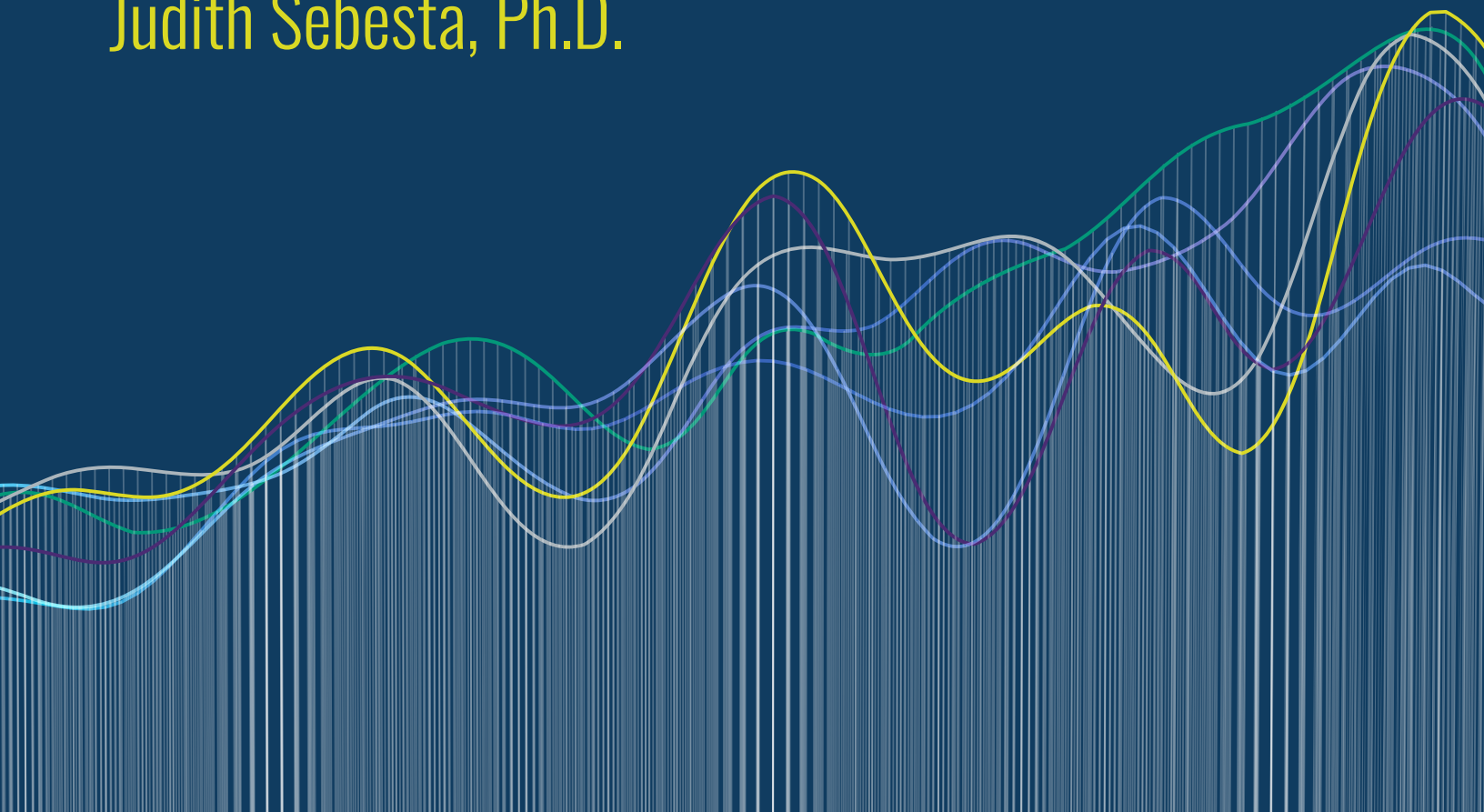# Survey on Accessibility of Web Information and Services

Judith Sebesta, Ph.D.

