

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



Legal Risk Assessment Template

Evaluate and mitigate accessibility compliance risks

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Version: 1.0

Date: October 18, 2025

Standards: ADA, Section 508, WCAG 2.2 AA

Disclaimer: This template is for risk management and documentation. It does not constitute legal advice.

Legal Risk Assessment Template

Use this template to assess and document legal risks related to website and application accessibility. Pair it with technical evidence (scan results, screenshots, code diffs, and user testing notes).

Risk Scoring Model

Likelihood Scale (1–5)

- 1. **Very Unlikely** — <10% chance in next 12 months
- 2. **Unlikely** — 10–30%
- 3. **Possible** — 30–50%
- 4. **Likely** — 50–70%
- 5. **Very Likely** — >70%

Impact Scale (1–5)

- 1. **Minimal** — No legal action; minor reputational impact
- 2. **Low** — Warning letter; small fine (< \$10k)
- 3. **Moderate** — Formal complaint; settlement (\$10k–\$50k)
- 4. **High** — Lawsuit; significant settlement (\$50k–\$250k)
- 5. **Critical** — Class action; agency investigation; injunctive relief; unlimited damages

Calculating Overall Risk

- **Risk Score** = Likelihood × Impact (range **1–25**).
- **Risk Level** mapping:

| Score | 1–3 | 4–6 | 7–12 | 13–19 | 20–25 | |---|---|---|---|---| | Level | Minimal | Low | Medium | High | **Critical** |

Likelihood/Impact Matrix

| Impact ↓ / Likelihood → | **1** | **2** | **3** | **4** | **5** | |---|---|---|---|---| | **5** | Medium | Medium | High | Critical | Critical | | **4** | Low | Medium | High | High | Critical | | **3** | Low | Medium | Medium | High |

| High | | **2** | Minimal | Low | Low | Medium | Medium | | **1** | Minimal | Minimal | Low | Low | Medium |

Risk Level Actions

- **Critical:** Immediate escalation, CEO/Board notification, daily status.
- **High:** Urgent remediation within **30 days**; weekly status.
- **Medium:** Address within **90 days**; biweekly status.
- **Low:** Plan in next quarter; monthly status.
- **Minimal:** Monitor; include in regression tests.

Assessment Form

1. Issue Identification

Issue: _____

WCAG Criterion: _____

Affected Pages/Flows: _____

Detected By: ☐ Automated scan ☐ Manual test ☐ User report ☐ Legal notice

2. Risk Scoring

Likelihood: ____ (1–5) — Rationale: _____

Impact: ____ (1–5) — Rationale: _____

Risk Score (L×I): ____ / 25

Risk Level: ____ (Critical / High / Medium / Low / Minimal)

3. Legal Context & Exposure

- **Jurisdiction(s):** _____
- **Applicable Law(s):** e.g., ADA Title III, AODA, Equality Act, EN 301 549/EAA
- **Past Complaints/Notices:** ☐ Yes ☐ No — Details: _____
- **Customer/SLA Impact:** _____

4. Remediation Plan

Immediate (0–7 days)

- ☐ Triage & verify reproduction steps
- ☐ Implement safe workaround (e.g., alt text, skip links, hotfix)
- ☐ Notify stakeholders and update accessibility statement if user-impacting

Short-term (8–30 days)

- ☐ Code fix merged; regression tests added
- ☐ Evidence captured (before/after HTML, screenshots, diffs)
- ☐ Re-verify with assistive tech (e.g., NVDA/VoiceOver)

Long-term (31–90 days)

- ☐ Pattern/library update (design system)
- ☐ Training issued to teams; linting rules/codemods applied
- ☐ Monitoring in place (dashboards, alerts)

5. Ownership & Accountability

Primary Owner: _____

Department: _____

Email: _____

Stakeholders

- Legal: _____
- Compliance: _____
- Development: _____
- Product/Design: _____
- Executive Sponsor: _____

6. Evidence & Documentation

Current State

- Screenshots: [] Yes [] No
- Audit/Scan Report: [] Yes [] No
- User Complaints: [] Yes [] No
- Assistive Technology Notes: [] Yes [] No

Remediation Evidence

- Test Results/Logs: _____
- Before/After Code or HTML: _____
- User Validation / UAT: _____
- Accessibility Statement Updated: [] Yes [] No (link)

7. Sign-off & Approval

Assessed By: _____ Date: _____
Legal Review: _____ Date: _____
Executive Approval: _____ Date: _____

Next Review Date: _____

Risk Register Template

ID	Issue	WCAG	Likelihood (1–5)	Impact (1–5)	Score	Level	Owner	Due Date	Status
001									
002									
003									

Status Codes: Open | In Progress | Remediated | Verified | Closed

Optional: Program KPIs (for dashboards)

- **Open High/Critical risks** (count & trend)
- **Mean Time to Remediate (MTTR)** by severity
- **Verification pass rate** (automated + manual)
- **Repeat offenses** (per component)
- **Jurisdiction exposure** (issues mapped to ADA/AODA/EAA/etc.)