



SBA-CERTIFIED SERVICE-DISABLED VETERAN-OWNED SMALL BUSINESS · EVALUATION ONLY, NEVER REMEDIATION

The deadline. The HHS final rule at 45 CFR Part 84 requires WCAG 2.1 Level AA for web content, mobile apps, and electronic documents. Recipients with 15 or more employees must comply by **May 11, 2027**, under 15 by **May 10, 2028**. Billing Medicare or Medicaid makes an organization a recipient of federal financial assistance, which is what brings the rule to nearly every provider. Enforcement runs through HHS OCR, and Section 504 also carries a private right of action.

A veteran-owned consultancy that tells a health center or health system how many patient-facing documents it actually has, which ones the rule reaches, and what to do with each. The deliverable is a count and a prioritized list, not a repair invoice. Delivered by one principal with an enterprise data and automation background.

SERVICES

Baseline Patient-Facing Document Inventory

Every document discovered across the organization's web properties and clinic microsites, each one probed for tag structure, reading order, declared language, headings, table headers, and alternative text. Each is then sorted by whether a patient uses it to apply for, access, or take part in a program, which is the line the rule actually draws. Deliverable is a count, a prioritized remediation specification a vendor can bid against, and a dated record of what was known and when. Fixed fee, scoped to the number of web properties.

Accessibility Conformance Report

All 50 WCAG 2.1 Level A and AA success criteria evaluated against the public site, each one marked Supports, Partially Supports, Does Not Support, or Not Applicable, each one evidenced. Issued in VPAT 2.5 format, the same document a procurement office already requires from software vendors. Dated and signed, with the method and its limits stated on the face of the report.

Annual Re-Inventory

Re-crawl, re-probe, and a delta against the prior baseline. A document library drifts in one direction: every form published without tags moves the count backward, and nobody publishing it is thinking about tags. A count taken once was true once.

Program Support

Published accessibility statement naming the standard and conformance level, a grievance path, procurement language requiring an ACR before purchase, and content governance so newly published material stops regressing.

DIFFERENTIATORS

- **The legacy-document exemption is narrower than it reads.** The rule exempts documents published before the compliance date, and the exemption stops at any document used to apply for, access, or take part in a program. Intake, consent, financial assistance, and portal documents stay in scope regardless of age. Most organizations plan against the exemption rather than against the carve-out inside it.
- **Evaluation only, never the remediation.** A conformance claim written by whoever repaired the documents is self-assessment. Staying out of the repair is what lets the report mean something, and it produces a specification a remediation vendor bids against rather than a per-page quote nobody can check.
- **A tagged PDF is not a conforming PDF.** Most checkers ask only whether tags exist. A document can carry them and still be unreadable: no headings, tables with no header cells, images with no alternative text. That is what an auto-tag pass leaves behind, and often what an organization receives after paying to have it fixed.
- **Triage before spend.** Remediation is priced per page. A library carries documents that are obsolete, duplicated, superseded, or should never have been PDFs. Sorting that out first is the cheapest money in the program, and it is the step that gets skipped.
- **The report says what it did not check.** Reading order, meaningful alternative text, and focus order are not machine-detectable. An unanswered criterion reports as Not Evaluated, never as Supports.
- **Built for volume.** An enterprise data and automation background applied to cataloging and classifying document libraries that run to five figures.
- **No overlay, no platform license, no per-page quota.** There is no product behind the recommendation, so the recommendation follows the findings.

DEMONSTRATED CAPABILITY

- **Conformance report issued:** a full evaluation of brianbeals.com against all 50 WCAG 2.1 Level A and AA success criteria, remediated to conformance and documented in an Accessibility Conformance Report in VPAT 2.5 format. Every defect found was fixed and re-verified, including a skip link that scrolled the page without moving keyboard focus.
- **Document probing at depth:** the engine opens each document and reports what a screen reader would encounter, separating files with no tag structure from files that are tagged and still unreadable. A byte scan cannot see into a compressed object stream, so an untagged result from one is treated as a suspicion rather than a finding.
- **Purpose-built evaluation tooling:** an assessment engine combining automated rule checking with the checks automation normally misses, among them 320-pixel reflow, dark color scheme contrast, and skip links that scroll without moving keyboard focus. Documents are read rather than counted: the tag tree is walked to find missing alternative text, tables with no header cells, and tagged files with no headings at all. A regression suite runs against fixture pages encoding known defects, so the engine is tested rather than trusted.
- **Volume screening in practice:** 22 public entities verified and sampled across four counties, producing per-entity findings mapped to specific success criteria. Third-party widget defects are attributed to the vendor rather than to the organization, so a client is never handed a finding it cannot act on.
- **Large-scale content inventory:** automation that polls a public records API, filters and classifies records by code and keyword, scores them, and publishes a live dashboard. The same pattern applied to a document library.
- **Scheduled pipelines:** screeners running on a schedule via CI and publishing to public web endpoints without manual intervention.

Method. Findings are measured, not estimated. Where a check cannot be made honestly, for example text over a photograph where the background color is unknowable from the page, it is reported as indeterminate rather than asserted. A finding a client can disprove costs more than a finding never made.

Past performance. Newly formed, with no accessibility contract past performance to date. The reference implementation above is the firm's own site, evaluated and remediated end to end under the same method proposed here, with the resulting report available on request. Manual assistive-technology validation at depth and high-volume document remediation are delivered with a specialist partner. Available to subcontract the assessment, inventory, and program layer under a remediation prime.

COMPANY SNAPSHOT

SDVOSB	SBA-Certified
Certified	August 2026
UEI	NJLEHNAQATJ6
CAGE	22XM3
Founded	2026 · Florida
Location	Punta Gorda, FL

Independent evaluator. No remediation services offered, at any price.

STANDARD APPLIED

WCAG	2.1 Level AA
Rule	45 CFR Part 84
Report	VPAT 2.5 / ACR
Also	Title II · 508

SCOPE COVERED

Documents	PDF & Office
Forms	Intake & fillable
Web	Pages & templates
Portal	Patient-facing
Mobile	Apps & responsive
Third party	Vendor VPAT review

CODES

541512	Computer Systems Design
541511	Custom Programming
541519	Other IT Services
541611	Management Consulting
80101507	IT Consultation
81112000	Data Services