

Release 26.5 - WCAG 2.1 AA

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MyMedicalLocker – WCAG 2.1 AA Accessibility Conformance

Overview

MyMedicalLocker conforms to **Web Content Accessibility Guidelines (WCAG) 2.1 Level AA**, the technical accessibility standard adopted by federal regulators for patient-facing healthcare technology. This document is intended to support practices that need to demonstrate the accessibility posture of the patient portal they make available to their patients.

Regulatory Driver

Healthcare organizations that receive federal financial assistance from HHS – including any practice that accepts Medicare or Medicaid payments – are required to ensure that their patient-facing websites, mobile applications, and patient portals conform to **WCAG 2.1 Level AA**. This requirement was established by the HHS Office for Civil Rights final rule under Section 504 of the Rehabilitation Act, published in the Federal Register on May 9, 2024 (89 FR 40066).

The rule applies broadly: any organization receiving federal financial assistance from HHS – directly or indirectly – is subject to it. The threshold is low; even a single Medicare or Medicaid payment can trigger coverage.

Compliance deadlines are:

- **May 11, 2026** – for organizations with 15 or more employees
- **May 10, 2027** – for organizations with fewer than 15 employees

Patient portals are explicitly named in the rule as in-scope technology. Because MyMedicalLocker is the patient-facing portal practices make available to their patients, its WCAG 2.1 AA conformance directly supports each practice's own Section 504 compliance obligation.

Conformance Details

MyMedicalLocker is built and tested against the four WCAG core principles – content must be **Perceivable, Operable, Understandable, and Robust**. Conformance areas include:

- Color contrast ratios for text and interactive elements
- Keyboard-only navigation (no mouse required)
- Screen reader compatibility and ARIA labeling
- Visible focus indicators
- Form field labels and error identification
- Compatibility with current and evolving assistive technologies

Overlapping Compliance Frameworks

WCAG 2.1 Level AA is the common technical standard across multiple regulatory frameworks that may apply to a practice:

- **HHS Section 504** (Rehabilitation Act) – healthcare organizations receiving federal financial assistance, deadlines noted above
- **ADA Title II** – state and local government entities, including public hospitals, under the DOJ final rule published April 2024
- **ADA Title III** – places of public accommodation; federal courts routinely cite WCAG 2.1 AA as the de facto standard in private-sector accessibility litigation
- **ONC Health IT Certification Program** – references WCAG conformance for patient-facing functionality, including the View, Download, and Transmit (VDT) criterion

Practices subject to multiple frameworks should treat them as reinforcing obligations rather than separate ones – they all point to the same technical standard.

What This Means for Your Practice

If a patient, auditor, or compliance reviewer asks whether the patient portal you offer is WCAG 2.1 AA conformant, you can confirm that **MyMedicalLocker is built and maintained to the WCAG 2.1 Level AA standard** required by HHS Section 504 for patient-facing healthcare technology.

This document covers the patient portal only. Practices remain responsible for the accessibility of their own websites, marketing properties, intake forms, and any other patient-facing digital tools outside of MyMedicalLocker.

Sources

- HHS Office for Civil Rights, *Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance* (89 FR 40066, May 9, 2024) – <https://www.federalregister.gov/documents/2024/05/09/2024-09237/>
 - HHS, *New Requirements on the Accessibility of Web Content, Mobile Apps, and Kiosks* – <https://www.hhs.gov/sites/default/files/new-requirements-accessibility-web-content-mobile-apps-kiosks.pdf>
 - U.S. Department of Justice, *ADA Title II Web Accessibility Final Rule* (April 2024) – <https://www.ada.gov/resources/2024-03-08-web-rule/>
 - W3C, *Web Content Accessibility Guidelines (WCAG) 2.1* – <https://www.w3.org/TR/WCAG21/>
 - ONC Health IT Certification Program – <https://www.healthit.gov/topic/certification-ehrs/certification-health-it>
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