Anthology Ally

The better way to make better content

Anthology® Ally gives instructors real-time guidance that builds lasting accessibility best practices—saving time, preventing errors, and helping institutions move confidently toward Title II readiness and beyond.

The market-leading accessibility tool for every major LMS gives you:

- Real-time remediation guidance that educates and automates, making it easier to create, maintain, and sustain accessible course content

- Time-saving features such as PDF Quick Fixes and AI-powered alt text

- Alternative formats that allow students to choose how they learn

- Dashboards that track adoption, progress, and DOJ-aligned compliance reporting

Request a demo at
anthology.com/contact-us/demo/ally

Blackboard

OVERVIEW

I n July 2024, the WICHE Cooperative for Educational Technologies (WCET) developed a brief survey to better understand institutional awareness around the [Department of Justice final rule Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities](#), to take effect for most public institutions in April 2026. The regulation establishes requirements, including the adoption of specific technical standards, for making all services offered via the web, mobile applications, or social media accessible. There are five very narrow exceptions to compliance. The regulations are for state and public entities, including higher education and K-12 institutions, libraries, and agencies.

WCET collaborated with both the State Authorization Network and NWHEAT (a collaboration of the Northwest Academic Computing Consortium and the Orbis Cascade Alliance) to solicit responses to that first survey. You can read more about the results in the Frontiers post [Survey on New DOJ Regulation on Accessibility of Web Information and Services](#).

In October 2025, WCET, in collaboration with the 1EdTech Consortium, developed a second survey to gauge current institutional awareness and progress toward compliance with the Department of Justice's final rule. Sixty-four total individuals responded to the survey.

Key findings and insights from the responses include:

- Ninety-seven percent of respondents are aware of the new U.S. Department of Justice regulation on accessibility, a significant increase from 81% in 2024.
- Primary challenges to compliance:
- Lack of staff remains the top challenge, while the timeline for compliance and convincing staff that compliance is a priority are the next major challenges.
- Costs to comply were identified by 40% as a major challenge and 42% as somewhat of a challenge.
- Working with third-party vendors, while still a major challenge, decreased from 43% in 2024 to 34.62% in 2025.
- Ninety-five percent of institutions have taken action to address compliance, up from 61% last year. Actions taken to address compliance:
- Organizations are actively engaged in substantial planning and implementation, a shift from 2024, when most were in initial planning phases.
- The highest percentage of action "fully addressed or nearly done" was convening a committee or work group.
- "Remediating online content including PDFs and videos" was the most common area for "substantial planning/implementation."
- Progress on "updating procurement policies and practices" and "working with vendors to
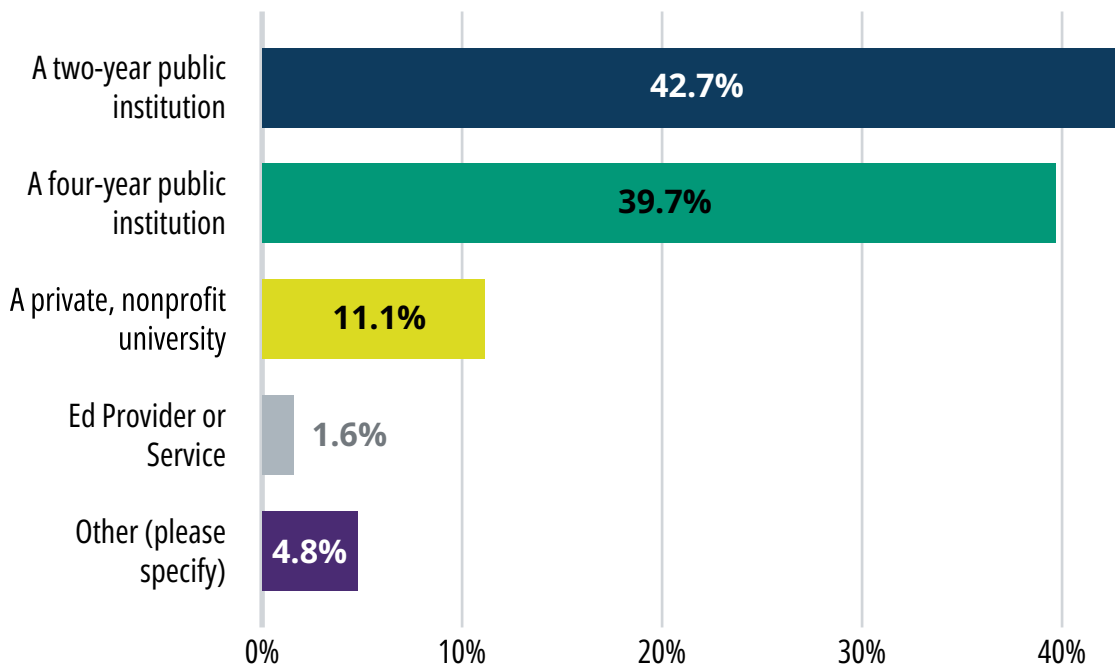
assess their ability to comply" is less advanced, with many still in initial planning stages.
- A potential gap in resourcing surfaced: 52% of institutions have "not addressed or taken action" on hiring additional staff, consultants, or services. "Planning to harness AI to ensure accessibility of web and mobile app content" and "consulting with institution's legal counsel" are also largely unaddressed.

