Guide: Delete, Archive, Remediate or Recreate Digital Content

Purpose: Use this guide to determine the appropriate action for digital content during accessibility review and remediation planning.

1. Start Here: Is the Content Still Needed?

Does the content support a current program, service, activity, patient function, educational service, research activity, employment process, or public-information function?

- **Yes.** Keep the content active. Remediate it, recreate it, or replace it with an accessible alternative.
- **No.** Determine whether the content should be deleted or archived, subject to records-retention and legal requirements.

2. Choose the Appropriate Action

Choice	Use when	Outcome
Delete	The content is no longer needed and does not need to be retained.	Remove it through approved records-management and deletion practices.
Archive	The content is inactive but must or should be retained solely for research, reference, historical, or record-keeping purposes.	Move it to a designated archive only if all four archive criteria are met.
Remediate	The content is current, accurate, actively used, and reasonable to repair.	Correct accessibility barriers in the existing source and published format.
Recreate or replace	The content is still needed, but rebuilding it or using an accessible alternative is more practical.	Create or obtain an accessible version and retire the inaccessible version from active use.

3. Delete

Delete content when it is no longer used, has no continuing business or historical value, and is not subject to a records-retention requirement, legal hold, preservation obligation, or other required retention period.

1. Confirm that the content is not used in a current program, service, activity, or workflow.
2. Confirm ownership and verify that no approved retention requirement applies.

3. Remove links, references, duplicates, and published copies as appropriate.
4. Delete the content through the approved platform or records-management process.

4. Archive

Archive content only when it is inactive and retained solely for research, reference, historical, or record-keeping purposes. Content must satisfy all four criteria below.

Archive eligibility criteria

- **Pre-existing:** The document was created before April 26, 2027, or reproduces other documents created before that date, such as scanned paper documents.
- **Reference Only:** The content is for research, reference, or record-keeping purposes. It cannot be used in any current service, program, or activity.
- **Unchanged:** The content has not been altered or updated since the date of archiving. The Final Rule permits very minor changes that do not involve adding, updating, or rearranging content, such as redacting Personally Identifiable Information (PII).
- **Clearly Labeled:** The content is in a designated location and explicitly marked as “archived.”

Mandatory archiving steps

- **Create an Archive Folder.** Set up a dedicated location to store archived materials and indicate that it contains documents from before April 2027.
- **Transfer.** Move eligible documents into the designated archive folder.
    - **Example:** A11yArchive_Pre-April-2027
    - **Large collection example:** A11yArchive_Pre-April-2027/Finance/
- **Title.** Ensure the document includes a proper document title. The title must reflect the actual document title as it appears within the document.
- **Maintain the Archive.** Periodically review archived content to ensure it still meets all four exception criteria. If a document is reactivated or updated, it must be made fully accessible.

Optional archive controls

- **Label.** At the top of each document, add a clear, prominent label identifying the content as archived and explaining that it may not meet current accessibility standards.
    - *Sample: This document has been archived and is retained for historical reference only. It may not meet current accessibility standards.*
- **Mark and Tag.** Add metadata that identifies the file as archived and includes the archive date.
    - **Metadata example:** Tags: Archived, November 11, 2025. Comments or Description: Archived for reference only. Created before April 26, 2027.

- **Protect.** When feasible change the permissions of archived files to read-only to prevent edits.

Read-only instructions

For OneDrive

1. Right-click the Archive folder.
2. Select Manage Access.
3. Change anyone with Can Edit access to Can View access.

For a local drive

1. Right-click the Archive folder.
2. Select Properties.
3. Open the Security tab.
4. Select Edit.
5. Remove Modify and Write permissions.
6. Allow only Read & Execute and Read.
7. Select Apply.

5. Remediate

Remediate content when it remains active, accurate, and necessary, and repairing the existing asset is efficient and sustainable.

1. Correct the accessible source file first whenever possible.
2. Use proper headings, lists, tables, link text, color contrast, alternative text, reading order, document titles, form labels, captions, transcripts, and other format-specific accessibility requirements.
3. Run the built-in accessibility checker, then perform manual review and assistive-technology testing appropriate to the format and risk.
4. Replace the active published version with the remediated version and remove or clearly retire outdated inaccessible copies.
5. Retain the accessible source for future updates.

6. Recreate or Replace

Recreate or replace content when the existing asset is difficult to remediate, has poor source structure, is scanned or image-only, is repeatedly reused, or has an approved accessible alternative.

- Recreate the content in an accessible source format, such as a properly structured Word document, accessible webpage, or accessible template.
- For scanned PDFs, consider recreating the content from an accessible source instead of relying only on OCR and extensive PDF repair.

- For frequently repeated documents, create an accessible template so future versions start with correct structure.
- For vendor or external content, request an accessible version or replace it with an approved accessible alternative.
- Remove the inaccessible version from active distribution after the new version is approved.

7. Final Decision Checks

- **Current use:** Is the content used to deliver or participate in a current program, service, activity, or workflow?
- **Accuracy:** Is the content current, accurate, and approved?
- **Ownership:** Is there an identified content owner who can approve the decision?
- **Duplication:** Is an accessible, authoritative version already available elsewhere?
- **Retention:** Must the content be retained under an applicable records schedule, legal hold, clinical requirement, research obligation, or institutional policy?
- **Sustainability:** Is repairing the current asset more practical and maintainable than recreating or replacing it?
- **Future use:** Could the content reasonably return to active use? If so, plan for accessibility before reactivation.

Appendix A: File Types That Are Out of Scope

These production or system files are generally outside the remediation inventory when they do not communicate information directly to users. Assess the published or user-facing output instead.

Category	Examples	More Info
Font files	.ttf, .otf, .woff, .woff2, .eot	Resources used to render content rather than documents that communicate information to users.
System, cache, and metadata files	.tmp, .bak, .lock, .cache, .ds_store, thumbs.db	Also includes machine-generated logs and database support or index files.
Software and development files	.dll, .exe, .jar, .class, .so, .bin, .ini, .cfg	Also includes package, dependency, and source-code files used as development artifacts.

Category	Examples	More Info
Raw design and source files	.psd, .ai, .indd, .sketch, Adobe XD files	Generally exclude when used solely as working production files. **Do assess the resulting PDF, image, webpage, or other published deliverable.**
CAD, BIM, and engineering files	.dwg, .dxf, .rvt, .rfa	Generally exclude when used as specialized working files. **Do assess drawings exported and distributed as PDFs or other user-facing formats.**
Media-production project and source files	.prproj, .aep, Audition session files	Also includes raw camera media, editing proxies, and production masters. **Exclude the production artifact, not the published output.**