



Reporting Conformance to ICT Accessibility Standards

A practical approach to public and private sector ICT acquisitions

July 2014

In light of the growing demand for information and communications technology (ICT) products with accessible features, manufacturers are increasingly being required to declare whether a product or service “complies” with specific accessibility standards. Technical specifications such as the U.S. Section 508 accessibility standards, ETSI EN 301549, and the W3C Web Content Accessibility Guidelines 2.0 (WCAG 2.0 or ISO/IEC 40500), are growing in influence, with WCAG 2.0 rapidly becoming the basis of web accessibility rules and regulations across the globe. Requests for conformance information occur in a variety of situations, such as during bidding on contracts/tenders or assessments of manufacturer compliance with government regulations.

We are seeing a trend whereby manufacturers are increasingly being asked to confirm accessibility compliance via a simple “yes/no” or “pass/fail” response, rather than via submission of a detailed conformance report. This is troubling, because it ignores the complexity involved in conforming to accessibility standards.

The newest accessibility standards, such as Europe’s ETSI EN301549 (for Mandate 376), can create significant challenges for designing, coding and testing for accessibility, particularly in the case of complex enterprise-class products, applications or websites with thousands or perhaps millions of pages or lines of code. Such products and related content are typically created by developers in multiple locations, and then are customized by the purchaser or perhaps a third party. Hardware and software configurations can change continuously. Web-based applications and software-as-a-service, in particular are moving to a “continuous delivery” model where development and test cycles may last only a few weeks. This complexity and constant change pose a significant challenge for assessing conformance with accessibility requirements. While a fully accessible product or web site is a laudable goal, it does not reflect reality.

What is driving the growing trend toward pass/fail evaluations? Perhaps one of the triggers is the WCAG 2.0 “Conformance Requirements” and “Conformance Claim,” which use phrases

such as “met in full” or “satisfies all...Success Criteria,” and “Conformance (and conformance level) is for full web page(s) only, and cannot be achieved if part of a web page is excluded.” Such criteria create the assumption that content and applications can be rendered in a fully accessible manner on a continual basis. Moreover, this approach implies that a web site that fails to meet a single criterion, however minor, is as inaccessible as a site where none of the criteria are met.

We believe that the best way to characterize conformance to an accessibility standard is by addressing the “degree of conformance.” This metric, also referred to as “best meets,” was introduced by the U.S. General Services Administration (GSA) with the publication of the initial Section 508 standards. The approach encouraged manufacturers to provide detailed standards conformance information on a criterion-by-criterion basis, enabling prospective purchasers to evaluate whether a product may still meet essential accessibility objectives even if it is not fully conformant with technical requirements. This flexible approach is important for a number of reasons:

- The presence of defects does not always constitute “failure.” Not all users use all features of applications or web sites. With the most complex enterprise-class applications, few customers even use a majority of features that are typically provided.
- Not all standards and defects are equal. In fact, some “defects” have absolutely no negative impact on accessibility (e.g., non-unique IDs on a web page for controls that are not a direct part of the user interface).
- Despite vast improvements in the wording of accessibility standards like WCAG 2.0, many standards still leave much room for interpretation. A detailed accessibility statement allows an organization to fully describe what was implemented and how it was tested for each requirement.
- Some regulations, such as those implemented in conjunction with the U.S. Section 508 standards, require procurers to procure the product that “best meets the standards” (see clause 1194.2(b) [footnote]). There is no way to accurately determine which product best meets the standards if each manufacturer can only respond with a “yes/no” answer.
- In the case of a customer-licensed authoring tool for creating web sites and applications, a conformance statement may also include information about the tool’s output. This

information can only describe what the tool is capable of producing, not what the output actually conforms to, because that is a function of how the tool is used.

- If accessibility conformance statements provide only “yes/no” answers, it may cause manufacturers to only focus on “passing the test” and thereby have the unintended consequence of removing any incentive to create novel solutions.
- Products and services may rely on advanced technologies such as AJAX (Asynchronous JavaScript and XML) and WAI-ARIA (Web Accessibility Initiative - Accessible Rich Internet Applications) to address accessibility criteria. Knowing if and how a technology was used to address each criterion may inform the reader of the appropriateness of a solution for a particular task or environment, the choice of browsers and assistive technology, and training requirements.

The Voluntary Product Accessibility Template® (VPAT®) is widely used for reporting accessibility conformance to Section 508, and addresses all of the issues above. The VPAT was developed jointly by the Information Technology Industry Council (ITI) and GSA to assist Federal Government contracting officials and other buyers in making preliminary assessments regarding the availability of commercial ICT products and services with features that support accessibility. The VPAT allows a manufacturer to report on a provision-by-provision basis how well Section 508 is met (or can be met), to provide remarks to document detailed information such as implementation and testing performed, and to describe known defects (if any). More information about the VPAT is available at <http://www.itic.org/public-policy/accessibility>.

The VPAT, used by public and private sector purchasers in the United States and beyond, has proven to be a highly effective way to report accessibility conformance, providing a prospective purchaser with an account of the product’s accessibility status and other useful information to help them make an informed decision. The format of the VPAT readily lends itself to describing conformance with a variety of standards, as well as adapting to a broad range of information technology such as web pages, software, hardware and documentation.

ITI is in the process of updating the VPAT to cover WCAG 2.0, ETSI EN 301549 and other relevant standards as they emerge. We would welcome the opportunity to discuss how the VPAT can help procurers to assess and compare the accessibility features of ICT products and services.

For more information please contact Erica Logan, Senior Director of Policy, elogan@itic.org.