

National Consumer Law Center (NCLC) Accessibility Conformance Report

WCAG Edition

(Based on VPAT Version 2.5)

Name of Product/Version

NCLC Digital Library website (library.nclc.org), a Drupal-based subscription platform with public marketing and landing pages and an authenticated member area, including the Book Reader, account, subscription, and checkout flows.

Report Date

July 28, 2026

Product Description

The NCLC Digital Library is the premier online repository for the Consumer Law Practice Series, offering a comprehensive, searchable collection of legal treatises, practice manuals, and essential research tools for consumer law advocates. Beyond its library of authoritative books, the platform provides thousands of sample pleadings, original source materials, and continuous digital updates designed to streamline practice. Featuring advanced search capabilities, annotation tools, and live cross-referencing, the Digital Library acts as a virtual expert assistant for legal aid professionals, private attorneys, and advocates at every stage of their career.

Contact Information

National Consumer Law Center, Digital Library.

Katie Eelman

keelman@nclc.org

617-542-9595

Notes

Remediation priorities were established primarily according to defect severity, with the most significant accessibility barriers addressed first to reduce the greatest risk of harm to users of the platform. Page level usage data served as a secondary prioritization factor, directing remediation effort toward the areas of the

platform most frequently used by legal aid professionals, private attorneys, and advocates conducting research. Once a defect was identified, the development team located all additional instances of the affected content or component across the site and applied a consistent correction, ensuring that fixes addressed recurring patterns rather than isolated occurrences. Lower effort remediation items were incorporated into the work plan as capacity allowed, enabling both the development team and internal NCLC staff to maintain continuous progress on higher impact issues while making efficient use of available resources throughout the remediation effort. Remediation is continuing in a phased approach, following this same prioritization framework.

Evaluation Methods Used

The accessibility audit of the NCLC Digital Library platform combined automated and manual evaluation techniques to ensure both broad and in depth coverage. Automated scanning using axe-core was performed across all publicly available pages to establish a baseline view of accessibility issues platform wide. This was followed by manual auditing of a representative sample of pages, selected in collaboration with NCLC to ensure coverage of all unique page types, templates, and post types. Sample selection was further informed by user visitation metrics and long tail analysis, allowing the audit to capture both high traffic areas and edge case issues that might otherwise go undetected.

Manual evaluation involved a thorough, code level inspection of nearly all components and underlying semantic structures present on the platform, including search interfaces, annotation tools, cross referencing features, navigation menus, and content templates, to verify proper use of semantic markup, accessible names, roles, states, and properties. Keyboard only navigation testing was performed to confirm that all interactive elements could be operated without a mouse, with particular attention to focus order, focus visibility, and the presence of keyboard traps. Screen reader testing was conducted using JAWS, NVDA, and VoiceOver across the supported browser combinations to evaluate how content, structure, and interactive components were announced to users of assistive technology. Responsive and zoom testing was performed across a range of viewport sizes and browser zoom levels up to 400 percent to confirm that content remained usable and did not require horizontal scrolling, and that text and interface elements reflowed appropriately. Color contrast was evaluated using the Colour Contrast Analyser to verify that text, interactive elements, and meaningful graphics met required contrast ratios.

The following applications were used as part of the audit to identify potential accessibility issues:

- Desktop browsers: Chrome, Firefox, and Safari.
- Assistive technologies: JAWS, NVDA (Windows); VoiceOver (macOS).
- Accessibility testing tools: ARC Toolkit, Accessibility Viewer, Browser Developer Tools, ANDI, axe DevTools, WAVE, and Colour Contrast Analyser.

The evaluation and this Accessibility Conformance Report were carried out and produced by [Zenyth](#).

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) - Level AA (Yes) - Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes) - Level AA (Yes) - Level AAA (No)
Web Content Accessibility Guidelines 2.2	Level A (Yes) - Level AA (Yes) - Level AAA (No)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

Conformance summary

Conformance level	Count
Supports	34
Partially Supports	14
Does Not Support	0
Not Applicable	8
Total	56

WCAG 2.x Report

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements. Conformance levels reflect the reconciled findings of record in ZenythAudit.

Table 1: Success Criteria, Level A, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	Non-text content must be given an equivalent text alternative, and purely decorative content must be hidden from assistive technology. The website does not fully meet this: • Some decorative icons and images are exposed to assistive technology instead of being hidden. • Some meaningful images carry an incorrect or non-equivalent text alternative.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Supports	Prerecorded audio-only and video-only content is given an alternative that presents equivalent information. This criterion is satisfied.
1.2.2 Captions (Prerecorded) (Level A)	Supports	Prerecorded audio in synchronized media is captioned. This criterion is satisfied.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	Prerecorded video content is given an audio description or a full text alternative. This criterion is satisfied.

