



WCAG 2.1 Level A and Level AA Conformance Reference

The technical standard incorporated by 28 CFR § 35.200

All 50 success criteria required for Level AA conformance
Regulatory basis, compliance deadlines, and conformance requirements
Prepared as a reference for rural public entities and nonprofit organizations

Rural Labor & Economic Development Corporation

723 East Route 66 Boulevard, Tucumcari, New Mexico 88401 • rledc.org
Serving Curry, De Baca, Guadalupe, Harding, Quay, Roosevelt and Union Counties

1. What This Document Is

The Web Content Accessibility Guidelines (WCAG) 2.1 is a technical standard published by the World Wide Web Consortium (W3C). It is not itself a statute. It acquires legal force in the United States because federal regulations adopt it by reference — most directly 28 CFR § 35.200, the Department of Justice rule under Title II of the Americans with Disabilities Act, which requires state and local governments to conform their web content and mobile applications to **WCAG 2.1 Level A and Level AA**.

This reference lists all fifty success criteria that a Level AA conformance claim requires, states the regulatory basis and the compliance deadlines, and sets out the five conformance requirements that must be met before conformance may be claimed. The descriptions are RLEDC's plain-language summaries. They are a guide to the standard, not a substitute for it; the normative text is published by the W3C at [w3.org/TR/WCAG21/](https://www.w3.org/TR/WCAG21/).

2. Regulatory Basis

Title II of the ADA — state and local governments

28 CFR Part 35, Subpart H (AG Order No. 5919-2024, 89 FR 31337, April 24, 2024), amended by AG Order No. 6742-2026, 91 FR 20912, April 20, 2026. Section 35.200 requires that web content and mobile apps a public entity provides or makes available — directly or through contractual, licensing, or other arrangements — conform to WCAG 2.1 Level A and Level AA.

Compliance deadlines under 28 CFR § 35.200(b)

Entity	Deadline
Public entity, other than a special district government, with total population of 50,000 or more	April 26, 2027
Public entity with total population of less than 50,000, and any special district government	April 26, 2028

Which deadline applies in Eastern New Mexico. No county or municipality in the seven-county Eastern Plains region has a population of 50,000 or more, and school districts, water districts, soil and water conservation districts, and similar bodies are special district governments. The operative date for essentially every public entity in the region is therefore **April 26, 2028**.

Section 504 of the Rehabilitation Act — recipients of federal financial assistance

45 CFR § 84.84 applies the same WCAG 2.1 Level A and AA standard to recipients of federal financial assistance from the Department of Health and Human Services, including many nonprofit organizations. Compliance is required by **May 11, 2027** for recipients with 15 or more employees and by **May 10, 2028** for recipients with fewer than 15.

Section 508 of the Rehabilitation Act — federal agencies and contractors

36 CFR Part 1194 incorporates WCAG 2.0 Level A and AA for federal information and communication technology. WCAG 2.1 is backward compatible: content conforming to WCAG 2.1 Level AA also conforms to WCAG 2.0 Level AA.

3. The Four Principles

- **Perceivable** — information and interface components must be presentable to users in ways they can perceive.
- **Operable** — interface components and navigation must be operable.
- **Understandable** — information and the operation of the interface must be understandable.

- **Robust** — content must be robust enough to be interpreted reliably by a wide variety of user agents, including assistive technologies.

4. Level A Success Criteria — 30 Criteria

WCAG 2.1 Level A

No.	Success criterion	What it requires
1.1.1	Non-text Content	Images, icons, and controls that convey meaning carry a text alternative; decorative images are hidden from assistive technology.
1.2.1	Audio-only and Video-only (Prerecorded)	A transcript is provided for prerecorded audio; a transcript or audio track for prerecorded video without sound.
1.2.2	Captions (Prerecorded)	Captions are provided for prerecorded video that has sound.
1.2.3	Audio Description or Media Alternative (Prerecorded)	Visual information in prerecorded video is conveyed by audio description or a text alternative.
1.3.1	Info and Relationships	Headings, lists, tables, and form labels are marked up as such in the code, not merely styled to look that way.
1.3.2	Meaningful Sequence	The reading order in the markup matches the order the content is meant to be read in.
1.3.3	Sensory Characteristics	Instructions do not rely on shape, size, visual location, or sound alone.
1.4.1	Use of Color	Color is not the only means of conveying information or indicating an action.
1.4.2	Audio Control	Audio that plays automatically for more than three seconds can be paused, stopped, or muted.
2.1.1	Keyboard	All functionality is operable through a keyboard alone.
2.1.2	No Keyboard Trap	Keyboard focus can always be moved away from any component using the keyboard.
2.1.4	Character Key Shortcuts	Single-character keyboard shortcuts can be turned off, remapped, or limited to when a component has focus.
2.2.1	Timing Adjustable	Time limits can be turned off, adjusted, or extended before they expire.
2.2.2	Pause, Stop, Hide	Moving, blinking, scrolling, or auto-updating content can be paused, stopped, or hidden.
2.3.1	Three Flashes or Below Threshold	Nothing flashes more than three times in any one-second period.
2.4.1	Bypass Blocks	A skip link or landmark structure lets users bypass blocks of content repeated across pages.
2.4.2	Page Titled	Each page has a title that describes its topic or purpose.
2.4.3	Focus Order	Components receive keyboard focus in an order that preserves meaning and operability.
2.4.4	Link Purpose (In Context)	The purpose of each link can be determined from its text, or from the text together with its context.
2.5.1	Pointer Gestures	Functions using multipoint or path-based gestures have a single-pointer alternative.

