



Digital Accessibility: It's All We Do

Navigating VPAT® 2: A Guide for Vendors

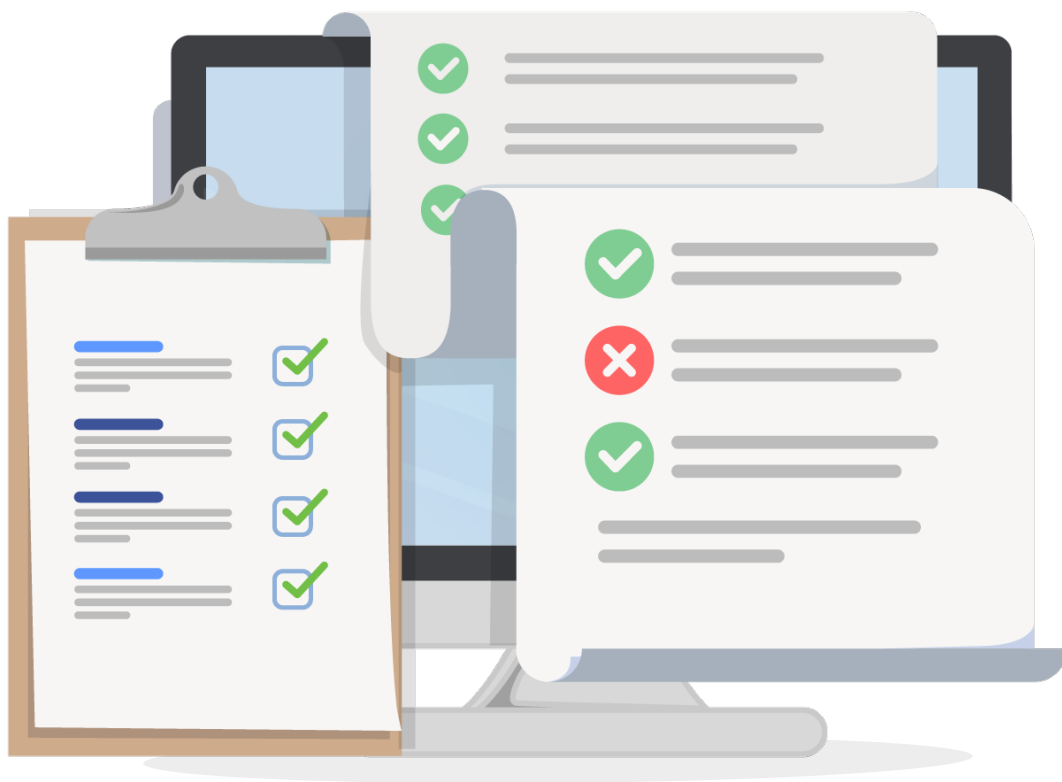


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Overview

The [Voluntary Product Accessibility Template®](#) (VPAT®) was originally developed jointly by the Information Technology Industry Council (ITI) and General Services Administration (GSA) to assist Federal Government contracting officials and other buyers in making preliminary assessments regarding the commercial availability of information and communications technology (ICT) products and services with features that support accessibility. The VPAT also allows ICT product manufacturers and vendors to self-report, on a provision-by-provision basis, how well applicable standards such as Section 508 are met (or can be met), provide remarks to document detailed information such as implementation and testing performed, and to describe known defects (if any). The updated VPAT 2 format incorporates international standards including WCAG 2.0/2.1, the revised Section 508 standards, and the European standard EN 301 549. There are four versions of the template for each of the standards and one that includes all of the standards. Using a consistent format of tables with accessibility criteria listed, the product manufacturer or vendor is expected to make specific statements to indicate if and how the features and functionality of their product or service meet each technical and functional performance requirement of the applicable standards.

Despite its name, completion of the **Voluntary** Product Accessibility Template® is a **requirement** for vendors selling to U.S. Federal Government, as well as generally for vendors who are selling to other public and private sector entities in the U.S. and around the world. For that reason, product manufacturers and vendors should establish a defined process for preparing Accessibility Conformance Reports (ACR) in VPAT format, and ensure they are prepared by people who have in-depth knowledge of digital accessibility requirements and testing procedures. By doing so, product manufacturers and vendors can ensure their accessibility conformance reports in VPAT format are both complete and accurate.

History and Use of the VPAT®

ITI is a trade association serving the entire ICT industry that bills itself as “the global voice of the technology sector” in areas related to advocacy and public policy. ITI’s membership spans major hardware, software, and services companies who do business around the world.

