

ADA Title Two (State & Local Government) — Compliance Guide

ADA Title Two is the part of the Americans with Disabilities Act that applies to us. It covers state and local government — every program, service, and activity a public entity provides. For the Disability Services Division it is not an outside rule to satisfy; it is the floor under everything we do.

Content

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What Title Two requires, in plain terms:

- Equal opportunity. People with disabilities must have the same real chance to take part in and benefit from our programs as anyone else.
- Effective communication. We must communicate with people with disabilities as effectively as with everyone else — which can mean interpreters, captions, large print, Braille, or accessible electronic formats, at no cost to the person.
- Reasonable modifications. We adjust our policies, practices, and procedures when needed so a person with a disability can take part — unless the change would fundamentally alter the program.
- Accessible facilities and services. Physical spaces, and the way services are delivered, must be usable by people with disabilities.

The web and mobile accessibility rule (2024). The U.S. Department of Justice set a specific technical standard for Title Two: state and local government websites and mobile apps must meet WCAG 2.1 Level AA. "Guidelines" is in the name, but meeting WCAG 2.1 AA is required, not optional. The compliance dates were later adjusted — public entities serving 50,000 or more people must comply by April 26, 2027, and smaller entities and special districts by April 26, 2028. Narrow exceptions exist for certain content, but even then, if a person with a disability needs that content, we still must provide it in a format they can use.

What this means for your work. When you build a form, write a notice, post a document, host a meeting, or stand up an online service, accessibility is part of the assignment from the start — not a fix added at the end. Captions on video. Real text, not pictures of text. Forms you can operate with a keyboard. Color contrast that meets the standard. A clear way to request another format. Build it in, and the service works better for everyone — older adults, people with low vision, people on phones or slow connections, and the Minnesotans with disabilities we serve.

This is a working summary for staff, not legal advice. For a specific legal question, route it to the consultant, who will refer it to the appropriate office.

Verify current authority, preserve rights and exceptions, and route interpretation questions using ADA Title Two (State & Local Government) — Compliance Guide.

Confirm the current purpose, audience, and decision authority before using ADA Title Two (State & Local Government) — Compliance Guide to verify current authority, preserve rights and exceptions, and route interpretation questions.

Choose the sections of ADA Title Two (State & Local Government) — Compliance Guide that match the situation; do not apply unrelated guidance as a blanket rule.

Document the action taken from ADA Title Two (State & Local Government) — Compliance Guide, the people affected, unresolved questions, and the responsible follow-up owner.

Check the stated limitations and evidence status for ADA Title Two (State & Local Government) — Compliance Guide; escalate when current authority or individual context is missing.

Review the result with the affected person, team, or community and revise the apply policy rights and compliance approach when it creates a barrier or unintended effect.

For policy regulatory analysts, use ADA Title Two (State & Local Government) — Compliance Guide to verify current authority, preserve rights and exceptions, and route interpretation questions; trace each recommendation to current authority, preserve exceptions, and document the decision record. Start by verify current authority, preserve rights and exceptions, and route interpretation questions using ADA Title Two (State & Local Government) — Compliance Guide.

Verify the current primary authority and effective date; this resource does not provide fact-specific legal advice or replace authorized program interpretation.

Do not replace official legal, policy, clinical, supervisory, program, or Tribal authority.

Do not infer an individual's identity, preferences, needs, or experience from group-level information.

State uncertainty, use current authoritative sources, and escalate when the decision exceeds the user's role.

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