

# Stony Brook University Title II Digital Accessibility Compliance Guide

*Updated April 2026 — reflects DOJ Interim Final Rule extending compliance deadline to April 26, 2027*

## Executive Summary

Stony Brook University, as a public university within SUNY, is covered by the U.S. Department of Justice's 2024 ADA Title II rule on the accessibility of web content and mobile apps, which generally requires public entities to make covered digital content conform to WCAG 2.1 Level AA by the applicable compliance date. **A DOJ Interim Final Rule issued in April 2026 extended the compliance deadline for larger public entities — including large public universities — from April 24, 2026 to April 26, 2027.** Stony Brook has already publicly acknowledged the requirements, maintains a Digital Accessibility Plan, and provides campus accessibility resources through Accessibility & Accommodations and CELT, which means the university already has the beginnings of a governance structure rather than starting from zero.

For media compliance specifically, the practical core is WCAG Guideline 1.2 on time-based media: captions, transcripts, live captioning where applicable, and audio description for prerecorded synchronized media when important visual information is not already conveyed in the audio. For a university environment, the highest-risk areas are typically LMS course videos, public-facing admissions and financial-aid content, mandatory trainings, event recordings used instructionally, and marketing or leadership videos with meaningful on-screen text or visuals.

The most important operational conclusion is that compliance is not just a captioning project. It requires a campus-wide system for content inventory, triage, remediation, publication standards, procurement controls, documentation of exceptions, and ongoing monitoring. For Stony Brook, the fastest path is likely a program centered on high-impact media triage, standardized caption and AD workflows, stronger ownership across Accessibility & Accommodations, CELT, IT, and communications, and clear rules for what content is remediated, archived, replaced, or removed.

---

## What the New Rule Is

In April 2024, DOJ published a final rule under ADA Title II covering the accessibility of web content and mobile applications provided by state and local governments. The rule adopts WCAG 2.1 Level AA as the technical standard for covered web and mobile content, subject to limited exceptions. Public colleges and universities are within scope because they are public entities or components of state or local government.

The rule does not create a separate "video law"; instead, it imports WCAG 2.1 AA's accessibility requirements into the ADA compliance framework for covered digital content. That matters because universities now have a much clearer benchmark than the older, more general "effective communication" standard alone. In practice, this means accessibility teams can no longer rely on informal good-faith efforts without tying those efforts to WCAG conformance and evidence of an institutional process.

## Compliance Dates — Updated April 2026

**Original rule:** DOJ's rule created staggered deadlines based on public-entity size. Large public entities (population 50,000+) were given a compliance date of **April 24, 2026**. Smaller public entities were given until **April 26, 2027**.

**April 2026 extension:** The DOJ issued an Interim Final Rule in April 2026 extending the compliance deadline by one year for all covered entities. **Large public universities — including Stony Brook — now have a compliance deadline of April 26, 2027.** The DOJ's stated rationale for the extension cited concerns about rushed compliance efforts and significant litigation risk if institutions were forced to act before a workable program could be built. This signals that DOJ expects structured, documented progress rather than last-minute remediation.

The rule covers web content and mobile apps that a public entity provides or makes available directly or through contractual or other arrangements. For a university, that can include the main website, subdomains, online forms, admissions and financial-aid content, LMS-delivered materials, video platforms used for instruction, public event recordings, and mobile-app experiences used by students or the public.

---

## The Technical Standard: WCAG 2.1 AA

WCAG 2.1 Level AA is the controlling technical benchmark under the Title II web rule. For media, the most relevant provisions sit under Guideline 1.2, Time-based Media, which covers prerecorded audio-only, prerecorded video-only, prerecorded synchronized media, and live synchronized media.

The most important success criteria for campus video programs are:

WCAG SC	Requirement	Why it matters for Stony Brook media
1.2.1	Alternative for prerecorded audio-only and video-only media	Covers stand-alone audio or silent video alternatives.
1.2.2	Captions (Prerecorded)	Required for prerecorded synchronized video with audio.

