

VELOXP

# ADA Compliance Audit

WCAG 2.1 AA Website Accessibility Assessment

100

Violations Found

0%

Compliance Rate

10

Pages Scanned

**⚠ HIGH LEGAL RISK**

Client: Sample Healthcare Organization

Website: samplehealthcare.org

Date: March 10, 2026

Standard: WCAG 2.1 Level AA (DOJ reference standard)

Total public pages detected: 10

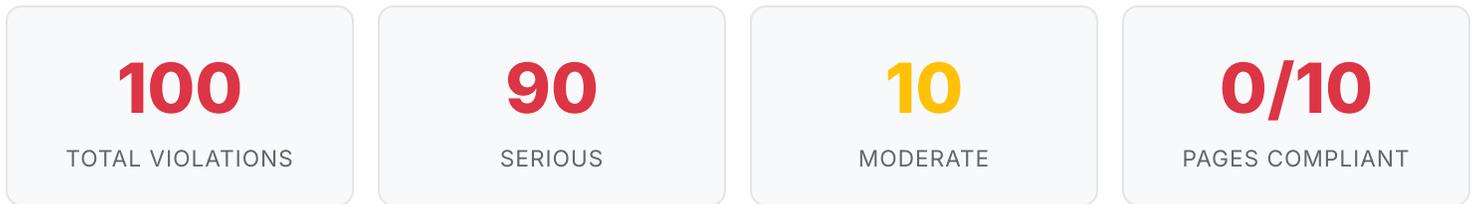
# Executive Summary

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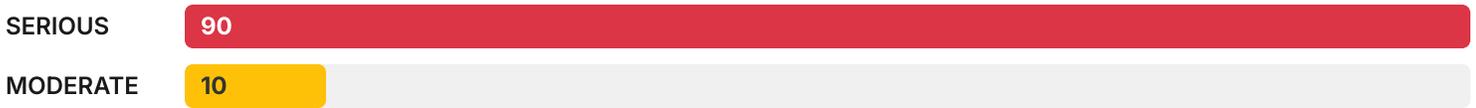
Our automated WCAG 2.1 AA scan of Sample Healthcare Organization's website (samplehealthcare.org) identified 100 accessibility violations across 10 pages, with a 0% pass rate. This represents significant legal exposure under ADA Title II and III requirements.

The most prevalent issues are ensure links have discernible text (61 instances) and ensure the contrast between foreground and background colors meets wcag 2 aa minimum contrast ratio thresholds (28 instances). These are classified as 'serious' under WCAG guidelines — meaning they create significant barriers for users with disabilities.

With 90 serious violations and the DOJ's April 2026 Title II deadline approaching, Sample Healthcare Organization should prioritize remediation to avoid potential ADA litigation (4,605 website lawsuits filed in 2024, average settlement \$5K-\$20K per case).



## Violation Severity Distribution



# Potential Liability Exposure

Based on current ADA enforcement trends and Sample Healthcare Organization's 100 violations, here is the estimated financial exposure if a lawsuit is filed.

**\$15,000-\$75,000**

Typical settlement  
(first offense)

**\$50,000-\$100,000**

Legal defense costs  
(if contested)

**\$65,000-\$175,000**

Total exposure  
(worst case)

**Context:** First-time ADA violations carry fines up to \$75,000. Repeat violations up to \$150,000. Legal defense alone averages \$50,000-\$100,000. The average small-to-mid business settles for \$5,000-\$20,000 — but healthcare providers face heightened scrutiny due to patient access requirements.

## Recent Healthcare ADA Settlements

**MedStar Health (2024)**

**\$440,000**

DOJ Title III complaint — disability discrimination in patient services

**Kent Hospital (2023)**

**\$35,000**

Inadequate communication support for deaf patient

**Fashion Nova (2025)**

**\$5,150,000**

Class action — website inaccessible to screen reader users

**CA Web Accessibility (2025)**

**\$5,150,000**

Largest-ever web accessibility class action settlement

## Key Deadlines

 **April 2026 — DOJ Title II Deadline:** All state and local government entities (including public hospitals) must ensure websites conform to WCAG 2.1 AA. Non-compliance after this date significantly increases litigation risk and potential DOJ enforcement action.

# Top Accessibility Violations

The most prevalent WCAG 2.1 AA violations found during the automated scan, ranked by frequency and impact.

