Beyond the Minimum

New Rule Requires Web Content (I'm Looking at You, LibGuides) to Meet WCAG 2.1 Level AA Standards

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Libraries take the call for accessibility very seriously. Whether designing spaces that accommodate different abilities or learning experiences that reach all users, libraries and library workers have been driving the industry forward through practical frameworks (like Universal Design for Learning) and in adopting assistive technologies. According to the ALA's report "Accessibility in Libraries: A Landscape Review," libraries are among the most accessible institutions in society, particularly when it comes to web accessibility.[1] However, our web content can still fall short of the World Wide Web Consortium guidelines first developed in 1999 and continuously updated through the present day.[2]

In April 2024, the Department of Justice (DOJ) finalized a rule updating regulations for Title II of the Americans with Disabilities Act (ADA), which requires that all state and local governments make their services, programs, and activities accessible, including those that are offered online and in mobile apps. The ADA is a civil rights law passed in 1990 and amended in 2008 that prohibits discrimination based on disability and guarantees that people with disabilities have the same opportunities in employment, the purchase of goods and services, and in participation in state and local government programs as anyone else.[3] Title II of the ADA is a section of the law that applies to state and local governments or "public entities," a term that includes public education. The final rule dictates that public entities' web content meet the technical standards of the Web Content Accessibility Guidelines (WCAG) Version 2.1, level AA, an industry standard since its creation. Libraries that receive federal funding will be required to follow this new rule for any web content they create and provide to their users. This will apply to widely used platforms, such as LibGuides, as well as licensed content.

Public institutions will need to begin planning immediately as the compliance deadlines, based on census-defined population size, must be met by April 26, 2027, for service areas with a population size of less than 50,000 and April 26, 2026, for populations over 50,000.

Although the rule currently applies only to public institutions under Title II, experts "expect this regulation to serve as a template for any forthcoming web accessibility regulation that the DOJ may promulgate under Title III of the ADA."[4] While Title II pertains to state and local governments, Title III prohibits discrimination against people with disabilities in public places, including private businesses. Private entities with an educational mission (and with libraries) will likely be affected by this new rule as well.

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This contributed column was submitted on 21 November 2024 and published 16 December 2024.

The DOJ rule applies to all content accessed on the web and through mobile apps, including course/learning management platforms, linked third-party licensed material, and digital displays. Basically, the rule applies to content that libraries preserve and provide access to through any licensed platform or service, including the ILS and Springshare products. This rule applies to library websites as well. Although it is still not clear exactly how exceptions will be defined, we anticipate they will include archived web content that will not be altered and is intended only for research/reference purposes, existing electronic documents, and social media content created before the effective rule compliance dates. Because libraries produce, manage, and preserve a tremendous amount of content, we must begin planning now to systematically ensure compliance with the WCAG 2.1 AA standards. We feel that it's particularly important to single out Springshare's LibGuides, since its content management platform allows library workers the opportunity to create web content easily and quickly and because of the sheer number of published guides (almost one million in over one hundred countries), not to mention all the libraries that have built their websites on the LibGuides CMS platform.[5] But, without institutional guidelines, templates, and regular assessment, LibGuides with varying fonts, colors, navigation, layout, and content types may or may not meet basic WCAG standards. Fortunately, all Springshare services are compliant with WCAG 2.1, but libraries are responsible for ensuring compliance at the AA level.

WCAG AA compliance:

- requires text versions for any non-text media (e.g., captioning for both live and recorded media, alternative text for images) and/or audio descriptions for certain pre-recorded media;
- sets color contrast standards for text and non-text media;
- provides functional standards for keyboard and mouse navigation;
- establishes formatting guidelines for the logical organization of headings, tables, webpages, etc.; and
- details expectations around the functionality of assistive technologies.[6]

Springshare's Voluntary Product Accessibility Template Report for LibGuides (available through the Springshare Lounge) was last updated in February 2024 and demonstrates that the web authoring tool fully or partially supports Level AA for all accessibility criteria, for example: the ability to enter alt text fields for images, built-in contrast ratio requirements, and the ability for screen readers to bypass navigation menus and skip to main content. While the platform's built-in accessibility features have the ability to create accessible guides by default, authors must still take care to maintain WCAG standards with design elements. Many authors choose to match LibGuide tabs, headings, and fonts with the color brand of their school or to add decorative images and flourishes that do not convey information. While these design choices are not prohibited, carefully following WCAG 2.1 AA standards allows customization within the limits of accessibility.

Using CSS allows us to go beyond the minimum of accessibility compliance to create a visually dynamic page while also improving the LibGuide experience for all users. Although developing the CSS expertise needed to create and maintain dynamic and accessible LibGuides is an additional challenge, the benefits are numerous.

CSS can:

- Automatically adjust font size, line height, and contrast for enhanced readability.
- Enhance responsive design across all device types, meaning it will adapt content to different screen sizes.
- Enhance the visual structure of the page without altering HTML. For example, you can change the visual layout of the header, navigation menu, main content, and footer of a LibGuide, but the HTML will not be affected, allowing screen readers to read the content in the intended order.
- Create a flexbox that adjusts the layout of different elements depending on screen size, allowing you to alter the graphic design without altering the HTML.

