

RESEARCH REPORT

When Accessibility Exists on Paper but Fails in Real Life

Achieving web accessibility involves more than just meeting technical guidelines. While accessibility aims to remove barriers, usability focuses on ease and comfort of use, and inclusion ensures all can participate. These concepts are distinct yet closely related, and effective web design benefits from addressing them together. Technical conformance with guidelines such as WCAG is essential, but conformance alone does not establish that a website will be equally usable or barrier-free for every person in every real-world context, since individual needs, assistive technologies, devices, environments, and interaction patterns cannot all be fully anticipated by guidelines alone. Consequently, a site can technically comply with guidelines but still be uncomfortable or unintuitive for some users. The Americans with Disabilities Act (ADA) mandates web accessibility for public accommodations, with the Department of Justice often referencing Web Content Accessibility Guidelines (WCAG) despite not having a uniform technical standard. This landscape leads to frequent litigation, underscoring the legal obligation while highlighting the practical challenges of achieving comprehensive accessibility in practice.

Published August 27, 2026

By Accibly Editorial Team · ⌚ 6 min read

Executive Summary

Achieving web accessibility involves more than just meeting technical guidelines. While accessibility aims to remove barriers, usability focuses on ease and comfort of use, and inclusion ensures all can participate. These concepts are distinct yet closely related, and effective web design benefits from addressing them together. Technical conformance with guidelines such as WCAG is essential, but conformance alone does not establish that a website will be equally usable or barrier-free for every person in every real-

world context, since individual needs, assistive technologies, devices, environments, and interaction patterns cannot all be fully anticipated by guidelines alone. Consequently, a site can technically comply with guidelines but still be uncomfortable or unintuitive for some users. The Americans with Disabilities Act (ADA) mandates web accessibility for public accommodations, with the Department of Justice often referencing Web Content Accessibility Guidelines (WCAG) despite not having a uniform technical standard. This landscape leads to frequent litigation, underscoring the legal obligation while highlighting the practical challenges of achieving comprehensive accessibility in practice.

| The Nuance of Digital Accessibility: Beyond Technical Checklists

Digital accessibility, usability, and inclusion are closely related concepts that are most effectively addressed together in the design and development of websites and applications. While they share overlapping goals, they represent distinct aspects of creating an equitable online experience.

Accessibility primarily focuses on removing barriers for people with disabilities, enabling them to perceive, understand, navigate, and interact with digital content. Usability, on the other hand, concerns the ease, comfort, and logical use of a system or environment. Inclusion aims to ensure that all users, regardless of ability or circumstance, feel welcomed and can participate fully. Understanding these distinctions is crucial, as a technically 'accessible' website may still fall short in terms of usability and true inclusion.

| Why Standards Conformance Alone Does Not Guarantee Usability

Technical conformance cannot account for every circumstance that may shape a person's experience of a website. Individual needs, assistive technologies, device configurations, environmental conditions, and interaction patterns can reveal barriers that were not apparent during standards-based evaluation. A website can therefore satisfy defined accessibility requirements while still presenting difficulties for some people in real-world use.

Accessibility guidelines are often built upon specific assumptions about how users will interact with features. Even if a website is developed to pass all current guidelines, actual users may employ the site in unpredictable ways. Recognizing this distinction between technical conformance and real-world experience creates a more useful approach to accessibility: standards provide an essential foundation, while usability testing, inclusive

design, feedback from people with disabilities, and continued evaluation help identify barriers that standards-based testing alone may not reveal.

The Americans with Disabilities Act and Web Accessibility Standards

The Americans with Disabilities Act (ADA) requires public accommodations to ensure effective communication with individuals with disabilities, which extends to making websites and mobile applications accessible. This mandate applies to state and local governments and businesses open to the public in the United States.

While the U.S. Department of Justice (DOJ) has not established a uniform technical accessibility standard, it has advised that public accommodations must make their websites accessible to individuals with disabilities. Court orders and settlements frequently cite the Web Content Accessibility Guidelines (WCAG) as a reference point. WCAG 2.1 success criteria are designed as testable statements that are not specific to any particular technology, though guidance for specific technologies is provided in separate documents. It is worth noting that WCAG 2.1 has known errata.

The Gap Between Compliance and User Experience

The absence of a uniform technical standard from the DOJ and the inherent limitations of guidelines contribute to a gap between technical compliance and actual user experience. Websites can meet accessibility requirements on paper yet remain uncomfortable or unintuitive in daily use for some individuals. This occurs because guidelines, by nature, cannot predict every possible user behavior or control all variables.

This disconnect is evident in the landscape of ADA website litigation. Many internet home pages possess accessibility barriers, leading to numerous lawsuits. These cases often settle because businesses with inaccessible websites typically have limited defenses. A pattern known as 'serial ADA litigation' involves repeated lawsuits filed by the same plaintiffs or law firms, highlighting the ongoing legal pressure on businesses to ensure web accessibility, even within the practical constraints of achieving universal usability.

Moving Towards Genuinely Inclusive Digital Experiences

Given the complexities, effective web design requires a coordinated approach that integrates accessibility, usability, and inclusive design rather than relying solely on checklist compliance. While standards and policies are important, focusing specifically

on the accessibility needs of people with disabilities during development helps in creating more effective solutions.

By recognizing the distinctions and overlaps between these concepts and encouraging increased coordination across research and practice, organizations can move beyond merely removing barriers. This approach fosters the creation of more humane, comfortable, and truly inclusive digital environments for everyone.

| Key Findings

KEY FINDINGS

Accessibility, usability, and inclusion are distinct but closely related concepts that are most effective when addressed together in web design (ev_e9ce201149bc0218f776, ev_4c968fda83c3170e3f1f).

