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Jennifer L. McGowan

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## **Stumbling through the Forest: A Journey Using PDF Remediation Software in Course Reserves**

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### **ABSTRACT**

With the impending Title II rule based on Web Content Accessibility Guidelines (WCAG) Version 2.1 Level AA coming into effect in April 2027 (changed from April 2026), the library has placed itself in the role of providing more accessible content to its patrons (Federal Register, 2026). This case study examines the use of PDF remediation software to ensure that Course Reserves in digital format are accessible to patrons with disabilities. While there are numerous articles discussing accessibility of library material, very few discuss real-world issues in accessibility within the context of library resources, specifically Course Reserves. There is a dearth of literature that addresses any practical steps in remediating these issues. This topic is important, as proper access to resources, and accessibility of those resources, are paramount to the success of students with disabilities. Additionally, the study is concerned with applying this remediation tool to library resources outside the area of Course Reserves, such as Special Collections and Interlibrary Loan (ILL). Please note that the author is not an attorney, and that no information in this journal should be construed as legal advice. Additionally, please be advised that the library adheres to specific policies and procedures that acknowledge and protect copyright law.

**Keywords:** WCAG, accessibility, Equidox, Course Reserves, documents

### **INTRODUCTION**

With the upcoming Title II deadline, research into practical step-by-step remediation of digital reserve texts conforming to specific WCAG 2.1 guidelines has not yet been mentioned in the literature. Our library offers a Course Reserves service to its students. Many of the library reserves are in physical or electronic format, the latter primarily sourced from third-party subscription databases. There is one specialized service offered, however: Controlled Digital Lending (CDL). This is an established practice among some higher education institutions. By definition, “CDL enables a library to circulate a digitized title in place of a physical one in a controlled manner” (Hansen, 2018). It is essentially a 1:1 ratio. The amount of material provided is within fair use guidelines; the amount of fair use material provided is comparable to other libraries that provide Course Reserves. With the advent of the new “Title II requirement for Web and Mobile Accessibility applications” (Civil Rights Division, 2024), the processes for this service have

undergone something of a transformation. An extra step will now need to be implemented to further ensure accessibility—remediating PDFs utilizing an accessibility solution software.

## LITERATURE REVIEW

The concept of course reserves, available via physical or digital access, is not a new one. One article discussed the idea of course reserves in the context of legal education, stating that “...the Litchfield Law School also pioneered a de facto reserve system in its library...” in the late 19<sup>th</sup> century (Radthorne 2020). This is reiterated in another article which states that course reserves services existed “...as far back as the 19th century, when history professors supplied the libraries at the University of Michigan, Harvard University, and Johns Hopkins University with lists of books” required for student success (Pollitz, 2009). However, while these articles discuss resources that are free for students to access, (hence “accessible”), the idea of “accessible” course reserve materials is usually restricted to physical or digital availability. They don’t broach the issue of disability-related accessibility, a highly nuanced concept.

Anita Kwak, in her article “Developing a Training Program for Student Library Assistants to Make Scanned PDFs Accessible: A Case Study” addresses the issue of training students on a complex process and provides solutions to mitigate it. Care will need to be taken to avoid overwhelming both student workers and full-time workers (Kwak, 2025). While it doesn’t address all issues in a step-by-step manner, it provides useful guidance in creating and maintaining a remediation process that will allow student workers to successfully complete the process.

Another article discusses accessibility (especially as it pertains to course reserves), stating, “...colleges must remediate existing digital content, which includes course materials” (Swaak, 2024). One of the biggest issues, according to the article, indicates that PDFs pose a significant barrier to access, stating that one professional “considers remediating documents like PDFs ‘the largest challenge’ in complying with the new regulations” (Swaak, 2024). It goes on to elucidate why PDFs are so cumbersome, including tags, headings, and paragraphs in its list of grievances. Chee and Weaver (2022) support this assertion in their article “The Great PDF Debate: Accessible or Impossible?”. They acknowledge that “unremediated PDFs will always fail accessibility requirements”; yet they give no advice on how to remediate the files.

