Disclaimer: This resource provides general guidance and is not legal advice. Consult qualified counsel for jurisdiction-specific requirements.

Accessibility Compliance Playbook

Building and operating accessible digital products

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Standards: WCAG 2.2, ADA, Section 508, EN 301 549

Executive Summary

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This playbook provides a comprehensive framework for building and operating accessible digital products that comply with international accessibility standards including WCAG 2.2, ADA, Section 508, and EN 301 549. It serves as a practical guide for product teams, engineering organizations, and compliance professionals.

Key Objectives: Establish accessibility as a core product requirement, implement systematic compliance processes, and create sustainable practices that scale across your organization.

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Strategy Overview

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Vision Statement

Create digital experiences that are accessible to all users, regardless of their abilities, while maintaining business objectives and technical excellence.

Strategic Pillars

1. **Inclusive Design** - Accessibility as a fundamental design principle
2. **Systematic Compliance** - Structured approach to meeting standards
3. **Continuous Improvement** - Ongoing monitoring and enhancement
4. **Organizational Capability** - Building internal expertise and processes

Success Metrics

- 100% WCAG 2.2 AA compliance across all digital properties
- Zero accessibility-related legal issues
- 95%+ user satisfaction scores from accessibility testing
- 50% reduction in accessibility-related support tickets

Maturity Model

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Level 1: Ad Hoc (0-3 months)

Characteristics:

- Reactive approach to accessibility
- Limited awareness and training
- Manual testing only
- No formal processes

Key Activities:

- Initial accessibility audit
- Basic team training
- Manual testing implementation
- Policy development

Level 2: Managed (3-6 months)

Characteristics:

- Basic processes in place
- Some automated testing
- Design system integration
- Regular reviews

Key Activities:

- Process documentation
- Automated testing integration
- Design system updates
- Regular compliance reviews

Level 3: Defined (6-12 months)

Characteristics:

- Standardized processes
- Comprehensive tooling
- Cross-functional collaboration
- Proactive approach

Key Activities:

- Process standardization
- Advanced tooling implementation
- Cross-team collaboration
- Proactive monitoring

Level 4: Optimized (12+ months)

Characteristics:

- Continuous improvement
- Innovation focus
- Industry leadership
- Advanced analytics

Key Activities:

- Continuous optimization
- Innovation initiatives
- Industry participation
- Advanced analytics

Governance & RACI

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Executive Steering Committee

Responsible: Strategic direction and resource allocation **Accountable:** CEO, CTO, CMO **Consulted:** Legal, Compliance, Product **Informed:** All stakeholders

Accessibility Center of Excellence

Responsible: Program execution and technical guidance **Accountable:** Accessibility Director **Consulted:** Engineering, Design, QA **Informed:** Product teams

Product Teams

Responsible: Implementation and testing **Accountable:** Product Managers, Engineering Leads **Consulted:** Accessibility specialists **Informed:** Executive team

WCAG 2.2 Mapping (A/AA) & Test Procedures

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Perceivable (Principle 1)

1.1 Text Alternatives

- **1.1.1 Non-text Content (A)**
  - **Test:** Manual inspection of all images, icons, and media
  - **Tools:** Screen reader testing, automated alt-text validation
  - **Pass Criteria:** All non-text content has appropriate alternatives

1.2 Time-based Media

- **1.2.1 Audio-only and Video-only (A)**
  - **Test:** Content review and user testing
  - **Tools:** Media player testing, transcript verification
  - **Pass Criteria:** Alternatives provided for all time-based media

1.3 Adaptable

- **1.3.1 Info and Relationships (A)**
  - **Test:** Code review and screen reader testing
  - **Tools:** HTML validators, screen readers
  - **Pass Criteria:** Information structure is programmatically determinable

1.4 Distinguishable

- **1.4.3 Contrast (Minimum) (AA)**
  - **Test:** Color contrast analysis
  - **Tools:** WebAIM contrast checker, automated tools
  - **Pass Criteria:** 4.5:1 ratio for normal text, 3:1 for large text

