

Not 100% Accessible?

Develop an Alternate Access Plan Ahead of Time

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Overview



Conference Civility Statement

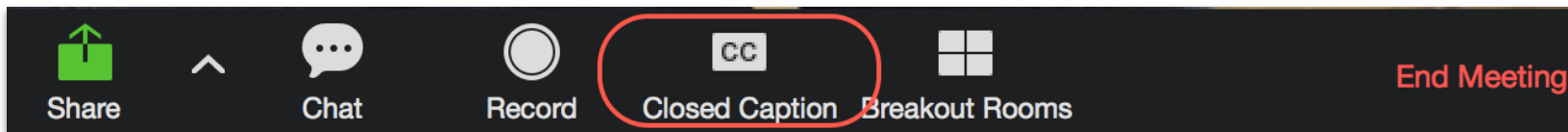
We ask you to join us in creating a culture that reflects...

- **Access and Inclusion**
- **Civility and Respect**

...this week and in all aspects of our organization.

Today's Session

- Please mute your line when just listening, type Alt+A on a PC, Command(⌘)+Shift+A on a Mac, or the Mute button.
- Please ask questions! We will monitor the Chat and Q&A.
- Live captions are available. See the Closed Captions button.
- The session is being recorded.



Why are you here?

- **Possible answer**

- You or your institution wants to know if a product is accessible.

- **More likely answer**

- Your institution already procured a product and now wants to know if the product is accessible.

Learning Goal 1

- ✓ Participants will be able to describe the:
 - ✓ Section 508 standards
 - ✓ Voluntary Product Accessibility Template
 - ✓ Accessibility Conformance Report
 - ✓ Equally Effective Alternate Access Plan

Learning Goals 2 and 3

- ✓ Participants will be able to identify the information in a VPAT and ACR that is relevant to reviewing a product for an institution's Section 508 compliance process
and
- ✓ Participants will be able to develop an Equally Effective Alternate Access Plan



VPAT, ACR and EEAAP



What's a VPAT?

- [Voluntary Product Accessibility Template](#), **VPAT**
- Information and Communication Technology, ICT
- **Not** an accessibility audit
- **Overview** of a product's level of accessibility conformance
- **Voluntary and self-reported** by the vendor (essentially)
 - So – what's the problem with this approach?
- VPAT leads to Accessibility Conformance Report, **ACR**

What's an ACR?

- Accessibility Conformance Report, **ACR**
- The ACR is what you have when the VPAT is completed
- Think of the VPAT as the recipe and ingredient list whereas the ACR is the resulting meal



Equally Effective Alternate Access Plan

- What to do when the product does not meet the standards
- Identifies how access to the product will be provided when a person with a disability were to use it
 - Description of the issue
 - Who is affected and who is responsible
 - How equal access will be provided
 - Necessary resources to provide equal access
 - Roadmap from vendor for removing the access barriers



VPAT Examples



Notes About the Virtual Format

- This is designed to be a hands-on activity
- We made adjustments for the virtual format
- Instead of reviewing actual VPATs from vendors, we have formatted the information into slides
- The example VPATs and handouts are available as part of Session 2 and Session 3 of the [Summer Web and IT Accessibility Workshop - June 16, 2020](#)

Conformance Level Terminology

VPATs will use the following terminology for conformance:

- **Supports** - product functionality has at least one method that meets the criterion without known defects.
- **Partially Supports** - some product functionality 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.

Remarks and Explanations

- **“Partially Supports” or “Does Not Support”**, the remarks should identify:
 - The functions or features with accessibility barriers
 - How the product does not fully support the criterion
 - A roadmap for the vendor to remove the accessibility barriers
 - If the criterion does not apply, explain why
 - If an accessible alternative is used, describe it

Success Criterion Name and Link (Level)

Test name

- Question
- Yes, no action needed
- No, alternate access may be needed
- Unclear response from vendor, follow-up with vendor or may need alternate access

Vendor VPAT Example Remarks

- Conformance Level from vendor
- Remarks and explanations
- Supports, look for examples
- Partially Supports or Does Not Support, look for information to create an alternate access plan
- [Additional information]

1.1.1 Non-text Content (Level A) #1

Meaningful image name

- Does the accessible name and accessible description for a meaningful image provide an equivalent description of the image?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- The product uses standard HTML and WAI-ARIA techniques to provide text equivalents for all visual elements. This includes the attributes “alt”, “aria-label”, and “aria-describedby”.