Emanuel (2025) touches more on the practical aspect of remediating PDFs (specifically legacy material). They discuss scanning using the searchable text feature, and talk about using various tools to remediate PDFs, (such as Abbyy Finereader and Equidox). While it discussed some areas of concern to materials in institutional repositories (IR), it didn’t discuss course reserves (by nature of its subject). While similar in some aspects (for example, columns), course reserves can present different issues than IR, such as complex images, overlying texts on images, lists (and nested lists), and other features. Additionally, it did not go into detail about the multi-layered process for remediating PDF documents with Equidox specifically.

Before discussing the approach in-depth, a brief review of the history of disability legislation is necessary to understand the driving force behind this new rule. Numerous laws and resolutions have been passed and implemented that govern institutions and advance the rights of persons with disabilities, specifically in higher education. For example, the Rehabilitation Act of 1974, Section 504 and 508 of this Act, and the Americans with Disabilities Act (hereafter referred to as “ADA”, specifically Title II). Section 504 of the Rehabilitation Act, in relation to higher education, forbids the exclusion of people with disabilities from any “program or activity receiving federal financial assistance” (Office for Civil Rights – FAPE, n.d.). The party responsible for enforcing it is the Department of Education’s Office for Civil Rights (Office for Civil Rights Section 504, n.d.). As society became more technologically advanced, Section 508 was implemented to cover areas of digital accessibility (Section 508 Background, 2025 March). This primarily applied to federal institutions receiving federal funds. The ADA intended to fill a gap in the accessibility needs for all people, “regardless of whether these entities receive Federal financial assistance” (Civil Rights Division – Title II Regulations, 2024 June 24).

The scope of this paper is not intended to cover these in detail, but this context illustrates that accessibility has been a protracted process that continues to evolve alongside society and technology. Failure to maintain awareness and enforcement of these laws can result in lawsuits, such as those currently in progress with the Office for Civil Rights, specifically in regard to Web Accessibility (Office for Civil Rights – Pending Cases, 2025). There are currently 27 pending cases stemming “from lack of accessibility to Website or Online Courses from Post-Secondary Institutions” according to the Office for Civil Rights Complaint Assessment System (Office for Civil Rights – Pending Cases, 2025).

The American Library Association has taken a proactive approach in providing guidance for the new Title II rule. They have curated several links to help organizations understand the basics of accessibility; a link is provided to an ADA website discussing the first steps. Therefore, the library acknowledges ALA’s information as guidance and best practices. They also included a section on “triaging” remediation. It also touched upon the murky area of copyright, explaining that, with the Chafee amendment to the Copyright Act Section 121, libraries will be in a more favorable position to remediate library resources to conform with WCAG 2.1 AA (Library of Congress, n.d.).

## **METHODOLOGY**

On the Course Reserves team, addressing possible accessibility issues in PDFs was fraught with concern. One primary issue was that of text on an image. While it seemed accessible the majority of the time, there were periods when staff could not be certain that the text was captured. In addition, textbooks are typically formatted in a variety of ways: one column throughout a document, two columns or more throughout a document; or perhaps one column in the upper section, and two columns in the lower sections. Even though Adobe has a Reading Order tool, the

Accessibility Checker will always caution the user to check this area of accessibility. This issue, among numerous others, led to a certain degree of doubt regarding whether a document created by our team would accurately be read by a screen reader.

In April 2025, staff were privileged to join the campus Title II Working Group on PDF Remediation. Given their role in working with Controlled Digital Lending, this was extremely important to them, to ensure accessibility and compliance with the new Title II requirement. Staff members were initially nervous at the prospect of remediating hundreds of pages. They had limited experience remediating PDFs; solely working in Adobe with reading order and Optical Character Recognition (OCR). The taskforce tested Equidox, a remediation software that allows users to create zones and edit reading orders. It also allows users to use OCR to ensure 100% text accuracy is being read via the screen reader (Equidox, n.d.). It is generally user-friendly, especially for staff who are not familiar with complex compliance needs. It alerts users to errors when exporting the PDF from Equidox. This contrasts with other remediation software such as CommonLook, which appears to require a bit more expertise (Allyant, 2018). Adobe Acrobat has an accessibility tool to establish correct reading order, and allows the user to manage tags. However, creating tags for lists, tables, and other non-text blocks is cumbersome, and requires knowledge beyond basic use.

