

# Accessibility in Procurement: How to Read a VPAT

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# Acronyms used in this presentation

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- **W3C** = World Wide Web Consortium
- **WCAG** = Web Content Accessibility Guidelines
- **ARIA** = Accessible Rich Internet Applications
- **VPAT** = Voluntary Product Accessibility Template



# Federal Law

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- **Section 504 of the Rehabilitation Act of 1973**
- **Americans with Disabilities Act of 1990 & Amendments**
  - Both are civil rights laws that prohibit discrimination against persons with disabilities.
  - In hundreds of legal complaints filed against higher education institutions for having inaccessible IT, resolution agreements and settlements have established that WCAG 2.x Level AA is our expected level of accessibility compliance.
- **Washington State Policy 188**
  - All state agencies (including higher education institutions) are required to meet WCAG 2.1 Level AA.



# What is WCAG 2.1?

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- **Web Content Accessibility Guidelines 2.1**
  - an international web accessibility standard, published by the World Wide Web Consortium (W3C)
  - version 1.0 was published in 1998
  - version 2.0 was published in 2008
  - version 2.1 was published in 2018
- **Success Criteria (78)**
  - **Level A** — 30 success criteria
  - **Level AA** — 20 success criteria
  - **Level AAA** — 28 success criteria



# WCAG 2.1 Example 1 of 3

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- 1.3.1 Info and Relationships (Level A)
  - Headings
  - Labels on Form Fields
  - Accessible Table Markup



## WCAG 2.1 Example 2 of 3

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- 2.1.1 Keyboard (Level A)
  - All functionality of the content is operable through a keyboard interface.
  - Take the #nomouse challenge!



## WCAG 2.1 Example 3 of 3

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- 4.1.2 Name, Role, and Value (Level A)
  - Proper use of ARIA



# What is ARIA?

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- Stands for "Accessible Rich Internet Applications"
- A W3C specification for markup that can be added to HTML to improve accessibility for assistive technology users
- Communicates an element's role, state, and properties





# Example:

## Accordion Widget *Before* ARIA

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```
<button id="button1">  
  More info  
</button>  
<div id="info1">  
  This section contains more info.  
</div>
```



# Example:

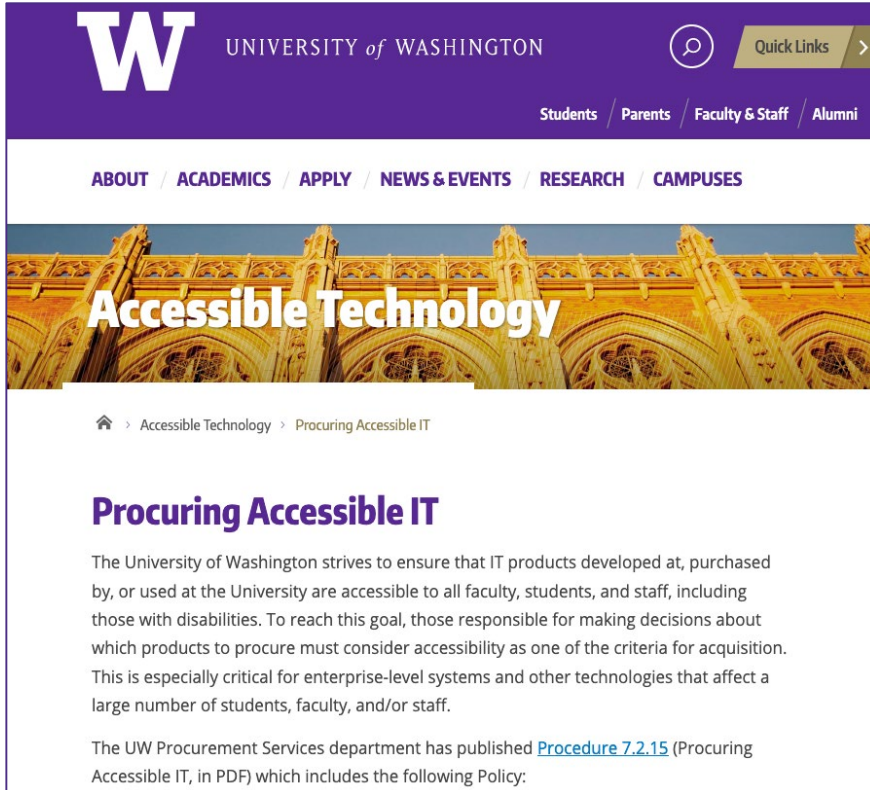
## Accordion Widget *After* ARIA

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```
<button
  id="button1"
  aria-controls="info1"
  aria-expanded="false">
  More info
</button>
<div
  id="info1"
  aria-labelledby="button1">
  This section contains more info.
</div>
```