In 2001, the VPAT was created by ITI in conjunction with the GSA to facilitate the process of procuring accessible ICT products and services by U.S. Federal Government agencies. The VPAT was initially developed to support documentation of conformance with the technical and functional performance requirements of [Section 508 of the Rehabilitation Act](#) (as published in 1998). However, since that time, there has been a growing demand for ICT product manufacturers and vendors to document conformance to multiple ICT accessibility standards, including, but not limited to, Section 508.

To address this growing demand, ITI updated the VPAT to cover changes to Section 508 that were finalized and published in 2017. Known as the Revised 508 Standards, the update incorporated the [Web Content Accessibility Guidelines 2.0](#) (WCAG 2.0 or ISO/IEC 40500) by reference. VPAT 2 can also be used to report against WCAG 2.0 or WCAG 2.1, and the European standard [EN 301 549](#), either alone or in combination with other standards.

Specifically, VPAT 2 supports documentation of conformance to:

- Section 508 Refresh 2017 (Chapters 3, 4, 5 and 6)
- WCAG 2.0 Success Criteria & Conformance Requirements (Levels A, AA, and AAA)
- WCAG 2.1 Success Criteria & Conformance Requirements (Levels A, AA, and AAA)
- EN 301 549 (Chapters 4-13)

ITI has renamed the original VPAT to VPAT 1.0 and developed a new version of the template, VPAT 2, the latest version of which was published in April of 2019. The VPAT 2 includes extensive instructions and best practices for completing the template.

Based on the Federal Acquisition Register's (FAR) updated guidance, and upon request from individual U.S. Federal agencies, vendors will need to provide an ACR in VPAT 2 format for the product or service being procured. Section 508 compliance is required for ICT that is used, maintained, developed, and procured by U.S. Federal agencies after January 18, 2018, with safe harbor for existing ICT that is already in place or not changed. Vendors should adhere to any requirements communicated by U.S. Federal agencies procuring their products and services as some agencies may still be requesting VPAT reports in the VPAT 1.0 format.

Rather than requiring documentation of conformance to all criteria from multiple standards or within one standard, VPAT 2 breaks down the criteria into sections that can be easily removed if they do not apply. However, only entire sections may be removed, not individual criterion. Some examples of when certain criteria may not apply include:

- The section is for a standard that is not being evaluated (e.g. If the procurement is not in Europe, the sections on EN 301 549 may be removed).
- The section does not apply to the product (e.g. If the product is software, the hardware criteria may be deleted).
- The section refers to a higher level of compliance than is required (e.g. If a product only needs to meet WCAG 2.0 AA success criteria, then the section on WCAG 2.0 AAA success criteria may be deleted).
- The procuring organization specifies that a section does not apply to the procurement.

Standards Supported by VPAT® 2

Section 508

Section 508 of the Rehabilitation Act of 1973 (as amended in 1998) (29 USC § 794d) requires that when U.S. Federal government agencies develop, procure, maintain, or use electronic and information technology (called ICT in the current standards), federal employees and members of the public with disabilities must have access to and use of information and data that is comparable to that of those who do not have disabilities, unless such a change would impose an undue burden on the agency.

By statute, the scope of Section 508 is limited to the federal sector. It does not apply to the private sector, nor does it directly impose requirements on federal funds recipients. However, some US Federal agencies may list following Section 508 standards as a guideline for organizations receiving funds through their agency. Many U.S. states and some local public sector organizations (such as government agencies and publicly funded educational institutions) have also adopted the Section 508 standards and require them in procurement.

The Revised 508 Standards bring harmonization with international standards, most notably the Web Content Accessibility Guidelines 2.0 (WCAG 2.0), which are incorporated by reference. This means WCAG 2.0 conformance requirements are used to measure compliance of documents, web content, and software (when applicable) for Section 508. In addition, platform software, application software and mobile apps must conform to relevant software technical standards as well as WCAG 2.0 ([W3C Guidance on Applying WCAG 2.0 to Non-Web ICT](#)).

WCAG 2.0

The Web Content Accessibility Guidelines 2.0 (WCAG 2.0) and 2.1 (WCAG 2.1) were developed by the World Wide Web Consortium (W3C) Web Accessibility Initiative, in cooperation with individuals and organizations around the world. WCAG 2 provides a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. WCAG 2.0 is also an approved ISO standard (ISO/IEC 40500). WCAG 2.0 is the tracking standard for web accessibility for almost all entities worldwide and most of the WCAG 2.1 criteria have been incorporated into EN 301 549.

WCAG 2 states that web content should be perceivable, operable, understandable, and robust.

Perceivable: Able to be seen by a person with visual impairments (through a screen reader, screen magnifier, or other assistive technology), or heard by a person who is hard of hearing or deaf (through captions, written transcript, etc.).

