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Alexa Hight, Susan Hoover, Shannon Kipphut-Smith, & Jeanne Hoover

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In April 2024, the U.S. Department of Justice issued a new rule under Title II of the Americans with Disabilities Act (ADA) requiring all state and local government web content and mobile applications to meet Web Content Accessibility Guidelines (WCAG) 2.1 Levels A and AA by April 2026. The Texas Digital Library (TDL)—a member-governed consortium supporting a shared digital infrastructure for scholarly communication across 28 higher-education institutions—mobilized its community to respond collaboratively to these accessibility mandates. Through its user-driven working groups, TDL launched coordinated accessibility initiatives across key platforms, including Open Journal Systems (OJS), Vireo (electronic theses and dissertations), and institutional repositories. This article traces the development of those efforts, highlighting the creation of toolkits, training materials, and shared policy guidance that reduce duplication of labor and empower member libraries to meet legal requirements and ethical commitments to digital inclusion. The TDL model illustrates how consortial collaboration strengthens institutional capacity and fosters a culture of accessibility across diverse scholarly publishing environments..

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## Consortial Collaboration for ADA Title II Compliance: Texas Digital Library's Accessibility Working Groups

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### ABSTRACT

In April 2024, the U.S. Department of Justice issued a new rule under Title II of the Americans with Disabilities Act (ADA) requiring all state and local government web content and mobile applications to meet Web Content Accessibility Guidelines (WCAG) 2.1 Levels A and AA by April 2026.<sup>1</sup> The Texas Digital Library (TDL)—a member-governed consortium supporting a shared digital infrastructure for scholarly communication across 28 higher-education institutions—mobilized its community to respond collaboratively to these accessibility mandates. Through its user-driven working groups, TDL launched coordinated accessibility initiatives across key platforms, including Open Journal Systems (OJS), Vireo (electronic theses and dissertations), and institutional repositories. This article traces the development of those efforts, highlighting the creation of toolkits, training materials, and shared policy guidance that reduce duplication of labor and empower member libraries to meet legal requirements and ethical commitments to digital inclusion. The TDL model illustrates how consortial collaboration strengthens institutional capacity and fosters a culture of accessibility across diverse scholarly publishing environments.

**Keywords:** Accessibility, collaboration, library consortium, open publishing platforms

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<sup>1</sup> As of April, 2026, the Department of Justice [issued an Interim Final Rule tentatively extending the compliance deadline by one year](#) (Department of Justice, 2026).

## INTRODUCTION

In April 2024, new federal accessibility requirements created an urgent mandate for public institutions to ensure equitable digital access. For libraries and universities, this rule under Title II of the Americans with Disabilities Act (ADA) extends long-standing commitments to inclusion into the digital environment, where much of scholarly communication now occurs. Meeting these standards—specifically the Web Content Accessibility Guidelines (WCAG) 2.1 Levels A and AA—requires sustained attention not only to platforms and technical infrastructure, but also to the everyday practices of content creators, editors, and repository managers. Within this context, the Texas Digital Library (TDL), a statewide consortium of 28 member institutions,<sup>2</sup> recognized that accessibility compliance could not be achieved sustainably by individual libraries working in isolation. By leveraging its existing collaborative governance structures and culture of shared problem-solving, TDL launched a coordinated approach to accessibility work across its primary services: Open Journal Systems (OJS), Vireo electronic theses and dissertations (ETDs), and institutional repositories. These collective efforts demonstrate how a consortial model can promote efficient, scalable, and ethically grounded progress toward digital inclusion.

### TEXAS DIGITAL LIBRARY: COLLABORATIVE MODEL

As the implications of the revised ADA Title II rule became clearer in 2024, it was evident that no single library could independently build all the expertise, tools, and workflows needed to achieve sustainable accessibility across multiple platforms. Within Texas, the Texas Digital Library (TDL) was well-positioned to respond because of its long-standing role as a collaborative consortium supporting shared digital infrastructure and community programs across member institutions. TDL's history of coordinating repository hosting, open access journal publishing, electronic theses and dissertations management, and research data services provided both the technical foundation and the governance structures needed to organize a consortial response. This section describes how TDL's consortial model shaped the development of its accessibility initiatives and created the conditions for three focused efforts: the OJS Accessibility Working Group, the Vireo Users Group Task Force on Accessibility Resources, and the Repository Content Accessibility Working Group.