# IT Accessibility in Procurement



The screenshot shows the University of Washington website. The header includes the 'W' logo, 'UNIVERSITY of WASHINGTON', a search icon, and 'Quick Links >'. Below the header are navigation links for 'Students', 'Parents', 'Faculty & Staff', and 'Alumni'. A secondary navigation bar lists 'ABOUT / ACADEMICS / APPLY / NEWS & EVENTS / RESEARCH / CAMPUSES'. The main content area features a large image of a Gothic building with the text 'Accessible Technology' overlaid. Below the image is a breadcrumb trail: 'Home > Accessible Technology > Procuring Accessible IT'. The section title is 'Procuring Accessible IT'. The text below reads: 'The University of Washington strives to ensure that IT products developed at, purchased by, or used at the University are accessible to all faculty, students, and staff, including those with disabilities. To reach this goal, those responsible for making decisions about which products to procure must consider accessibility as one of the criteria for acquisition. This is especially critical for enterprise-level systems and other technologies that affect a large number of students, faculty, and/or staff. The UW Procurement Services department has published [Procedure 7.2.15](#) (Procuring Accessible IT, in PDF) which includes the following Policy:'

1. Solicit accessibility information.
2. Validate accessibility information received.
3. Include accessibility assurances in contracts.

<https://uw.edu/accessibility/procurement>



# Soliciting accessibility information

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University of Washington bidders and vendors shall be **required** to demonstrate that information technology provided to the University of Washington conforms to or addresses each of the World Wide Web Consortium's **Web Content Accessibility Guidelines (WCAG) 2.1, Level AA** success criteria wherever demonstrating such performance is practicable. Vendors may do so by providing a **Voluntary Product Accessibility Template (VPAT) using VPAT 2.3 or higher**. The VPAT templates are available from the [Information Technology Industry Council](#). There are four different editions of the VPAT, based on different accessibility standards. Since IT procured by the University of Washington must meet WCAG 2.1 Level AA, the most appropriate edition for our needs is the WCAG edition (the INT edition is also acceptable since it includes WCAG 2.1 guidelines). NOTE: It is not sufficient for a bidder or vendor to simply provide a VPAT; they must take care to do so accurately. If they have insufficient expertise in-house, they should receive help from an independent third party accessibility consultant. The VPAT 2.x templates includes detailed instructions. Bidders and vendors should be expected to follow these instructions, and complete all required parts.

Source: UW Procurement Policy 7.2.15



# What is a VPAT?

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- Stands for "Voluntary Product Accessibility Template"
- Is a standard means by which IT vendors can provide documentation on whether and how they meet accessibility standards
  - VPAT 2.4 (February 2020) is the latest version
  - VPAT 2.3 or higher is required for reporting on conformance to WCAG 2.1
- Four editions:
  - WCAG 2.1
  - Section 508
  - EN 301 549 (European Union)
  - INT (incorporates all of the above standards)



