Accessibility Conformance Report

Newton & Carter LLC Website — newtonandcarter.com

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Based on VPAT® 2.5Rev (April 2025), WCAG Edition. This is a self-assessment by Newton & Carter LLC of its own public website. No “VPAT certification” is claimed or implied: per ITI (the template's publisher), there is no such thing as a VPAT certification; an ACR is a vendor self-assessment using the VPAT template. This document follows that convention exactly.

About this report

Publication status. This report was prepared October 31, 2026 and reviewed by Chris Carter, Founder, Newton & Carter LLC. It was first published on November 1, 2026 with the remediation items in Section 7 — including the additional verification round listed at §7.5, which has not been performed — recorded as known, open items. Later on November 1, 2026, three of those items were remediated and this report was reissued: §7.1 (the empty footer heading), the code-ticker pause control at §7.2, and §7.4 (the tagged capability-statement PDF) were fixed and verified on the live site, and criteria 1.3.1, 2.2.2 and 2.4.6 were re-evaluated against the remediation build and re-rated on that evidence (see their remarks in Section 5). §7.3 (contrast watch item), §7.5 (verification round) and §7.6 (enhancements) remain open and unchanged. No other conformance level was altered at reissue, and nothing in this copy upgrades or softens an evaluated result beyond the re-checked criteria named above.

What was actually evaluated. The request that produced this report asked for an ACR against WCAG 2.1 AA. The evaluation actually performed — and the standard this report states results against — is WCAG 2.2, Levels A and AA, in full, using the VPAT 2.5Rev template. WCAG 2.2 was chosen because it is the stricter, current standard: verdicts in this report also satisfy the corresponding WCAG 2.1 / 2.0 criteria, which are a subset (see Section 3). Read every conformance level below as a WCAG 2.2 A/AA result, not a WCAG 2.1 result.

Scope. newtonandcarter.com only — the public marketing and procurement-information website. Seven pages were evaluated, covering every page template the site uses for its main content (see Section 1). The downloadable capability-statement PDF linked from the site is a document, not web content, and is flagged separately in Section 7.4.

Evaluation date. October 31, 2026. All evidence was gathered firsthand on that date against the production build then live.

Methods. Four methods were combined: (1) automated testing with axe-core 4.10.2 (Deque), run with WCAG 2.0/2.1/2.2 A + AA + best-practice rule tags against the rendered DOM of all 7 sampled pages; (2) contrast measurement computed from the shipped production CSS using the WCAG sRGB relative-luminance formula (not eyeballed); (3) manual code inspection of the production HTML and CSS (landmarks, heading outline, link/button inventory, alt text, ARIA attributes, focus styles, reduced-motion rules, target geometry, form absence); and (4) keyboard traversal (30 consecutive Tab stops recorded), a 320 CSS px reflow test, and a text-spacing override test on the sampled pages. Detail in Section 2.

Mirror disclosure. The automated axe-core scan did not run against the live site directly: the test environment's browser could not reach newtonandcarter.com through its network proxy, so axe ran against a byte-identical local mirror of the production pages (HTML, CSS, and JS fetched from newtonandcarter.com on October 31, 2026), with reveal animations settled to their final state before each run. The bytes tested are production bytes; server behavior (headers, redirects) was verified separately with direct fetches.

Result summary. 56 criteria rows: Supports 33 · Partially Supports 2 · Does Not Support 0 · Not Applicable 21. (At first publication the counts were Supports 30 · Partially Supports 5; the change is the re-rating of criteria 1.3.1, 2.2.2 and 2.4.6 after the November 1, 2026 remediation described above. The two remaining Partially Supports ratings — 1.4.13 and 2.4.11 — are evaluation gaps held with the §7.5 round, not known failures.)