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	The website does not contain live synchronized media that would require captions. This criterion is not applicable to this product.
1.2.5 Audio Description (Prerecorded) (Level AA)	Supports	Prerecorded multimedia does not contain sufficient pauses in the audio to accommodate audio description. This criterion is satisfied.
1.3.1 Info and Relationships (Level A)	Partially Supports	Information, structure, and relationships conveyed through presentation must be programmatically determinable. The website does not fully meet this: • Some visual paragraphs, lists, blockquotes, and emphasized text are not marked up with the corresponding semantic elements. • Some content that functions as a heading is not marked as a heading, some non-heading content is marked as a heading, and the heading hierarchy is not always followed. • Some lists use invalid structure, including list containers or list items with roles or child elements that are not permitted. • Some grouped form controls are not associated with a shared group label, and some field instructions or error messages are not programmatically associated with their fields. • Some landmark regions are missing or are used inappropriately. • A field is visually marked as required but is not identified as required in the code. • A product price shown with a strikethrough has no programmatic explanation of its meaning.

Criteria	Conformance Level	Remarks and Explanations
1.3.2 Meaningful Sequence (Level A)	Partially Supports	When the sequence in which content is presented affects its meaning, a correct reading sequence must be programmatically determinable. The website does not fully meet this: • Content intended to be presented only in specific circumstances is exposed to assistive technology before it is relevant. • Repetitive content is included in the reading order.
1.3.3 Sensory Characteristics (Level A)	Partially Supports	Instructions for understanding and operating content must not rely solely on sensory characteristics such as shape, size, location, or sound. In an isolated instance, instructions rely on a sensory characteristic without a supporting text description.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	Content and functionality are available in both portrait and landscape orientation and are not restricted to a single orientation. This criterion is satisfied.
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Partially Supports	The purpose of input fields that collect information about the user must be programmatically determinable. Some fields that collect user information do not expose a valid input purpose value.
1.4.1 Use of Color (Level A)	Partially Supports	Color must not be used as the only visual means of conveying information or distinguishing a visual element. In some cases, within blocks of body text, links are distinguished from the surrounding text by color alone, without an additional visual indicator such as an underline.

Criteria	Conformance Level	Remarks and Explanations
1.4.2 Audio Control (Level A)	Not Applicable	The website does not contain audio that plays automatically for more than three seconds. This criterion is not applicable to this product.
1.4.3 Contrast (Minimum) (Level AA)	Partially Supports	Text and images of text must have a contrast ratio of at least 4.5:1, or 3:1 for large text. Some isolated occurrences of text, including certain small-text and button elements, do not meet the minimum contrast ratio.
1.4.4 Resize text (Level AA)	Supports	Text can be resized up to 200 percent without assistive technology and without loss of content or functionality. This criterion is satisfied.
1.4.5 Images of Text (Level AA)	Partially Supports	Text must be used to convey information rather than images of text, except where a particular presentation is essential. In an isolated instance, an image is used to present text that could be rendered as real text.
1.4.10 Reflow (Level AA 2.1 and 2.2)	Supports	Content reflows into a single column at 320 CSS pixels and at 400 percent zoom without loss of information or functionality and without two-dimensional scrolling. This criterion is satisfied.
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	User interface components and meaningful graphics meet a contrast ratio of at least 3:1 against adjacent colors. This criterion is satisfied.
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Supports	No loss of content or functionality occurs when users override text spacing for line height, paragraph spacing, letter spacing, and word spacing. This criterion is satisfied.

Criteria	Conformance Level	Remarks and Explanations
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	Additional content revealed on hover or focus can be dismissed, can be hovered without disappearing, and remains visible until dismissed. This criterion is satisfied.
2.1.1 Keyboard (Level A)	Supports	All functionality is operable through a keyboard interface without requiring specific timings for individual keystrokes. This criterion is satisfied.
2.1.2 No Keyboard Trap (Level A)	Supports	Keyboard focus can be moved to and away from every component using the keyboard alone. This criterion is satisfied.
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Not Applicable	The website does not implement any single-character key shortcuts. This criterion is not applicable to this product.
2.2.1 Timing Adjustable (Level A)	Supports	Users can turn off, adjust, or extend time limits, or no time limits are imposed. This criterion is satisfied.
2.2.2 Pause, Stop, Hide (Level A)	Not Applicable	The website does not contain moving, blinking, scrolling, or auto-updating content. This criterion is not applicable to this product.
2.3.1 Three Flashes or Below Threshold (Level A)	Not Applicable	The website does not contain any content that flashes. This criterion is not applicable to this product.

