

POLICY AND PROCEDURE MEMORANDA

Office of the Governor Division of Administration Office of the Commissioner

PPM Number 74—Web Accessibility Compliance
(LAC 4:V.Chapter 61)

Policy and Procedure Memorandum Number 74, Web Accessibility Compliance, has been revised effective June 9, 2025. Due to unexpected administrative challenges, the minimum web accessibility standard has been revised from WCAG 2.2 to WCAG 2.1.

Title 4

ADMINISTRATION

Part V. Policy and Procedure Memoranda

Chapter 61. Web Accessibility Compliance—PPM Number 74

§6101. Purpose

A. The purpose of this memorandum is to ensure people with disabilities can access online government services. It also provides consistency for web users across state websites and mobile applications.

B. All boards, commissions, departments, agencies, institutions, and offices of the executive branch of state government shall comply with this memorandum.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

HISTORICAL NOTE: Promulgated by Office of the Governor, Division of Administration, LR 51:327 (February 2025), amended LR 51:765 (June 2025), effective June 9, 2025.

§6103. Definitions

A. For purposes of this memorandum, the following definitions shall apply.

Agency—a board, commission, department, agency, institution, or office of the executive branch of state government.

Agency Home Page—the starting point for an agency website or mobile application. It is the first page presented whenever a user goes to the agency website or opens the mobile application.

Americans with Disabilities Act (ADA)—a federal law that prohibits discrimination based on disability in all areas of public life.

DOJ Final Rule—a set of requirements issued by the U.S. Department of Justice (DOJ) in 28 CFR Part 35, Subpart H. It sets minimum standards for web content and mobile applications so that they are accessible by people with disabilities.

Exceptions to DOJ Final Rule—in limited situations, certain web content does not have to comply with the DOJ Final Rule.

The exceptions include:

- a. archived web content;
- b. electronic documents posted before April 24, 2026;
- c. content posted on the agency's website or mobile application by a member of the public;
- d. individualized documents that are password-protected;
- e. social media posts before April 24, 2026.

Mobile Applications—software applications (referred to as apps) that are downloaded and designed to run on mobile devices, such as smartphones and tablets.

Web Content—the information and sensory experience communicated to the user of a website or mobile application. This may be achieved through the use of text, images, sound, videos, documents, and social media posts.

Web Content Accessibility Guidelines (WCAG)—a set of technical standards issued by the World Wide Web Consortium (W3C). For each standard, there are three levels of conformance: A, AA, and AAA.

Web Properties—the various points of presence on the web that an agency uses to represent itself. This may include websites, mobile applications, and social media accounts that serve different purposes or audiences.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

HISTORICAL NOTE: Promulgated by Office of the Governor, Division of Administration, LR 51:327 (February 2025), amended LR 51:765 (June 2025), effective June 9, 2025.

§6105. Web Accessibility Coordinator

A. Agency heads shall designate at least one full-time employee of the agency to serve as web accessibility coordinator.

B. The web accessibility coordinator shall:

1. complete web accessibility training within 90 days of hire or designation to the role. The training materials may be determined by the agency head;
2. resolve accessibility issues reported by web or mobile application users;
3. provide assistance to agency staff, as needed, to create and manage web content that complies with this PPM.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

HISTORICAL NOTE: Promulgated by Office of the Governor, Division of Administration, LR 51:327 (February 2025), amended LR 51:765 (June 2025), effective June 9, 2025.

§6107. Agency Policy

A. Agencies shall develop a Web Accessibility Policy. At a minimum, the policy shall include the following.

1. Content Standards. The policy must, at a minimum, adopt WCAG 2.1, Level AA. The standards are available at <https://www.w3.org/TR/WCAG21/>. Given how quickly technology advances, agencies are encouraged to adopt increased standards whenever possible.

2. Accessibility Statements. The policy shall require that an accessibility statement be posted as a link directly from the agency home page. The statement must:

- a. express a commitment by the agency to making their web content accessible for people with disabilities;
- b. include the name, email address and telephone number of the agency's web accessibility coordinator. This ensures that people with disabilities know who to contact, and how, if they experience any accessibility issues.

3. Internal Controls. The policy must set appropriate internal controls in order to achieve and maintain web accessibility requirements. Internal controls should be based on organizational, staffing and financial considerations specific to each agency. Examples of possible internal controls may include but are not limited to:

- a. approval procedures for how web content will be screened for accessibility prior to publication;
- b. reducing the number of web content authors and managers;
- c. contracting with a vendor to fix web content that is not compliant.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

HISTORICAL NOTE: Promulgated by Office of the Governor, Division of Administration, LR 51:327 (February 2025), amended LR 51:766 (June 2025), effective June 9, 2025.

§6109. Implementation

A. Agencies shall submit the following to the State ADA Coordinator, Rikki David, at rikki.david@la.gov by the deadlines given below.

1. By March 31, 2025: Agencies are to complete and submit the designation of agency contacts form to identify their web accessibility coordinator.

2. By June 30, 2025: Agencies are to submit an inventory of their major web properties, to include who is responsible for managing each web property.

3. By September 30, 2025: Agencies are to submit an action plan identifying the steps that they intend to take in order to update their major web properties so that they comply with the content standards.

4. By December 31, 2025: Agencies are to submit a report regarding the completion status of each step in the action plan.

5. By March 31, 2026: Agencies are to submit a copy of their Web Accessibility Policy that meets the requirements of §6107 above.

6. On/After April 24, 2026: Web content (not subject to exception from the DOJ final rule) shall be compliant.

B. Agencies should refer to the Web Accessibility Roadmap at <https://www.doa.la.gov/media/3k4it0jg/web-accessibility-roadmap.docx> for further information regarding how to complete each implementation step.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

HISTORICAL NOTE: Promulgated by Office of the Governor, Division of Administration, LR 51:327 (February 2025), amended LR 51:766 (June 2025), effective June 9, 2025.

§6111. Roles and Responsibilities

A. The Office of State ADA Coordinator (OSADAC) provides administrative support and recordkeeping for all agency forms, reports and policies required by this PPM.

B. The Office of Technology Services (OTS) provides technical and educational support to help understand the WCAG standards.

AUTHORITY NOTE: Promulgated in accordance with R.S. 39:8 and 28 CFR Part 35, Subpart H.

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