1.1.1 Non-text Content (Level A) #2

Decorative background image

- Is important information in a background image conveyed by other means?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- User interfaces, including Popups, Notify and PC Station (logon and print release screens) and Print Center Web, support integration with Freedom Scientific's JAWS Screen Reader

1.3.1 Info and Relationships (Level A) #1

Programmatic label

- Does the combination of the accessible name, accessible description, and other programmatic associations (e.g., table column, row associations) describe each input field and include all relevant instructions and cues (textual and graphical)?

Vendor VPAT Example Remarks

- Conformance Level: Partially Supports
- Most component relationships are programmatically determinable. However, some object relationships may not share a hierarchy.

1.3.1 Info and Relationships (Level A) #2

Headings and Lists

- Is each programmatically determinable heading a visual heading and each visual heading programmatically determinable?
- Are all visually apparent lists programmatically identified according to their type?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- The product uses semantically-correct markup so that all content may be understood independent of presentation.

2.1.1 Keyboard (Level A)

Keyboard access

- Can all functionality be accessed and executed using only the keyboard?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- Content conforms to web standards and should be operable via a keyboard interface. All buttons use the standard Windows focus rectangle to indicate current focus.

2.4.2 Page Titled (Level A)

Page title defined and purpose

- Is a <title> element defined for the web page?
- Does the <title> element identify the contents or purpose of the web page?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- The product does not include web pages.
- [This product includes a set of web pages with videos.]

1.4.3 Contrast (Minimum) (Level AA)

Contrast

- Does the visual presentation of text and images of text have sufficient contrast?

Vendor VPAT Example Remarks

- Conformance Level: Partially Supports
- Product meets these criteria for user-level interfaces. Administrative components may not.

2.4.7 Focus Visible (Level AA)

Focus visible

- Is a visible indication of focus provided when focus is on the interface component?

Vendor VPAT Example Remarks

- Conformance Level: Supports
- The product uses visual change of elements to indicate focus.
- [The text is repeated twice in the reading order. The visible focus does not follow the first series of text in the reading order.]



EEAAP Examples



Types of EEAAPs

- General plans for accommodations
- Available to everyone
 - Equivalent alternate versions of information or processes
 - Alternate software, instructional materials, or assignments
- Available by request
 - Assistance by staff familiar with a product
 - Changes in job duties
- This is not an exhaustive list

Focus Visible EEAAP, Chatbot

Persons or groups affected

- Current and prospective students with disabilities may encounter barriers when attempting to use the chatbot.
- Faculty and staff who use assistive technology may also encounter barriers with the product.

Access provided and resources

- A web page with an accessible text version of the Financial Aid information available from the chatbot will be maintained by the Financial Aid office with assistance from IT.
- The vendor indicates work is continuing to fix the barriers.

Keyboard EEAAP, Online Counseling

Persons or groups affected

- Current and prospective students with disabilities may encounter barriers when attempting to login and schedule a meeting with a counselor.

Access provided and resources

- The counselor's email address and phone number who is currently available will be included on the web page.
- The Online Counseling web page will include an accommodation statement.
- Vendor roadmap: 6 months

Info and Relationships EEAAP, Scheduling

Persons or groups affected

- Deans, department chairs and coordinators, Deans' administrative support staff, and the Class Scheduler.
- Approximately 24 employees.

