

Client Brief

May 29, 2026

Topic: Website compliance with Section 504 of the Rehabilitation Act

The Law: 45 CFR § 84.84 Requirements for web and mobile accessibility [emphasis added]

(a) *General.* A recipientⁱ shall ensure that the following are readily accessible to and usable by individuals with disabilities:

- (1) Web content that a recipient provides or makes available, directly or through contractual, licensing, or other arrangements; and
- (2) Mobile apps that a recipient provides or makes available, directly or through contractual, licensing, or other arrangements.

(b) *Requirements.*

(1) Beginning **May 11, 2027**, a recipient **with fifteen or more employees** shall ensure that the web content and mobile apps that the recipient provides or makes available, directly or through contractual, licensing, or other arrangements, comply with Level A and Level AA success criteria and conformance requirements specified in WCAG [Web Content Accessibility Guidelines] 2.1, unless the recipient can demonstrate that compliance with this section would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens.

(2) Beginning **May 10, 2028**, a recipient **with fewer than fifteen employees** shall ensure that the web content and mobile apps that the recipient provides or makes available, directly or through contractual, licensing, or other arrangements, comply with Level A and Level AA success criteria and conformance requirements specified in WCAG 2.1, unless the recipient can demonstrate that compliance with this section would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens.

How to meet

WCAG 2.1: For a quick guide, see <https://www.w3.org/WAI/WCAG22/quickref/?versions=2.1>. Talk to your IT vendor or website designer/manager about WCAG 2.1 to confirm that you are in compliance.

ⁱ Any program or activity receiving federal financial assistance from HHS, including physician practices.

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