1.2.3	Audio description or media alternative (Prerecorded) at Level A	Provides a Level A path via AD or full alternative for some prerecorded media.
1.2.4	Captions (Live)	Relevant to live-streamed events and webcasts when covered content is delivered live.
1.2.5	Audio Description (Prerecorded)	Requires AD for prerecorded synchronized video when needed to convey visual meaning.

For universities, the most operationally significant pair is 1.2.2 and 1.2.5: prerecorded captions and prerecorded audio description. Those are the criteria most likely to drive remediation budgets, workflow changes, and vendor usage across large video libraries.

## What Captions Are Required

Prerecorded synchronized video with audio generally must have captions under SC 1.2.2. In plain terms, if Stony Brook publishes or delivers a recorded lecture, training, promo, interview, webinar, or similar video with audio, captions are usually required unless a narrow exception applies.

Caption compliance is not simply "machine captions exist." High-quality accessibility guidance from universities and accessibility groups stresses accuracy, synchronization, completeness, and correct speaker/non-speech information, because poor captions can still fail users even if a file exists. This means a campus process should distinguish between auto-generated captions that need review and captions that are publication-ready.

For live content, SC 1.2.4 requires captions for live synchronized media. Operationally, that matters most for major live-streamed events, commencement, town halls, and any live instructional or public webcast content delivered through campus web channels.

## What Audio Description Is Required

SC 1.2.5 requires audio description for prerecorded synchronized video when essential visual information is not already conveyed through the existing audio track. W3C's understanding document explains that AD communicates important visual details such as actions, scene changes, on-screen text, speaker identification, charts, and other visual information necessary for understanding.

This does not mean every video needs the same amount of AD. A talking-head lecture in which the instructor speaks all meaningful slide text aloud may need little or no additional AD, while a training module with unlabeled on-screen steps, a silent software demo, or a chart-heavy

admissions explainer may require substantial description.

For Stony Brook, this creates a strong case for a triage model such as No AD / Light AD / Full AD. The compliance question should be framed as: "Would a blind or low-vision user miss important meaning if they only heard the native soundtrack?" If yes, AD or an equivalent alternative is needed.

---

## **What Content Is Highest Risk at a University**

The highest-risk categories for a public university are usually those that are both important and widely used. In Stony Brook's case, that likely includes course content in Brightspace and integrated video tools, public-facing admissions and aid content, orientation and mandatory training modules, disability and student-support information, and videos embedded across official university sites.

A practical priority ladder looks like this:

1. Required student-facing instructional content, especially core courses and high-enrollment classes.
2. Public-facing essential services content such as admissions, financial aid, registration, health, and student support.
3. Mandatory trainings for students, faculty, or staff.
4. Recurring live-streamed or recorded public events hosted on official channels.
5. Marketing and advancement media with meaningful visuals or on-screen text.

This priority model is useful because it ties remediation to user impact and legal exposure rather than to raw file count alone.

---

## **The Exceptions and What They Do Not Solve**

The Title II web rule includes limited exceptions, but they are narrower than many institutions initially assume. Guidance discussing the rule commonly points to categories such as archived web content, preexisting conventional electronic documents, third-party posted content not controlled by the entity, individualized password-protected documents under certain conditions, and preexisting social-media posts, depending on how the content is situated and maintained.

These exceptions do not provide a blanket escape from media remediation. If content is actively used for current instruction, current services, or current public communication, it is much less likely to qualify as genuinely archived or out-of-scope content. In a university environment, the biggest operational mistake is labeling stale-but-still-used course or departmental content as "archived" when students or the public still rely on it.

DOJ also preserves familiar ADA defenses such as fundamental alteration and undue financial and administrative burdens, but those require a high threshold and formal analysis, not a casual assumption that remediation is expensive. In practice, those defenses are poor substitutes for a documented prioritization and remediation program.

### What Stony Brook Already Appears to Have in Place

Stony Brook has a public Digital Accessibility Plan and multiple accessibility support pages through Accessibility & Accommodations and CELT. The university also has video accessibility guidance and Brightspace accessibility tooling references, indicating that some of the building blocks for a campus-wide program already exist.

