

FreeWill Accessibility Conformance Report

WCAG Edition

(Based on VPAT[®] Version 2.5Rev)

Name of Product/Version: Planned Giving Suite - Wills

Report Date: May 6, 2026

Product Description: FreeWill is a service that lets you create or update your last will and testament online, for free.

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Evaluation Methods Used: Accessibility testing was conducted manually by 7 auditors including one with visual disabilities. The following tools were used for evaluation.

- Keyboard-only testing on all browsers
- Contrast testing using Colour Contrast Analyser by TPGi
- Screen reader testing using the following tools:
 - NVDA with FireFox on Windows
 - JAWS with Chrome on Windows
 - VoiceOver with Safari on macOS

- VoiceOver with Safari on iOS
- Talkback with Chrome on Android OS

Applicable Standards/Guidelines

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

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes) Level AAA (No)
Web Content Accessibility Guidelines 2.2	Level A (Yes) Level AA (Yes) Level AAA (No)

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 only be used in WCAG Level AAA criteria.

WCAG 2.2 Report

Note: When reporting on conformance with the WCAG 2.2 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

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports	
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	Criterion is not relevant to the product.
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	Criterion is not relevant to the product.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not Applicable	Criterion is not relevant to the product.
1.3.1 Info and Relationships (Level A)	Partially Supports	<ul style="list-style-type: none"> Page headings on the Residuary: Summary of Gifts to Non-Profits page use different heading rankings but exist on the same level semantically. The Basic Information table on the Review page incorrectly has the top level row marked as the table's column header. Some tables throughout the user flow have a column featuring actions such as Edit and Delete but with an empty header cell.
1.3.2 Meaningful Sequence (Level A)	Supports	
1.3.3 Sensory Characteristics (Level A)	Supports	
1.4.1 Use of Color (Level A)	Supports	
1.4.2 Audio Control (Level A)	Not Applicable	Criterion is not relevant to the product.
2.1.1 Keyboard (Level A)	Partially Supports	<ul style="list-style-type: none"> Form fields that suggest the names of people previously entered by the user are inaccessible to some screen readers. These fields can still be completed by typing the relevant data. Some screen readers are unable to read menu options from the expandable menus in the navigation bar that represent pages the user is not meant to reach yet. This does not impact the user's ability to access these pages as they progress through the user flow. The birthdate picker menu is inaccessible to some screen readers. The field can still be completed by typing the information.

Criteria	Conformance Level	Remarks and Explanations
2.1.2 No Keyboard Trap (Level A)	Supports	
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Supports	
2.2.1 Timing Adjustable (Level A)	Not Applicable	Criterion is not relevant to the product.
2.2.2 Pause, Stop, Hide (Level A)	Not Applicable	Criterion is not relevant to the product.
2.3.1 Three Flashes or Below Threshold (Level A)	Not Applicable	Criterion is not relevant to the product.
2.4.1 Bypass Blocks (Level A)	Supports	
2.4.2 Page Titled (Level A)	Supports	
2.4.3 Focus Order (Level A)	Partially Supports	<ul style="list-style-type: none"> On the Will Finalization page, clicking “Learn more” under the Sign With Notary section as well as both of the buttons under the “Thinking about speaking with an attorney?” section will open a web dialog that may not receive focus from some screen readers. These dialogs can still be accessed by moving the screen reader to the end of the page.
2.4.4 Link Purpose (In Context) (Level A)	Partially Supports	<ul style="list-style-type: none"> The Review page has multiple links with “Edit” as their label which allow the user to revisit previously completed pages. These are distinguishable by the page heading they are placed under but have identical screen reader descriptions. Users can still use the navigation menu to return to previously visited pages in the same manner.
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Not Applicable	Criterion is not relevant to the product.
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	
2.5.3 Label in Name (Level A 2.1 and 2.2)	Supports	
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Not Applicable	Criterion is not relevant to the product.
3.1.1 Language of Page (Level A)	Supports	
3.2.1 On Focus (Level A)	Supports	
3.2.2 On Input (Level A)	Partially Supports	<ul style="list-style-type: none"> The user does not receive input confirmation from the screen reader upon activating the delete button on an item inside of a table.
3.2.6 Consistent Help (Level A 2.2 only)	Supports	