While the working group initially covered the basic aspects of remediating PDFs, such as reading order, lists, tables, OCR, etc., the library's course reserve texts provided unique and complex challenges; they contained documents with various layouts, including one column at the head of the document, and two columns at the bottom. Numerous images required alternative text; page numbers and other headers/footers needed to be artifacted (e.g. unrecognized by screen readers); links, lists, and tables merited attention. Pages had marginalia, which required OCR before they could be read accurately. Text on images was another aspect that proved difficult to remediate. Therefore, a variety of issues needed to be addressed in Course Reserves.

## **Accessibility Issues**

Here is a somewhat comprehensive, but by no means exhaustive, list of potential accessibility issues in PDFs, as well as their WCAG Guidelines when applicable.

### ***Reading Order***

Reading Order is of primary importance when ensuring accessibility. It requires that creators of documents present information in a logical order. One of the issues encountered was proper tagging. "Walking the tags", a process in which the user clicks on each tagged item in Adobe, expands each tag, and makes sure that the appropriate tag matches the correct text, did not always yield the best results. This is because users will find text that has not been captured correctly using OCR. Consequently, using Adobe's "Check Reading Order" function will be less than effective, skipping over untagged items. While training on Equidox, staff were shown how to correct the issues. Equidox primarily uses zones, which could be edited to reflect proper

reading order, which is one of the primary benefits of Equidox. This helped the document conform to Reading Order WCAG 1.3.2 Success Criterion - Meaningful sequence (World Wide Web Consortium – Meaningful Sequence, 2025).

### ***Table of Contents***

It can be tempting to categorize the Table of Contents as a list, but WCAG 2.4.5 - Multiple Ways must be followed, and their webpage indicates why a distinction must be made: “It gives users an overview of the document's contents and organization” (World Wide Web Consortium – Technique G64, 2025).

### ***Headings***

As discussed in the article by Emanuel (2025), headings are not always at the forefront of a creator’s thoughts. Heading structure is immensely important, as it determines the relationships of various document sections. The United States General Services Administration (GSA) has an excellent section dedicated to Section 508 that explains what headings are and how they are used (Section 508, n.d.). Auto-tagging the document in Adobe did not always yield the correct results; repeatedly, H1 (Heading Level 1) was listed as H2; there was no Level 1. This is a major oversight. As discussed, users will find text that has not been captured correctly using OCR, or, as in the case of headings, discover that the headings are not in order from H1 to H5. This contradicts the WCAG Guideline for Headings: WCAG 2.4.6 Navigable - Headings and Labels (World Wide Web Consortium- Headings and Labels, 2025). Walking the tags help to ensure that the Headings were nested in the correct order. Staff verified that there were no gaps between heading levels. This process was much quicker in Equidox. After visually evaluating the document to determine the heading structure, it was a simple task to create a zone over the heading text and to label it as H1, H2, H3, and so on. A quick look at the Preview in Equidox showed us the sections of enlarged text to ensure proper layout. This satisfied the WCAG 2.2 Success Criteria (2.4.6) that stated “When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.” It is important to remember that headings should be properly nested, (e.g., H1 is followed by H2 and not H3), and that only one H1 (Level one heading) can exist per document (World Wide Web Consortium – Headings, 2017).

### ***Lists (and Nested Lists)***

Lists posed a particular challenge, especially nested lists. Adobe did not always correctly interpret list labels or list bodies. In Adobe, this would involve creating tags for Labels and List Bodies under a List item, moving these individual List Items, and their nested Labels and List Bodies, to their appropriate place in the list, and finally nudging them to the right to create the proper structure. Nested lists would need to be manually created, or, at the very least, their tags reorganized within the tag tree. This cumbersome process could easily prevent compliance with the WCAG 1.3.1 Success Criterion - Info and Relationships for lists and nested lists, in which “assistive technology can easily inform users about the number of steps” (World Wide Web Consortium-Content Structure, 2017). With Equidox, proper tagging of lists became easy as well. A zone was placed around the list text, and the type “List” was chosen. Nested lists were solved

in minutes within Equidox. One zone was created for the entire list, including nested items. Then a useful AI tool, the List Sensitivity slider, was used to recognize all lists. Reviewing the Preview window alerted us to any issues.