Operable (Principle 2)

2.1 Keyboard Accessible

- **2.1.1 Keyboard (A)**
  - **Test:** Complete keyboard navigation
  - **Tools:** Keyboard testing, screen readers
  - **Pass Criteria:** All functionality accessible via keyboard

2.2 Enough Time

- **2.2.1 Timing Adjustable (A)**
  - **Test:** Time limit functionality testing
  - **Tools:** User testing, functionality verification
  - **Pass Criteria:** Users can adjust or extend time limits

2.4 Navigable

- **2.4.1 Bypass Blocks (A)**
  - **Test:** Skip link functionality
  - **Tools:** Screen reader testing, keyboard navigation
  - **Pass Criteria:** Skip links available and functional

Understandable (Principle 3)

3.1 Readable

- **3.1.1 Language of Page (A)**
  - **Test:** HTML lang attribute verification
  - **Tools:** HTML validators, screen reader testing
  - **Pass Criteria:** Language properly declared

3.2 Predictable

- **3.2.1 On Focus (A)**
  - **Test:** Focus behavior testing
  - **Tools:** Keyboard testing, user observation
  - **Pass Criteria:** No unexpected context changes on focus

3.3 Input Assistance

- **3.3.1 Error Identification (A)**
  - **Test:** Form validation testing
  - **Tools:** Screen reader testing, user testing
  - **Pass Criteria:** Errors clearly identified and described

Robust (Principle 4)

4.1 Compatible

- **4.1.1 Parsing (A)**
  - **Test:** HTML validation
  - **Tools:** HTML validators, automated testing
  - **Pass Criteria:** Valid, well-formed markup

4.1.2 Name, Role, Value (A)**

- **Test:** Screen reader testing

- **Tools:** Screen readers, automated testing
- **Pass Criteria:** All UI components have proper names and roles

SDLC Integration

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Design Phase

- **Accessibility Requirements:** Include in design specifications
- **Design Reviews:** Accessibility checkpoints in design process
- **Design System:** Accessible component library
- **User Testing:** Include users with disabilities

Development Phase

- **Code Standards:** Accessibility coding guidelines
- **Code Reviews:** Accessibility checklist in reviews
- **Automated Testing:** CI/CD integration
- **Manual Testing:** Regular accessibility testing

Testing Phase

- **Test Planning:** Accessibility test cases
- **Automated Testing:** Regression testing
- **Manual Testing:** Comprehensive accessibility testing
- **User Testing:** Testing with actual users

Deployment Phase

- **Pre-deployment:** Final accessibility check
- **Monitoring:** Ongoing accessibility monitoring
- **Feedback:** User feedback collection
- **Updates:** Continuous improvement

Tooling Stack

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Automated Testing

- **axe-core** - Comprehensive accessibility testing engine
- **Lighthouse** - Built-in Chrome accessibility audits
- **Pa11y** - Command-line accessibility testing
- **WAVE** - Web accessibility evaluation tool

Manual Testing

- **Screen Readers** - NVDA, JAWS, VoiceOver
- **Keyboard Testing** - Tab navigation, keyboard shortcuts
- **Color Testing** - Contrast analyzers, colorblind simulation
- **Zoom Testing** - Browser zoom, text scaling

Design Tools

- **Figma** - Accessibility plugins and templates
- **Sketch** - Color contrast and accessibility plugins
- **Adobe XD** - Accessibility design kits
- **Stark** - Color blindness and contrast testing

Development Tools

- **React** - Accessibility testing libraries
- **Vue** - A11y testing utilities
- **Angular** - Accessibility testing framework
- **Web Components** - Accessible component libraries

KPIs & OKRs

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Key Performance Indicators

Compliance Metrics

- WCAG 2.2 AA compliance percentage
- Critical accessibility issues resolved
- Automated test pass rates
- Manual audit scores

Business Impact Metrics

- Customer satisfaction scores
- Support ticket reduction
- Revenue from accessibility improvements
- Market share in disability market