This is strategically important because it means the compliance job is likely not "invent accessibility from scratch." It is more likely "standardize, enforce, expand, and document" across a distributed campus environment where pockets of good practice already exist.

A likely governance map for Stony Brook media compliance would involve:

Function	Likely campus stakeholders	Operational role
Policy / institutional standard	Accessibility & Accommodations, legal/policy leadership	Owns standards, exceptions framework, institutional accountability.
Instructional implementation	CELT, academic technology, faculty support	Trains faculty, defines course-media workflows, supports accessible design.
Technical platforms	DoIT, Brightspace/Kaltura-related admins	Player settings, integrations, procurement, storage, publishing controls.
Communications / web publishing	MarCom and site owners	Ensures public-facing media meets standards and old media is triaged.
Production / remediation	Internal staff or vendors	Captions, transcripts, AD, QA, re-publication, tracking.

### What 'Compliance' Actually Requires Operationally

A compliant university program usually needs at least six operating components.

#### 1. Inventory

The university needs a reliable way to know where official video lives: websites, subdomains, Brightspace, video platforms, YouTube channels, social platforms, departmental repositories, and training systems. Without an inventory, remediation turns into unbounded firefighting.

## **2. Triage**

Not all content carries the same risk or remediation burden. A triage system should classify content by audience, purpose, current use, and media requirements: captions only, captions plus AD, replace/remove, or archive under a defensible rule.

## **3. Production Workflow**

There must be a standard intake and processing path for captioning, transcript review, AD scripting, narration, mixing, file naming, and return to the publishing platform. If each department uses a different ad hoc approach, quality and documentation will drift.

## **4. QA and Standards**

A university should define minimum caption quality, review thresholds for auto-captions, criteria for when AD is required, and publication checks before content is considered complete. This is especially important where faculty or staff create content independently.

## **5. Procurement and Third-Party Controls**

The Title II rule covers content and apps provided through contractual or other arrangements. Procurement, renewal, and vendor governance therefore matter: video platforms, embedded tools, and outsourced production should be required to support WCAG-conformant outputs and accessibility workflows.

## **6. Documentation and Exceptions**

Every exception, archive decision, undue-burden analysis, or removal decision should be documented. If OCR or DOJ scrutiny arises, the existence of a rational, repeatable, documented process is as important as the remediation count itself.

---

## **Media-Specific Interpretation for Stony Brook**

Because the user's likely remit is media compliance, the strongest operational reading is this: every official prerecorded video used for instruction, services, or public communication should be assumed to need at least a caption review, and then separately evaluated for whether AD is needed. This is more defensible than assuming only a small manually selected subset needs attention.

A practical media triage rule for Stony Brook would be:

**Caption-only likely sufficient:** talking-head videos, narrated lectures where visual content is fully verbalized, simple announcements with no essential on-screen text beyond what is spoken.

**Light AD likely needed:** slide presentations with some unspoken titles or bullet points, webinar recordings with charts not fully explained, demos with a few visually conveyed steps.

**Fuller AD likely needed:** silent demos, process videos, chart- or diagram-heavy explainers, orientation/training modules with on-screen instructions, promotional content where visuals convey key meaning.

This approach aligns directly with WCAG rather than with arbitrary budgeting logic.

## **Live Events, Lecture Capture, and Instructional Systems**

Stony Brook uses Brightspace and provides guidance around accessibility within that ecosystem. In practice, a significant compliance issue at public universities is not just polished public marketing video but the large mass of lecture captures, instructor uploads, discussion recordings, and event webcasts.

For live content, captions are the most immediate requirement under WCAG 1.2.4. For recorded lecture capture that is later made available on demand, the item becomes prerecorded synchronized media and should be evaluated for prerecorded captions and, where needed, AD. This means a workflow that is sufficient for the live event itself may still be insufficient once the recording is repurposed for later use.

---

## **Enforcement Risk**

The practical enforcement exposure for a public university comes from DOJ enforcement, private complaints, reputational pressure, and U.S. Department of Education OCR processes involving inaccessible student-facing content. Even where the web rule is DOJ-administered, educational institutions already operate in a complaint-sensitive environment where inaccessible instructional and service content can trigger fast escalation.

