

Library Pass Comics Plus Accessibility

Conformance Report Revised Section 508 Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: Comics Plus

Report Date: February 2022

Product Description: *Comics Plus* is a digital unlimited simultaneous checkout service for Comics and Manga from over 100 different publishers.

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Notes: This report was conducted using the Full content package of the Comics Plus Service platform.

Evaluation Methods Used: The main testing tools and methods used were WAVE (Web Accessibility Evaluation Tool) from WebAIM, ARC Toolkit, the JAWS (Job Access With Speech) screen reader from Freedom Scientific, and manual keyboard testing.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

“Voluntary Product Accessibility Template” and “VPAT” are registered service marks of the Information Technology Industry Council (ITI)

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Note: Accessibility deficiencies discovered while creating this report have been logged into a remediation road map for future resolution.

Criteria	Conformance Level	Remarks and Explanations
<p>1.1.1 Non-text Content (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>All non-text cover images and banners have associated text equivalents, including captions when provided by the original publisher and alt text.</p> <p>Current Exceptions: Comics and Manga individual pages while reading do not have text equivalent as it is not provided to us by publishers.</p> <p>Test method: WAVE, JAWS, manual visual checks</p>
<p>1.2.1 Audio-only and Video-only (Prerecorded) (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Audio and video content is not offered on the Comics Plus website. Since there is no content to which this criterion applies, this criterion is satisfied.</p> <p>Testing method: Manual visual checks</p>
<p>1.2.2 Captions (Prerecorded) (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Audio and video content is not offered on the Comics Plus website. Since there is no content to which this criterion applies, this criterion is satisfied.</p> <p>Testing method: Manual visual checks</p>
<p>1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Audio and video content is not offered on the Comics Plus website. Since there is no content to which this criterion applies, this criterion is satisfied.</p> <p>Testing method: Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>1.3.1 Info and Relationships (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p><i>Comics Plus</i> uses semantically correct HTML and CSS.</p> <p>Current Exceptions:</p> <ul style="list-style-type: none"> • The hierarchical heading organization is inconsistent. There is not always an h1 heading on a page, and heading levels get skipped throughout the site. • Some page ARIA labels seem to be broken or empty in automated tests. • Missing one alternative text and 1 form label <p>Test method: WAVE, JAWS, https://validator.w3.org/nu/, manual visual checks</p>
<p>1.3.2 Meaningful Sequence (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Content is ordered based on structural markup. All content is displayed to be read from left to right, top to bottom. If the content is nested, breadcrumbs with links that describe this relationship are displayed on the page.</p> <p>Test method: WAVE, JAWS, manual visual checks</p>
<p>1.3.3 Sensory Characteristics (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>No content or operation instructions rely on location, shape or size to convey that information.</p> <p>Test method: WAVE, manual visual checks</p>
<p>1.4.1 Use of Color (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>No content or operation instructions rely on color alone to convey information.</p> <p>Testing method: Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>1.4.2 Audio Control (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>There are no audio-only media on the Comics Plus. Since there is no content to which this criterion applies, this criterion is satisfied.</p> <p>Testing method: Manual visual checks</p>
<p>2.1.1 Keyboard (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Comics Plus is designed for keyboard access. Most page functionality is available using the keyboard.</p> <p>Testing method: Manual visual checks</p>
<p>2.1.2 No Keyboard Trap (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Keyboard controls can be used to move keyboard focus throughout the platform without being trapped on a component.</p> <p>Testing method: Manual visual checks</p>
<p>2.2.1 Timing Adjustable (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>The Comics Plus website does not have any perceptible timed response requirements.</p> <p>Testing method: Manual visual checks</p>
<p>2.2.2 Pause, Stop, Hide (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>The Comics Plus website does not have any moving, blinking, scrolling, or auto-updating content.</p> <p>Testing method: Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>2.3.1 Three Flashes or Below Threshold (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Content does not contain anything that flashes more than three times in any one second period.</p> <p>Testing method: Manual visual checks</p>
<p>2.4.1 Bypass Blocks (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Partial Supports	<p>Skip to Main Content bypass link is available on content reading pages.</p> <p>Current Exceptions:</p> <ul style="list-style-type: none"> • No way to Skip Main Navigation • No way to Skip Header Images <p>Testing method: Manual visual checks</p>
<p>2.4.2 Page Titled (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Page titles are descriptive to the purpose of the page.</p> <p>Testing method: WAVE, manual visual and code checks</p>
<p>2.4.3 Focus Order (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Tabbing follows a left to right, top to bottom order on the page.</p> <p>Testing method: JAWS, Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>2.4.4 Link Purpose (In Context) (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>The purpose of links can usually be determined by text alone or by its context to a surrounding paragraph or list.</p> <p>Current Exceptions:</p> <ul style="list-style-type: none"> • Use of the following text as link text, All, and More Details, without any programmatically determined link context, is not sufficient in providing a clear link purpose. <p>Testing method: WAVE, JAWS, manual visual checks</p>
<p>3.1.1 Language of Page (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>The default language of the page is English. The language is also expressed using the HTML language attribute the page markup.</p> <p>Testing method: WAVE, manual visual and code checks</p>
<p>3.2.1 On Focus (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>When a component receives focus, it does not initiate a change of context.</p> <p>Testing method: Manual visual checks</p>
<p>3.2.2 On Input (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Submit buttons are provided for forms and input boxes.</p> <p>Testing method: WAVE, Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>3.3.1 Error Identification (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>All pages provide an error message when input fields are required.</p> <p>Testing method: Manual visual checks</p>
<p>3.3.2 Labels or Instructions (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Elements are labeled using descriptive text or ARIA elements.</p> <p>Testing method: WAVE, JAWS, manual visual checks</p>
<p>4.1.1 Parsing (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>Comics Plus’s web pages conform to modern HTML/XHTML web standards.</p> <p>Current exception:</p> <ul style="list-style-type: none"> • Some HTML/XHTML validation/parsing errors do exist when code was checked through a HTML/XHTML validator. They do not prevent access to the content, however, and may not be noticeable to a user. <p>Testing method: ARC Toolkit, validator.w3.org/nu/, HTML_CodeSniffer, manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	Webpages and user interfaces within Comics Plus have been developed with current HTML/XHTML specifications, but not all elements and components can be guaranteed programmatically determined or set. Current exceptions: <ul style="list-style-type: none"> • Reading a piece of content with custom Zoom options Testing method: WAVE, validator.w3.org, HTML_CodeSniffer, manual visual checks

