

## Guest Editorial

# Preparing for the ADA Title II Clarification: A Call to Cultural Change in Virtual Reference

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In April 2026, the Department of Justice's clarification of Title II of the Americans with Disabilities Act (ADA) will take effect, defining accessibility requirements for the web and mobile services of public institutions, including academic libraries (U.S. Department of Justice, 2024). These updates formalize expectations that library websites, chat services, and other digital platforms meet Web Content Accessibility Guidelines (WCAG) 2.1 AA standards (World Wide Web Consortium, 2025), which is a necessary threshold many academic libraries have yet to reach. As the deadline approaches, conversations among our colleagues have increasingly centered on the urgency of compliance. However, as librarians with expertise in accessibility, we contend that the pressing problem that comes with these requirements is not timelines or technical remediation—the deeper issue is cultural. We encourage libraries to move away from approaching accessibility as a reactive process by responding to audits, complaints, and deadlines; rather we encourage colleagues to embed it as a proactive, ongoing value in our work.

Accessibility is not a separate compliance task; it is a core component of service design, user experience, and digital stewardship. Drawing on our complementary experience in online reference and accessibility, we approach these changes with the goal of providing accessible reference services that meet the needs of all our users. Because virtual reference sits at the intersection of human interaction and technology, it is an ideal place to begin promoting a culture of accessibility in academic libraries. In our experience, waiting until issues arise requires more time and labor to remediate documents, provide accessible databases, etc., than it would if accessibility had been considered from the start. More importantly, it limits who can fully participate in academic life. We contend that a proactive culture requires intentional planning, distributed responsibility, and leadership that prioritizes inclusion and accessibility in every decision about library systems and services.

We argue that this moment offers libraries an opportunity to move beyond compliance by moving toward cultural transformation. The approaching deadline should not be seen just as a mandate to meet but as the impetus for reimagining how accessibility is integrated into daily practice within academic libraries. Building a proactive culture means that accessibility is not just the work of designated specialists or coordinators: it is everyone's job. As one of the most visible digital touchpoints of the library, virtual reference can lead the way.

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By starting here, libraries can then work toward embedding accessibility into other design processes, training, and evaluation cycles to become more inclusive while also ensuring that our services reflect our values as library professionals.

### **What Is the ADA Title II Update?**

In 2024, the U.S. Department of Justice issued an update to Title II of the ADA, extending accessibility requirements to all digital services offered by state and local governments, including public colleges and universities. The ruling mandates that online platforms—such as virtual reference tools, research databases, and instructional media—meet WCAG 2.1 AA standards by April 1, 2026, for institutions serving populations of 50,000 or more, and by 2027 for smaller entities (U.S. Department of Justice, Civil Rights Division, 2024). The populations are defined by broad census areas rather than just the university community. These requirements apply equally to third-party and licensed content, underscoring that accessibility is a shared institutional and social responsibility.

### **Why Virtual Reference Belongs in the Accessibility Conversation**

Virtual reference is an access service. It extends the library's expertise to users wherever they are—on campus, at home, or around the world. As our teaching and research environments have become increasingly hybrid, the virtual reference desk has become the “front door” of the library. However, that front door is not equally open to all.

Research continues to reveal barriers faced by users with disabilities when interacting with digital library services. Ferrara (2024) notes that inaccessible platforms perpetuate systemic inequities in academic life, affecting students' ability to complete coursework or fully participate in their institutions. Studies of library websites show persistent accessibility failures. Liu et al. (2024) found that 80% of the top 100 U.S. university library websites contained WCAG 2.0 AA-level errors, while Yang et al. (2020) observed similar shortcomings among Ivy League institutions.

Barriers impact not only users with disabilities but all users. Chow and Croxton (2014) similarly linked patron satisfaction with virtual reference to the overall usability of the library's website. Mulliken (2019) found that visually impaired patrons using screen readers required substantially more time to learn library interfaces, disrupting research workflows and diminishing the perceived usability of library services. Thus, accessibility is not an isolated concern but a dimension of user experience itself.