RESPONDENT CHARACTERISTICS

Of the 63 responses to the respondent identity questions received, 27 were from two-year publics that primarily offer associate degrees, 25 from four-year publics that primarily offer baccalaureate and/or graduate degrees, seven responses from private, nonprofit universities, and one from an education provider or service (Figure 1). Two respondents wrote that they are at a public university system and one is with a nonprofit education provider and advocate, while another respondent to the survey chose not to answer the identity questions.

Figure 1

Category	Percentage
A two-year public institution	42.7%
A four-year public institution	39.7%
A private, nonprofit university	11.1%
Ed Provider or Service	1.6%
Other (please specify)	4.8%

Fifty-four percent of respondents' institutions have Fall 2024 headcount enrollments of 10,000 or more, then 3,000–9,999 (33%), 1,000-2,999 (6%), fewer than 1,000 (5%), and 2% not applicable.

When asked what office/service within the institution respondents represent, a majority (52%) chose Distance or Digital Learning Leadership, a 9% increase from the previous survey. Academic Leadership/Provost was the next most-frequently selected office (13%) along with Instructional Design (13%), then Chief Information Office/Information Technology (5%), Instructional Faculty (3%), and Accessibility Services (1%). Thirteen percent selected "Other"; the responses included Compliance (3), Centers for Teaching and Learning (2), instructional design, online student support, and nonprofit leadership. Unlike the previous survey, we did not have any respondents from Library Services.

AWARENESS AND COMPLIANCE

Respondents were next asked: "Are you generally aware of the new U.S. Department of Justice regulation Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities, which went into effect on June 24?" Ninety-seven percent responded "Yes" and only 3% "No." In 2024, 81 percent responded "Yes" and 19% "No," indicating a fairly significant increase in awareness over the past year (Figure 2).

Even more significant is the increase in institutions who have taken action to begin addressing compliance, from 61% last year to 95% this year (Figure 2).