Top remediation items (from Section 7, in the evaluation's own order of concern). (1) Empty footer heading sitewide — the footer template rendered an empty heading element on every page; this was the only confirmed WCAG defect found, and it is why criteria 1.3.1 and 2.4.6 were Partially Supports at evaluation (Section 7.1, severity High). Remediated and verified live on November 1, 2026; both criteria re-rated Supports (§7.1 closed). (2) Untagged capability-statement PDF — the PDF linked from the site had no structure tree, no marked content, and no document language (Section 7.4, severity High, credibility). Regenerated as a tagged PDF and verified before re-posting (§7.4 closed November 1, 2026). (3) Auto-motion ticker with no pause control — the code ticker ran continuously with no explicit pause/stop control, why criterion 2.2.2 was Partially Supports (Section 7.2, Medium). An explicit pause/play control was added and verified live on November 1, 2026; criterion re-rated Supports (§7.2 ticker item closed; the mega-menu Escape confirmation remains with §7.5). (4) Contrast watch item — secondary text in the Muted color (#666B61) on the tinted panel surface passes AA at 4.55:1 with only 0.05 margin; any palette drift breaks AA silently (Section 7.3, Medium). Still open.

1. Product information

Name of product	Newton & Carter LLC public website
Version	Evaluation build: production live 2026-10-31 (Next.js; deployment dpl_BMKrmeFrFHFXWXMFVx2w4CMrZsnN per stylesheet URLs in the served HTML). Remediation build for the criteria re-checked at reissue (1.3.1, 2.2.2, 2.4.6 and §7.4): production live 2026-11-01 (deployment dpl_2AHHznBmTknsrTgWcdZov5CNmwGU)
Product description	Public marketing and procurement-information website for Newton & Carter LLC, a Leander, TX digital services firm. Content pages only: no accounts, no authentication, no transactions, and no web forms anywhere on the sampled pages (contact is by mailto: link).
Report date	October 31, 2026
Evaluation date	October 31, 2026
Publication date	November 1, 2026 (reissued November 1, 2026 after remediation — see “About this report”)
Contact information	Newton & Carter LLC · Chris Carter, Founder · chris@newtonandcarter.com · (512) 553-2217
Vendor	Newton & Carter LLC (self-assessment of its own product)

Pages evaluated (7 of the 34 URLs in the site's sitemap):

/ (home) · /capabilities · /about · /work · /for-government-buyers · /capability-statement · /contact

These seven cover every page template the site uses for its main content (home, index, narrative, buyer information, document page, contact). The remaining sitemap URLs (capability detail pages, work case-study pages, labs pages, /brand) share the same header/footer/component system and were not individually evaluated — see §8, Limitations.

Out of scope: the downloadable PDF linked from the site (/capability-statement.pdf) is a document, not web content; it is flagged separately in §7.4. Third-party embeds: none present on the sampled pages (no iframes, no video, no third-party widgets; Google Analytics script only).

2. Evaluation methods and results

Evaluation combined automated testing, computed measurement, and manual code inspection of the production site. All evidence was gathered firsthand on 2026-10-31; every "Supports" verdict below cites the specific check behind it.

1. **Automated testing** — axe-core 4.10.2 (Deque), run with WCAG 2.0/2.1/2.2 A + AA + best-practice rule tags against the rendered DOM of all 7 sampled pages. Because this sandbox's browser cannot traverse the egress proxy to the live site, axe ran against a byte-identical local mirror of the production pages (HTML, CSS, and JS fetched from

newtonandcarter.com on 2026-10-31), with reveal animations settled to their final state before each run. Result: one violation — empty-heading — on all 7 pages; zero other violations. Raw output: evidence/test-results2-2026-10-31.json.

2. **Contrast measurement** — computed, not eyeballed. Every foreground/background color pair used for text in the shipped CSS was extracted from the production stylesheet and its WCAG contrast ratio computed from the sRGB relative-luminance formula. This was necessary because axe returned "incomplete" for color-contrast on layered/animated backgrounds (49 nodes on the home page) — each such pair was resolved by direct computation instead. Full pair table: §6.
3. **Manual code inspection** of the fetched production HTML and CSS: landmarks, heading outline, link/button inventory (75 links, 7 buttons on home), alt text, ARIA attributes, focus styles, reduced-motion rules, target geometry, and form absence.
4. **Keyboard traversal** (headless Chromium, home page): 30 consecutive Tab stops recorded with each focused element's computed outline (3px solid, verified) and geometry; logical order confirmed. Text-spacing override test (WCAG 1.4.12 values) and 320 CSS px reflow test run on all 7 pages (no horizontal scrolling anywhere).