When accessibility is neglected, the impact is systemic as users with disabilities may be excluded outright and all users may experience friction. Conversely, when accessibility is integrated into virtual reference from the start, everyone wins. As Vesco (2024) observes, “when we design and provide accessible products, everyone benefits.” Users gain flexibility and choice, and libraries save time and resources by avoiding costly retrofits later.

### **From Reactive Compliance to Proactive Culture**

Accessibility in libraries has often been treated as a technical or legal issue, separate from service design or user experience. The ADA Title II update should compel academic librarians to rethink that division. Accessibility and usability are not separate tracks; they are mutually reinforcing dimensions of inclusive design (Schmutz et al., 2017).

Creating accessible virtual reference services requires a shift from reactive remediation to proactive cultural integration. Accessibility cannot rest solely with the web developer nor

the accessibility coordinator. It must be distributed across the organization into everyday decisions about platforms, content, staffing, and training. Thus, we propose four strategies for building sustainable accessibility in virtual reference services. We provide links to resources for more information in Appendix A. Additionally, based on these points, we also created an annual checklist/workflow in Appendix B.

### *Test Regularly and Routinely*

Accessibility testing should not be a one-time compliance task. Libraries can begin with basic automated tools, such as WAVE or Axe, to identify common WCAG violations; however, automated reports are only a starting point. Full accessibility evaluation must include usability testing by people with disabilities, ideally drawn from the institution's student and staff communities (Ghosh & Dubey, 2025; Øksnebjerg et al., 2019; Valencia et al., 2021).

Partnerships with campus accessibility or disability resource offices can make this feasible. Likewise, an in-house accessibility librarian also improves a library's chances of success. If this is not an option, task an existing staff member, or a working group with these responsibilities. If full testing cycles are not possible each year, a rotating schedule can ensure coverage of key services. Testing should mirror real information-seeking behavior by asking participants to complete tasks that range from finding a database article to booking a reference appointment. Regular testing not only improves compliance but normalizes accessibility as part of the library's operational rhythm, which shows that inclusion is ongoing work and not a project to be completed and forgotten.

### *Procurement with Accessibility in Mind*

Many academic libraries rely on vendor-provided virtual reference software such as LibChat, LibraryH3lp, or third-party chatbots and widgets. Under the ADA clarification, these tools must also meet accessibility standards. Libraries should integrate accessibility criteria into procurement and licensing workflows. They should also obtain a current Voluntary Product Accessibility Template (VPAT) and conduct independent verification using the tools mentioned above when possible (Hines, 2012). The VPAT is a disclosure voluntarily filled out by the vendor and indicates to which level their product is accessible. Because they are completed by vendors or updated with every interface update, it's important to check their accuracy.

The Library Accessibility Alliance, a partnership between the Big 10 Academic Alliance and other regional consortia, has led the way in sharing accessibility resources. They provide sample contract language and vendor accessibility evaluations to assist in this process. Oud (2011) cautions that technical compliance does not guarantee usability; even an "accessible" product may pose barriers in real contexts. Procurement policies should therefore include both compliance review and user testing to ensure that chosen platforms truly work for the library's community. Proactive accessibility training for staff overseeing procurement can help identify accessibility problems before they become major issues.

### *Train and Empower Staff*

Accessibility must be part of every staff member's skill set, not confined to one department or a designated accessibility librarian. Many accessibility issues arise simply because staff are unaware of them (Oud, 2011). Training programs can begin with basic instruction in WCAG principles and progress to advanced workshops on accessible content creation. Training should cultivate empathy, foster accountability, and include the real-world impacts of design

choices on disabled users. For virtual reference, this training could include best practices for interacting with patrons and providing online information. This could mean providing additional time for visually impaired students to interact with the database link you have sent them; using shorter, more easily understood sentences; or providing screenshots with alternative text or appropriate color contrast.

