



Digital accessibility:

A BEST PRACTICE GUIDE FOR US LIBRARIANS

ADVANCING
DISCOVERY

Contents

Introduction	3
Legislation	3
Web Content Accessibility Guidelines (WCAG 2.1)	4
What is a VPAT?	4
What you need to know about reviewing a VPAT	5
A good VPAT	6
A bad VPAT – what are the warning signs?	6
VPAT checklist	7
Other ways of judging an organization's accessibility	8
Conclusion	8

Introduction



Digital resources have been well and truly embraced by general readers as well as educators and learners at all levels of education. And they have become further embedded in the wake of the COVID-19 crisis and the rapid shift to blended learning. However, with this growth in popularity, the accessibility of digital resources has become an ever more prominent issue. For users with disabilities, digital resources are a tremendous opportunity, but also a potential barrier where the technology doesn't support them.

Roughly 26% of US adults experience some form of disability, so it's clear why digital accessibility is now such a key issue for librarians. One of the many diverse tasks now falling to the library is ensuring that digital content is accessible to as many people as possible.

However, accessibility can be a tricky issue to address, especially if you're not well versed in the technical and legal aspects that surround it. This best practice guide will give you a clear overview of the legislation and documentation you need to be aware of relating to accessibility in the US. It will also help you to assess suppliers' documentation and compliance, ensuring you can go beyond the minimum requirements.

Before you get started, it's worth noting that it's extremely difficult for many products to be 100% conformant with Web Content Accessibility Guidelines (WCAG). However, there's still plenty that can be done to ensure your users have the best experience possible, regardless of any disability they may have.

Legislation

Accessibility rules in the United States are covered by The Americans with Disabilities Act (ADA) of 1990. This prohibits discrimination against individuals with disabilities in all areas of public life. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. When it comes to technology and web accessibility, ADA Title III is the most important part of the act to be aware of.

In addition, the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability and applies to any program that receives federal financial support. Section 508 of the Rehabilitation Act specifically requires federal agencies to develop, procure, maintain and use information and communications technology (ICT) that is accessible to people with disabilities – regardless of whether or not they work for the federal government.

What's more, accessibility is also enforced under various state laws. For example, New York State Human Rights Law, the New York State Civil Rights Law, the New York City Human Rights Law, and the Unruh Civil Rights Act California.



1 Source: [National Center on Birth Defects and Developmental Disabilities, Centers for Disease Control and Prevention, 2018](#)

Web Content Accessibility Guidelines (WCAG 2.1)



The Web Content Accessibility Guidelines (WCAG) are an internationally recognized set of recommendations for improving web-based content accessibility. They set out how to make digital services, websites and apps accessible to everyone, including users with vision, hearing, mobility and cognitive impairments.

Many laws adopt the WCAG criteria, include them by reference, or produce derivative variations of them to cover web, mobile, and software applications, and electronic documents.

More information is available [here](#).

What is a VPAT?

A VPAT, or Voluntary Product Accessibility Template, is used by suppliers of IT products to provide a comprehensive statement of a product's conformance with global accessibility standards, such as [W3C/WAI WCAG, Section 508 of the Rehabilitation Act](#) in the US, and [EN 301 549 of the Web Accessibility Directive](#) in the EU [2016/2102](#).

Essentially, the VPAT is the key document you will use when assessing a supplier's accessibility credentials.

A VPAT report must – as a minimum – provide the following information:

VPAT template

version: including the registered service mark (VPAT®)

Name of product:

including the version of the product being reviewed

Product

description: a brief explanation of the product

Date: specifying when the report was published

Contact

information: where follow-up questions can be sent

Notes: any further information about the product or the report (this may be left blank)

Evaluation methods

used: a description of the evaluation methods used in testing accessibility of the product

Application standards/ guidelines:

a clear indication of the standards or guidelines that are covered in the conformance report. A minimum of one applicable standard or guideline, or a combination of the three standards and guidelines that are applicable to the product being assessed

Terms: provides definitions of the conformance level terms used within the document.

