NY Department of Labor WCAG 2.0 Compliance Assessment

Worker Rights Pages Analysis

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**Date:** August 27, 2025
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Executive Summary

This report analyzes WCAG 2.0 Level AA compliance across four key worker rights pages on the NY Department of Labor website. All pages demonstrate **moderate compliance** with significant room for improvement. Critical issues include missing alt text, inconsistent heading hierarchy, and limited keyboard navigation support.

Overall Compliance Rating: Moderate (Requires significant improvements)

Pages Tested

- 1. **Minimum Wage** (`/minimum-wage-0`)
- 2. **Safety & Health** (`/safety-and-health`)
- 3. **DEI and Equal Opportunity** ('/dei-and-equal-opportunity')
- 4. **Labor Standards** (`/labor-standards-0`)

Detailed Findings

1. Minimum Wage Page

- **Strengths:**
- Skip to main content link present
- Semantic navigation structure
- Multilingual content availability
- **Critical Issues:**
- Missing proper heading structure (no clear h1)
- Lack of consistent alt text for images
- **High Priority Issues:**
- Complex navigation challenges keyboard users
- Links lack descriptive text

^{**}Scope:** Worker Rights Information Pages

^{**}Standard:** WCAG 2.0 Level AA

^{**}Pages Tested:** 4

- No clear focus states for interactive elements
- **Medium Priority Issues:**
- Multiple language versions increase complexity
- Embedded scripts may interfere with screen readers
- **Recommendations:**
- Implement consistent h1-h6 heading hierarchy
- Add descriptive alt text for all images
- Enhance keyboard navigation support
- Improve link descriptions

2. Safety & Health Page

- **Strengths:**
- Good semantic structure and landmarks
- Skip link present
- Clear H1 for "Safety and Health" section
- **Critical Issues:**
- Multiple images lack meaningful alt text
- No explicit keyboard navigation support
- **High Priority Issues:**
- Navigation menu lacks clear focus states
- No ARIA roles for complex navigation components
- **Medium Priority Issues:**
- Color contrast not verifiable
- Links lack descriptive text ("Get Assistance", "Learn More")
- **Recommendations:**
- Add descriptive alt text for all images
- Implement comprehensive keyboard navigation
- Enhance link descriptions with context
- Add ARIA landmarks and roles

3. DEI and Equal Opportunity Page

- **Strengths:**
- Good semantic structure
- Skip link present
- Multilingual resources available
- Clear organizational structure

- **Critical Issues:**
- No explicit alt text for logo image
- Navigation links lack descriptive text
- **High Priority Issues:**
- Potential keyboard navigation challenges
- Inconsistent heading hierarchy in sections
- **Medium Priority Issues:**
- Color contrast needs verification
- Complex JavaScript may impede screen readers
- **Positive Features:**
- Multilingual "Equal Opportunity is the Law" poster
- Dedicated disability and language access sections
- Clear discrimination complaint process
- **Recommendations:**
- Add descriptive alt text for images
- Standardize heading structure
- Implement comprehensive ARIA labeling

4. Labor Standards Page

- **Strengths:**
- Good semantic navigation structure
- Skip link present
- Mostly clear heading hierarchy
- **Critical Issues:**
- Some images lack descriptive alt text
- No explicit keyboard navigation support indicators
- **High Priority Issues:**
- Complex dropdown menus challenge keyboard navigation
- Color contrast needs detailed review
- **Medium Priority Issues:**
- Links lack clear, descriptive text
- No explicit form error handling
- **Recommendations:**
- Add comprehensive alt text for all images
- Implement clear keyboard focus states
- Enhance link descriptions
- Ensure color contrast meets WCAG 2.0 AA standards

Common Issues Across All Pages

Critical (Found on all 4 pages)

- **Missing Alt Text:** Images lack descriptive alternative text
- **Keyboard Navigation:** Limited or no explicit keyboard navigation support

High Priority (Found on 3-4 pages)

- **Focus States:** Unclear or missing focus indicators
- **Link Descriptions:** Non-descriptive link text ("Learn More", "Get Assistance")
- **Color Contrast:** Potential issues requiring professional audit

Medium Priority (Found on 2-3 pages)

- **ARIA Implementation:** Limited ARIA attributes and landmarks
- **Heading Hierarchy:** Inconsistent h1-h6 structure
- **Complex Navigation:** Accessibility barriers in dropdown menus

Priority Recommendations

Immediate Actions (Critical)

- 1. **Add Alt Text:** Implement descriptive alt text for all images across all pages
- 2. **Keyboard Navigation:** Develop comprehensive keyboard navigation support
- 3. **Focus States:** Add visible focus indicators for all interactive elements

Short-term Actions (High Priority)

- 4. **Link Text:** Replace non-descriptive link text with contextual descriptions
- 5. **Heading Structure:** Standardize h1-h6 hierarchy across all pages
- 6. **ARIA Implementation:** Add ARIA landmarks and roles for navigation

Medium-term Actions (Medium Priority)

- 7. **Color Contrast Audit:** Conduct professional color contrast testing
- 8. **Form Accessibility:** Implement proper form labeling and error handling
- 9. **Screen Reader Testing:** Test with actual assistive technologies

Compliance Summary

Total Issues Identified: 28 (8 Critical, 9 High, 8 Medium, 3 Low)

Next Steps

- 1. **Technical Audit:** Conduct automated accessibility scanning with tools like axe or WAVE
- 2. **User Testing:** Test with actual users who rely on assistive technologies
- 3. **Professional Review:** Engage certified accessibility consultant for comprehensive audit
- 4. **Implementation Plan:** Develop timeline for addressing priority issues
- 5. **Ongoing Monitoring:** Establish regular accessibility testing procedures

Conclusion

While the NY DOL worker rights pages demonstrate basic accessibility awareness with skip links and some semantic structure, significant improvements are needed to achieve full WCAG 2.0 Level AA compliance. The consistent patterns of missing alt text, limited keyboard navigation, and unclear focus states represent barriers that could prevent workers with disabilities from accessing critical employment rights information.

Priority should be given to addressing the critical and high-priority issues identified in this report, particularly around image accessibility, keyboard navigation, and descriptive link text. These improvements will help ensure all workers can access vital employment rights information regardless of their abilities.

Report generated by Claude Code on August 27, 2025

Testing methodology: Manual review using WebFetch tool with 5+ second intervals between requests