## Ensure links have discernible text

**SERIOUS** 61 instances

Found 61 instances across scanned pages. Ensure links have discernible text

**Fix:** Fix all of the following: Element is in tab order and does not have accessible text Fix any of the following: Element does not have text that is visible to screen readers aria-label attribute does not exist or is empty aria-labelledby attribute does not exist, references elements that do not exist or references elements that are empty Element has no title attribute

## Ensure the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds

**SERIOUS** 28 instances

Found 28 instances across scanned pages. Ensure the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds

**Fix:** Fix any of the following: Element has insufficient color contrast of 3.99 (foreground color: #ff0000, background color: #ffffff, font size: 12.8pt (17px), font weight: normal). Expected contrast ratio of 4.5:1

## Ensure does not disable text scaling and zooming

**MODERATE** 10 instances

Found 10 instances across scanned pages. Ensure does not disable text scaling and zooming

**Fix:** Fix any of the following: maximum-scale on tag disables zooming on mobile devices

## Ensure links are distinguished from surrounding text in a way that does not rely on color

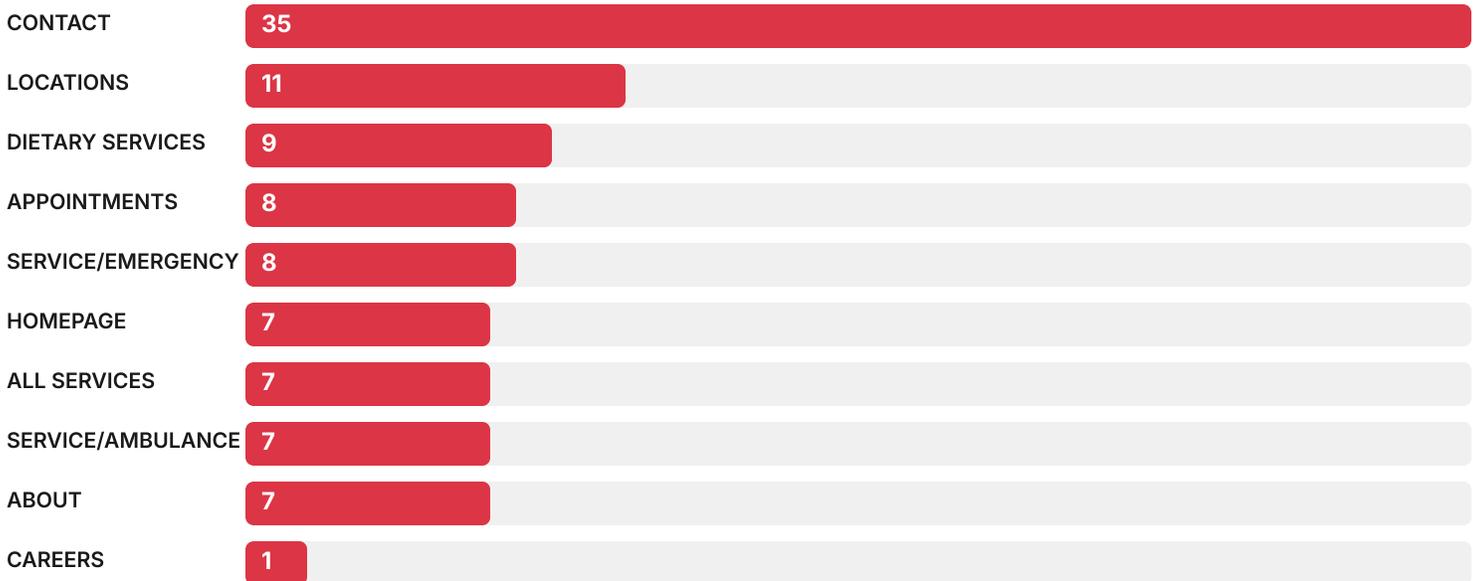
**SERIOUS** 1 instances

Found 1 instances across scanned pages. Ensure links are distinguished from surrounding text in a way that does not rely on color

**Fix:** Fix any of the following: The link has insufficient color contrast of 1.38:1 with the surrounding text. (Minimum contrast is 3:1, link text: #1f2f69, surrounding text: #051b2e) The link has no styling (such as underline) to distinguish it from the surrounding text

# Violations by Page

Breakdown of accessibility issues on each scanned page. Pages with the most violations should be prioritized for remediation.