# VPAT 2.3, WCAG Edition

**Table 1: Success Criteria, Level A**

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.1.1 Non-text Content</a> (Level A)		
<a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)		
<a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)		
<a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)		
<a href="#">1.3.1 Info and Relationships</a> (Level A)		
<a href="#">1.3.2 Meaningful Sequence</a> (Level A)		
<a href="#">1.3.3 Sensory Characteristics</a> (Level A)		
<a href="#">1.4.1 Use of Color</a> (Level A)		
<a href="#">1.4.2 Audio Control</a> (Level A)		
<a href="#">2.1.1 Keyboard</a> (Level A)		
<a href="#">2.1.2 No Keyboard Trap</a> (Level A)		
<a href="#">2.1.4 Character Key Shortcuts</a> (Level A 2.1 only)		
<a href="#">2.2.1 Timing Adjustable</a> (Level A)		
<a href="#">2.2.2 Pause, Stop, Hide</a> (Level A)		
<a href="#">2.3.1 Three Flashes or Below Threshold</a> (Level A)		
<a href="#">2.4.1 Bypass Blocks</a> (Level A)		
<a href="#">2.4.2 Page Titled</a> (Level A)		
<a href="#">2.4.3 Focus Order</a> (Level A)		
<a href="#">2.4.4 Link Purpose (In Context)</a> (Level A)		
<a href="#">2.5.1 Pointer Gestures</a> (Level A 2.1 only)		
<a href="#">2.5.2 Pointer Cancellation</a> (Level A 2.1 only)		
<a href="#">2.5.3 Label in Name</a> (Level A 2.1 only)		
<a href="#">2.5.4 Motion Actuation</a> (Level A 2.1 only)		
<a href="#">3.1.1 Language of Page</a> (Level A)		



# Three Columns in a VPAT

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- **Criteria:** One row for each WCAG success criterion
- **Conformance Level:**
  - **Supports**
  - **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**
  - **Not Evaluated**
- **Remarks & Explanations:**
  - Detailed remarks to justify the answer in the Conformance Level column



# Required Metadata at top of VPAT

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- There are 11 required fields in the instructions. These are arguably the most critical:
  - Name of product/version
  - Report date
  - Contact information for follow-up questions
  - Evaluation methods used
  - Applicable standards/guidelines





# Quick Guide to Reading a VPAT

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1. Did they include all required metadata?
2. Did they fill the form out properly?
  - a) Conformance Level is one of the available choices
  - b) Remarks/explanations is **sufficiently detailed** so you can make an informed decision about their product's accessibility.
3. Look a little closer at a few specific success criteria:
  - a) 1.3.1 Info and Relationships
  - b) 2.1.1 Keyboard
  - c) 4.1.2 Name, Role, and Value



# Questions to ask yourself

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- Who completed the VPAT? (an independent accessibility consultant is preferred)
- Did they follow instructions? (if not, a VPAT is either new to them or is not something they take seriously)
- Do they seem to be knowledgeable of accessibility?
- After reading their VPAT, do you know more about the accessibility of their product?
- After reading their VPAT, what follow-up questions do you have for the vendor?



# Example Questions for Vendors

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- ~~Is your product accessible?~~
- In your VPAT, you said **X** related to 1.3.1 *Info and Relationships*. Could you please elaborate on that? What are some specific examples of how your product meets this success criterion?
- Please describe how your company addresses the need for accessibility throughout the product lifecycle.
- What is your methodology for testing your products for accessibility? Who does the testing? Which tools and assistive technologies do you use?
- What sort of training do your designers, engineers, and quality assurance personnel receive on accessibility?



# Example VPAT #1

**Table 1: Success Criteria, Level A**

Notes:

Criteria	Conformance Level
<a href="#">1.1.1 Non-text Content</a> (Level A)	Partially Supports
<a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)	Not Applicable
<a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)	Not Applicable
<a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)	Not Applicable
<a href="#">1.3.1 Info and Relationships</a> (Level A)	Supports
<a href="#">1.3.2 Meaningful Sequence</a> (Level A)	Supports
<a href="#">1.3.3 Sensory Characteristics</a> (Level A)	Supports
<a href="#">1.4.1 Use of Color</a> (Level A)	Supports
<a href="#">1.4.2 Audio Control</a> (Level A)	Not Applicable
<a href="#">2.1.1 Keyboard</a> (Level A)	Supports
<a href="#">2.1.2 No Keyboard Trap</a> (Level A)	Partially Supports



