive Online Course Design](#)

## Finer Detail Information:

### **11. How do I add alternative text to images?**

Answer: Alternative (alt) text is a written description of the content of an image that cannot be interpreted with screen reading technologies. Alt text descriptions allow users to gain some information about an image that they cannot otherwise "see", which could also include important content (unless the image is only decorative). Examples of images that need alt text include pictures, photos, graphs, charts, and diagrams. Alt text can be added in most document creation programs with built-in accessibility checking tools. Accessibility tool menus have prompts to add and/or confirm alt text, and many programs include an "add alt text" option after right clicking on the image. Some programs can automatically suggest alt text using artificial intelligence technology, which the user can subsequently edit if needed.

Resource:

[General Services Administration - Authoring Meaningful Alternative Text](#)

### **12. How do I make descriptive hyperlinks?**

Answer: Individuals who use screen readers rely on text being read aloud to navigate digital content. When encountering a hyperlink, screen readers typically announce the presence of a link followed by the hyperlink text, whether it is a web address or descriptive text. For this reason, users should be able to determine the purpose or destination of a link based solely on the hyperlink text. When creating hyperlinks, the link text should be concise and meaningful when read out of context; therefore, vague phrases such as "click here" or "read more" should be avoided. Long URLs should also not be used as hyperlink text, as they can be difficult and cumbersome for screen reader users to interpret. The process for creating descriptive hyperlink text varies by application, but in general, authors can highlight the desired text, select the link or insert hyperlink option, and enter a clear, descriptive phrase as the display text while providing the corresponding web address as the link destination.

Resource:

[General Services Administration - Accessibility Bytes No. 4: Descriptive Links and Hypertext](#)

### **13. How do I add headings to a document?**

Answer: Headings are important features of accessible documents because they allow screen readers to interpret the document's structure. Nuances in text that can be interpreted by the human eye (eg, bolding, underlined) are not captured by screen readers, so accessible documents require the addition of headings. Most word processor programs have built-in headings such as titles, subtitles, and heading levels - the style of the text can be changed with a single click, either before typing or when the appropriate text is selected. The more headings are present in a document, the easier it will be for a screen reader to communicate the document structure to the user.

Resource:

## General Services Administration - Module 2: Use Styles to Create Headings

### **14. My PDF is not accessible. What are my options?**

Answer: PDF documents are more complex than text-based documents made by word processors, so they are more challenging to make accessible. PDF documents have 3 layers of content - visual information, textual content, and tags. Every structural element of a PDF document should have a tag, and screen readers follow the tags to read through a document. Therefore, missing tags, or tags in an incorrect order, will lead to an incorrect interpretation by a screen reader. Title II requires preceptors to provide fully accessible digital content (including PDFs) to our learners; however, in many cases the preceptor does not have access to the source document that was used to create the PDF document, so the instructor cannot make the changes required for accessibility. In this case, the instructor has the following options: 1) convert the document to an easier format to remediate (such as a word document), 2) for published content, share a link to the HTML version (which the learner can read following their usual methods for HTML content), or 3) provide the original PDF to learners and clearly mark it as inaccessible, then work with individual learners to try to meet their specific accessibility needs regarding that content.

Resources:

[WebAIM web accessibility in mind - PDF Accessibility](#)

[General Services Administration - Create Accessible PDFs](#)

[Adobe guide - What is an accessible PDF](#)

### **15. Why is color contrast important?**

Answer: Color contrast refers to the difference in color between text or images and its background. It is important to ensure that content is readable and usable by all individuals, including those with visual impairments such as low vision and color vision deficiencies. Accessibility guidelines define specific contrast ratios to help ensure readability. For most standard text that is smaller than 18-point font or 14-point bold font, the contrast ratio between the text and its background should be at least 4.5 to 1. Larger text, such as text that is 18-point or larger or 14-point and bold, only requires a contrast ratio of 3 to 1 because larger text is generally easier to read. These contrast requirements do not apply to decorative text, text that is part of an inactive user interface element, text that is not meant to be visible, or text that appears within a logo or brand name. These standards help ensure that digital content remains readable for a wide range of users.

Resource:

[General Services Administration - Testing Color Contrast in Non-Web Documents and Images](#)

### **16. How do I make videos and podcasts accessible?**

Answer: To ensure that videos and podcasts are accessible they should include audio descriptions, synchronized captioning, transcripts, and accessible player. Audio and video creation programs (eg, Zoom, Panopto) can help preceptors make videos and/or podcasts accessible via captioning

and transcription features. The [University of Michigan Library on podcasting and audio storytelling](#) may be a useful resource for preceptors who need to make video or audio content accessible.

Resource:

[ADA Site Compliance - Making Podcasts Accessible: Tips for Engaging a Diverse Listener Base](#)

### **17. What if I can't make a file accessible?**

Answer: When an individual preceptor is having difficulty making a specific document accessible, the first step is to access institution- or organization-level accessibility support resources. Colleagues and experts in digital accessibility may be able to help. If those resources are not able to make a specific document accessible, the preceptor should check their institutional policies. Some institutions have adopted a "do your best" approach and are comfortable with less than perfect accessibility if reasonable efforts toward accessibility have been made. Other institutions require 100% accessibility - in this case, the non-accessible document cannot be shared with learners, and the preceptor must find an alternative way of conveying the information. A hybrid approach is to provide the non-accessible document (clearly labeled as non-accessible) and state in writing that you will collaborate with learners on a case-by-case basis to find an alternate way of conveying the non-accessible content.

*Reference clinical information:*

*The reference and resources were included in each questions answer as it is intended to answer the question but also provide the reader with additional information if they would like more detailed information. There are various resources available and each institution may have specific tools and resources for faculty and preceptors to utilize as they work towards ADA Title II compliance.*

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