Table 2: Success Criteria, Level AA

Note: Accessibility deficiencies discovered while creating this report have been logged into a remediation road map for future resolution.

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Live content is not offered in the Comics Plus website. Since there is no content to which this criterion applies, this criterion is satisfied. Testing method: Manual visual checks
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Audio content is not offered in the Comics Plus website. Since there is no content to which this criterion applies, this criterion is satisfied. Testing method: Manual visual checks

Criteria	Conformance Level	Remarks and Explanations
<p>1.4.3 Contrast (Minimum) (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>The text has been checked via WAVE/WebAIM and HTML_CodeSniffer tools, and most text content has a contrast ratio of at least 4.5:1.</p> <p>Current exception:</p> <ul style="list-style-type: none"> • Automated tests do indicate there are some contrast deficiencies in the main menu. <p>Testing method: HTML_CodeSniffer, WAVE, manual visual checks</p>
<p>1.4.4 Resize text (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Text can be resized via a browser without loss of content or functionality.</p> <p>Testing method: Manual visual checks</p>
<p>1.4.5 Images of Text (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>Images of text are only used when the format of the text is essential to the information being conveyed, such as it being a piece of content such as a Comic. Captions are provided for the images and banners.</p> <p>Current exception:</p> <ul style="list-style-type: none"> • Actual content for reading are not provided with captions as it is not feasible for the content type. <p>Testing method: Manual visual checks</p>
<p>2.4.5 Multiple Ways (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	<p>Comics Plus provides a search function, many lists of content through visual drawers, links to similar types of content, links to content via category, links to content via Publisher, and links to content based on release date.</p> <p>Testing method: Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
<p>2.4.6 Headings and Labels (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>Most heading structures and form labels are informative and compliant with accessibility standards.</p> <p>Current exceptions:</p> <ul style="list-style-type: none"> • The heading structure is not logically nested in all areas. Many of the headings are h4. It is recommended a page should have at least one h1 for the primary header, e.g., page title, followed by h2, h3, and h4s heading levels. <p>Testing method: WAVE, JAWS, manual visual checks</p>
<p>2.4.7 Focus Visible (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>User interface components are highlighted by the user agent when they receive focus.</p> <p>Current exceptions:</p> <ul style="list-style-type: none"> • In the comics reader which is driven by DRM technology, there is no focus indicator on some parts due to security protections <p>Testing method: Manual visual checks</p>
<p>3.1.2 Language of Parts (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Comics Plus uses a language tag in the HTML to indicate the language of the text.</p> <ul style="list-style-type: none"> • Please note: All of Comics Plus website has been created in English but some content may be in other languages which is indicated on the platform. However the content is visual as it is a comic so the page does not change language codes, but we are working on fixing this. <p>Testing method: Manual visual checks</p>