Criteria	Conformance Level	Remarks and Explanations
3.3.1 Error Identification (Level A)	Supports	
3.3.2 Labels or Instructions (Level A)	Supports	
3.3.7 Redundant Entry (Level A 2.2 only)	Supports	<ul style="list-style-type: none"> See remarks under 2.1.1 Keyboard.
4.1.1 Parsing (Level A)	Does not apply	
4.1.2 Name, Role, Value (Level A)	Supports	

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	Criterion is not relevant to the product.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	Criterion is not relevant to the product.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Supports	
1.4.3 Contrast (Minimum) (Level AA)	Supports	
1.4.4 Resize text (Level AA)	Supports	
1.4.5 Images of Text (Level AA)	Supports	
1.4.10 Reflow (Level AA 2.1 and 2.2)	Supports	
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Supports	
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	
2.4.5 Multiple Ways (Level AA)	Supports	
2.4.6 Headings and Labels (Level AA)	Partially Supports	<ul style="list-style-type: none"> Pages that have multiple instances of “Click to add another” buttons may use identical screen reader readouts for said buttons. These can be differentiated by their respective preceding page headings. Tables in the user flow that have multiple recurring instances of the same button (such as Edit and Delete buttons) may use identical screen reader readouts for said buttons. These

Criteria	Conformance Level	Remarks and Explanations
		can still be differentiated by their table cell location relative to their respectively listed items.
2.4.7 Focus Visible (Level AA)	Supports	
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)	Supports	
2.5.7 Dragging Movements (Level AA 2.2 only)	Not Applicable	Criterion is not relevant to the product.
2.5.8 Target Size (Minimum) (Level AA 2.2 only)	Supports	
3.1.2 Language of Parts (Level AA)	Supports	
3.2.3 Consistent Navigation (Level AA)	Supports	
3.2.4 Consistent Identification (Level AA)	Supports	
3.3.3 Error Suggestion (Level AA)	Supports	
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)	Supports	
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Supports	

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Not evaluated	
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Not evaluated	
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Not evaluated	
1.2.9 Audio-only (Live) (Level AAA)	Not evaluated	
1.3.6 Identify Purpose (Level AAA 2.1 and 2.2)	Not evaluated	
1.4.6 Contrast (Enhanced) (Level AAA)	Not evaluated	
1.4.7 Low or No Background Audio (Level AAA)	Not evaluated	
1.4.8 Visual Presentation (Level AAA)	Not evaluated	
1.4.9 Images of Text (No Exception) (Level AAA)	Not evaluated	
2.1.3 Keyboard (No Exception) (Level AAA)	Not evaluated	
2.2.3 No Timing (Level AAA)	Not evaluated	

Criteria	Conformance Level	Remarks and Explanations
2.2.4 Interruptions (Level AAA)	Not evaluated	
2.2.5 Re-authenticating (Level AAA)	Not evaluated	
2.2.6 Timeouts (Level AAA 2.1 and 2.2)	Not evaluated	
2.3.2 Three Flashes (Level AAA)	Not evaluated	
2.3.3 Animation from Interactions (Level AAA 2.1 and 2.2)	Not evaluated	
2.4.8 Location (Level AAA)	Not evaluated	
2.4.9 Link Purpose (Link Only) (Level AAA)	Not evaluated	
2.4.10 Section Headings (Level AAA)	Not evaluated	
2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only)	Not evaluated	
2.4.13 Focus Appearance (Level AAA 2.2 only)	Not evaluated	
2.5.5 Target Size (Level AAA 2.1 and 2.2)	Not evaluated	
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 and 2.2)	Not evaluated	
3.1.3 Unusual Words (Level AAA)	Not evaluated	
3.1.4 Abbreviations (Level AAA)	Not evaluated	
3.1.5 Reading Level (Level AAA)	Not evaluated	
3.1.6 Pronunciation (Level AAA)	Not evaluated	
3.2.5 Change on Request (Level AAA)	Not evaluated	
3.3.5 Help (Level AAA)	Not evaluated	
3.3.6 Error Prevention (All) (Level AAA)	Not evaluated	
3.3.9 Accessible Authentication (Enhanced) (Level AAA 2.2 only)	Not evaluated	

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