Figure 2
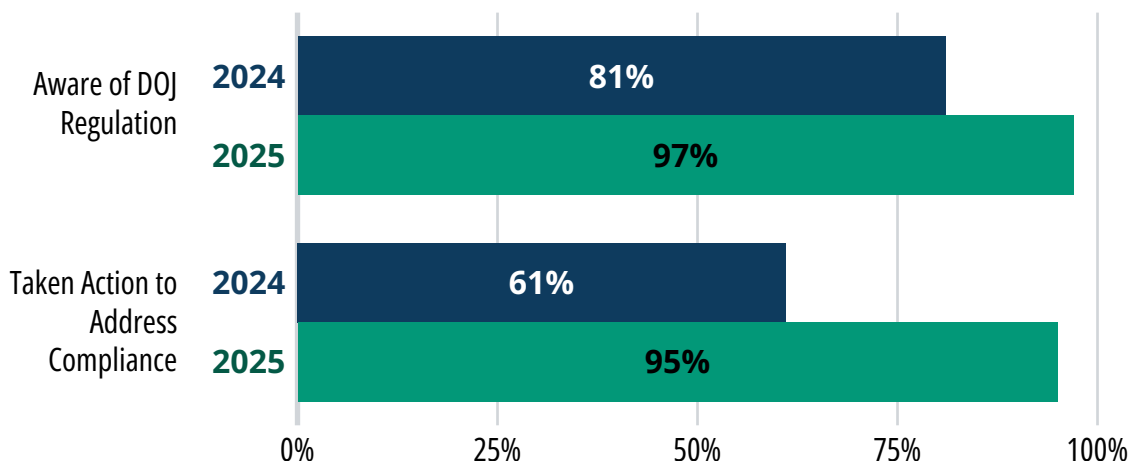
Next, 52 respondents answered, "What are your institution's primary challenges to complying with this regulation?" Lack of staff remained the top challenge, increasing 21% from the previous year to nearly 67% in 2025. While working with third-party vendors was the second top challenge in 2024 (43%), it decreased to 34.62% this year. Instead, respondents identified the timeline for compliance and convincing staff that compliance is a priority as the next major challenges. Costs to comply were identified by 40% as a major challenge and 42% as somewhat of a challenge as well.

For 26.92% of respondents, neither "electing 3rd party service/consultants to outsource content needing remediation" nor "lack of understanding the five exceptions in the rule" were challenges.

	A major challenge	Somewhat of a challenge	Challenging, but doable	Not a challenge
Lack of staff	66.67%	15.69%	15.69%	1.96%
Timeline for compliance	47.06%	35.29%	15.69%	1.96%
Convincing staff that compliance is a priority	45.10%	27.45%	23.53%	3.92%
Costs to comply	40%	42%	14%	4%
Managing the compliance process	38.46%	40.38%	21.15%	0%
Inventorying content needing remediation or archiving	36.54%	36.54%	21.15%	5.77%
Working with third-party vendors to ascertain their compliance	34.62%	36.54%	19.23%	9.62%
Ensuring that open educational resources are accessible	28.85%	36.54%	26.92%	7.69%
Selecting 3rd party service/consultants to outsource content needing remediation	17.31%	32.69%	23.08%	26.92%

	A major challenge	Somewhat of a challenge	Challenging, but doable	Not a challenge
Lack of understanding the regulation	11.54%	30.77%	36.54%	21.15%
Lack of understanding the five exceptions in the rule	11.54%	23.08%	38.46%	26.92%

One respondent argued that "assessing textbook/online textbook tools compliance has been challenging enough to be its own category. Publishers vary widely in their responsiveness." Another pointed to accessibility of non-academic content as a challenge, and two described the difficulty of identifying who will lead and is responsible for compliance efforts.

In general, these results highlight that staffing, costs, timelines, and internal buy-in are the most pressing barriers, with additional complexity from content management and vendor coordination.

Next, respondents were asked what actions, if any, their institution has taken to address compliance, and to what extent. The survey data from 52 respondents indicate that a majority of organizations are actively engaged in substantial planning and implementation toward compliance. This is a significant shift from the 2024 survey, when responses indicated that a majority (56%) were in the initial planning phases of reviewing, analyzing, and/or discussing the regulation, while only 29% had engaged in substantial planning and implementation on this work.

In that previous survey, the highest percentage (17%) of action fully addressed or nearly done was for consulting/working with campus Accessibility Services. In this 2025 survey, the highest percentage (35%) of action fully addressed or nearly done was for convening a committee or work group, suggesting many institutions have formalized their internal response teams. The next fully addressed or nearly done action, "reviewing, analyzing, and/or discussing the regulation," lagged considerably behind at 23%.

In the current survey, the most common area for "substantial planning/implementation" was "remediating online content including PDFs and videos," with 55% of respondents reporting progress in this area. This focus on remediating existing content was followed closely by "reviewing, analyzing, and/or discussing the regulation" and "consulting/working with campus Accessibility Services."