Access provided and resources

- The HR 504 coordinator will make the assistance of support staff available for employees required to use the product who experience accessibility barriers. Support staff will receive training to be prepared to assist.
- Vendor roadmap: 9 months

Non-text Content EEAAP, Virtual Lab

- **Vendor Reports:** “Users who are blind will only be able to play a subset of simulations.” and “Users relying on keyboard navigation will not be able to complete all simulations.”
- **Syllabus Statement:** This course will use virtual lab simulations for some assignments. The software may not be accessible for students using assistive technology. Alternate assignments may be available for all students. Additional individualized accommodations can be provided by the Disabled Students Program and Services. Students do not need to be signed up with DSPS to get accommodations for assignments that use the virtual lab software.

VPAT Details



What to Look for in a VPAT

- [VPAT Editions](#) (there are four)
 - **Revised Section 508 Edition**, includes WCAG criteria
- Version Number
 - **VPAT 2.4** is the current version
 - **Do not** accept anything prior to 2.0
- When Completed
 - Products change regularly
 - Recent copy of the report – within the last 12 months

More to Look for in a VPAT

- Evaluation Methodology
 - Should identify the evaluation methods used to complete the report
 - What automated tools were used?
 - What manual evaluation techniques were conducted?
 - What browsers and assistive technologies were used?
And by who?
- Recently received statement: “We used WCAG 2.0”

Descriptive Evaluation Methodology

1. “An accessibility expert conducted an overall technical analysis using Chrome with the axe plugin. Code analysis was conducted using the Chrome browser Developer Tools.”
2. “Keyboard accessibility analysis was conducted by attempting to thoroughly navigate the web application through the keyboard, without using a mouse.”

One More Methodology Example

3. “Screen reader testing was conducted by an expert screen reader user. The evaluator worked through the web application using JAWS for Windows (v. 2020) screen reader with Chrome Version 80 and the NVDA v. 2019.3.1 screen reader with the Firefox web browser version 73. The evaluator also worked through the course on an iOS 13.3.1 mobile device with the Safari browser and the VoiceOver screen reader.”