Operational Metrics

- Development velocity impact
- Rework and bug fix reduction
- Training completion rates
- Employee engagement scores

Objectives and Key Results

Q1 Objectives

- **Objective:** Establish accessibility foundation
- **KR1:** 100% team accessibility training completion
- **KR2:** 80% WCAG 2.2 AA compliance
- **KR3:** 50% reduction in critical issues

Q2 Objectives

- **Objective:** Scale accessibility practices
- **KR1:** 95% WCAG 2.2 AA compliance
- **KR2:** 100% new features accessibility tested
- **KR3:** 75% reduction in accessibility support tickets

Q3 Objectives

- **Objective:** Optimize and innovate
- **KR1:** 100% WCAG 2.2 AA compliance
- **KR2:** Industry recognition for accessibility
- **KR3:** 90% customer accessibility satisfaction

Risk Management

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Legal Risks

- **ADA Lawsuits** - Risk of accessibility-related litigation
- **Regulatory Fines** - Government penalties for non-compliance
- **Contract Violations** - Breach of accessibility requirements
- **Reputation Damage** - Negative publicity from accessibility issues

Technical Risks

- **Legacy System Integration** - Challenges with older systems
- **Third-party Dependencies** - Inaccessible external components
- **Performance Impact** - Accessibility features affecting performance
- **Maintenance Overhead** - Ongoing accessibility maintenance costs

Mitigation Strategies

- **Proactive Compliance** - Regular audits and testing
- **Legal Review** - Regular legal compliance assessment
- **Vendor Management** - Accessibility requirements for vendors
- **Training Programs** - Continuous team education

Rollout Plan (90-180 Days)

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Phase 1: Foundation (Days 1-30)

Objectives: Establish governance and baseline

- [ ] Executive sponsorship and budget approval
- [ ] Accessibility Center of Excellence formation
- [ ] Comprehensive accessibility audit
- [ ] Legal and compliance assessment
- [ ] Employee awareness training

Phase 2: Pilot (Days 31-60)

Objectives: Prove value through focused implementation

- [ ] Select 2-3 high-impact properties for pilot

- [ ] Implement accessibility testing automation
- [ ] Train pilot teams on accessibility practices
- [ ] Establish baseline metrics and KPIs
- [ ] Create accessibility design system components

Phase 3: Scale (Days 61-120)

Objectives: Roll out accessibility practices across organization

- [ ] Expand accessibility practices to all product teams
- [ ] Integrate accessibility into development lifecycle
- [ ] Implement automated testing in CI/CD pipelines
- [ ] Launch comprehensive training program
- [ ] Establish accessibility review processes

Phase 4: Optimize (Days 121-180)

Objectives: Achieve excellence and drive innovation

- [ ] Advanced accessibility training and certification
- [ ] Innovation lab for accessibility R&D
- [ ] Industry thought leadership initiatives
- [ ] Customer accessibility advisory board
- [ ] Advanced analytics and personalization

Training Plan

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Executive Level (4 hours)

- Business case and ROI
- Legal and regulatory landscape
- Strategic planning and governance
- Industry best practices and case studies

Management Level (8 hours)

- Accessibility fundamentals
- Team leadership and change management

- Resource planning and budgeting
- Metrics and performance management

Individual Contributors (16 hours)

- Role-specific accessibility training
- Hands-on tool usage
- Testing and validation techniques
- Continuous learning and certification

Specialized Roles

- **Designers** - Inclusive design principles and tools
- **Developers** - Accessible coding practices and testing
- **QA Engineers** - Comprehensive testing methodologies
- **Product Managers** - Accessibility requirements and planning

Vendor Management

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Vendor Selection Criteria

- Accessibility compliance requirements
- WCAG 2.2 AA compliance certification
- Accessibility testing and validation processes
- Ongoing accessibility support and maintenance

Contract Requirements

- Accessibility compliance clauses
- Regular accessibility audits
- Accessibility training and support
- Performance metrics and SLAs

