

Section 504, on one page

Federal money brings the duty, and for most nonprofits it covers the whole organization.

For community and social service organizations, schools and camps, health and behavioral health providers, arts and cultural groups, and any organization whose programs get federal money, even through a city, a state or another nonprofit. Every application for the money carries a signed assurance of compliance (45 CFR 84.5; for HHS, form HHS-690).

Who it reaches

- **The whole organization, for most nonprofits.** Where the main work is education, health care, housing, social services, or parks and recreation, every operation is covered, not only the funded program (29 U.S.C. 794(b)(3)).
- **Money passed through someone else.** Federal assistance that arrives through a state, a city or another nonprofit still makes you a recipient. A federal procurement contract doesn't (45 CFR 84.10).
- **Each funder sets its own rule.** HHS, Education and HUD set the coordinator duty at fifteen employees; the Justice Department at fifty employees and \$25,000 in its funding (45 CFR 84.7; 34 CFR 104.7; 24 CFR 8.53; 28 CFR 42.505).

What the organization is required to hold

1. **Coordinator designation.** At fifteen or more employees, at least one person designated to coordinate compliance. The HHS and Education rules say person, not employee (45 CFR 84.7(a); 34 CFR 104.7(a)).
2. **Grievance procedure.** At fifteen or more employees, adopted with appropriate due process standards (45 CFR 84.7(b)).
3. **Notice.** Information about the rule and how it applies, made available to participants, applicants, employees and others (45 CFR 84.8; 34 CFR 104.8).
4. **Self-evaluation.** A review of policies and practices with interested persons; at fifteen or more employees, the record kept on file for three years (45 CFR 84.6(c); 34 CFR 104.6(c)).
5. **Transition plan.** Where a building has to change for a program to be reached: the obstacles, the methods, the schedule and the person responsible, open to public inspection (45 CFR 84.22(e)).

The first 90 days

- **Days 1 to 30: name it, adopt it, give notice.** The organization names its coordinator, adopts the grievance procedure, puts out the notice, and opens one intake path with a dated log.
- **Days 31 to 60: map the money and the programs.** The single audit or the subaward paperwork names each funding agency, and each agency's rule follows (2 CFR 200.501(a); 200.332(b)(1)). Then programs, buildings and websites.
- **Days 61 to 90: self-evaluation under way.** Interested persons take part, the programs people can't fully use get interim measures, and a transition plan schedule is set where needed.

The web and mobile dates

Under HHS's rule, WCAG 2.1 Level AA for web content and mobile apps, including those provided through contracts and licenses: May 11, 2027 at fifteen or more employees and May 10, 2028 below fifteen (45 CFR 84.84(b), as extended in 2026). The extension is challenged in *National Federation of the Blind v. Department of Justice*, No. 1:26-cv-02007 (D. Md.); no ruling had been reported as of October 20, 2026. The Education, HUD and Justice Department rules set no web date; their Section 504 duty still reaches the website.

What to require from whoever performs the work

- **A record the organization keeps.** Signed, dated findings that outlast any subscription.
- **A named method, run by hand.** Such as the DHS Trusted Tester process, with assistive technology. A scan or an overlay isn't conformance.
- **A read of every funder's rule.** The threshold, the notice and who may be designated differ by agency.
- **Accessible deliverables.** Reports a screen reader can read, and PDFs that pass PDF/UA, like this one.
- **Limits in writing.** Architects and counsel where the work needs them, and no promise of guaranteed compliance.

Who performs this

ADA Access for All performs the Section 504 program function for organizations: the coordinator function under the organization's designation, the notice, the grievance procedure, the self-evaluation and the record, with conformance testing of the digital channels. Its principal, Marc Guillaume, holds the ADA Coordinator Certification (ADACC), University of Missouri, current through May 2027, is a DHS Trusted Tester, and served as a Disability Service Facilitator for New York City Public Schools.

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