Reporting Conformance to ICT Accessibility Standards

Considering 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 and the recently revised W3C/WAI Web Content Accessibility Guidelines 2.0 (WCAG 2.0) are growing in influence, with the latter 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.

More and more, we are seeing a trend whereby manufacturers are 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 tends to ignore the complexity involved in conforming to accessibility standards.

The newest accessibility standards, such as Europe's Mandate 376/EN 301 549, can create difficult challenges for designing, coding and testing for accessibility, particularly in the case of complex enterprise-class products, applications or web sites with thousands or even millions of lines of code. Such products and related content typically are created by multiple 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 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. Ultimately, while a fully accessible product or web site is a laudable goal, it may never be achievable.

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 web pages, for example, can be rendered completely and fully accessible on a continual basis. Moreover, they imply 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 "compliant" with technical requirements. This flexible approach is important for many 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 product features 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 government contracting officers to procure the product that "best meets the standards" when products do not fully meet the standards (see clause 1194.2(b)). There is no way to accurately determine which product best meets the standard if each vendor only can respond with a "yes/no" answer.

- In the case of an "authoring tool" or software-as-a-service, which a customer licenses to construct their own website, a conformance statement can only describe what the product is capable of, not what it actually conforms to, since that is a function of how it is used.

- If accessibility is viewed as only a "yes/no" answer, 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 this technology was

used to address each criteria 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.

While some situations may require specific reporting formats, the ITI Voluntary Product Accessibility Template$^®$ (VPAT$^®$) is already widely used for reporting accessibility conformance to Section 508, and addresses all the issues above. The new VPAT 2.0 has been expanded to also include Europe's accessibility standard, EN 301 549, and the W3C/WAI web accessibility standard, WCAG 2.0. The VPAT was developed jointly by the Information Technology Industry Council 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 create a product Accessibility Conformance Report on a criterion-by-criterion basis, indicating how well each provision of Section 508 and other standards are met (or can be met), providing remarks to document detailed information such as implementation and testing performed, and describing known defects (if any). More information about the VPAT is available at http://www.itic.org/policy/accessibility/vpat.

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 a broad range of information technology such as web pages, software, hardware and documentation.

ITI is committed to assisting public and private sector procurers to make informed decisions when purchasing ICT products and services with accessible features. We welcome the opportunity to discuss how the VPAT can help you achieve success.

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