



JASON E. MUMPOWER  
*Comptroller*

March 24, 2026

MEMORANDUM TO: Tennessee Local Government Officials

FROM: Jason E. Mumpower, Comptroller of the Treasury

SUBJECT: Upcoming ADA Accessibility Requirements for Local Government Web Content and Mobile Applications

A handwritten signature in blue ink, appearing to read "J. E. Mumpower", is written over the "FROM" and "SUBJECT" lines of the memorandum.

The U.S. Department of Justice (the “DOJ”) has issued a final rule updating its regulations for Title II of the Americans with Disabilities Act (the “ADA”). These updated ADA requirements are in addition to any existing applicable requirements related to accessibility or otherwise.

The updated rule requires public entities to ensure their web content and mobile applications are readily accessible to and usable by individuals with disabilities and that their web content and mobile applications comply with Level A and Level AA success criteria and conformance requirements specified in the Web Content Accessibility Guidelines (“WCAG”) 2.1. Web content includes, but is not limited to, websites, webpages, online forms, PDFs, and social media posts. These guidelines are available here: <https://www.w3.org/TR/WCAG21/>.

The deadlines for compliance with these requirements depend on public entity population size:

- Local governments with a total population of **50,000 or more** must comply by **April 24, 2026**
- Local governments with a total population of **fewer than 50,000** or a special district government as defined in the federal rules must comply by **April 26, 2027**

The DOJ has issued the following resources to help guide compliance:

- <https://www.ada.gov/resources/web-rule-first-steps/>
- <https://www.ada.gov/resources/2024-03-08-web-rule/>
- <https://www.ada.gov/resources/small-entity-compliance-guide/>

**We are sharing this information with local officials to raise awareness of this federal requirement. While we are not able to offer technical guidance or legal advice regarding its implementation, we encourage you to consult the U.S. Department of Justice or your legal counsel.**