### DIGITAL ACCESSIBILITY WORKING GROUP FORMATION

An example of how the collaborative aspect of the TDL community can benefit all members of the consortium is how the community organized to address the updated Title II requirements and

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<sup>2</sup>TDL is a consortium of Texas higher-education libraries, with a strong representation of R1 universities and health-science centers, as well as R2 and master's-level institutions and a few special-focus members. The consortium has a [governing board](#), and day-to-day operations are managed by a small full-time [staff](#) (Texas Digital Library, n.d.).

the accessibility of content published or hosted on TDL-supported platforms. Rather than leaving each institution to interpret the rule and develop guidance on its own, TDL members identified shared pain points—limited staff time, distributed responsibilities, and uneven local expertise—and agreed that a coordinated approach would make the work more sustainable and consistent across the consortium. The groups were formed in response to a clear gap: while TDL staff could work with vendors and development communities to improve the accessibility of hosted software and user interfaces, they could not directly remediate or standardize the accessibility of the content that member institutions and their authors upload. TDL members, therefore, needed a mechanism to support local efforts to make journal articles, theses and dissertations, and repository deposits more accessible while still honoring institutional autonomy. The initial scope focused on three content areas where the Title II rule has immediate impact—Open Journal Systems (OJS), Vireo-managed ETDs, and institutional repository content—framed broadly enough to be relevant across different repository platforms in use by TDL members. Because the member institutions' staff lack bandwidth to remediate all content, the working groups were also directed to focus on helping content creators make new content accessible rather than auditing existing content, with the understanding that this focus would not absolve institutions of the responsibility of making existing content accessible.

To launch this work efficiently, the consortium drew on existing user groups as the foundation for new accessibility working groups and task forces. Members of the OJS Users Group, the Vireo Users Group, and the DSpace Users Group identified volunteers and recommended representatives who were already familiar with the workflows, user communities, and technical constraints of each platform. Each accessibility group was chaired by a member of the relevant user-group steering committee, which ensured a direct line between accessibility planning and ongoing user-group activities, as well as clear communication channels back to the wider TDL community. This structure allowed the working groups and task force to move quickly from problem identification to concrete deliverables while maintaining broad, consortial input.

## **WORKING GROUP APPROACHES**

Although the three groups shared common motivations and a commitment to reducing duplicated effort, each adopted an approach tailored to its platform and community. The OJS Accessibility Working Group centered its work on journal managers and editors, conducting an initial environmental scan and developing author-facing guidance and training. The Vireo Users Group Task Force on Accessibility Resources concentrated on the needs of graduate students and graduate school staff, curating platform-agnostic documentation and clarifying roles and responsibilities for accessible ETDs. The Repository Content Accessibility Working Group, grounded in the DSpace Users Group but scoped across multiple repository platforms, focused on shared resources and assessment, planning both a toolkit for repository content creators and administrators and a survey to understand member practices and needs.

## OPEN JOURNAL SYSTEMS (OJS) ACCESSIBILITY WORKING GROUP

In response to the ADA Title II updates and their implications for library-hosted journals, the OJS Accessibility Working Group formed in January 2025 as a subgroup of the TDL OJS Users Group. Building on conversations that began in the Users Group in August 2024, the Working Group focused on how the consortium could collectively support journal managers and editors of TDL-hosted OJS journals in meeting new accessibility expectations, rather than leaving each institution to respond in isolation. With approximately 75 journals hosted across the consortium of 28 TDL member institutions, the scale and diversity of needs are significant: some members support a single journal through TDL's hosting service, while others manage more than 20 titles.

The group's charge had two main components: to develop a practical accessibility toolkit for journal managers and editors of TDL-hosted journals, and to establish an effective strategy for disseminating that toolkit across the consortium. To ground this work, the Working Group began with a baseline assessment of TDL-hosted journals, reviewing site themes, article file formats, and the presence and depth of author-facing submission guidelines related to digital accessibility. This review showed that most journals relied on PDF-only workflows, that only a minority provided thorough author submission guidelines, and that almost all offered little to no guidance to authors on making their submissions accessible. These findings directly shaped the group's priorities and clarified that the greatest need was author-facing guidance and editor support.

From this assessment, the Working Group developed a multipronged response. Members drafted a communications plan to raise awareness among journal managers about the Title II timeline and the accessibility work ahead. They created and published an [accessibility toolkit](#) that drew on existing documentation and external resources, including an author guidelines template that journal teams could adopt or adapt locally (Baggett et al., 2025a). The toolkit offers concrete, role-based steps such as adding web accessibility requirements to author guidelines, incorporating accessibility checks and remediation into editorial workflows, and following best practices when configuring OJS themes and creating web content. To help introduce these materials and model their use, the group hosted a live webinar (later made available as a [recording](#)) that explained the regulatory context, demonstrated the toolkit, and highlighted practical steps toward more accessible journal publishing (Baggett et al., 2025b). Although the materials were developed for journals hosted through the Texas Digital Library, the [web accessibility overview](#) and toolkit are openly available and may be used or adapted by library staff and journal managers at institutions outside the TDL consortium as a ready-made starting point for accessibility work (Park, 2025).