Ferrara (2024) emphasizes that staff skills and confidence improve when training is tiered and the training meets employees where they are. As staff knowledge grows, they become better equipped to identify barriers in their daily work, whether editing LibGuides, responding to chat inquiries, or designing search tutorials. Accessibility goals should be embedded into professional development plans and performance evaluations, reinforcing that they are everyone's responsibility. Empowered staff not only catch accessibility issues early but also foster a culture in which inclusivity becomes a professional norm rather than a compliance burden.

### ***Engage the Users: "Nothing for Us Without Us"***

A core principle of the disability rights movement—"Nothing about us without us"—should guide library accessibility work. Libraries can only design accessible services by working in partnership with those who use them. Engaging with student disability organizations, faculty advocates, and campus accessibility offices brings critical lived experience into decision-making.

Hearing directly from users reveals barriers that automated audits or staff reviews might miss. Users may note that chat windows automatically take focus and disrupt screen-reader navigation, or that captioning lags in live-reference video sessions. These insights help libraries move beyond minimal compliance toward authentic inclusivity. Ongoing communication channels, such as accessible feedback forms, user advisory groups, or open office hours, can keep the conversation active and ensure that accessibility remains responsive to changing needs. Including the community in yearly accessibility testing can improve results while also building trust (Pionke 2017).

### **Sustaining the Work: Resources and Leadership**

Sustained accessibility requires resources, including time, staffing, funding, and administrative will. As Ferrara (2024) reminds us, these investments are essential if accessibility work is to move beyond rhetoric. Creating "born accessible" content takes time, as does building relationships, conducting user testing, and training staff.

Leadership commitment is crucial. Administrators must recognize accessibility as core to the library's mission and allocate corresponding support. Accessibility should appear in strategic plans, budget lines, and annual goals. Library administration should internalize that accessibility is a defining service standard. At the same time, libraries can understand that accessibility investments often result in efficiency and user satisfaction. Vesco (2024) notes that designing accessibly from the start saves time, cost, and effort later. The "extra" time spent now prevents far greater time lost to retrofitting, user frustration, or legal exposure later.

### **Building a Culture of Accessibility**

Accessibility work does not end when a library meets the April 2026 deadline. Laws, technologies, and user expectations evolve and so must academic libraries. To sustain progress, accessibility must become part of institutional culture and a shared expectation that at

the very least informs all decisions. This means embedding accessibility into the annual assessment cycle, just as libraries already schedule budget reviews or accreditation reporting. It also means treating accessibility as a form of professional ethics and upholding librarianship's core value of equity.

Removing barriers to information is a natural area of growth for the academic library. As campus information leaders, libraries have both the power and the obligation to dismantle barriers for all patrons. A culture of accessibility grows through repetition and reinforcement: regular audits, continuous training, collaborative design, and leadership advocacy. Over time, these practices move accessibility to an active choice rather than an afterthought.

### **Conclusion: From Regulation to Transformation**

The April 2026 ADA Title II update offers libraries a powerful opportunity. Meeting WCAG 2.1 AA standards for virtual reference and digital services is non-negotiable; failure to comply risks both legal and ethical consequences. However, compliance should not be our ultimate ambition.

The real opportunity here lies in transforming how libraries think about accessibility, from a reactive technical issue to a proactive cultural value. When accessibility becomes embedded in design, procurement, training, and user engagement, the benefits reach far beyond compliance. Benefits can include smoother user experiences, reduced barriers, improved equity, and a stronger institutional reputation. A truly accessible library fosters a culture of empathy, inclusion, and shared responsibility wherein accessibility is embraced not merely as a requirement but as a reflection of core institutional values.

As librarians, we hold equity as a defining principle. Ensuring that all members of our communities—students, faculty, staff, and the public—can seek and receive information equitably is not a new mandate. This is the heart of our profession. The 2026 deadline should therefore be understood not as an endpoint but as a milestone on a longer path. By committing to continual testing, staff empowerment, inclusive design, and community partnership, libraries can fulfill both the letter and the spirit of the ADA. More importantly, we can build the kind of culture where accessibility is no longer exceptional but expected.