No.	Success criterion	What it requires
2.5.2	Pointer Cancellation	Actions complete on release rather than on press, so a mistaken press can be aborted.
2.5.3	Label in Name	The accessible name of a control contains the text shown on its visible label.
2.5.4	Motion Actuation	Functions triggered by device or user motion can also be operated by conventional controls, and motion actuation can be disabled.
3.1.1	Language of Page	The default human language of each page is set in the code.
3.2.1	On Focus	Moving focus to a component does not by itself cause a change of context.
3.2.2	On Input	Changing a setting does not automatically cause a change of context unless the user was warned beforehand.
3.3.1	Error Identification	Input errors that are detected automatically are identified and described in text.
3.3.2	Labels or Instructions	Labels or instructions are provided where content requires user input.
4.1.1	Parsing	Markup is well formed: elements are properly nested, tags are closed, and ID attributes are unique.
4.1.2	Name, Role, Value	The name, role, state, and value of every user interface component are exposed to assistive technology.

A note on 4.1.1 Parsing. This criterion remains in force under WCAG 2.1, which is the version the federal regulations adopt. It was declared obsolete in the later WCAG 2.2 standard. An entity subject to 28 CFR § 35.200 is measured against WCAG 2.1 and should continue to satisfy it.

5. Level AA Success Criteria — 20 Criteria

WCAG 2.1 Level AA, additional to all Level A criteria above

No.	Success criterion	What it requires
1.2.4	Captions (Live)	Captions are provided for live audio content in synchronized media.
1.2.5	Audio Description (Prerecorded)	Audio description is provided for prerecorded video content.
1.3.4	Orientation	Content is not restricted to a single display orientation unless that orientation is essential.
1.3.5	Identify Input Purpose	Fields collecting information about the user declare their purpose so browsers can autofill them.
1.4.3	Contrast (Minimum)	Text has a contrast ratio of at least 4.5:1, or 3:1 for large text.
1.4.4	Resize Text	Text can be resized up to 200 percent without loss of content or functionality.
1.4.5	Images of Text	Real text is used rather than images of text, except where the presentation is essential.
1.4.10	Reflow	Content reflows to a 320 CSS pixel width without requiring scrolling in two dimensions.

No.	Success criterion	What it requires
1.4.11	Non-text Contrast	User interface components and meaningful graphics have a contrast ratio of at least 3:1.
1.4.12	Text Spacing	No content is lost when users adjust line height, paragraph spacing, letter spacing, and word spacing.
1.4.13	Content on Hover or Focus	Content revealed on hover or focus is dismissible, hoverable, and stays visible until dismissed.
2.4.5	Multiple Ways	More than one way is available to locate a page within the site.
2.4.6	Headings and Labels	Headings and labels describe the topic or purpose of the content they introduce.
2.4.7	Focus Visible	The keyboard focus indicator is visible wherever focus lands.
3.1.2	Language of Parts	Passages in a language other than the page default are identified in the code.
3.2.3	Consistent Navigation	Navigation repeated across pages appears in the same relative order each time.
3.2.4	Consistent Identification	Components with the same function are identified consistently throughout the site.
3.3.3	Error Suggestion	Where an input error is detected and a correction is known, the correction is suggested.
3.3.4	Error Prevention (Legal, Financial, Data)	Submissions with legal or financial consequence are reversible, checked for errors, or confirmed before finalizing.
4.1.3	Status Messages	Status messages are announced by assistive technology without moving keyboard focus.

6. The Five Conformance Requirements

Meeting the success criteria is necessary but not sufficient. WCAG 2.1 states five requirements that must all be satisfied before conformance may be claimed. An entity that satisfies most criteria on most pages does not conform.

- **Conformance level.** All Level A and all Level AA success criteria are satisfied, or a conforming alternate version is provided.
- **Full pages.** Conformance is claimed for entire pages. It cannot be claimed where part of a page is excluded.
- **Complete processes.** Where a page is part of a multi-step process, every page in that process conforms. A conforming form that submits to a non-conforming confirmation page fails.
- **Only accessibility-supported ways of using technologies.** Information relied upon to meet the criteria must be provided in ways that assistive technologies actually support.
- **Non-interference.** Technologies not relied upon must not block a user's ability to access the rest of the page.

7. How RLEDC Applies This Standard

RLEDC audits websites against every criterion listed above using automated testing at multiple viewport widths together with manual keyboard, screen reader, contrast, and reflow review, because automated tools detect only a portion of the criteria. Findings are reported by criterion number with the specific element, the failure, and the remediation. RLEDC provides audit, remediation planning, and implementation support to public entities and nonprofit organizations across the seven-county Eastern Plains region of New Mexico.

Conformance is a state, not a project. A site conforming today falls out of conformance the first time an untagged PDF, an uncaptioned video, or a low-contrast button is published. Entities subject to these rules should treat conformance as a maintained condition with a designated owner, not as a one-time remediation.

Source and attribution. Web Content Accessibility Guidelines (WCAG) 2.1 is a W3C Recommendation, © World Wide Web Consortium. The criterion numbers and titles above are those of that standard; the accompanying descriptions are summaries prepared by Rural Labor & Economic Development Corporation and are not the normative text. The authoritative document is published at [w3.org/TR/WCAG21/](https://www.w3.org/TR/WCAG21/). Regulatory citations are current as of July 2026. This reference is provided for informational purposes and is not legal advice.

Rural Labor & Economic Development Corporation • 501(c)(3) • EIN 41-3513223 • 723 East Route 66 Boulevard, Tucumcari, New Mexico 88401 • rledc.org