

Section 504 Rapid Compliance Assessment

Federally-Defensible WCAG 2.1 AA Audit · 4-Week Delivery · Fixed-Fee
ADA Access for All · DHS Trusted Tester Certified · Stony Brook, New York

REGULATORY DEADLINE — MAY 11, 2027

On May 7, 2026, HHS issued an Interim Final Rule extending the Section 504 web and mobile accessibility compliance deadline by one year, aligning it with the parallel ADA Title II extension. WCAG 2.1 AA conformance under 45 CFR Part 84 is now required by May 11, 2027 for recipients of HHS federal financial assistance with 15 or more employees, and by May 10, 2028 for recipients with fewer than 15.

The extension moved the technical deadline — it did not pause the obligation. The Section 504 nondiscrimination requirement has been in force since July 8, 2024, and HHS Office for Civil Rights continues to accept and investigate complaints now. The twelve-month runway is time to build a documented, defensible compliance posture on a sane timeline — not a reason to wait.

WHO NEEDS THIS ENGAGEMENT

Any organization receiving HHS federal financial assistance with public-facing websites, patient or program-participant portals, or mobile applications: hospitals and health systems, federally qualified health centers, schools of medicine and nursing, public health departments, behavioral health providers, HHS-grant-funded programs, and Medicare and Medicaid participating providers operating digital services.

ENGAGEMENT DELIVERABLES

Within four calendar weeks of contract execution, the engagement delivers four artifacts:

- WCAG 2.1 Level AA technical conformance audit conducted using DHS Trusted Tester for Web (TTv5) methodology — the federal Section 508 testing standard. Findings categorized by success criterion, severity, user impact, and remediation complexity.
- Section 504 gap analysis mapping technical findings against the regulatory requirements at 45 CFR Part 84, including treatment of conforming alternate versions, third-party content, exception scope, and undue-burden documentation.
- Written Section 504 Compliance Plan suitable for submission in response to an HHS Office for Civil Rights inquiry. Documents current conformance posture, identified gaps, prioritized remediation timeline with named accountable parties, and procurement-language commitments for new digital systems.
- Methodology attestation letter on ADA Access for All letterhead, attesting to the methodology used, the scope assessed, the findings produced, and the assessor's federal credentials. The attestation is the artifact most directly useful in OCR response and litigation defense.

ENGAGEMENT TIERS & FIXED-FEE PRICING

TIER	SCOPE	FEE	DELIVERY
Tier 1	Single-facility provider or single-program HHS grantee. One website, one patient/participant portal, up to 2 mobile apps, up to 50 templates assessed.	\$11,500	4 weeks
Tier 2	Multi-facility health system or multi-program HHS grantee. Up to 3 websites, 3 portals, 4 mobile apps, up to 150 templates assessed.	\$32,500	5 weeks
Tier 3	Large health system, academic medical center, or state health department. Custom-scoped engagement with on-site assessor time as needed.	\$55K–\$140K	6–8 weeks

WHAT THIS ENGAGEMENT DOES NOT INCLUDE

Code-level remediation. The deliverable is the assessment, gap analysis, plan, and attestation; the organization or its retained development vendor performs the actual remediation work. ADA Access for All can scope a separate remediation oversight engagement on request.

METHODOLOGY STATEMENT

Manual testing performed using DHS Trusted Tester for Web v5 protocol against WCAG 2.1 Level AA success criteria. Automated testing performed using Deque axe DevTools, ANDI, and Color Contrast Analyser as supplementary tools. Mobile applications tested on iOS using VoiceOver and Android using TalkBack. All findings independently reviewed before delivery. Engagement principal: Marc Guillaume, DHS Trusted Tester (TT-2604-08987), University of Missouri ADA Coordinator Certified.

ENGAGEMENT TERMS

- 50% retainer at signing; balance on delivery of attestation letter. Net-15 payment terms.
- Confidentiality and Business Associate Agreement (BAA) executed where the organization is a HIPAA covered entity.
- Professional Liability insurance: \$1M per occurrence (in place at engagement start).
- Engagement principal performs all testing and authors all deliverables.

TO SCHEDULE A 30-MINUTE CALL

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