

WCAG 2.1 LEVEL AA STANDARDS - ACCESSIBILITY

Hola Senate Committee Leaders,

I wanted to share with you all more information about the WCAG 2.1 Level AA standards for all our Senate Committees.

Cindy and I have done a lot more research into law and regulations, and this is what we have found:

Historical archival documents accessible to the public are generally not subject to the Department of Justice (DOJ) 2024 web accessibility rules (under [ADA Title II](#)) if they meet specific criteria, including being created before the compliance date, kept only for research/reference, and located in a dedicated archive. However, these documents must still adhere to WCAG 2.1 Level AA standards if they are modified, used for current services, or are not in a separate, clearly identified archive.

Exceptions for Archived Web Content

According to [ADA.gov resources](#), digital, historical, or archived documents are exempt from accessibility requirements only if they meet all five of the following criteria:

- **Pre-existing:** The content was created before the entity's ADA compliance deadline or reproduces physical media created before that date.
- **Reference Only:** The content is maintained exclusively for research, reference, or recordkeeping.
- **Dedicated Area:** The content is housed in a specific, clearly labeled archival section.
- **Unchanged:** The content has not been modified or updated since it was archived.
- **Not Actively Used:** The content is not used for current, active, or essential government services.

When Accessibility Rules Apply

Even if items are labeled "archives," they must follow DOJ accessibility rules (WCAG 2.1 Level AA) if they are used for current, active, or essential government services (e.g., a 2018 PDF that still provides instructions for a current park service). Additionally, the DOJ emphasizes that, for usability, these archived areas should still be clearly identifiable to people with disabilities.

Key Takeaways

- **Applicability:** The new rules primarily apply to active, current digital content from state and local governments.
- **Exceptions:** True, static, historical, and archived documents (like old meeting minutes, research papers, etc.) that are not used for current services are generally exempt from the 2024 DOJ final rule.
- **PDFs:** [Web Content Accessibility Guidelines \(WCAG\)](#) still apply to PDFs, but only to those that do not qualify for the archive exception.

We also found a good example of what another university is doing to handle the accessibility of their older documents: University of Kentucky: <https://ada.uky.edu/digital-accessibility/archived-web-content>.

What this means for our committees is that all our supporting data can be retained on our website spaces if they were created prior to April 24, 2026, and are archived as historical documents. They should follow the criteria listed above: a) pre-existing, b) reference only c) in a dedicated archival section d) unchanged

This means we can maintain information to the public as Brown Act Committees. I suggest archiving all your previous minutes, agendas, and training materials that we made prior to the April 24, 2026, deadline.

Moving forward, all committees should either make sure all documents are in compliance with the law or maintain data on a SharePoint for their committees with forward-facing lists for members of the public to see in order to request access to materials that are not in compliance with the law. The Academic Senate is planning to have all supporting documents listed with the agenda and stored on a SharePoint, unless requested by the public. We will maintain all our agendas and minutes as accessible files for the public from the April 26th date and move forward until the college pursues a more permanent fix. This way, the public will be able to easily request supporting documents that they need for their references. We will be training our Senators on how to utilize SharePoint in the coming meetings.

For some committees, SharePoint is not new. GE and CC have been using SharePoint for its members for supporting and supplemental data for a while now. For other groups, it will take some training. You will need to request the SharePoint via the district IT office, and then you will need to add your members to it.

In terms of the accessibility documents, I am attaching the template that IT created that both the Academic Senate and GE committee have been using. I left examples of how the

GE committee has used the agenda template on the blank one. The main thing is to not change the colors, font, and headers. You can change the content of what you include on your agenda or what you call each section. For the minutes, we add everything to the agenda as bullet points under the appropriate heading (I included an example of GE minutes for your review).

When you convert the files to PDF, you will need to access the accessibility tools on the left side of Adobe. Click the "more" arrow to find the purple looking person that says check accessibility. Eloine Chapman made a video to walk the GE committee on what to look for, and I am including that here too. It is short and very easy to follow. One of the main tasks you need to complete is to add the title to the adobe files. Please review the video for more information: [adding a title to a PDF](#).

Please reach out with questions, concerns, and follow-up. I believe this process will be a temporary fix until the college determines if it will purchase the updated version of Board Docs, which is supposed to roll out in fall 2026.

Appreciate you all and the labors around the accessibility requirements.

In solidarity,

Adrianna Simone

“Racist’ is not—as Richard Spencer argues—a pejorative. It is not the worst word in the English language; it is not the equivalent of a slur. It is descriptive, and the only way to undo racism is to consistently identify and describe it—and then dismantle it. The attempt to turn this usefully descriptive term into an almost unusable slur is, of course, designed to do the opposite: to freeze us into inaction.”

— Ibram X. Kendi



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