Criteria	Conformance Level	Remarks and Explanations
2.4.1 Bypass Blocks (Level A)	Supports	A skip link and a consistent landmark structure allow users to bypass blocks of content that are repeated across pages. This criterion is satisfied.
2.4.2 Page Titled (Level A)	Supports	Pages have descriptive titles that identify their topic or purpose. This criterion is satisfied.
2.4.3 Focus Order (Level A)	Partially Supports	When components are navigated sequentially, focus order must preserve meaning and operability. In an isolated instance, keyboard focus moves to an element that is not visible on screen.
2.4.4 Link Purpose (In Context) (Level A)	Partially Supports	The purpose of each link must be determinable from its link text alone or together with its surrounding context. The website does not fully meet this: • Some links in the tab order have no text available to assistive technology. • Some links do not convey their purpose through a descriptive name.
2.4.5 Multiple Ways (Level AA)	Supports	More than one way is available to locate a page within the site, including site search and navigation menus. This criterion is satisfied.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA)	Partially Supports	Headings and labels must describe their topic or purpose. The website does not fully meet this: - Some interactive elements for different products or options do not clearly indicate which item they will act upon. - Some headings, labels, or names include state, function, or role wording in addition to the descriptive text, producing unnecessarily lengthy and at times confusing headings and labels. - Some headings or labels do not describe their topic or purpose.
2.4.7 Focus Visible (Level AA)	Supports	A visible keyboard focus indicator is provided for interactive elements. This criterion is satisfied.
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)	Supports	When a component receives keyboard focus, it is not entirely hidden by author-created content. This criterion is satisfied.
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Not Applicable	The website does not use multipoint or path-based gestures to operate any functionality. This criterion is not applicable to this product.
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	Functions operated by a single pointer can be cancelled, or are completed only on the up event. This criterion is satisfied.
2.5.3 Label in Name (Level A 2.1 and 2.2)	Supports	For components with a visible text label, the accessible name contains the visible label text. This criterion is satisfied.

Criteria	Conformance Level	Remarks and Explanations
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Not Applicable	The website does not provide any functionality that is operated by device motion or user motion. This criterion is not applicable to this product.
2.5.7 Dragging Movements (Level AA 2.2 only)	Not Applicable	The website does not require any dragging movements to operate functionality. This criterion is not applicable to this product.
2.5.8 Target Size (Minimum) (Level AA 2.2 only)	Supports	Interactive targets meet the minimum target size, or an equivalent means of activation is available. This criterion is satisfied.
3.1.1 Language of Page (Level A)	Supports	The default human language of each page is programmatically set. This criterion is satisfied.
3.1.2 Language of Parts (Level AA)	Supports	The human language of passages that differ from the page default is programmatically set. This criterion is satisfied.
3.2.1 On Focus (Level A)	Supports	Moving focus to a component does not trigger an unexpected change of context. This criterion is satisfied.
3.2.2 On Input (Level A)	Supports	Changing the setting of a component does not automatically cause an unexpected change of context. This criterion is satisfied.

Criteria	Conformance Level	Remarks and Explanations
3.2.3 Consistent Navigation (Level AA)	Supports	Navigation mechanisms that are repeated across pages appear in the same relative order on each page. This criterion is satisfied.
3.2.4 Consistent Identification (Level AA)	Supports	Components with the same functionality are identified consistently across the site. This criterion is satisfied.
3.2.6 Consistent Help (Level A 2.2 only)	Supports	Where help mechanisms are provided across multiple pages, they appear in a consistent location and order. This criterion is satisfied.
3.3.1 Error Identification (Level A)	Partially Supports	When an input error is automatically detected, the item in error must be identified and described to the user in text. The website does not fully meet this: • Some fields in error do not identify the required format in the error message. • Some fields in error are not identified in text. • In one case, no error message is presented after an invalid or empty submission.
3.3.2 Labels or Instructions (Level A)	Partially Supports	Labels or instructions must be provided when content requires user input. The website does not fully meet this: • Some input fields have no visible label. • Required and optional fields are not always distinguished. • Some fields rely on placeholder text in place of a persistent label. • Where a required-field symbol is used, its meaning is sometimes not explained.

Criteria	Conformance Level	Remarks and Explanations
3.3.3 Error Suggestion (Level AA)	Supports	When an input error is detected and a correction is known, the correction is suggested to the user. This criterion is satisfied.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	For legal or financial transactions, submissions are reversible, checked for errors, or confirmed before completion. This criterion is satisfied.
3.3.7 Redundant Entry (Level A 2.2 only)	Supports	Information previously entered by the user is auto-populated or available to select rather than requiring re-entry within a process. This criterion is satisfied.
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)	Supports	Authentication does not require a cognitive function test, or an accessible alternative is provided. This criterion is satisfied.
4.1.1 Parsing (Level A)	Supports	For WCAG 2.0 and 2.1, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata.
4.1.2 Name, Role, Value (Level A)	Partially Supports	The name, role, state, and value of user interface components must be available to assistive technology. The website does not fully meet this: • Some interactive elements, including form controls, do not have an accessible name available to assistive technology. • An inline frame does not have an accessible name. • A custom-coded interactive element does not expose a role.

Criteria	Conformance Level	Remarks and Explanations
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Supports	Status messages are presented to assistive technology through appropriate roles or properties without receiving focus. This criterion is satisfied.