What was NOT done in this evaluation (and therefore limits specific verdicts — see §8): no screen-reader testing (NVDA/JAWS/VoiceOver), no testing with a person with a disability, no 200%-zoom visual pass, no Escape-key dismissal test of the mega menu, and no evaluation of the 27 unsampled sitemap URLs.

3. Applicable standards

- WCAG 2.2, Levels A and AA — evaluated in full (Tables 1–2). Verdicts also satisfy the corresponding WCAG 2.1 / 2.0 criteria, which are a subset.
- Revised Section 508 (2017) incorporates WCAG 2.0 A/AA by reference. Because this report evaluates the stricter WCAG 2.2 AA set, a criterion marked "Supports" here meets its Section 508 counterpart. The one defect found at evaluation (the empty footer heading, criteria 1.3.1 and 2.4.6) was remediated on November 1, 2026 and those criteria re-rated Supports, so at reissue no criterion carries a defect-based qualification under 508. A separate 508-edition ACR can be generated from this data if a buyer requires that format.

4. Terms used in this report

- **Supports** — The functionality of the product has at least one method that meets the criterion without known defects, as evidenced by the checks in §2.
- **Partially Supports** — Some functionality of the product does not meet the criterion, or the criterion could not be fully evaluated in this evaluation (stated explicitly in the remarks wherever this is the reason).
- **Does Not Support** — The majority of product functionality does not meet the criterion.
- **Not Applicable** — The criterion does not apply to the product (e.g., no time-based media, no forms, no authentication exist on the sampled pages).

5. WCAG 2.2 report

Counts (56 rows): Supports 33 · Partially Supports 2 · Does Not Support 0 · Not Applicable 21.

Table 1: Success Criteria, Level A (29 criteria, plus legacy 4.1.1)

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content	**Supports**	All 7 <img> elements on the home page (and every image on the 6 other sampled pages — zero missing alt attributes anywhere in the sample) carry appropriate text alternatives: informative images have descriptive alt (e.g., founder portrait, portfolio heroes); the decorative brand symbol uses alt="" + aria-hidden="true". All 15 inline SVGs on the home page are decorative (aria-hidden/focusable="false", or inside links whose accessible name comes from the link's aria-label/text). Axe image-alt passed on all 7 pages (settled-state run, 2026-10-31).
1.2.1 Audio-only and Video-only (Prerecorded)	**Not Applicable**	No audio or video content exists on the sampled pages (0 <video>/<audio> elements; verified by markup inspection of 11 fetched pages).
1.2.2 Captions (Prerecorded)	**Not Applicable**	No time-based media on the sampled pages.
1.2.3 Audio Description or Media Alternative (Prerecorded)	**Not Applicable**	No time-based media on the sampled pages.
1.3.1 Info and Relationships	**Supports**	Structure is programmatically sound — one <header>, <main id="main-content">, <footer>, five labeled <nav> landmarks, correct list markup; axe landmark/list/region rules passed on all 7 pages. The one defect found at evaluation — an empty heading, , as the heading of the "More capabilities" footer column (axe flagged empty-heading on all 7 sampled pages; an empty heading is exposed to assistive technology and pollutes the heading outline) — was remediated on November 1, 2026: the heading element was deleted from the footer template and replaced with a presentational spacer (aria-hidden, identical layout metrics), so the heading outline no longer contains an empty heading. Verified on the live remediation build (deployment dpl_2AHHznBmTknsrTgWcdZov5CNmwGU) by inspection of the served markup: no empty heading present, landmark and list structure unchanged. Remediation §7.1, closed November 1, 2026.
1.3.2 Meaningful Sequence	**Supports**	DOM order matches reading/visual order on all sampled pages (verified by markup inspection and by the extracted text order of the home and contact pages, which reads coherently end to end).
1.3.3 Sensory Characteristics	**Supports**	No instructions or references in the sampled content rely on shape, size, visual location, orientation, or sound (content inspection of all 7 pages).
1.4.1 Use of Color	**Supports**	Color is never the sole means of conveying information in the sample: links inside text blocks are underlined (axe link-in-text-block passed); the current page in navigation is indicated by aria-current="page" plus a background/underline treatment, not color alone; the small accent "badge dot" is decorative beside text, not a status signal.
1.4.2 Audio Control	**Not Applicable**	No audio content; nothing plays sound.