The OJS Accessibility Working Group also helped surface policy-level questions for the consortium. TDL undertook a review and revision of its Hosting Policy to clarify responsibilities and align expectations around accessibility across hosted services. In addition, the Working Group coordinated with the Vireo Users Group Task Force on Accessibility, meeting with its chair to compare approaches, share resources, and ensure some coherence across guidance for journal publishing and for electronic theses and dissertations. This collaborative, cross-platform work

illustrates how TDL's consortial model enables member institutions to share expertise, spread labor, and respond more nimbly to changing accessibility requirements than any one library could manage on its own.

## **VIREO USERS GROUP TASK FORCE ON ACCESSIBILITY RESOURCES**

TDL is the lead developer of Vireo, software used for the management of electronic theses and dissertations. Vireo leadership has long made accessibility a development priority (Mumma, 2026a). While the Vireo developer community made plans to meet updated ADA Title II guidelines for the platform, members of the Vireo Users Group (VUG) recognized that this work would not bring the actual documents into compliance. In response, the VUG Task Force on Accessibility Resources was formed to provide documentation and resources on making electronic theses and dissertations (ETDs) accessible. In January 2025, a call for Task Force members was sent to the VUG listserv, which includes representatives from TDL members and the wider North American Vireo users. The group included seven members, including representatives from the VUG Steering Committee and TDL. Membership included representation from TDL-hosted Vireo instances as well as those who have locally hosted instances, including representation outside the TDL consortium.

Over the next six months, the Task Force investigated the best way to support accessibility of documents ingested into Vireo. The group began this process by reviewing resources for both general digital document accessibility and thesis accessibility, including those from content creation tools (e.g., Microsoft Word) and from other universities. The group found that a number of valuable resources for creating accessible material already existed and could be curated and/or adapted for the Vireo community. The Task Force spent a significant amount of time determining its targeted audience: who is responsible for thesis and dissertation accessibility? The answer is not straightforward or universal because each institution has its own unique processes and policies.

The group determined that, ultimately, students need to submit accessible documents, and the responsibility falls to students and advisors. However, staff at the graduate school and library should also be aware of accessibility requirements so they may assist students and advisors with questions. Additionally, theses and dissertations submitted in Vireo are often published to the institution's institutional repository, where accessibility compliance is also required. Currently, Vireo does not have the capability to check documents for accessibility. This requires students to use campus-provided or free tools to check the accessibility of their documents. Additionally, most library or graduate school staff do not have the capacity to check and remediate all theses and dissertations individually.

Because there are two primary stakeholder groups with different needs, the Task Force decided to create different resources for each. For students and advisors, the group developed a

one-page document that provides a brief overview of the new ADA Title II guidelines and student and advisor responsibilities. It briefly describes the major elements of accessible documents and includes links to several of the resources identified by the task force. For libraries and graduate schools, the group curated resources for digital accessibility training and managing thesis and dissertation accessibility. All resources can be found on the Vireo Task Force on [Accessibility Resources page of the TDL wiki](#) (Mumma, 2026b).

## **REPOSITORY CONTENT ACCESSIBILITY WORKING GROUP (RCAWG)**

The idea for a Repository Content Accessibility Working Group (RCAWG) originated in the June, 2025, TDL DSpace User Group (DSUG) monthly meeting. Although TDL member institutions use a variety of platforms and hosting models for their institutional repositories (IRs), about two-thirds of them maintain their IRs in the DSpace platform by Lyris. These DSpace repositories range in size from about 1,200 items to nearly 150,000, with most repositories containing between 5,000 and 20,000 items. About three-fourths of the institutions using DSpace rely on TDL to host, maintain, and support their DSpace instances. This hosting model ensures that each institution's DSpace instance is updated in a timely manner consistent with other institutions, and it relieves member institutions from the burden of troubleshooting problems and implementing bug fixes. On the other hand, a few of the larger TDL member institutions host their own DSpace instances, which requires additional staff with specialized knowledge. Finally, about one-third of the member institutions use a non-DSpace repository platform, and one institution does not yet have an IR.

To handle the platform and hosting variation, the DSUG defined the scope of work for the RCAWG to focus solely on repository content and not on the platform. Lyris creates and distributes the DSpace application, and TDL provides DSpace hosting and support for most institutions, but neither of these organizations is responsible for the content being ingested and made available on the IRs. The DSUG engaged in discussions about the exemptions specified in the Title II guidelines and concluded that IR content is not exempt, because the materials are intended for access and research, not archives. In addition, the IR poses a unique challenge in that some content is submitted by non-library affiliates of the institution.