If your library does not use a standardized template or have guidelines for LibGuide design, testing, review, and assessment, individual content creators will be required to review and test their public guides to ensure compliance. For libraries using CSS to create a common feel and experience across all LibGuides, making necessary updates and edits will be less burdensome since CSS is applied across all linked LibGuides. However, many institutions do not use CSS, and individual authors may have scores of guides that need to be updated (made even more time consuming if common shared elements are not used across guides). This is the perfect opportunity to unpublish guides that are obsolete, outdated, or have low use. This is also the perfect opportunity to ensure WCAG 2.1 AA standards apply to all new LibGuides. Following the most basic standards and using the four POUR principles of accessibility should be a priority:

- **Perceivability**: not using light colored fonts on light backgrounds, which results in very low contrast;
- **Operability**: using descriptive links rather than "click here;"
- **Understandability**: using descriptive alternative text for images or designating images that serve a purely decorative purpose.
- **Robustness**: avoiding poor navigation such as the use of redundant or vague titles and headings of content boxes and elements.[7]

Although LibGuides give us tremendous freedom and flexibility to author our own web pages, the basics of writing and designing for the web are founded on accessibility compliance; most of the early guidelines and rules from almost twenty years ago are still relevant. For example, avoid using color to impart meaning, avoid using multiple fonts, avoid using heading sizes other than denoting hierarchy (starting with H1 and following the correct order), and avoid embedding video without captions or accompanying text scripts.

Even if a LibGuide is fully WCAG 2.1 AA compliant, the design and layout can still result in a poor experience for learners using screen readers. For instance, screen readers must read every element of the webpage, beginning with page title and banner elements, through the LibGuide banner elements and tabs, before reading the content boxes. Reducing the number of tabs can improve a learner's experience significantly, since the program must read all the tabs before reading the content (and the learner must remember all the tabs to navigate to those pages). Using the Previous/Next page navigation options can be useful as well. Screen readers read LibGuides vertically by column, making three-column guides especially cumbersome. Eliminating unnecessary text such as welcome and purpose messages or lengthy descriptions, using one or two columns, and hiding breadcrumb navigation are a few ways to improve the experience. We recommend you experience navigating your guides through a screen reader, which is easy to do

using the programs built into Windows (search "Narrator" in the task bar) and MacOS ("VoiceOver," Command-F5).

To ensure your LibGuides (or other webpages) are minimally WCAG 2.1 compliant, you can use a variety of free tools that thoroughly review sites:

- The [WAVE suite](#) of evaluation tools developed by the WebAIM division of the Institute for Disability Research, Policy & Practice at Utah State University have been in development since 1999 and offer a variety of solutions. The WAVE site provides the ability to inspect sites one page at a time by copying and pasting URLs or by using a private and secure browser extension. Pricing for the stand-alone API and Accessibility IMpact (AIM) assessment reports are available as well.
- W3C's Web Accessibility Initiative provides a comprehensive list of evaluation tools that can be filtered and searched by platform, price, type, scope and more.
- Deque's Axe tools provide options from browser extensions to comprehensive developer, auditor, and monitoring solutions for larger-scale, enterprise-level needs.

In addition to meeting basic usability accessibility standards, we feel it's important to draw attention to the purpose that LibGuides serve and how we must consider the information seeking behavior of our users. The literature has shown unequivocally that typical LibGuide design lacks pedagogical effectiveness, clear navigation, and intuitive usability. Guide design often does not center the learner and their needs (quick access to specific research resources and tools) but rather centers libraries' collections and services, which are often already available on the library website. For instance, many LibGuides feature long lists of print materials and/or content boxes labeled "Helpful/Useful Links." These carefully curated lists are often neither helpful nor useful for meeting the immediate research needs of students' assignments/projects and, they are a burden to navigate for any learner using assistive technology to read these pages.[8]

We will add here that another option in working towards a more accessible web presence in light of this deadline is to not make a new LibGuide at all. If existing guides are not up to the AA level, they should be prioritized for update over the creation of new guides. As we prepare to update our web content for accessibility and usability, this is also the time to perform an assessment, no matter how informal, around the purpose, design, and overall usability of our LibGuides. Student research behavior is grounded in the ease and immediacy of open web search tools, and study after study[9] shows students are unlikely to seek out and use curated lists of sources when hoping to find the right database, book, or journal to meet their immediate research need. In addition to broad subject-based guides, purposefully creating guides that are process- or skills-driven, or developed at the course/assignment level and linked directly in the LMS, have higher pedagogical impact. Springshare offers an LTI tool that allows automatic integration of course-specific guides and databases into their corresponding course shells.

When performing an informal or formal assessment of LibGuides for web accessibility purposes, keep alternative ways of engagement in mind. By taking on a student-centered lens, we can develop new ways of connecting and engaging with students. Creating modules within the LMS environment, for example, is an alternative method to effective student engagement. Not only does this place the library at the point of need for students as they are working on research assignments, it also allows librarians to plan a more sustainable workload for themselves. Arguably, reusable content for a variety of courses, especially if focused on process- or skills-based instruction, is easier to maintain and keep up to date than disparate LibGuides.

The DOJ rule will have wide ranging implications for libraries due to various types of web content libraries provide, from our actual websites, to educational tools, to archival materials, and more. It will be important to use the tools Springshare already provides that support minimum compliance for web accessibility standards. We recommend using a learner-centered lens when creating any instructional materials, including LibGuides, with an emphasis on considering what students need to be successful in their assignments. Universal Design for Learning is one framework that allows for incorporating learning preferences and accessibility standards from the ground up instead of retrofitting into what already exists. This approach builds in some future-proofing in case standards continue to change. Although the DOJ's new rule complicates things for public entities, including libraries, it is necessary for us to be and stay accessible for all our communities.

FURTHER READING

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ENDNOTES

[1] Melina Sherman, "Accessibility in Libraries: A Landscape Review," n.d., p. 10.

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