Criteria	Conformance Level	Remarks and Explanations
2.1.1 Keyboard	**Supports**	Every interactive element in the sample is a native link or button (75 links, 7 buttons on home; zero tabindex attributes anywhere). Menu toggle, Capabilities mega-menu trigger, and the five method-accordion buttons are real <button>s with aria-expanded/aria-controls. A 30-stop Tab traversal of the home page completed through header, hero, and content links in order (evidence: evidence/test-results-2026-10-31.json).
2.1.2 No Keyboard Trap	**Supports**	The 30-stop Tab traversal moved freely with no trap; the site has no iframes, plugins, or modal dialogs in the sample. (Full-site trap testing is part of the pre-publication round, §7.5.)
2.1.4 Character Key Shortcuts	**Not Applicable**	The site implements no keyboard shortcuts.
2.2.1 Timing Adjustable	**Not Applicable**	No time limits, sessions, or expiring content exist on the public site.
2.2.2 Pause, Stop, Hide	**Supports**	Two auto-animating elements run continuously: a logo marquee and a code ticker. Verified mitigations in the shipped CSS: the marquee pauses on hover and on :focus-within, and both animations are disabled under prefers-reduced-motion: reduce (marquee becomes a static wrapped list; ticker wraps statically). The gap found at evaluation — no explicit pause/stop control existed, and a pause rule for the code ticker equivalent to the marquee's hover/focus pause was not found in CSS inspection — was remediated on November 1, 2026. The code ticker now has an explicit pause/play control: a native <button> ("Pause code ticker" / "Play code ticker", aria-pressed) directly beneath the panel, keyboard-operable and rendered with the site's verified focus-visible styling (see 2.1.1, 2.4.7); activating it pauses both ticker tracks. The ticker also pauses on hover and while focus is within the ticker block — the marquee's pattern — and under prefers-reduced-motion the control starts in the paused state, when no animation is applied at all. Verified on the live remediation build (deployment dpl_2AHHznBmTknsrTgWcdZov5CNmwGU) by inspection of the served markup and CSS. Remediation §7.2 (ticker control), closed November 1, 2026; the mega-menu Escape confirmation in §7.2 remains with the §7.5 round.
2.3.1 Three Flashes or Below Threshold	**Supports**	No flashing content; all animation in the sample is fade/slide/scale transitions (CSS inspection). Nothing flashes more than once, let alone three times per second.
2.4.1 Bypass Blocks	**Supports**	A "Skip to content" link is the first focusable element on every sampled page and targets <main id="main-content">; it becomes visible on focus (.skip-link:focus rule). Axe bypass and skip-link passed on all 7 pages. Measured focused size 129×48px with a 3px outline.
2.4.2 Page Titled	**Supports**	Every sampled page has a unique, descriptive <title>.
2.4.3 Focus Order	**Supports**	The recorded 30-stop Tab sequence follows the visual and logical order: skip link → brand home link → Capabilities button → primary nav → header CTA → hero CTAs → content links in reading order (evidence file as at 2.1.1).