# Example VPAT #2

**Table 1: Success Criteria, Level A**

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.1.1 Non-text Content</a> (Level A)	Supports	
<a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">1.3.1 Info and Relationships</a> (Level A)	Support	
<a href="#">1.3.2 Meaningful Sequence</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">1.3.3 Sensory Characteristics</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">1.4.1 Use of Color</a> (Level A)	Supports	
<a href="#">1.4.2 Audio Control</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">2.1.1 Keyboard</a> (Level A)	Supports	
<a href="#">2.1.2 No Keyboard Trap</a> (Level A)	Supports	
<a href="#">2.1.4 Character Key Shortcuts</a> (Level A 2.1 only)	Supports	
<a href="#">2.2.1 Timing Adjustable</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">2.2.2 Pause, Stop, Hide</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">2.3.1 Three Flashes or Below Threshold</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">2.4.1 Bypass Blocks</a> (Level A)	Not Applicable	Criterion is not relevant to this particular technology.
<a href="#">2.4.2 Page Titled</a> (Level A)	Supports	
<a href="#">2.4.3 Focus Order</a> (Level A)	Supports	
<a href="#">2.4.4 Link Purpose (In Context)</a> (Level A)	Supports	
<a href="#">2.5.1 Pointer Gestures</a> (Level A 2.1 only)	Supports	
<a href="#">2.5.2 Pointer Cancellation</a> (Level A 2.1 only)	Supports	
<a href="#">2.5.3 Label in Name</a> (Level A 2.1 only)	Supports	



# Example VPAT #3

<a href="#">2.1.1 Keyboard</a>	Partially supports	<p>All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes. However, there are minor exceptions. For example:</p> <ul style="list-style-type: none"><li>• The calendar widget on the manage section is not keyboard operable. However, alternatively, the date can be directly entered into the date field.</li></ul>
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# Example VPAT #4

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<a href="#">4.1.2 Name, Role, Value</a>	Partially supports	<p>The web application provides the correct name, role, state, and other important accessibility information for most form controls, with the following exceptions:</p> <ul style="list-style-type: none"><li>• Dynamic filter results are not announced to screen reader users.</li><li>• Some calendar widgets are not using appropriate roles.</li></ul>
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# Example VPAT #5

<p><b>1.2.2 Captions (Prerecorded)</b> (Level A)  Captions are provided for all pre recorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such.</p>	<p>Supports</p>	<p>The [REDACTED] Web App does not contain prerecorded synchronized media.</p>
<p><b>1.2.3 Audio Description or Media Alternative (Prerecorded)</b> (Level A)  Captions are provided for all live audio content in synchronized media.</p>	<p>Supports</p>	<p>The [REDACTED] Web App does not contain prerecorded video content that would require audio description or a media alternative.</p>
<p><b>1.3.1 Info and Relationships</b> (Level A)  Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.</p>	<p>Partially Supports</p>	<p>[REDACTED] Web App has proper information, structure &amp; relationship text.  Exception Includes:</p> <ul style="list-style-type: none"> <li>● Content should be in a data table but is not in the "Manage – Payments" Page.</li> <li>● Group of form controls are not associated with some group labels in the following page <ul style="list-style-type: none"> <li>○ In [REDACTED] - Top Nav - Starting voting session Modal</li> <li>○ In [REDACTED] - Top Nav - Start Private Mode Modal</li> <li>○ Profile - Navigation Options</li> </ul> </li> <li>● Some heading are not marked as per the functionalities like some headings are out of order, some non-heading text is marked as heading and some heading text is not marked as headings in the following pages <ul style="list-style-type: none"> <li>○ Manage – payments</li> <li>○ Manage – Settings</li> </ul> </li> </ul>





# Questions?

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