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Bringing Your Identity Verification Interface to Meet Americans with Disabilities Act (ADA) Compliance Deadlines

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As digital identity verification (IDV) has become both a cornerstone, and gateway, for public-facing government services, ensuring these platforms are accessible to all users—including persons with disabilities—is both a legal requirement and a commitment to inclusivity.

The Americans with Disabilities Act (ADA) final rule originally issued by the U.S. Department of Justice (DOJ) mandated that state and local public entities make their web content and mobile applications accessible by April 24, 2026. However, on April 20, 2026, DOJ issued an interim final rule extending these compliance dates for web content and mobile application accessibility by one year. The new date for larger public entities (populations>50,000 people) is April 26, 2027, and for smaller entities/special districts (populations<50,000 people), April 26, 2028.

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Some may consider that the IDV connection into the “accessible government” landscape is overwhelmingly stressed to support a service that in the ordinary course must balance security with customer experience , both at the highest levels. The goal is to balance the friction of the onboarding of or re-authentication by a beneficiary with tungsten-strength fraud and scam mitigation. This task can become even more challenging when the end user is physically challenged to operate a mobile device, a tool that is integral to our daily connection to the abundance of services (government and otherwise) that are offered online.

Managing this balance can be a point of opportunity for IDV service providers – if one can provide a seamless, secure, and accessible service, it exemplifies the utility of the product for the majority of users who do not face similar obstacles.

Understanding and implementing ADA compliant solutions is not just critical to avoid legal risks that relate to an ADA rule, but central to delivering equitable experiences, for any user.

The Impact of the ADA Interim Final Rule on Digital Accessibility for Government Agencies

The Title II regulations under the ADA apply broadly across state and local governments—including municipal agencies, public schools, hospitals, and transportation authorities—and extend contractual obligations to private vendors who provide digital services to these entities.

Most covered entities are required to comply with the ADA Interim Final Rule by April 26, 2027, with smaller public bodies (serving populations with under 50,000 people) granted an additional year. This means that companies offering remote IDV technology must remain ahead of the curve in their development progress to ensure their IDV interfaces meet accessibility standards if they serve government clients.

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The Key Web Content Accessibility Guidelines (WCAG) Requirements

Compliance centers around adherence to the WCAG v2.1 at Levels A and AA—the recognized technical standard incorporated into the DOJ's interim final rule (see our note on v2.2 below). For IDV interfaces specifically, this includes:

Contrast (Minimum) – Ensuring that text and interactive elements have a contrast ratio (of at least 4.5:1) against their background, which is essential for readability in varying lighting conditions common with mobile device use.

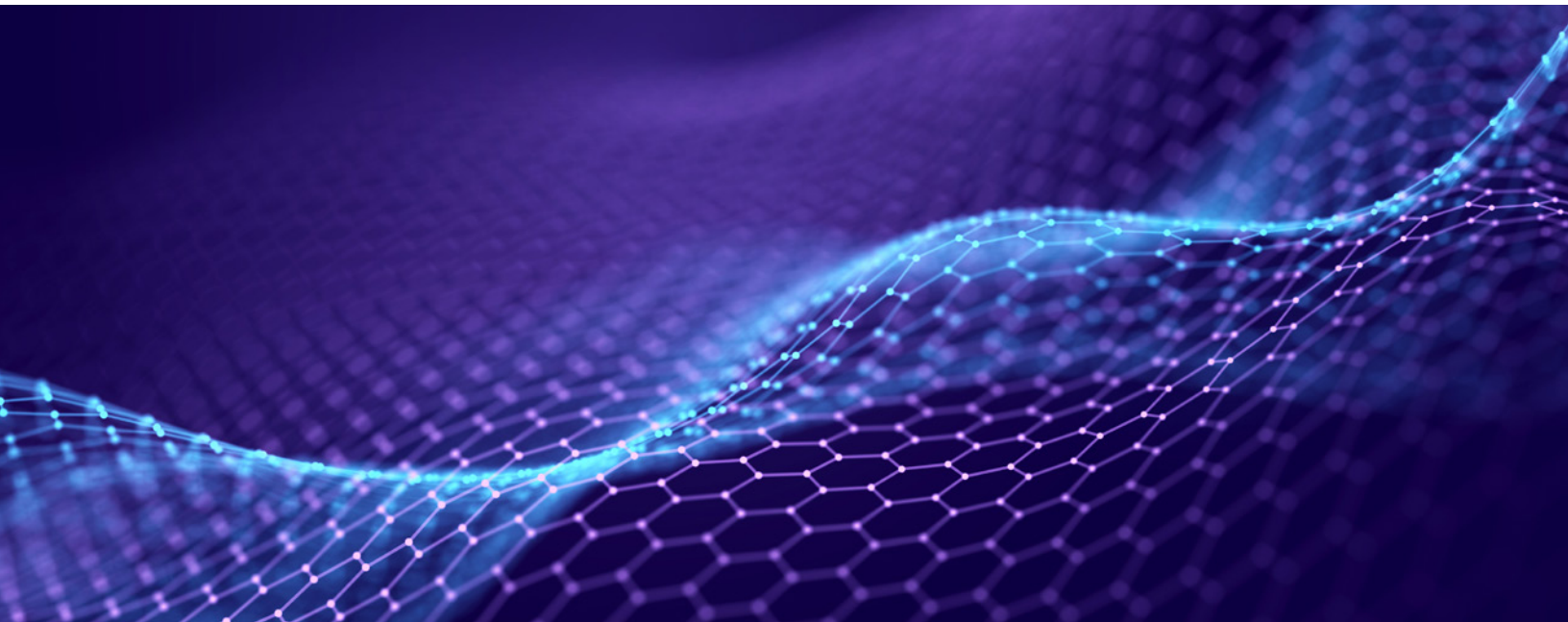
Focus Visible – Requiring that any keyboard or focus indicator be clearly visible when users navigate through form fields, buttons, or other controls during the IDV process on mobile devices.