Criteria	Conformance Level	Remarks and Explanations
2.4.4 Link Purpose (In Context)	**Supports**	Link texts are descriptive in context throughout the sample (e.g., "See the Connected Care case study ↗", "For government buyers", full capability names in nav and footer). No "click here"/bare-URL links. Axe link-name passed on all 7 pages. The brand home link's purpose is supplied by aria-label="Newton and Carter home".
2.5.1 Pointer Gestures	**Not Applicable**	No multipoint or path-based gestures are required for any function.
2.5.2 Pointer Cancellation	**Supports**	All activation is via native link/button click behavior (fires on the up event); no down-event-only handlers were found in inspection.
2.5.3 Label in Name	**Supports**	Accessible names match or contain the visible labels: buttons expose their visible text ("Menu +", "Capabilities", "01 Assess"–"05 Deliver"); the home link's aria-label ("Newton and Carter home") contains the brand name shown by its logo image (alt "Newton & Carter"). Axe button-name/link-name passed.
2.5.4 Motion Actuation	**Not Applicable**	No functionality is operated by device or user motion.
3.1.1 Language of Page	**Supports**	<html lang="en"> on all sampled pages. Axe html-has-lang and html-lang-valid passed on all 7 pages.
3.2.1 On Focus	**Supports**	Receiving focus changes nothing: the mega menu and accordion open on activation, not on focus (code inspection), and the 30-stop Tab traversal produced no context change.
3.2.2 On Input	**Not Applicable**	The sampled pages contain no form controls or settings to change (0 <form>, 0 <input> across 11 fetched pages).
3.3.1 Error Identification	**Not Applicable**	No user input exists to error on; there are no forms on the sampled pages.
3.3.2 Labels or Instructions	**Not Applicable**	No input fields exist on the sampled pages.
4.1.1 Parsing	**Not Applicable**	Removed as obsolete in WCAG 2.2 (its intent is covered by other criteria). For the record: the home page's 22 element IDs are all unique, and axe duplicate-id-aria passed on all 7 pages.
4.1.2 Name, Role, Value	**Supports**	All UI components expose correct name/role/state: buttons carry aria-expanded/aria-controls wired to existing panel IDs (mega-capabilities, method-panel-0…4); navigation landmarks carry distinguishing aria-labels ("Primary", "Capabilities", "More capabilities", "Firm", "Profiles"). Axe's full ARIA rule family (aria-valid-attr, aria-required-attr, aria-allowed-attr, aria-roles, etc.) passed on all 7 pages.

Table 2: Success Criteria, Level AA (26 criteria)

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live)	**Not Applicable**	No live audio/video content.
1.2.5 Audio Description (Prerecorded)	**Not Applicable**	No time-based media on the sampled pages.
1.3.4 Orientation	**Supports**	Content is not locked to any orientation; the layout is fully responsive (media queries throughout the shipped CSS) and passed the 320px reflow test (§1.4.10) on all 7 pages in portrait geometry.