**Private right of action and the 2027 deadline context.** The ADA grants a private right of action, meaning individual students, staff, or members of the public can file suit directly in federal court without waiting for DOJ or OCR to act. This is a distinct and significant risk track separate from agency enforcement. The DOJ's April 2026 Interim Final Rule extending the compliance deadline to **April 26, 2027** specifically cited concerns about rushed compliance efforts and significant litigation risk — signaling that DOJ expects structured, documented programs rather than last-minute remediation. Institutions with a documented compliance program are in a materially stronger legal position to defend against private suits than those that have treated accessibility as a reactive afterthought.

The most important risk factor is not the existence of some inaccessible legacy content somewhere on campus. It is the combination of high-impact inaccessible content, weak institutional process, and poor documentation. Universities that can show active governance, prioritization, remediation, training, and a documented plan are in a stronger position than those treating accessibility as a reactive afterthought.

Three enforcement channels warrant specific attention:

**DOJ enforcement discretion.** The DOJ cannot pursue every institution simultaneously. Its own extension notice signaled a preference for structured progress over rushed, incomplete efforts. An institution with a documented, active program is a less attractive enforcement target than one with no program at all.

**OCR complaint investigations.** If a complaint is filed against SBU, the Office for Civil Rights will examine whether the institution has a documented, active plan and is working through its backlog. An institution with no program is far more exposed than one with documented governance, an inventory, triage rules, and evidence of remediation underway.

**Private litigation.** Because the ADA allows direct suit, any student or member of the public encountering an inaccessible official video can bring a claim. A university that can demonstrate a systematic program — not just individual fixes — has a materially stronger defense.

---

## What to Do First at Stony Brook

The highest-leverage first steps are operational rather than theoretical.

- 1. Define the media universe.** Decide which systems and channels count as official university digital content for remediation tracking: websites, Brightspace, central video platforms, official YouTube/social channels, training systems, and core departmental repositories.
  - 2. Create a defensible triage rubric.** Use WCAG-based rules for caption review and AD need, not informal intuition.
  - 3. Prioritize top-risk content.** Focus on required course media, essential public services, and mandatory trainings first.
  - 4. Set production standards.** Define caption quality thresholds, AD style rules, turnaround tiers, and publication checks.
  - 5. Document exceptions and archive decisions.** This prevents "informal exemptions" from proliferating.
  - 6. Train campus creators.** The long-term cost reducer is born-accessible content creation: narrate meaningful visuals, read important text aloud, design videos with accessible structure from the start.
-

## What 'Knowing Everything' Should Mean in Practice

For someone handling compliance, mastery does not require memorizing all 50 WCAG criteria equally. It means understanding the subset that drives the university's biggest exposure, knowing the exception structure, knowing how to map those rules to media workflows, and being able to explain to stakeholders why certain content must be captioned, described, remediated, archived, or removed.

For Stony Brook specifically, the most important knowledge domains are:

DOJ Title II rule structure, scope, deadlines (now April 26, 2027 for large entities), and exceptions.

WCAG 2.1 AA media criteria, especially 1.2.2, 1.2.4, and 1.2.5.

Institutional governance: who owns standards, systems, and publication channels.

Platform realities in Brightspace and connected video tools.

Evidence and documentation practices that show active compliance management.

---

## Bottom Line

The new regulations require Stony Brook, as a public university, to run digital accessibility as an institutional program anchored to WCAG 2.1 AA rather than as a loose set of one-off accommodations. For media, the decisive operational shift is that official recorded video should now be managed through a formal system that covers captioning, audio-description triage, production workflows, archival decisions, and documentation. The compliance deadline for Stony Brook is now **April 26, 2027**, following the DOJ's April 2026 Interim Final Rule.

The university already appears to have meaningful accessibility infrastructure, which is an advantage. The remaining challenge is disciplined execution across a large, decentralized media environment. A Stony Brook compliance lead who can inventory content, prioritize high-risk media, standardize caption and AD decisions, and document exception logic will be operating in line with the spirit and structure of the new Title II regime.