However, progress on some critical areas is less advanced. For instance, "updating procurement policies and practices" remains in the "Initial planning stages" for 35% of respondents, with only 19% having fully addressed it or nearly done. Similarly, while 43% are

substantially "working with vendors to assess their ability to comply," a significant portion (33%) are still in the initial planning phase for this action.

A key insight from the data highlights a potential gap in resourcing. A striking 52% of institutions reported they have not addressed or taken action on "hiring or planning to hire additional staff, consultants, or services" to aid compliance, suggesting that many institutions may be relying on existing staff to meet the upcoming deadlines. This was, by a wide margin, the most commonly unaddressed action in the survey, with "planning to harness AI to ensure accessibility of web and mobile app content" the next most unaddressed action (42%) followed by "consulting with institution's legal counsel" (23%).

Overall, these data show that while organizations are making progress in planning and implementing compliance actions, resource-intensive steps like hiring and leveraging AI are less advanced.

ADDITIONAL INSIGHTS

We also asked, "Describe any additional experiences, thoughts, or concerns that were not covered above." The 22 responses were, predictably, wide-ranging, from the blunt "We are not prepared. Are others?" to "We have an accessibility fellow program, use AI, have hired additional staff, had 1,500 attendees in training last year. There is still a lot of work to do, but we are making significant progress."

The open-ended feedback both reinforced and augmented information garnered from the previous questions, and it surfaced widespread concern and a sense of being overwhelmed regarding the new accessibility rule. The most notable insights related to resource constraints and the sheer scale of the task. Respondents cited "prohibitive" costs and "skeleton staff," with one arguing that "most smaller colleges do not have compliance personnel in place to address the new rules." Others pointed to the daunting volume of inaccessible materials, especially those rapidly created during the COVID-19 pandemic. Many feel the work of retrofitting existing content is a significant challenge.

These anxieties were compounded by a perceived lack of clear guidance; respondents expressed a need for specific compliance metrics (e.g., whether 85% compliance is sufficient or 100% is required), definitions of "good faith" effort, clarity on the full scope of digital assets covered by the rule, and information on who is tracking compliance and what are the consequences for non-compliance. One respondent expressed concern around the "discrepancy between this regulation and the anti-inclusion priorities of the current federal administration," while another suggested, "Since the current administration has not been

discussing the regulations, I believe our institution feels it will go by without any fanfare and 'bigger fish' will be chased in higher education."

Furthermore, key takeaways from these responses highlight critical external and internal barriers. Dealing with third-party vendors is a major issue, with respondents citing inaccessible textbook platforms, student application portals, and public ticketing systems. There is frustration that vendor accessibility claims (like VPATs) often prove unreliable. Internally, one respondent cited a "major lack of awareness for many faculty," emphasizing it is a "lack of knowledge," not a "lack of concern." This points to a critical need for raising awareness, training, and managing ongoing compliance. Additionally, some respondents noted a lack of leadership or priority from their administration and uneven implementation across campus units.

Finally, the survey included the question "What resources or workshop topics would be helpful to you in your organization's work to move towards compliance with the DOJ requirements?" WCET and the 1EdTech Consortium will utilize the responses to inform the development of a series of workshops and a culminating hands-on capstone on accessibility. This series aims to equip institutions and edtech providers with the tools and knowledge to ensure their web-based content and digital learning environments are accessible to all learners and meet U.S. Department of Justice (DOJ) compliance requirements and WCAG 2.1 AA standards.

The program will include a range of virtual workshops starting in January 2026 and an in-person capstone in June 2026, scheduled in conjunction with 1EdTech's 2026 Learning Impact Conference in San Francisco, California. More information can be found at Planning to Delivery: A 1EdTech and WCET Accessibility Workshop Series.

AI Use Statement

Survey Monkey's AI analysis tool was utilized to crosscheck and confirm key insights from the data, and Gemini Pro was used to refine and edit the content of the report. All analyses, interpretations, and conclusions have been verified independently for accuracy.