Page	URL	Total	Serious	Moderate
Contact	<a href="/contact/">/contact/</a>	35	34	1
Locations	<a href="/locations/">/locations/</a>	11	10	1
Dietary Services	<a href="/dietary-services/">/dietary-services/</a>	9	8	1
Appointments	<a href="/appointments/">/appointments</a>	8	7	1
Service/Emergency Care	<a href="/service/emergency-care/">/service/emergency-care</a>	8	7	1
Homepage	<a href="/">/</a>	7	6	1
All Services	<a href="/all-services/">/all-services</a>	7	6	1
Service/Ambulance	<a href="/service/ambulance/">/service/ambulance</a>	7	6	1
About	<a href="/about/">/about/</a>	7	6	1
Careers	<a href="/careers/">/careers/</a>	1	0	1

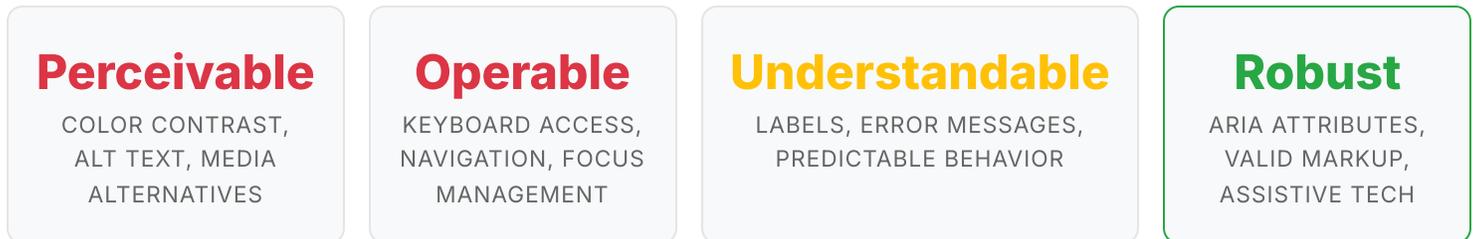
# Complete Violation Inventory

All unique WCAG 2.1 AA violations identified, with WCAG criterion mapping and remediation impact level.

Rule	Instances	Impact	Description	WCAG
link-name	61	serious	Ensure links have discernible text	wcag2a, wcag244, wcag412
color-contrast	28	serious	Ensure the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds	wcag2aa, wcag143
meta-viewport	10	moderate	Ensure does not disable text scaling and zooming	wcag2aa, wcag144
link-in-text-block	1	serious	Ensure links are distinguished from surrounding text in a way that does not rely on color	wcag2a, wcag141

## WCAG 2.1 — The Four Principles

Every WCAG success criterion falls under one of four core principles. Here's how Sample Healthcare Organization's violations map:



Automated scanning primarily detects Perceivable and Robust issues. Manual review (Audit tier) additionally tests Operable and Understandable criteria — which account for the other ~70% of potential violations that automation cannot catch.

# Legal & Regulatory Context

ADA website compliance is federally mandated. Enforcement is accelerating.

**4,605**

LAWSUITS FILED (2024)

**8,800**

TITLE III SUITS (2024)

**441**

FEB 2026 ALONE

## Why Overlay Widgets Don't Work

**⚠️ FTC crackdown:** The Federal Trade Commission fined accessiBe **\$1,000,000** in January 2025 for falsely claiming their overlay widget ensures ADA compliance. 800+ businesses using overlay widgets (accessiBe, UserWay, AudioEye) were still sued. Courts reject widget installation as evidence of compliance. The National Federation of the Blind formally opposes overlay technology. **Real compliance requires fixing source code.**

## Automated vs. Manual Audits

Capability	Automated Only	Overlay Widget	VeloXP Audit
Issue detection rate	~30%	~5% <b>real</b>	~90%
Keyboard navigation test	<b>No</b>	<b>No</b>	<b>Yes (Audit+)</b>
Screen reader test	<b>No</b>	<b>No</b>	<b>Yes (Audit+)</b>
Legally defensible	Partial	<b>No — FTC fined</b>	<b>Yes — attorney reviewed</b>
Dev-ready fix specs	<b>Generic</b>	<b>None</b>	<b>Code examples</b>
Ongoing monitoring	Some	Superficial	<b>Full regression</b>

## Who Is At Risk?

**Healthcare providers face elevated scrutiny.** Under ADA Title II (government/public hospitals) and Title III (private healthcare), patient-facing websites must be accessible. HIPAA intersection means patient portals, appointment scheduling, and medical records access are particularly high-risk areas. The DOJ has specifically targeted healthcare in recent enforcement actions (MedStar, Barnet Dulaney Perkins).