The RCAWG formed in autumn 2025 with ten people, about half of whom had participated in one of the other two accessibility working groups (OJS, Vireo). As with other TDL groups, the initial meeting started with housekeeping tasks of deciding how to share documents, how frequently to meet, where to maintain notes and how to select a note-taker, and meeting norms. The RCAWG also discussed its deliverables and a phased plan for quick wins leading to longer-term activities. The group also surfaced some questions about audiovisual (AV) materials, because DSpace provides a video player with the ability to add captioning files. This player is enabled for the TDL-hosted instances, but several institutions host their AV on a separate platform.

The RCAWG was divided into two subgroups, one to create a set of shared resources and another centered around assessment. The shared resources subgroup drew from the materials produced by the earlier TDL accessibility working groups to create and advocate for a collection of shared resources for repository authors and administrators. The assessment subgroup was charged with defining assessment and administering a survey to the TDL membership. This survey built on a 2019 survey of TDL membership (Waugh et al., 2020), fine-tuning it to focus on repository content and efforts to meet the Title II deadline. In the following months, the subgroups met individually to draft the survey and to work on the resource toolkit, reporting back to the main working group monthly.

The RCAWG completed and distributed the [shared resources toolkit](#) in early 2026 (Baggett et al., 2026). The toolkit includes information about the U.S. web accessibility laws, best practices for creating accessible documents, and talking points that can be used to advocate for accessibility practices.

The RCAWG also created and administered the survey to the TDL membership in early 2026. In-depth analysis of the results is not yet complete, but some preliminary findings were observed from the 13 institutions that responded. Demographically, about half of the respondents are from doctoral-granting institutions, with another 30% in the category of “special colleges” such as medical schools. About 76% of the respondents have between 5,000 and 25,000 items in their repositories. Just over half of the respondents have a dedicated accessibility-focused group in their library that is discussing accessibility of repository content. However, regarding remediation of existing content, many respondents reported that guidance on whether, what, and how to remediate is unclear. Further analysis of the survey results, and action based on the analysis, are expected to take place in summer 2026.

## REFLECTIONS AND LESSONS LEARNED

The upcoming changes to the ADA digital accessibility policies will make a positive impact on making research and library materials more accessible to readers. The working groups and task force provided opportunities for us to collaborate on these new changes that would have been difficult to complete alone. At some institutions, there is one person managing multiple platforms, and identifying what needs to be done to make materials accessible on these platforms is challenging. Additionally, the workload to develop resources and instructions for users on accessibility can be time consuming. The TDL collaboration provided a way to offer support on the new ADA digital accessibility policies to a larger community. The groups were able to divide up the work to identify and develop resources that could be shared with other institutions. Additionally, it provided an opportunity to learn from each other. The collaborations provided clear plans and resources to bring back to individual institutions. Using an established network, like TDL, for this work provided a needed structure and timeframe for the working groups and task force. The TDL community could easily share feedback and suggestions to the working

groups. The collaborative resources that came out of the TDL groups make it easier and in turn, more likely that institutions will effectively apply the new ADA regulations to materials in library software.

Working group members and the consortium more broadly have continued to address accessibility beyond the initial scope of work. This work is ongoing and evolving; efforts are being made to build upon the initial outputs and ensure that TDL can support users in a sustainable way. Moving forward, working groups are incorporating “lessons learned” from this initial iteration. For example, it would have been helpful to schedule opportunities for all working groups/task forces to meet to share their experiences and identify opportunities for collaboration. Groups tried to communicate what they were doing and ensure that they were not duplicating efforts, but more coordinated, “official” meetings could help to maximize opportunities for collaboration and broader impact. Following the success of these time-bound, limited-scope working group collaborations, it is conceivable that a broader, more permanent accessibility working group could be formed within the consortium to address matters of accessibility across all TDL-supported platforms on an ongoing basis.

## CONCLUSION

The accessibility initiatives developed through TDL’s working groups highlight the power of consortial collaboration to turn compliance requirements into community-building opportunities. By aggregating labor, sharing expertise, and producing adaptable toolkits and training resources, TDL empowered its member libraries to approach accessibility not as a technical checklist, but as a shared value embedded in scholarly communication. The experience also revealed ongoing challenges—such as distinguishing responsibilities among platform hosts, content creators, and institutional staff—but strengthened community understanding of how to address them collectively. As the compliance deadline approaches, TDL’s model offers a pathway for other regional or disciplinary consortia to follow: start from existing community structures, act early, share freely, and treat accessibility as core infrastructure rather than an afterthought. The outcome is more than legal compliance—it is a more inclusive, sustainable digital research ecosystem.

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