### ***Images***

Images were a primary concern for the team. While users can add alternative text for images in Adobe, using the “Scan and OCR” function in Adobe was unreliable in capturing OCR’d text. Manually adding tags did not always alleviate the issue, and it was also time-consuming. Furthermore, complex images with overlaying text were difficult to portray correctly to a screen reader. This is an important accessibility issue, as evidenced by the existence of Text within images WCAG Success Criterion 1.4.5 - Images of Texts (World Wide Web Consortium – Images of Texts, 2023). Equidox made this simple. When creating a zone around the image, “Graphic” was chosen as the item type, and alternative text was entered. Staff added another zone to capture the overlaying text. Choosing “Text” would allow this to be displayed; utilizing the OCR function ensured that the text was correct. Basic alternative text is covered by WCAG Success Criterion 1.1.1 - Non-Text Content, specifically under “Images of Texts” (World Wide Web Consortium – Non-text Content, 2025). However, overlaying text on an image did not seem to be mentioned; this appeared to supersede WCAG requirements.

### ***Tables***

WCAG Success Criterion 1.3.1 - Info and Relationships success criterion discusses the need to establish logical relationships (World Wide Web Consortium – Tables Tutorial, 2023). While this can be done in Adobe, it is time-consuming and iterative. Table headings must be delineated, as well as table data, requiring numerous tags in Adobe to be situated correctly with accurate text. Within Adobe, several tags were required, such as TH for table header and TD for tabular data. TD tags could be numerous, and the data within the cells could be unreadable due to a poor scan. When tagging a table in Equidox, users can easily create a zone, using the Zone Type drop-down lists to select Table. From there, the Table Editor tool was used. This brought up a separate window allowing staff to use an AI tool to detect columns and rows. Users were able to include the correct number of header columns and rows. The Spanning Tool merged cells together for a cleaner display. Finally, cells could be adjusted to eliminate excess rows or columns. Once everything was in place, the entire table was OCR’d. Staff then clicked in each individual cell to review and/or edit the text.

### ***Columns***

Several of our course reserve texts contained two or more columns, complicating the reading order. Following the “Mixed number of columns on one page WCAG Success Criterion 1.3.2 - Meaningful Sequence” is again imperative in ensuring accessibility (World Wide Web Consortium – Meaningful Sequence, 2025). Adobe’s Fix Reading Order function was not 100% accurate, as discussed earlier. Moreover, Adobe stressed that the Reading Order must be checked manually. When pages had varying columns, such as when the top section had one column, and the bottom section had two or more, it proved difficult to enforce the correct reading order. Numbering the

zones eliminated this difficulty, allowing one zone to cover a section with one column, and subsequent zones to individually outline two or more columns that were side-by-side. This provided the proper layout for a screen reader to process the text.

All these specialized features in the documents from textbooks gave staff great cause for concern, not only due to Title II compliance, but also due to the possible lack of accessibility for vision-impaired (VI) students. Would this new software help us to remediate all aspects of the document to ensure accessibility? Would it function simply as an accessibility overlay, and not address the root of each problem? How could this software be used to help anticipate and proactively mitigate previously unknown issues, such as texts in different languages?

While starting out, staff found that creating alternative text was quite difficult. Equidox support staff and staff from Academic Innovation showed the team various websites that taught them how to conceptualize it. PoetDiagram has tools that allow users to practice writing alternative text (Poet Training Tool, n.d). Additionally, Arizona State University's Image Accessibility Generator has been heavily used to assist with alternative text, by means of artificial intelligence (Arizona State University, n.d.). It must be stressed, however, that it was imperative to check the text prior to adding it, to guarantee that it captured the essence of the image.

One important added feature in Equidox explored in detail was the use of the OCR function to ensure accurate display of text. This AI feature was incredibly important. It enabled users to go into each section or paragraph to edit text, so that it could be accurately read by a screen reader. The OCR function on the left-hand side was much more efficient than using the Custom Text option; it had an overall accuracy rate of approximately 85%, requiring small, quick changes. This contrasts with the Custom Text option, which typically reached a 50% accuracy rate, necessitating more editing.