Criteria	Conformance Level	Remarks and Explanations
1.3.5 Identify Input Purpose	**Not Applicable**	No input fields exist on the sampled pages.
1.4.3 Contrast (Minimum)	**Supports**	No contrast violations in the settled-state axe run on any sampled page. Because axe returned "incomplete" against layered/animated backgrounds, every text color pair in the design system was also computed directly (§6): body text Ink on Ivory 16.22:1; secondary text Muted #666B61 on white 5.47:1, on Ivory 4.92:1, on surface #ECEAE6 4.55:1 (passes, but with only 0.05 margin — see the watch item in §7.3); footer text #A9A9A1 on Ink 7.62:1 (computed color verified in-browser at settled state, opacity 1); Neon #FF5A00 is used as text only on the dark Ink background (5.76:1) or paired with Ink text on a Neon background (5.76:1); focus/hover deep orange #C2410C on white 5.18:1. All normal-text pairs meet 4.5:1 and all large-text pairs meet 3:1.
1.4.4 Resize Text	**Supports**	All text is sized in relative units (rem/clamp() throughout the shipped CSS) with no fixed-height text containers found in inspection; the stricter 320 CSS px reflow test (§1.4.10) passed on all 7 pages with no loss of content. A direct 200%-zoom visual pass is scheduled in the pre-publication round (§7.5).
1.4.5 Images of Text	**Supports**	Content text is real text throughout the sample. The only text rendered as image is the firm's logotype (brand lockup SVG), which falls under this criterion's logotype exception; portfolio screenshots are case-study imagery, not a substitute for available text.
1.4.10 Reflow	**Supports**	Measured, not assumed: at a 320 CSS px viewport, scrollWidth == innerWidth == 320 (no horizontal scrolling) on all 7 sampled pages (evidence: evidence/test-results-2026-10-31.json).
1.4.11 Non-text Contrast	**Supports**	Essential UI indicators meet 3:1: the focus outline is #C2410C on light surfaces (5.18:1) and #FF5A00 on dark surfaces (5.76:1); primary button background #FF5A00 against adjacent white is 3.13:1. Decorative graphics (numbered-badge borders, accent bars/dots) are not required to identify any component — each is accompanied by text.
1.4.12 Text Spacing	**Supports**	Applying the criterion's override values (line-height 1.5, letter-spacing 0.12em, word-spacing 0.16em, paragraph spacing 2em) to the home page produced no horizontal overflow and no clipped content (measured: scrollWidth == innerWidth == 1280 after overrides). Body line-height is already 1.5 by design.
1.4.13 Content on Hover or Focus	**Partially Supports**	The Capabilities mega menu (the site's hover/focus-revealed content) is hoverable (the pointer can move onto it without it disappearing — it is a persistent panel, not a tooltip) and persistent (it remains until dismissed or focus/pointer leaves). Not verified in this draft: dismissal with the Escape key without moving focus (the criterion's "dismissible" prong). This is a verification gap, not a known failure; it is item §7.2/§7.5.
2.4.5 Multiple Ways	**Supports**	Every sampled page is reachable by at least three mechanisms: the primary navigation, the footer navigation (four labeled nav columns), and the published sitemap (/sitemap.xml, 34 URLs); capability pages are additionally linked from the /capabilities index and cross-linked from related pages.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels	**Supports**	Headings are descriptive and the outline is orderly (one <h1> per page; no skipped levels; axe heading-order passed on all 7 pages). The sole qualification at evaluation — the empty footer <h3> described at 1.3.1, which is a heading with no descriptive content at all — was removed on November 1, 2026 (see 1.3.1); the heading outline of the served pages now contains no empty headings, verified by inspection of the served markup on the live remediation build. Remediation §7.1, closed November 1, 2026.
2.4.7 Focus Visible	**Supports**	A global :focus-visible style renders a 3px solid outline with 3px offset on every interactive element; measured on the actual focused elements during keyboard traversal: solid 3px rgb(194,65,12) (#C2410C) on light surfaces and solid 3px rgb(255,90,0) (#FF5A00) in the dark CTA band. No outline: none exists anywhere in the shipped CSS (0 occurrences).
2.4.11 Focus Not Obscured (Minimum) ***(WCAG 2.2)***	**Partially Supports**	Not evaluated in this draft. The site header is position: sticky; top: 0, so a focused element can in principle scroll beneath it; whether any focused component is *entirely* hidden in practice was not tested. Listed as a pre-publication verification item (§7.5).
2.5.7 Dragging Movements ***(WCAG 2.2)***	**Not Applicable**	The site has no dragging functionality.
2.5.8 Target Size (Minimum) ***(WCAG 2.2)***	**Supports**	Axe target-size passed on the home page. Direct measurement of all 61 visible interactive elements (desktop) and 55 (mobile) found every non-inline target ≥24×24px (header links 45px tall, CTAs 39–52px, buttons ≥39px). The only sub-24px measurements are inline text links inside the footer/nav lists (16–17px line height), which fall under this criterion's inline/spacing exceptions. (The stricter AAA 44px target size is not met by those list links — noted as an enhancement in §7.6.)
3.1.2 Language of Parts	**Supports**	All sampled content is in English, the page language; no passages in another language exist that would require a language change marker.
3.2.3 Consistent Navigation	**Supports**	The header and footer are a single shared component repeated identically across all 7 sampled pages (same nav labels, same order, verified page by page).
3.2.4 Consistent Identification	**Supports**	Components with the same function are identified consistently across the sample (e.g., "Let's talk ↗" header CTA, capability names, and footer columns use identical labels on every page).
3.2.6 Consistent Help ***(WCAG 2.2)***	**Supports**	The human-contact mechanism — the "Let's talk" link and the chris@newtonandcarter.com email link — appears in the same relative location (header CTA + footer contact block) on every sampled page.
3.3.3 Error Suggestion	**Not Applicable**	No forms or user input exist on the sampled pages.
3.3.4 Error Prevention (Legal, Financial, Data)	**Not Applicable**	The site takes no legal/financial commitments, payments, or user-data submissions.
3.3.7 Redundant Entry ***(WCAG 2.2)***	**Not Applicable**	No multi-step processes or forms exist on the sampled pages.

Criteria	Conformance Level	Remarks and Explanations
3.3.8 Accessible Authentication (Minimum) ***(WCAG 2.2)***	**Not Applicable**	The public site has no authentication.
4.1.3 Status Messages	**Not Applicable**	The sampled pages contain no status messages (no form results, search results, or progress updates). The method accordion's panels are user-activated disclosures, not status messages.

