

Voluntary Product Accessibility Template

Best Practices for Electronic & Information Technology Vendors

Suggested Guidelines for Applying Section 508 Subpart B Standards

This section provides suggestions to contractors which, if adopted, could result in more consistent reporting of product accessibility information via VPATs and thereby simplify product comparisons for government purchasers.

Below you will find a list of product categories cross-referenced to the various sections of Subpart B of the Access Board's E&IT Accessibility Standards (36 CFR 1194). Since it is assumed that Subpart C (1194.31 - Functional Performance Criteria) and Subpart D (1194.41 - Information, Documentation, and Support) apply to all products, those subparts are not included in the chart below.

Ultimately, agency 'requiring officials' are responsible for determining which sections of the Accessibility Standards apply in a given procurement, if any (see the [Federal Acquisition Regulations](#), "Requirements Development, Market Research, and Solicitations." Their decisions will be influenced by the agency's intended application or use of a product, as well as possible external factors, such as an agency's existing systems, mandated technologies, product availability, the nature of the product or users, etc. The determination will be communicated to contractors via the solicitation documents.

Occasionally, vendors may encounter a procurement official or agency that will inadvertently attempt to shift this standards determination onto vendors in the form of a compliance clause or similar device. In those rare cases, it is recommended that the vendor take the initiative to support the ongoing education process being led by GSA by providing the official with the appropriate VPAT(s) and referring them to the agency's [Section508.gov](#) web site for further information.

When filling out a VPAT, it is also recommended that vendors help to inform the agencies of the applicability of particular provisions of the standards to a product or service being offered in procurement. For example, the vendor might list 1194.24 (c), (d), and (e) as "Not Applicable" in a hardware product VPAT and provide the explanation, "This is not a multimedia production." Similarly, a vendor might list 1194.24 (b) as "Not Applicable - Fundamental Alteration Exception Applies" in the VPAT for a product such as a monaural TV tuner and provide the explanation "SAP requires a Stereo Tuner". Following this process should result in a more useful and effective VPAT for the agency.

Note: O = Applies

Product Category	1194.21	1194.22	1194.23	1194.24	1194.25	1194.26
A/V Equipment as identified in the Standards				O		
Copiers (not multi-function document imaging - see Note 1)					O	
Digital Copiers	O=PC Soft	O=Web Interface			O	
Scanners	O=PC Soft					
Smart Card Readers	O=PC Soft					
Operating Systems, Application Software	O					
Websites		O				
Printers	O=PC Soft				O	
Handhelds	O=PC Soft					O
Personal Computers (Desktop, Notebook, Portable, including displays)	O			O=Tuner		O
Servers and Workstations	O					O
Fax machines (public line or via the Internet)	O=PC Soft		O		O	
PBX (in-house electronic exchanger)	O=TAPI		O			
Telephone answering machines			O			
Telecommunications devices (wired, analog and digital wireless, Internet)	O=PC Soft	O=Web Interface	O			

Note 1: If a product provides the equivalent functionality of a combination of the products listed above, all relevant standards apply.

Note 2: Subpart C applies to the user interface of the product only. Not installation, service or maintenance.

Note 3: Agencies should first determine whether the particular procurement qualifies for exceptions to the Section 508 requirements and should communicate such determinations in the purchase request.

Note 4: "PC Soft" is defined as any application software bundled or sold with the product that executes on an attached network connected personal computer or server that is necessary to utilize the product for its normal intended operation.

Note 5: "TAPI" is the Telephony Application Programming Interface that can allow access to phone system functions from a computer workstation.

Note 6: "Web Interface" refers to browser applications.

Note 7: "Tuner" refers to a television tuner/receiver.