Ongoing Management

- Regular accessibility reviews
- Performance monitoring

- Training and support
- Continuous improvement

Audit & Evidence Templates

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Accessibility Audit Checklist

- [ ] WCAG 2.2 AA compliance verification
- [ ] Automated testing results
- [ ] Manual testing documentation
- [ ] User testing results
- [ ] Legal compliance review
- [ ] Performance impact assessment

Evidence Collection

- **Test Results** - Automated and manual testing reports
- **User Feedback** - Accessibility user testing results
- **Legal Review** - Compliance assessment documentation
- **Performance Data** - Impact on system performance
- **Training Records** - Team training completion

Reporting Templates

- **Executive Summary** - High-level compliance status
- **Technical Report** - Detailed testing results
- **Action Plan** - Remediation and improvement plan
- **Progress Tracking** - Ongoing compliance monitoring

Key Terms

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Accessibility - The practice of making digital products usable by people with disabilities

WCAG 2.2 - Web Content Accessibility Guidelines version 2.2, the international standard for web accessibility

ADA - Americans with Disabilities Act, US law requiring accessibility compliance

Section 508 - US federal accessibility requirements for government technology

Assistive Technology - Tools and devices that help people with disabilities use technology

Screen Reader - Software that reads digital content aloud for users with visual impairments

Keyboard Navigation - Using only keyboard input to navigate and interact with digital interfaces

Color Contrast - The difference in light between text and background colors

Alt Text - Alternative text descriptions for images and other non-text content

ARIA - Accessible Rich Internet Applications, standards for making web content accessible

Appendix: Code & Patterns

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HTML Accessibility Patterns

```
<!-- Good: Proper heading structure -->
<h1>Main Page Title</h1>
<h2>Section Title</h2>
<h3>Subsection Title</h3>

<!-- Good: Form labels -->
<label for="email">Email Address</label>
<input type="email" id="email" name="email" required />

<!-- Good: Table headers -->
<table>
```

```
  <thead>
    <tr>
      <th scope="col">Product</th>
      <th scope="col">Price</th>
      <th scope="col">Stock</th>
    </tr>
  </thead>
  <tbody>
    <tr>
      <th scope="row">Widget A</th>
      <td>$19.99</td>
      <td>In Stock</td>
    </tr>
  </tbody>
</table>
```

CSS Accessibility Patterns

```
/* Good: High contrast text */
.text-primary {
  color: #1f2937; /* Dark gray on white = 16.5:1 ratio */
  background-color: #ffffff;
}

/* Good: Focus indicators */
.focus-visible {
  outline: 2px solid #4f46e5;
  outline-offset: 2px;
}

/* Good: Skip links */
.skip-link {
  position: absolute;
  top: -40px;
  left: 6px;
  background: #4f46e5;
```

```
  color: white;
  padding: 8px;
  text-decoration: none;
  z-index: 1000;
}

.skip-link:focus {
  top: 6px;
}
```

JavaScript Accessibility Patterns

```
// Good: Keyboard event handling
function handleKeydown(event) {
  if (event.key === "Enter" || event.key === " ") {
    event.preventDefault();
    // Perform button action
  }
}

// Good: Focus management
function openModal() {
  const modal = document.getElementById("modal");
  const firstFocusable = modal.querySelector(
    'button, [href], input, select, textarea, [tabindex]:not(
  );

  modal.style.display = "block";
  firstFocusable.focus();
}

// Good: ARIA updates
function updateProgress(percent) {
  const progressBar = document.getElementById("progress");
  progressBar.setAttribute("aria-valuenow", percent);
```

```
  progressBar.textContent = `${percent}% complete`;
}
```

> **Implementation Support:** Halytic provides comprehensive accessibility compliance consulting, auditing services, and ongoing monitoring. Our platform automates testing while our experts guide your strategic implementation.

This playbook is prepared by Halytic and represents industry best practices for accessibility compliance implementation.