6. Contrast evidence table (computed 2026-10-31)

Ratios computed from the WCAG sRGB relative-luminance formula against the exact tokens in the production stylesheet (--ink #151715, --paper #F4F3EE, --gray-500 #666B61, --on-black-dim #A9A9A1, --accent #FF5A00, --accent-deep #C2410C, --surface-2 #ECEAE6).

Foreground	Background	Ratio	Used for	AA result
#151715 (Ink)	#F4F3EE (Ivory)	16.22:1	Body text	Pass (AAA)
#151715 (Ink)	#FFFFFF	18.02:1	Body text	Pass (AAA)
#666B61 (Muted)	#FFFFFF	5.47:1	Ledes, descriptions, eyebrows	Pass AA
#666B61 (Muted)	#F4F3EE (Ivory)	4.92:1	Secondary text on paper	Pass AA
#666B61 (Muted)	#ECEAE6 (surface-2)	4.55:1	Panel labels/captions on tinted panels	Pass AA — margin 0.05, watch item §7.3
#A9A9A1 (on-black-dim)	#151715 (Ink)	7.62:1	Footer text, dark-section secondary text	Pass (AAA)
#F4F3EE (Ivory)	#151715 (Ink)	16.22:1	Dark-section body text	Pass (AAA)
#FF5A00 (Neon)	#151715 (Ink)	5.76:1	Accent text/links on dark only	Pass AA
#151715 (Ink)	#FF5A00 (Neon)	5.76:1	Primary button text	Pass AA
#C2410C (Neon-deep)	#FFFFFF	5.18:1	Focus outline, deep-accent text	Pass AA
#FFFFFF	#C2410C (Neon-deep)	5.18:1	Text on deep-accent surfaces	Pass AA
#FF5A00 (Neon)	#FFFFFF (as UI boundary)	3.13:1	Primary button edge vs page	Pass non-text (3:1)
#FF5A00 (Neon)	#F4F3EE / white as text	2.82:1 / 3.13:1	Does not occur — Neon is never body text on light backgrounds in the shipped CSS	Would fail — design rule to preserve

A note on method honesty: an early axe run taken mid-animation (reveal transitions still running) reported the footer's #A9A9A1 text at 2.37:1. Re-testing at the settled state showed the same elements at computed color rgb(169,169,161) with effective opacity 1 — i.e., 7.62:1 — and the settled-state axe run reports no color-contrast violations. The 2.37 figure was a measurement artifact of sampling a fading element, and it is not reported as a defect. The working papers preserve both runs so the discrepancy is auditable: evidence/test-results-2026-10-31.json (first battery) and evidence/test-results2-2026-10-31.json (settled-state battery).

7. Remediation roadmap

#	Item	Criteria affected	Severity	Fix
7.1	Remove the empty footer heading. The sitewide footer renders above the second capabilities column (a spacer for visual alignment). An empty heading is exposed to AT on every page. CLOSED November 1, 2026: the heading element was deleted from the footer template and replaced with a presentational spacer (aria-hidden) with identical layout metrics; verified in the served markup of the live remediation build — no empty heading present sitewide. Criteria 1.3.1 and 2.4.6 re-rated Supports at reissue.	1.3.1, 2.4.6	High (only confirmed WCAG defect; blocked "Supports" on two criteria) — closed 2026-11-01	Done as specified: element deleted, spacer substituted; layout verified unchanged.
7.2	Give auto-moving content a real pause. Add an explicit pause/play control for the code ticker (and keep the marquee's hover/focus pause); confirm the mega menu dismisses with Escape and returns focus to its trigger. TICKER CONTROL CLOSED November 1, 2026: an explicit pause/play control — a native button (aria-pressed) directly beneath the ticker panel — was added; the ticker also pauses on hover and on focus-within, matching the marquee, and starts paused under prefers-reduced-motion; verified in the served markup and CSS of the live remediation build. Criterion 2.2.2 re-rated Supports at reissue. The mega-menu Escape confirmation remains open with the §7.5 round, item (b).	2.2.2, 1.4.13	Medium — ticker control closed 2026-11-01; Escape item open with §7.5	Ticker control: done as specified (explicit, keyboard-operable native button). Mega-menu Escape confirmation: outstanding with §7.5.
7.3	Restore contrast margin on the tightest pair. Muted #666B61 on #ECEAE6 passes at 4.55:1 — any future palette drift breaks AA silently.	1.4.3 (watch)	Medium	Darken the muted token one step for tinted-panel use (a value near #5F6459 restores ≈5.0:1) or stop placing muted text on surface-2. Add the pair to a regression check.
7.4	Fix the linked capability-statement PDF. / capability-statement.pdf (the firm's flagship procurement document, linked from the site) is an untagged PDF: pdfinfo reports Tagged: no, and the file contains no structure tree, no marked content, and no document language. An accessibility firm cannot ship an inaccessible capability statement. CLOSED November 1, 2026: regenerated as a tagged PDF — a real structure tree (document, headings, paragraphs, and a figure whose alt text is the firm name), document language	Document scope (PDF/UA; outside the web tables above)	High (credibility) — closed 2026-11-01	Done as specified and verified before re-posting (pdfinfo Tagged: yes plus structure-tree inspection).