Technical conformance with accessibility guidelines does not establish that a website will be equally usable or barrier-free for every person in every real-world context, since not every variable or user interaction can be fully anticipated (ev_fa7d8d4269f346fa4061, ev_9711c0e1155f70259117, ev_1e106daa79f13bce15db).

A website can technically meet accessibility guidelines but still be uncomfortable or unintuitive for users due to unpredictable usage patterns (ev_b3cdbc9aefe915e5567c, ev_a4b70fc82c74075bc246).

The Americans with Disabilities Act (ADA) requires public accommodations, including websites, to be accessible to individuals with disabilities (ev_ee65476d8825e30c5ca9, ev_8d35647ea9c80850678e).

The U.S. Department of Justice (DOJ) has not established a uniform technical accessibility standard for the ADA but has advised that websites must be accessible, often citing Web Content Accessibility Guidelines (WCAG) in court orders and settlements (ev_f97ce24bc972f3833503).

WCAG 2.1 criteria are testable and technology-agnostic, with separate guidance for specific technologies (ev_0107fd1273d1682be360). Errata exist for WCAG 2.1 (ev_b6cd949aa94a7619f1db).

Serial ADA litigation involves repeated lawsuits against businesses with alleged website accessibility issues, often settling because businesses with inaccessible sites have few defenses (ev_bdfc3745551736c49aef, ev_7b14192309b407bd7672, ev_d62c86e41b2be2cb8c3e).

| Evidence

Evidence Reviewed

40 statements support this investigation, drawn from 10 sources.

KEY EVIDENCE

OBSERVED · 90% confidence

Accessibility, usability, and inclusion are closely related aspects in creating a web that works for everyone. Their goals, approaches, and guidelines overlap significantly. It is most effective to address them together when designing and developing websites and applications. [Source](#)

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There are a few situations when it's important to focus specifically on one aspect. For example, when developing standards and policies. Researching the accessibility needs of people with disabilities helps with developing those. [Source](#)

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explains the distinctions and overlaps between accessibility, usability, and inclusive design, [Source](#)

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encourages increased coordination across research and practice in these disciplines, and, [Source](#)

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More details about this document
This version: <https://www.w3.org/TR/2025/REC-WCAG21-20250506/>
Latest published version: <https://www.w3.org/TR/WCAG21/>
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History: <https://www.w3.org/standards/history/WCAG21/>
Commit history: <https://www.w3.org/WAI/WCAG21/implementation-report/>
Previous Recommendation: <https://www.w3.org/TR/WCAG20/>
Editors: Andrew Kirkpatrick (Adobe) [Source](#)

[View all 40 evidence items](#)

| Analysis

The evidence strongly supports the idea that accessibility, while crucial and legally mandated by the ADA for public accommodations, is a more complex concept than mere technical compliance with guidelines. The Web Content Accessibility Guidelines (WCAG), though widely referenced by the Department of Justice in legal contexts, are not a uniform technical standard established by the DOJ. Furthermore, WCAG criteria, while testable and technology-agnostic, can only account for certain assumptions about user interaction. This creates a gap where a website might technically pass all guidelines yet fail to provide a comfortable or intuitive experience for users because real-world usage is unpredictable and variables cannot all be controlled. Conformance should therefore be treated as an essential foundation for accessibility rather than proof that every real-world experience will be barrier-free. This disconnect

between technical compliance and actual user experience is underscored by the prevalence of ADA litigation, where businesses often settle due to limited defenses against claims of inaccessible websites, highlighting that the legal obligation to provide accessible experiences exists independent of any single compliance evaluation. The evidence therefore suggests that a holistic approach integrating accessibility, usability, and inclusion, supported by testing with people with disabilities and continued evaluation, is more effective than a checklist mentality.

Practical Takeaways

Recognize that achieving technical compliance with accessibility guidelines, such as WCAG, does not automatically guarantee that a website will be fully usable or inclusive for all individuals.

Combine standards-based accessibility evaluation with usability testing, inclusive design, and feedback from people with disabilities to identify barriers that technical conformance testing alone may not reveal.

Approach web development with a coordinated strategy that integrates accessibility, usability, and inclusive design principles from the outset, rather than treating them as separate or post-development considerations.

Be aware that even in the absence of a uniform technical standard from the Department of Justice, the Americans with Disabilities Act mandates web accessibility, and legal actions can arise from inaccessible websites.

Focus on continuous improvement and user-centered design, acknowledging that guidelines provide a foundation but cannot foresee every potential barrier for every user.

Source Appendix

1. [Accessibility, Usability, and Inclusion | Web Accessibility Initiative \(WAI\) | W3C](#)
w3.org
2. [Web Content Accessibility Guidelines \(WCAG\) 2.1](#)
w3.org
3. [Guidance on Web Accessibility and the ADA | ADA.gov](#)
ada.gov
4. [Conducting Accessible Research: Including People With Disabilities in Public Health, Epidemiological, and Outcomes Studies - PMC](#)
pmc.ncbi.nlm.nih.gov
5. [A comprehensive evaluation of life sciences data resources reveals significant accessibility barriers - PMC](#)

6. [ADA Accessibility Standards](#)
access-board.gov
7. [No Website is ever 100% accessible \(and what that means for your site\) - AccessiCart](#)
accessicart.com
8. [Main differences between usability and accessibility](#)
aiscertificacion.com
9. [What Is Serial ADA Website Litigation? | Accessible.org](#)
accessible.org
10. [Digital Accessibility Under Title III of the ADA: Recent Developments and Risk Mitigation Best Practices](#)
americanbar.org

UPDATE HISTORY

Published August 27, 2026

HOW THIS ARTICLE WAS BUILT

10 sources reviewed.

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