Section 508 Standards

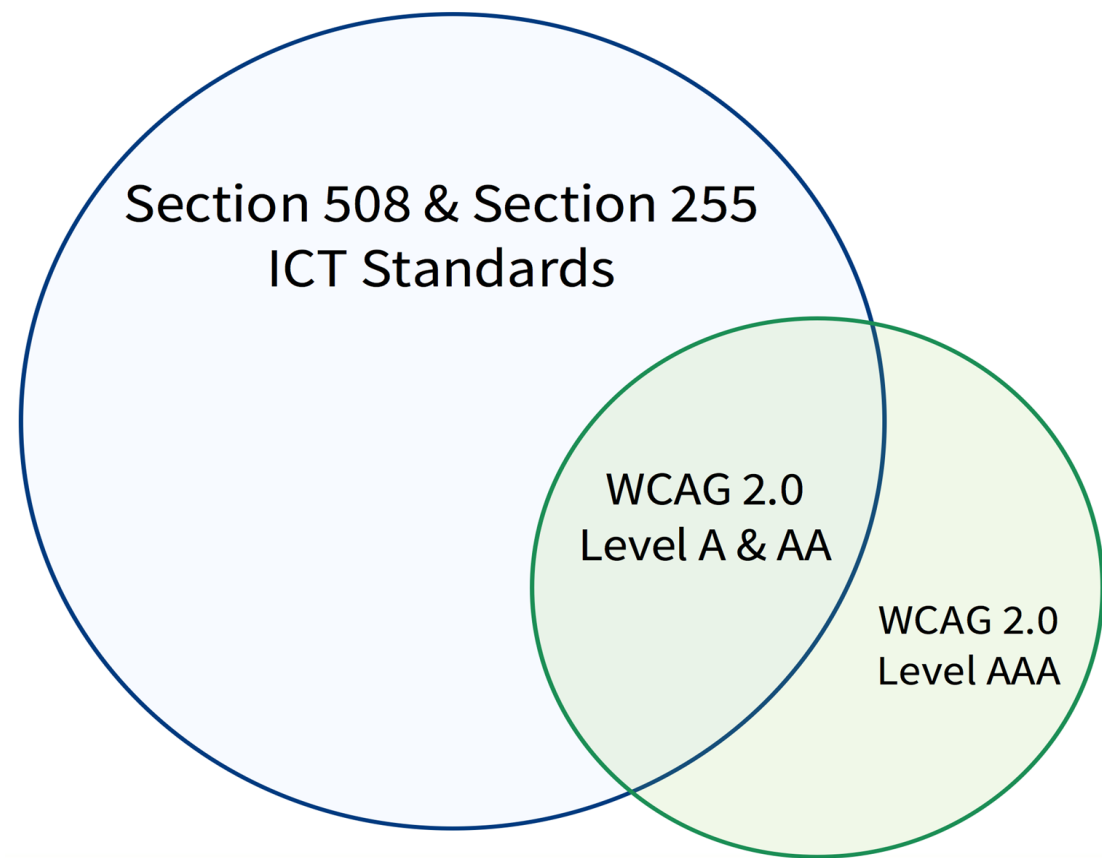


Technology Accessibility Standards

Section 508 of the Rehabilitation Act

- **DUMP**: Applies to Federal agencies when they develop, use, maintain, or procure information and communication technology (ICT)
- **Revised standards** effective January 2018
- **WCAG 2.0**, Level A and Level AA standards are included
- **California** adopted these accessibility requirements for state entities (Government code 7405)

Intersection of Section 508 and WCAG 2.0



Section 508 Compliance and Higher Ed

- Section 508 standards are the floor, not the ceiling
- Section 508 compliance is for an institution more than the accessibility of products
- Section 508 is a part of an institution's obligation to ensure access for individuals with disabilities
 - What is the accessibility barrier reporting process?
 - How is accessibility integrated into purchasing decisions?

Section 508 Compliance Process

- Requiring and reviewing a product's VPAT and ACR is necessary in a robust accessibility compliance process
- Two crucial steps towards achieving 508 compliance
 - Identified accessibility barriers need to be addressed
 - Plans need to be developed to “provide individuals with disabilities access to and use of information and data by alternate means that meets identified needs”

Accessibility Review Process

Example Accessibility Review Process

- Adopt the Section 508 standards, including WCAG 2.0 level A and AA
- Review VPATs and ACRs and document the results
- What if the ICT (software, electronic content, or hardware) reviewed is not completely accessible?
 - The products do not support all the Section 508 standards

ICT Accessibility Review Examples

1. Review a VPAT, taking the information at face value

- Incomplete or contradictory information leads to questions for the vendor and alternate access plans

2. Manual testing by trained staff

- Automated tools
- Manual testing
- Documented testing process such as Trusted Tester, Axe Pro, etc.

Accessibility Review Examples

3. Vendor product demonstration

- Not using a mouse
- With assistive technology identified in the VPAT
- Include various product features and user interfaces

4. In-house evaluation (more detailed than testing)

5. Third-party audit (who pays?)

6. User testing by various users of assistive technology

When ICT Does Not Meet the Standards

- Include a process to address the identified product accessibility barriers
 - Individuals with disabilities do not need to request access or reasonable accommodations
- Document how vendors will address the identified accessibility barriers, including timelines

Accessibility Review Process at COD

- College of the Desert (COD) uses an ICT Section 508 Compliance Review and EEAAP form
- Guides faculty and staff requesting ICT through the accessibility review and development of alternate access plans
- Implements five procurement steps recommended by the California State University Accessible Technology Initiative and the California Community Colleges Accessibility Center

Accessibility and Procurement Steps

1. Identify the business needs that the product will meet
2. Provide a comparison of similar products and their features
3. Evaluate the accessibility compliance level of each product
4. Describe the reasons for recommending the preferred product
5. If the product selected does not meet Section 508 standards, develop and document an alternate access plan (EEAAP)

Review



Session Evaluation

- Please visit: [AHEAD Session Survey](#) and enter the session number 10.1 or the abbreviated title Not 100% Accessible
- Your feedback helps shape future programming
- Thank you for attending!