Finally, an important feature in Equidox was error notification after file download. This has been helpful, and at times frustrating, to ensure accessibility. While Adobe has a similar feature, the Accessibility Checker, the visual layout in Equidox greatly enhanced the understanding behind errors. In addition, there was an option to review what each error message means simply by clicking on a link that takes the user to an external website with proper documentation.

## **Workflow**

To make things more manageable, a workflow was created for the entire process. First, staff would scan a document as a PDF. They would then import the PDF into Adobe, run the text recognition within Adobe, and upload to Equidox. From there they would enforce correct zones, OCR problematic areas, make tables, lists, images, and other aspects accessible. Finally, they would reimport into Adobe as a remediated PDF, taking final steps to ensure accessibility.

### ***Action***

When scanning the documents, staff always used the “Searchable PDF” feature. The first step was to scan the document in PDF file format, crop any pages, and let Adobe recognize any text and/or images. At this stage, the document is untagged, unless the user chooses to activate the “AutoTag” function in Adobe. This is not recommended when it will be remediated in Equidox.

### ***Equidox***

The next step in the process was to import it into Equidox. First, zones are used to categorize different areas, such as texts, list, and tables. Equidox allows for several types of tagging by utilizing “zone type”. Users create a zone and outline a section. Then they use the Zone type drop-down list to tag it. Tagging items such as lists or tables prompts the editor buttons to appear, and allows for quick, easy remediation.

After tagging, it was essential to use the OCR button, ensuring text has been interpreted correctly by the program. Since this is an AI function, mistakes might occur; it was important to double-check. Incorrect or extraneous text will make it difficult for a person using a screen reader to understand the material. Since the alternative is to type it out, it certainly saves time and is highly efficient.

Once everything was tagged and OCR’d appropriately, the user clicked the “Reorder” button to ensure that the reading order was correct. The document was saved and staff looked at the preview. This allowed staff to quickly determine whether sections of texts were out of order. The final step was to export it. Any errors in accessibility were noted at this point. Equidox made it easy to pinpoint the errors and fix them. Staff clicked on the error, and it led them to the exact page in the document. After the errors were fixed, the document was ready for export.

### ***Back to Adobe***

When remediation in Equidox was completed, the document was reloaded into Adobe where the final accessibility check was performed. Adobe Acrobat will always display a “Logical Reading Order” message when generating an error report, even if the reading order has already been corrected in Equidox. This message can be safely ignored.

The Academic Innovation Office provided five steps to work through after running a PDF through Equidox:

1. Ensure that the PDF is selectable and searchable.
2. Check the reading order and tag types.
3. Confirm image descriptions are meaningful.
4. Update the document properties.
5. Run Adobe’s Accessibility Checker.

Since checking the Reading Order is the last step in Equidox, this Adobe checklist might seem to be mis-ordered. However, a conversation with Academic Innovation staff indicated that the image descriptions can only be done if the figure tags are correct.

Finally, Adobe's Accessibility Checker was run. This would confirm that the remediation work completed in Equidox was successful. As addressed previously, while this would capture errors such as improper heading structure, list errors, and text tagged as figures, it did not address Reading Order or Character Encoding. The reading order was previously verified and modified by Equidox; Character Encoding continues to be a separate issue.

## FINDINGS

It was discovered that Equidox would not only assist in remediation of basic accessibility issues, but help to address other issues as well. This will assist staff in the quest to meet the expectations of the Title II rule. Additionally, since this is a team-based software, it will allow collaboration with other departments, and within the current department, as described below.

### **Collaboration with other departments**

In the journey to become acquainted with Equidox and accessibility, staff were fortunate to be able to help other departments. They worked with a Digital Archivist to render scanned items accessible in different formats and languages. It was discovered that no language barrier existed; Adobe Acrobat allowed the team to change the document language by going into the Document Properties toolbox (File → Properties). From the Document Properties dialog box, users selected the Advanced tab, and chose the correct language from the Reading Options drop-down box. In Equidox, the language was changed to reflect the nature of the document; this was done by using the language drop-down box on the left-hand side and choosing the correct language. Subsequent use of the AI OCR function ensured accuracy.