Operable: The technology can be operated by a user with a disability. For example, a website can be navigable with keyboard shortcuts by someone unable to use a mouse.

Understandable: The technology can be operated by users with varying cognitive abilities.

Robust: The technology is compatible with current assistive technology and is prepared for upgrade for future iterations of AT.



The WCAG 2 web content accessibility requirements are broken up into three levels of compliance that include success criteria written as testable statements which are not technology-specific:

- **Level A:** This level defines the lowest or minimum level of accessibility. Many groups of users with disabilities will find it very difficult or impossible to access information in the document. Satisfying these success criteria is the minimum set of requirements.
- **Level AA:** This level defines a higher level of accessibility. Satisfying these success criteria will remove significant barriers to accessing web content. In order to be AA conformant, content must also be level A conformant.
- **Level AAA:** Satisfying these criteria will enhance the user experience for individuals with disabilities. Not all Level AAA success criteria can be addressed for all types of content.



While WCAG 2.0 applies to web content, it has also been applied to mobile accessibility, as well as to non-web ICT. Most governments around the world, including the U.S. Government, have adopted WCAG 2.0 Level A and AA and the Conformance Requirements, but not Level AAA.

EN 301 549

EN 301 549, passed in 2014, is a digital accessibility standard in the European Union (EU) created in response to a request by the European Commission. It was adopted as the default standard in 2016 in Directive 2016/2102/EU, which applies to public sector websites and mobile apps throughout the EU. As of January 2017, EN 301 549 became the standard for accessible procurement in Europe.

The current version of EN 301 549 v 2.1.2 incorporates WCAG 2.1, and there is substantial harmonization and normalization between EN 301 549 and Revised 508 Standards (with the exception that Section 508 references WCAG 2.0 and not WCAG 2.1 for conformance).

Using VPAT® with Different Product Types

In order to help U.S. Federal contracting and procurement officials comply with Section 508, GSA developed a "Accessibility Requirements Tool (ART)" that can produce sample procurement language and accessibility requirements statements. These documents serve as clear notice of Section 508 requirements for the ICT being procured – responses to meeting these requirements become a part of the vendor proposal to indicate how their proposed solution addresses the applicable Section 508 requirements.

Important Details about VPAT® 2

In this guide, we will focus on describing how to use the new VPAT 2.

VPAT 2® Structure

Here is what you will find in VPAT 2. All sections must be completed for the final VPAT unless otherwise noted:

- **Report Title:** In the heading format of “[Company name] – Accessibility Conformance Report”
- **VPAT Heading Information:** VPAT heading and acronym with service mark and template version
- **Name of Product:** The name of the product being reported, including version of the product
- **Product Description:** A brief description of the product
- **Report Date:** Date of report publication (month and year at minimum)
- **Contact Information:** Contact information for follow-up questions
- **Notes:** Any details or further explanations about the product or the report (may be left blank)
- **Evaluation Methods Used:** Include a description of what evaluation methods were used to complete the VPAT for the product under test.
- **Applicable Standards/Guidelines:** A clear indication of which Standards/Guidelines the Conformance Report covers.
- **Terms:** Conformance level terms description section
- **Tables for Each Standard or Guideline:** Tables showing the responses to the criteria

Conformance Levels

At least one of the three conformance standards (Section 508, WCAG 2.0/2.1, EN 301 549) must be completed in VPAT 2. Alternatively, a combination of all three standards may be used to report only the criteria applicable to your product. If you are completing a VPAT 2 for Section 508 procurement purposes, you will need to fill out the tables for WCAG 2.0 (except for hardware only) and for the applicable Section 508 sections.

ITI requires that the following terms must be used to communicate conformance to each VPAT 2 criterion:

- **Supports:** The product must have at least one method that meets the criterion.
- **Partially Supports:** Though parts of the product meet the criterion, the product does not fully conform.
- **Does Not Support:** The majority of the product does not meet the criterion.
- **Not Applicable:** The specific criterion does not apply to the product.
- **Not Evaluated:** Can only be used as a response when evaluating WCAG 2.0 AAA success criteria.

When documenting conformance to WCAG 2.0/2.1 success criteria, a rating of “Supports” may be used instead of “Not Applicable” to document support for success criteria that do not apply to the product. This is in keeping with existing conventions for documenting conformance with WCAG 2.0/2.1.

If the standard selected has more than one level of conformance, depending on the level you select to report on, you may also need to include the criteria of any lower conformance levels of the same standard. For example, if you are reporting WCAG 2.0/2.1 Level AA compliance, you must also report compliance with WCAG 2.0/2.1 Level A success criteria.



Note: To ensure your conformance claims are valid, Level Access recommends first performing an audit of the product or service, utilizing a combination of automatic testing, manual code-level review, and functional testing by individuals with disabilities using common assistive technologies.