# Remediation Roadmap

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A phased approach to achieving WCAG 2.1 AA conformance, prioritized by legal risk and user impact.

## ● Phase 1: Critical Fixes (Week 1-2)

- Add alt text and aria-labels to 61 links missing discernible text
- Fix 28 color contrast failures to meet 4.5:1 AA ratio
- Fix all critical and serious violations on homepage and key landing pages
- Implement skip navigation links for keyboard users

## ● Phase 2: Comprehensive Remediation (Week 3-6)

- Fix viewport meta tag to allow text scaling/zooming
- Implement proper heading hierarchy across all pages
- Add ARIA landmarks (header, nav, main, footer) to all templates
- Ensure all interactive elements are keyboard accessible
- Add focus indicators with 3:1 minimum contrast
- Review and fix all form error handling and validation messaging

## ● Phase 3: Ongoing Compliance (Month 2+)

- Configure monthly automated WCAG scans to catch regressions
- Create accessibility statement and feedback mechanism
- Establish content creation guidelines for ongoing compliance
- Generate VPAT/Accessibility Conformance Report for vendor procurement
- Train content team on accessibility best practices

# Audit Scope & Compliance Criteria

A VeloXP ADA Compliance Audit is designed to validate conformance with federal accessibility standards. Here is exactly what the paid audit covers and which criteria are tested.

## What the Audit Covers

Area	Scan (This Report)	Full Audit (Paid)
Automated WCAG 2.1 AA scan	✓ (up to 10 pages)	✓ (all public pages)
Manual expert review	—	✓ (10 critical pages)
Keyboard-only navigation test	—	✓
Screen reader test (NVDA + VoiceOver)	—	✓
Form & interactive element validation	—	✓
Color contrast with exact fix specs	Flagged only	✓ with hex values
ARIA attribute validation	Partial	✓ complete
Developer-ready code examples	—	✓ per violation
VPAT / Conformance Report	—	✓
Remediation strategy call (1 hr)	—	✓
<b>Attorney-reviewed compliance letter</b>	—	✓

## WCAG 2.1 AA Success Criteria Tested

The audit evaluates conformance against all 50 Level A and AA success criteria across the four WCAG principles:

Principle	Key Criteria	What We Test
<b>1. Perceivable</b>	1.1.1 Non-text Content 1.3.1 Info & Relationships 1.4.3 Contrast (Minimum) 1.4.4 Resize Text 1.4.5 Images of Text	Alt text, headings, color contrast ratios, text scaling, image accessibility
<b>2. Operable</b>	2.1.1 Keyboard 2.1.2 No Keyboard Trap 2.4.1 Bypass Blocks 2.4.4 Link Purpose 2.4.7 Focus Visible	Tab order, focus indicators, skip links, link text, keyboard traps
<b>3. Understandable</b>	3.1.1 Language of Page 3.2.1 On Focus 3.3.1 Error Identification 3.3.2 Labels or Instructions	Page language, form labels, error handling, predictable navigation
<b>4. Robust</b>	4.1.1 Parsing 4.1.2 Name, Role, Value 4.1.3 Status Messages	Valid HTML, ARIA attributes, dynamic content announcements

## ADA Compliance Validation

✅ **Legal Basis:** The U.S. Department of Justice recognizes WCAG 2.1 Level AA as the technical standard for ADA compliance (28 CFR Part 35, effective April 2026). A VeloXP Audit produces a **VPAT (Voluntary Product Accessibility Template)** — the industry-standard document used to demonstrate conformance. This documentation is accepted by courts, procurement offices, and regulatory bodies as evidence of good-faith compliance efforts.

Upon completing remediation, Sample Healthcare Organization will receive an **Accessibility Certification Letter** confirming WCAG 2.1 AA conformance on audited pages — providing documented evidence of compliance in the event of an ADA inquiry or lawsuit.

⚖️ **Attorney-Reviewed Documentation:** All VeloXP compliance deliverables — including the VPAT, Accessibility Certification Letter, and remediation specifications — are reviewed by a licensed business attorney before final delivery. This attorney sign-off provides an additional layer of legal defensibility beyond the technical audit itself, ensuring documentation meets the evidentiary standards courts expect in ADA proceedings.