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<b>APPENDIX A</b>		
<b>Accessibility Resources for Consideration</b>		
<b>Resources</b>	<b>Website</b>	<b>Description</b>
Title II of the Americans with Disability Act	<a href="https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/">https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/</a>	Full text of the updated ruling on Title II of the ADA
Web Content Accessibility Guidelines (WCAG) 2.1 Standards	<a href="https://www.w3.org/TR/WCAG21/">https://www.w3.org/TR/WCAG21/</a>	WCAG 2.1 standards and success criteria
Library Accessibility Alliance	<a href="https://www.libraryaccessibility.org/">https://www.libraryaccessibility.org/</a>	A comprehensive resource that includes an accessibility toolkit, sample licensing language, accessibility testing results, and information on the ADA Title II update
The Digital Accessibility Handbook for Libraries	<a href="https://alastore.ala.org/dahdbkl">https://alastore.ala.org/dahdbkl</a>	Book published by the American Library Association (ALA) with practical strategies for incorporating digital accessibility at all libraries
ALA Accessibility for all Libraries	<a href="https://www.ala.org/accessibility">https://www.ala.org/accessibility</a>	A resource curated by the Accessibility Assembly at ALA that includes best practices for libraries, accessibility toolkits, information on the Title II update, and resources for building accessible online content
Librarian Groups Working in Accessibility	<a href="https://www.ala.org/accessibility/ala-accessibility-groups">https://www.ala.org/accessibility/ala-accessibility-groups</a>	Professional librarian organizations doing accessibility work
Association on Higher Education and Disability (AHEAD)	<a href="https://www.ahead.org/home">https://www.ahead.org/home</a>	Professional organization for accessibility work in higher education. Includes resources and training opportunities.

**APPENDIX B**  
**Annual Checklist/Workflow for Virtual Reference Accessibility**

**1. Regular Testing of Virtual Reference Services and User Feedback**

- Schedule and conduct automated accessibility testing on all virtual reference platforms with diverse users, including individuals with a range of disabilities (e.g., visual, hearing, motor, cognitive).
- Test all associated content that could potentially be linked during virtual reference interactions (e.g., research databases, LibGuides, tutorials, instructional videos). Include users in testing and platform selection when possible.
- Establish a rotating testing schedule for larger or more complex content.
- Form and maintain partnerships with campus disability services and student groups. Collect feedback from users about their experiences with virtual reference.
- Update services and interfaces based on user feedback.
- Document test results and create remediation plans to address inaccessible content.

**2. Procurement and Vendor Compliance**

- Conduct independent accessibility testing of vendor products, even if a Voluntary Product Accessibility Templates (VPAT) is provided.
- Include accessibility clauses in contracts with third-party vendors.
- Request, review, and archive VPATs.

**3. Policy and Content Creation**

- Ensure all in-house digital content follows WCAG 2.1 AA standards (“born accessible”).
- Review and update policies to reflect changes in ADA, WCAG, or state regulations.
- Maintain an accessibility policy for virtual reference services.
- Maintain documentation of accessibility training for content creators.
- Maintain updated lists of tools and resources supporting accessibility.
- Document your remediation priorities and workflows. Record all tests, remediation, and training conducted during the year.

**4. Staff Training and Awareness**

- Provide regular accessibility training at multiple levels (i.e., basic to advanced).
- Train staff to identify and report accessibility barriers.
- Maintain training on best practices of patron interaction for virtual reference services.
- Encourage staff to consider accessibility in all workflows.

**5. Repeat and Improve**

- Schedule next year’s accessibility review at the end of each cycle.
- Identify lessons learned and adjust processes for continuous improvement.
- Celebrate and recognize staff successes and contributions to accessibility initiatives.