Meaningful Sequence – Mandating that content is presented in a logical reading and interaction order so users relying on assistive technologies can complete multi-step verification processes without confusion.

Labels or Instructions – Requiring clear labels or instructions for input fields, such as document captures or biometric scans, to help users understand what information is required and how to provide it correctly.

Non-text Contrast – Ensuring sufficient contrast between non-text user interface components (e.g., buttons, icons) and adjacent colors, so all interactive elements are easily identifiable by users with visual impairments on small screens.

It is noted that WCAG v2.2 was released in October 2023, adding 9 new success criteria over v2.1. Even though v2.2 was not submitted as the reference standard by the DOJ, some IDV service providers have elevated their accessibility offering by reaching v2.2 compliance, further benefiting their government customers to be able to offer even more enhanced service improvements to the widest user base.



Integrating Assistive Technologies into Remote IDV Processes

To balance security needs with accessibility requirements effectively, WCAG compliance cannot be an after-the-fact checklist item. Developers should be embedding assistive technologies directly into their workflows as a foundational element, rather than treating them as add-ons after deployment. In process this means:

Features like voice command capabilities can facilitate hands-free operation during multi-factor authentication steps, while maintaining robust fraud prevention measures through secure voice recognition protocols.

Screen reader compatibility can ensure visually impaired users receive step-by-step guidance throughout document submission or facial recognition stages without confusion.

Adjustable font sizes can improve readability without disrupting layout integrity—a crucial factor when verifying sensitive personal data visually displayed on-screen—and error messages should be designed clearly with both visual highlights and auditory alerts where possible.

Monitoring Your ID Verification Solution for Ongoing ADA Compliance

Achieving initial compliance is just one part of maintaining an accessible interface over time amid evolving standards and user expectations. As mentioned above, the DOJ standards are already one version behind WCAG releases, with the v2.3 release forthcoming. Agencies should be requiring their IDV vendors to implement continuous testing strategies. Further, regular audits can help identify emerging issues before they escalate into costly enforcement actions or damage customer trust—especially important given potential DOJ investigations triggered by complaints from individuals experiencing inaccessible digital services.

With the ADA deadlines now in effect, compliance requires coordinated efforts between government agencies and private service providers to deliver remote IDV solutions built on inclusive design principles and supported by rigorous testing regimes. The goal remains unified—to foster equal access while safeguarding privacy and security in digital interactions tied to agency benefits.

As agencies work to meet ADA requirements and modernize digital services, the path forward is not about choosing between accessibility, security, and user experience—it's about advancing all three in parallel. Identity verification sits at the center of this balance.

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AI-driven approaches that combine document authentication, biometric verification, and adaptive fraud detection are helping agencies reduce friction for legitimate users, while strengthening defenses against increasingly sophisticated threats. Solutions like LexisNexis® IDVerse® can enable agencies to verify identities in seconds, detect deepfakes and manipulated media, and deliver secure, accessible experiences at scale.

Now is the time to evaluate whether your identity verification approach is ready—not just for compliance deadlines, but for the next generation of digital trust.

For more information, scan QR code or call 1-888-216-3544

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