Earlier in the journey to remediate PDFs, staff discussed alternative text with a subject specialist in the Digital Humanities department to improve accessibility. They intend to build on this by showing them how to use Equidox to add alternative text and successfully OCR text within an image to allow for proper accessibility remediation. Staff have continued to correspond with Academic Innovation to ensure that appropriate accessibility measures were taken, and knowledge was passed on to the department's Level I support specialist. More complex issues will be expedited through a ticket to Equidox itself. Collaboration for student success will be further enhanced by forming stronger partnerships with the Student Disability Services to improve turn-around remediation times by coordinating these services with registered students and their appointed specialists. Within the library itself, they will be responsible for training the InterLibrary Loan team in remediation tasks, so that external users are also able to properly access our material.

### Next steps

Our team will need to focus on remediating course reserves files required for Spring 2026. This involves completing a review of all documents that will be used in the coming semester and remediating them. Staff and student workers will be trained in this process. As was discovered while training in both Equidox and accessibility, there is quite a cognitive load in processing information, as previously referenced in the Kwak article. A step-by-step document was created, and has already shown success in one case.

## CONCLUSION

It is important to ensure accessibility, not only due to legal compliance, but also to allow for all students to have an accessible education. While training to use this practice, it quickly became apparent that the scope of remediation would extend far beyond the initial assumptions, including different areas such as language and the ability to address text on images. Staff on the Working Group were involved in a collaborative effort to learn about accessibility as well as this tool. It will be necessary to engage in another collaborative effort, this time within the Access Service department, as well as with external departments, creating cross-departmental partnerships. This software will ultimately help the library to ensure accessibility and discover more opportunities to make information accessible.

### References

- Allyant. (2018). *PDF Accessibility: Testing and Verification* <https://allyant.com/blog/which-pdf-accessibility-standard-should-i-check-my-document-against/#:~:text=April%203%2C%202025-,Which%20PDF%20Accessibility%20Standard%20Should%20I%20Check%20My%20Document%20Against,need%20to%20meet%20one%20standard.>
- American Library Association. (n.d.). *Applying the Rule to Library Content*. <https://www.ala.org/accessibility/applying-rule-library-content#audio-video-files>
- Arizona State University. *Image Accessibility Generator* <https://teachonline.asu.edu/image-accessibility-generator/>
- Chee, M., & Weaver, K. (2022). The great PDF debate: Accessible or impossible?. *College & Research Libraries News*, 83(8), 363. doi:<https://doi.org/10.5860/crln.83.8.363>

- Civil Rights Division. (2024, April 8). *Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments*. Department of Justice. <https://www.ada.gov/resources/2024-03-08-web-rule/>
- Civil Rights Division – Title II Regulations. (2024, June 24). *Americans with Disabilities Act Title II Regulations*. Department of Justice. <https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/>
- Emanuel, M. (2025). Making your repository (more) accessible. *Journal of Librarianship and Scholarly Communication*, 13(1), 0\_1,1-14. doi:<https://doi.org/10.31274/jlsc.18308>
- Equidox. (n.d.) *Equidox PDF Accessibility Solutions*. <https://equidox.co/>
- Federal Register (2026) Extension of Compliance Dates for Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities <https://www.federalregister.gov/documents/2026/04/20/2026-07663/extension-of-compliance-dates-for-nondiscrimination-on-the-basis-of-disability-accessibility-of-web>
- Hansen, D. & Courtney, K. (2018). A White Paper on Controlled Digital Lending of Library Books. *Controlled Digital Lending by Libraries*. <https://www.controlleddigitalending.org/whitepaper>
- Kwak, A. (2025). Developing a Training Program for Student Library Assistants to Make Scanned PDFs Accessible: A Case Study. *College & Research Libraries*, 86(1), 160. doi:<https://doi.org/10.5860/crl.86.1.160>
- Library of Congress. (n.d.). *The Chafee Amendment: 17 U.S.C. 121 & 121A*. <https://www.loc.gov/nls/who-we-are/laws-regulations/copyright-law-amendment-1996-pl-104-197/>
- Office for Civil Rights. (n.d.). *Pending Cases Currently Under Investigation at Elementary-Secondary and Post-Secondary Schools*. Department of Education. [https://ocras.ed.gov/open-investigations?field\\_ois\\_state=All&field\\_ois\\_discrimination\\_statute=702&field\\_ois\\_type\\_of\\_discrimination=733&items\\_per\\_page=20&field\\_ois\\_institution=&field\\_ois\\_institution\\_type=752&field\\_open\\_investigation\\_date\\_1=&field\\_open\\_investigation\\_date\\_2=&field\\_open\\_investigation\\_date\\_3=&page=0](https://ocras.ed.gov/open-investigations?field_ois_state=All&field_ois_discrimination_statute=702&field_ois_type_of_discrimination=733&items_per_page=20&field_ois_institution=&field_ois_institution_type=752&field_open_investigation_date_1=&field_open_investigation_date_2=&field_open_investigation_date_3=&page=0)
- Office for Civil Rights (n.d.) *Section 504*. Department of Education. <https://www.ed.gov/laws-and-policy/individuals-disabilities/section-504>
- Office for Civil Rights - FAPE (n.d.). *Frequently Asked Questions: Section 504 Free Appropriate Public Education (FAPE)*. Department of Education. <https://www.ed.gov/laws-and->

