

Title II program access, on one page

The duty has applied since 1992. The 2027 and 2028 dates add a web and mobile standard on top of it.

For towns, cities, counties, state agencies, school districts and special districts. Each program, service and activity has to be accessible when viewed in its entirety, whether it runs at a counter, in a meeting room or online. An investigator asks for documents first, and a website vendor can't produce them.

The four documents an inquiry asks for first

1. **Coordinator designation and notice.** At 50 or more employees, at least one employee designated, with name, office address and telephone number published, plus public notice of the rights the law gives (28 CFR 35.106 and 35.107(a)).
2. **Self-evaluation.** A documented review of services, policies and practices, open to comment from people with disabilities, kept on file for public inspection for three years at 50 or more employees (28 CFR 35.105).
3. **Transition plan.** Where a building has to change for a program to be reached: the barriers, the steps, the schedule and the official responsible (28 CFR 35.150(d)).
4. **Grievance procedure, adopted and published.** A working path for complaints, so they resolve inside the entity (28 CFR 35.107(b)).

The first 90 days

- **Days 1 to 30: name it, publish it, open one door.** The entity names its designee. The notice and grievance procedure go up, one intake path opens for requests and complaints, and every one is logged with a date.
- **Days 31 to 60: inventory what the entity runs.** Programs, the buildings where they happen, websites, apps, portals, vendor systems and document sets, with a real way for people with disabilities to take part.
- **Days 61 to 90: first findings and interim measures.** The programs people can't fully use today and how each reaches people meanwhile, conformance terms in the next solicitations, and a transition plan schedule where needed. Ninety days starts the self-evaluation. It doesn't finish it.

The web and mobile dates

WCAG 2.1 Level AA for web content and mobile apps, including those provided through contracts and licenses: April 26, 2027 for entities of 50,000 people or more, and April 26, 2028 for smaller entities and every special district (28 CFR 35.200(b), as extended April 20, 2026). Both dates are 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 19, 2026, and neither rule protects an entity that waited.

What to require from whoever performs the work

- **A record the entity 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.
- **Honesty about the designation.** Under Title II it goes to an employee. A provider can perform the function under it, not hold it.
- **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 ADA program function for public entities: the coordinator function under the entity's designation, the self-evaluation, the grievance procedure 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.

info@adaaccessforall.com · Book a 30-minute call at adaaccessforall.com/book

Current as of October 19, 2026. The current version, with every citation and the sources behind it, is at adaaccessforall.com/resources. Federal law only; states add their own. ADA Access for All is the d/b/a of Guillaume & Co. LLC. Not a law firm; built to be usable by counsel. General information, not legal advice to any entity.