#	Item	Criteria affected	Severity	Fix
	set, title/author/subject metadata unchanged, and text content identical to the previous file (verified by extraction comparison: 121 of 121 tokens). pdfinfo reports Tagged: yes and the structure tree was inspected directly before re-posting; the served file is the tagged build.			
7.5	Run the pre-publication verification round and update this ACR with results: (a) screen-reader pass over the 7 sampled pages (NVDA + VoiceOver); (b) keyboard-only pass including mega-menu Escape dismissal and accordion operation; (c) 2.4.11 focus-not-obscured check under the sticky header; (d) 200% zoom visual check; (e) extend the axe + inspection sample to all 34 sitemap URLs.	1.4.13, 2.4.11, and sample scope generally	Gate	No publication until (a)–(d) are done and any findings are folded into Tables 1–2.
7.6	Enhancements (not conformance blockers): footer legal imprint is 10.4px — raise to ≥12px for readability; footer/nav list links are 16–17px tall — below the AAA 44px target size (AA-compliant via exceptions); the site has no accessibility statement page (/accessibility returns 404) — publish one alongside the finalized ACR, with a feedback contact.	—	Low	Bundle with 7.1–7.3 in one site change.

8. Limitations of this report

1. **Sample, not census:** 7 of 34 sitemap URLs were evaluated. The unsampled pages share the audited templates and components, but this report does not claim page-level results for them.
2. **No assistive-technology testing yet.** Automated tools reliably decide only a minority of WCAG criteria; the manual checks here were code inspection, computed measurement, and keyboard traversal — not screen-reader use. Verdicts marked Supports are supported *by the evidence cited*, and §7.5 exists precisely to close this gap.
3. **Mirror methodology:** axe ran against a byte-identical local mirror of production because the evaluation sandbox's browser cannot reach the live site through its proxy. HTML/CSS/JS bytes are production bytes fetched 2026-10-31; server behavior (headers, redirects) was verified separately with direct fetches.
4. **Point in time:** the site deploys from a changing codebase. This report describes the builds identified in §1: the 2026-10-31 evaluation build, and — for the criteria re-checked at reissue (1.3.1, 2.2.2, 2.4.6 and §7.4) — the 2026-11-01 remediation build.

9. Working papers

The evaluation's working papers are retained with this report's evaluation record: the production HTML for 11 pages, the production CSS, and the capability-statement PDF as fetched; the settled-state automated test battery (test-results2-2026-10-31.json); the first test battery — automated scan, Tab order with measured outlines, reflow, target sizes, text spacing (test-results-2026-10-31.json); the test run log (test-run-log.txt); the re-runnable test scripts; and the byte-identical site mirror used for browser testing.

VPAT® is a registered trademark of the Information Technology Industry Council (ITI). This report uses the VPAT 2.5Rev WCAG-edition structure. It is a self-assessment by Newton & Carter LLC of its own website, prepared 2026-10-31; this reissued copy is dated 2026-11-01.