



VCU Compliance Update: ADA Title II Digital Accessibility Deadline Extended

By Katy Washington, J.D., Ph.D., Chief Accessibility Officer/ADA/Section 504
Coordinator, VCU Equity and Access Services

On April 20, 2026, the Department of Justice published the *Extension of Compliance Dates for Nondiscrimination of the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities*. This [Interim Final Rule \(IFR\)](#) officially extends the compliance deadlines for the accessibility of web content and mobile applications under Title II of the Americans with Disabilities Act (ADA) by one year. Under the Interim Final Rule (IFR), the compliance deadline for large public entities like VCU is now April 26, 2027. No other provisions of the 2024 rule have been changed.

The publishing of the IFR in the Federal Register signals the beginning of a 60-day comment period that ends June 22, 2026, to provide the public an opportunity to provide feedback (i.e., comment) about the one-year extension. By definition, an interim final rule is a procedural shortcut that makes the rule effective immediately upon publication. While the interim rule is effective immediately to postpone the compliance deadline for 12 months, the IFR states that “regardless of the compliance dates, covered entities have an ongoing obligation to ensure that their services, programs, and activities offered using web content and mobile apps are accessible to individuals with disabilities in accordance with their existing obligations under title II of the ADA.”

As Chief Accessibility Officer, my recommendation is we must treat the extension as an opportunity to accelerate documented, risk-based remediation and to shore up legal and procurement practices that reduce litigation risk. Next, we must use this additional time to shore up legal, procedural, and procurement practices that reduce the likelihood of VCU community members encountering a digital access barrier and the university’s litigation risk as well as build a centralized digital accessibility infrastructure to support digital accessibility efforts beyond academic affairs.

I look forward to continued campus collaborations and conversations to ensure VCU can demonstrate its preparedness to comply with ADA Title II technical requirements under WCAG 2.1 Level AA.