[policy/civil-rights-laws/disability-discrimination/frequently-asked-questions-section-504-free-appropriate-public-education-fape](#)

Pollitz, J. H., Christie, A., & Middleton, C. (2009). Management of Library Course Reserves and the Textbook Affordability Crisis. *Journal of Access Services*, 6(4), 459–484.

Poet Training Tool. (n.d.). *How to Describe Images*. <https://poet.diagramcenter.org/how.html>

Radthorne, D. (2020). Reserves as a Matter of Course: The History and Necessity of Academic Law Library Course Reserves. *Legal Reference Services Quarterly*, 39(2–3), 133–169.

Section 508. (n.d.). *Accessibility Bytes No. 6: Document Headings*. General Services Administration. <https://www.section508.gov/blog/accessibility-bytes/document-headings/#:~:text=How%20Heading%20Structure%20Works,further%20breaks%20down%20those%20sections>.

Section 508 Background (2025, March). Background: Federal Law and Policy on ICT Accessibility. <https://www.section508.gov/manage/section-508-assessment/2023/background/>

Swaak, T. (2024, December 6). Colleges Must Revise Millions of Web Pages. It Will be ‘Painful’. *The Chronicle of Higher Education*. <https://www.chronicle.com/article/colleges-must-revise-millions-of-web-pages-it-will-be-painful>

World Wide Web Consortium. (2017, April 13). *Content Structure*. <https://www.w3.org/WAI/tutorials/page-structure/content/>

World Wide Web Consortium. (2017, May 4). *Headings*. <https://www.w3.org/WAI/tutorials/page-structure/headings/>

World Wide Web Consortium. (2023, February 16). *Tables Tutorial*. <https://www.w3.org/WAI/tutorials/tables/>

World Wide Web Consortium. (2023, Jun 7). *Success Criterion 1.4.5: Images of Text*. <https://www.w3.org/WAI/WCAG20/Understanding/images-of-text>

World Wide Web Consortium. (2025, July 15). *Technique G64: Providing a Table of Contents*. <https://www.w3.org/WAI/WCAG21/Techniques/general/G64>

World Wide Web Consortium. (2025, September 16). *Headings and Labels*. <https://www.w3.org/WAI/WCAG22/Understanding/headings-and-labels.html>

World Wide Web Consortium. (2025, September 16). *Meaningful Sequence*. <https://www.w3.org/WAI/WCAG22/Understanding/meaningful-sequence.html>

World Wide Web Consortium, (2025, September 16).. *Non-text Content*.

<https://www.w3.org/WAI/WCAG21/Understanding/non-text-content.html>

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### **About the author**

Jennifer L McGowan is currently a Library Assistant at the University of Texas at San Antonio. She has a M.A. in Library and Information Science from the University of Wisconsin-Madison. Her research interests include accessibility in libraries as well as disability representation in collection development. One notable achievement is a joint article titled "Representation Matters: Board Books with Children with Disabilities", published in the ALA journal *Children and Libraries*. Additionally, she is pursuing a certification in CPACC from the International Association of Accessibility Professionals.