Remarks and Explanations

The remarks and explanations section is used to explain the conformance level that you selected in the previous column. You may also include information about your testing methods, known defects in your product, and other accessibility features that your product may have. If you selected “not applicable” as your conformance level, you should provide an explanation of why the criteria do not apply.

VPAT® 2 Best Practices

Below are some best practices to keep in mind when using the VPAT 2 template:

- The VPAT 2 document is broken up into two sections: instructions on how to use the document and the conformance template. However, your final version for publication should only include the completed
- Be sure to keep your ACR up to date. If your product’s features or functionality change, your ACR should be modified to reflect those changes, and include the date of the revision, as well as the version of your product that is being evaluated.
- It is particularly important that your ACR is accurate and completed by someone who is familiar with accessibility laws and standards. Submitting an inaccurate or untruthful ACR puts your company at great risk if you are awarded a contract and your product does not meet the criteria indicated in the VPAT report.
- A common mistake when completing the VPAT is to simply state “supported” or “not supported” for an accessibility criterion. It is equally important to provide an explanation to back your claim and give the reviewer an accurate picture of what your product can do.
- If possible, completed ACRs should be posted on your company website or be available at the request of a customer. Although this may seem obvious, please ensure that the ACR document itself is accessible.

Accessibility Conformance Report Example

For an example of a completed VPAT, see [Level Access's VPAT for AMP \(Accessibility Management Platform\)](#).

How Level Access Can Help



Product manufacturers and vendors should ensure they have a defined process for preparing ACRs, and that their ACRs are prepared by people who are able to thoroughly test their products using in-depth knowledge of digital accessibility requirements and testing procedures.

If you don't have internal resources with this type of knowledge, you may want to consider hiring an accessibility expert like Level Access.

Testing for Conformance to Multiple Standards

Prior to writing the ACR, Level Access can perform an Accessibility Audit to give you an accurate picture of your current level of compliance. The Audit will identify and prioritize accessibility errors within the ICT system, define the method for addressing any issues; and document the system's overall compliance with Section 508, WCAG 2.0/2.1, and other relevant standards.

Level Access utilizes a proven Audit Methodology, backed by extensive documentation, deep expertise, and a data-driven governing process. Audits include a mix of automated, manual, and assistive technology validation, as well as the use of individuals with disabilities to perform actual system tasks. In addition to identifying and prioritizing the accessibility issues discovered during the Audit, the Audit Report will detail why specific modules are inaccessible, provide remediation recommendations for improving accessibility, and include code-level guidance on methods for implementing the required fixes.

Authoring ACRs

Level Access has 20 years of experience in digital accessibility, and we have in-depth, expert knowledge of all ICT accessibility laws and standards. We can use this experience and knowledge. Over the years, we have written hundreds of ACRs, enabling our clients to meet their obligations as suppliers to organizations that require conformance to various accessibility standards.

Other Services



Remediation Services. After the Audit, we can help you remediate the most glaring issues to give you a better chance of landing a government contract.



Policy and Program Services. Level Access can help you evaluate your existing digital accessibility programs, policies, and resources, or develop them from the ground up. This includes processes that will enable your organization to consistently test products for conformance to multiple standards, create / maintain VPATs, or include accessibility standards conformance in your contracting and procurement processes.



Training Services. If you need help training your employees on designing, developing, and testing accessible products and services, we can provide onsite, virtual or web-based training services.



On-Demand Support Services. We also offer services such as Access Advisor, where you can get the digital accessibility help and guidance you need—exactly when you need it—from our most experienced subject matter experts, analysts and developers.

Key Points to Remember

- An ACR in VPAT format is often required as part of the procurement process of the Federal Government, State and Local Government, and Public Universities.
- The VPAT format has been traditionally used to report conformance to the original Section 508 Standards (1998), but the VPAT 2 format has been expanded to support documentation of conformance to the revised Section 508 (2017) as well as WCAG 2.0/2.1 and the European standard EN 301 549.
- Your conformance level with each individual criterion should generally be reported as "Supports," "Partially Supports," "Does Not Support," or "Not Applicable."
- The remarks and explanations section should be used to explain why you selected a particular conformance level, and may include information about your testing methods, known defects in your product, and other accessibility features that your product may have.
- Ensure that your ACR is accurate and is drafted by someone with knowledge of your product, as well as accessibility laws and standards and testing methodology.
- A digital accessibility expert, such as Level Access, can test your product or service for conformance to one or more accessibility standards, help you remediate or fix issues, assist you with authoring ACRs in VPAT format, train your staff, and help you put policies, procedures, and resources in place to enable consistent results.