Criteria	Conformance Level	Remarks and Explanations
3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The location of headers, footers, and toolsets occur in the same relative order on different types of pages, such as entries and topic pages. Testing method: Manual visual checks
3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Components are labeled consistently across different page types. Testing method: Manual visual checks
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Our forms provides feedback on required fields when they are not filled out correctly. Testing method: Manual visual checks
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Comics Plus does not collect any financial or legal data. Testing method: Manual visual checks

Table 3: Success Criteria, Level AAA

Notes: Comics Plus is not being evaluated for Level AAA conformance

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Chapter 3: [Functional Performance Criteria \(FPC\)](#)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	<p>Comics Plus conforms to HTML5 standards and uses ARIA labels for more descriptive information to aid screen readers.</p> <p>Current exceptions:</p> <ul style="list-style-type: none"> • Our content is visual based images that do not have descriptive information • The hierarchical heading organization is inconsistent. There is not always an h1 heading on a page, and heading levels get skipped throughout the site.
302.2 With Limited Vision	Partially Supports	<p>Comics Plus can be rendered in any modern browser and supports standard browser magnification and contrast adjustments.</p> <p>Current exception:</p> <ul style="list-style-type: none"> • Automated tests such as WAVE indicate there are insufficient contrast errors in some regions, which could make it difficult for limited vision users to access some areas of the site. • Navigating with the keyboard to the content reader then to zoom in and out of each page may be difficult.

Criteria	Conformance Level	Remarks and Explanations
302.3 Without Perception of Color	Partially Supports	No operation instructions within Comics Plus rely on color to convey information. Main menu items may have insufficient contrast errors, which could make it difficult for limited vision users to access some areas of the site.
302.4 Without Hearing	Supports	Comics Plus does not convey any specific operational information via audio nor does it have audio content.
302.5 With Limited Hearing	Supports	Comics Plus does not convey any specific operational information via audio nor does it have audio content.
302.6 Without speech	Not Applicable	The use of speech is not required to access Comics Plus website content.
302.7 With Limited Manipulation	Supports	Comics Plus supports standard input mechanisms such as keyboard navigation.
302.8 With Limited Reach and Strength	Supports	Comics Plus supports standard input mechanisms such as keyboard navigation.
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	<p>Comics Plus has no timed response limits. In most cases, error indications and suggestions are also provided. Logical keyboard navigation and tab focus order functionality is available across the platform as well.</p> <p>Current exceptions:</p> <ul style="list-style-type: none"> • Use of the following text as link text, All, and More Details, without any programmatically determined link context, is not sufficient in providing a clear link purpose

Chapter 4: [Hardware](#)

Notes: Comics Plus is a web-only platform and is not subject to the requirement of this section.

Chapter 5: [Software](#)

Notes: Comics Plus is a web-only platform and is not subject to non-web software criteria.

Chapter 6: [Support Documentation and Services](#)

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	Documentation of accessibility and compatibility features is available in the platform help center.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	All support documentation is available electronically or can be printed. If alternate formats of documentation are required, they can be made available upon request.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Documentation of accessibility and compatibility features is available in the platform help center. Support is also provided over email or telephone.
603.3 Accommodation of Communication Needs	Supports	Comics Plus support team can be contacted for assistance via email, r telephone. Other methods can be made available upon request.

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