# Service Tiers

Based on Sample Healthcare Organization's 100 violations and HIGH risk level, we recommend the **Audit** tier — combining automated scanning with manual expert review to produce a legally defensible compliance report with developer-ready fix specifications.

*Pricing based on 10 public pages detected on samplehealthcare.org. Base includes 10 pages; additional pages priced per-page.*

	RECOMMENDED		
<p><b>Scan</b></p> <p><b>FREE</b></p> <p>Complimentary</p> <p><i>Up to 10 pages</i></p> <p>Automated WCAG 2.1 AA scan — your first step to understanding compliance risk. See violation count, severity breakdown, and liability estimate.</p> <ul style="list-style-type: none"><li>Automated WCAG 2.1 AA scan (up to 10 pages)</li><li>Violation count by severity (Critical/Serious/Moderate)</li><li>Risk level assessment and liability estimate</li><li>Legal context and regulatory deadlines</li><li>Service tier recommendations with pricing</li></ul> <p>✓ Current Report</p>	<p><b>Audit</b></p> <p><b>\$1,500</b></p> <p>One-time</p> <p><i>10 pages detected (base covers 10). +\$100/page beyond 10</i></p> <p>Comprehensive audit with manual expert review. Developer-ready fix specs. Legally defensible documentation.</p> <ul style="list-style-type: none"><li>Full-site automated scan (all publicly accessible pages)</li><li>Manual expert review of 10 critical pages</li><li>Keyboard navigation and focus testing</li><li>Screen reader audit (NVDA + VoiceOver)</li><li>Per-page violation detail with screenshots</li><li>Complete violation inventory with WCAG mapping</li><li>Developer-ready code examples for every fix</li></ul> <p>Purchase — \$1,500</p>	<p><b>Remediate</b></p> <p><b>\$5,000</b></p> <p>One-time</p> <p><i>10 pages detected (base covers 10). +\$200/page beyond 10</i></p> <p>Full-service: we find and fix the violations. Complete audit plus hands-on code remediation and verification.</p> <ul style="list-style-type: none"><li>Everything in Audit</li><li>Direct code remediation (all scanned pages)</li><li>Alt text creation for all images and media</li><li>Form label and ARIA implementation</li><li>Keyboard navigation and focus management fixes</li><li>Color contrast and typography remediation</li><li>Post-remediation verification scan</li></ul> <p>Purchase — \$5,000</p>	<p><b>Monitor</b></p> <p><b>\$300/mo</b></p> <p>Monthly (6-month minimum)</p> <p><i>10 pages detected (base covers 10). +\$25/page beyond 10</i></p> <p>Ongoing compliance monitoring. Monthly scans, regression detection, quarterly expert review.</p> <ul style="list-style-type: none"><li>Monthly automated compliance scans (full site)</li><li>Regression detection and instant alerts</li><li>Remediation verification after fixes</li><li>Quarterly manual review of critical pages</li><li>Accessibility statement maintenance</li><li>Monthly compliance scorecard</li><li>Priority support for compliance questions</li></ul> <p>Purchase — \$300/mo</p>

# Cost of Inaction vs. Investment

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**\$65,000-\$175,000**

Potential cost of a single ADA lawsuit  
(settlement + legal + remediation)

**\$1,500**

VeloXP Audit Tier  
(comprehensive audit + fix specs)

Prevention costs **116x** less than a single lawsuit.

## About This Assessment

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This ADA Compliance Audit was produced by VeloXP's automated WCAG scanning system using axe-core and Puppeteer. It evaluates website accessibility against WCAG 2.1 Level AA standards — the benchmark recognized by the U.S. Department of Justice for ADA Title II and Title III compliance. Note: Automated scanning detects approximately 30% of WCAG issues. A comprehensive manual audit (available in the Audit tier) covers 100% of testable criteria.

### Methodology

This audit used axe-core (Deque Systems) via Puppeteer for automated WCAG 2.1 AA testing. Each page was fully rendered in Chromium and evaluated against 50+ WCAG success criteria. Automated scanning identifies approximately 30% of accessibility issues. A comprehensive manual audit (Audit tier and above) combines automation with expert review to achieve ~90% detection across all testable criteria, including keyboard navigation, screen reader compatibility, and assistive technology testing.

### Tools Used

- **axe-core v4.x** (Deque Systems) — industry-standard WCAG testing engine
- **Puppeteer** — headless Chromium for full page rendering
- **VeloXP Compliance Engine** — AI-enhanced analysis and report generation

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