Tables of each standard or guideline:

showing the responses to the criteria

TOP TIPS:

You can check the latest version of the VPAT template [here](#).

The accessibility consultancy Deque has published a [sample VPAT](#) that demonstrates many of the good practices explained below.

What you need to know about reviewing a VPAT



As a VPAT is a technical document, reading and interpreting it can be a challenge for those not familiar with accessibility principles and terminology. And unfortunately there's no summary section that says, 'yes, this is accessible'. However, the guidance below should make the process of reviewing VPATs a little easier to manage.

What you can expect to see when reviewing a VPAT

VPATs are dense, technical documents. Below, the different sections and terminology are explained to help you get to grips with them:



Standard terminology

Standard terms you'll find in a VPAT are 'Supports', 'Partially Supports' and 'Does Not Support'. If a VPAT you're reviewing doesn't use this terminology, then the author is probably using an outdated version or hasn't understood how to apply the standard phrasing.



One VPAT per product

Only one product should be included in each VPAT. Having a single VPAT for multiple products makes tracking requirements that are not supported very difficult.



Evaluation methods used

This section was added Following the 2018 Section 508 refresh. It describes the tools and methods that a supplier has used to evaluate the accessibility of their product. You may see assistive technologies such as screen readers like JAWS or NVDA, or voice input software like Dragon included here. You may also see a range of accessibility testing tools, such as Pa11y, axe, WAVE, Tenon, SortSite, and so on. Some suppliers may describe a specific evaluation method, such as WCAG-EM or Trusted Tester.



Conformance level

WCAG has three levels of conformance, denoted as Level A, AA, or AAA. Level A conformance is the lowest level of possible conformance. AA and AAA conformance include conformance to their preceding levels. Individual criteria are associated with a particular conformance level – generally speaking, the lower the level, the easier the criterion is to fulfill and/or the greater the impact it has on the user. Many organizations target Level AA, the same level expected by Section 508.



'Not evaluated'

This means that this product wasn't tested for a specific criterion. Often, VPAT authors specify this instead of having to put 'Does Not Support'. Wherever there is a 'Not evaluated' in the Level A or AA section, read this as 'Does Not Support'.

What is an accessibility conformance report (ACR)?

An ACR is a completed VPAT (the VPAT itself being a proprietary template published by the Information Technology Industry Council to be used in the production of an ACR). In practice, many suppliers and procurers use the term 'VPAT' for both the template and the finished product.

A good VPAT



There are a few things you can look out for to help you spot a VPAT that's been completed to a good standard.

You can feel more confident in a VPAT that:

- ✓ Clearly states the testing methods and tools that were used and outlines the document scope.
- ✓ Contains concise but thorough remarks and explanations, and reflects real components.
- ✓ Gives an honest disclosure of defects – no product will be 100% perfect, so seeing these defects clearly listed means that a thorough audit has been completed.
- ✓ Is publicly available – for example on the vendor's website, or clearly linked to from a public page like the vendor's Accessibility Statement or FAQ.

TIPS:

You can take a look at this [sample VPAT](#) published by Deque which demonstrates many of the good practices we've outlined.

A bad VPAT – what are the warning signs?

Just as there are signs that a VPAT has been completed well, there are plenty of indicators when one has been completed poorly.

Here's what to look out for:

<ul style="list-style-type: none"> ✗ An out of date template or mismatched formatting – for example, using the 'Supports', 'Supports with exceptions' terminology from VPAT v1, which was superseded in 2017. 	<ul style="list-style-type: none"> ✗ No useful detail in the 'Remarks and Explanations' column, for example: <ul style="list-style-type: none"> • Remarks column left blank • Remarks column just says 'yes' or 'no' without elaboration • Remarks text simply repeats the text of the associated WCAG criterion
<ul style="list-style-type: none"> ✗ A document that hasn't been updated for a long time – more than 12 months should ring alarm bells. 	<ul style="list-style-type: none"> ✗ Missing content – each cell on a VPAT table should have content. If a product meets a requirement, there must be a description of how this is achieved. If a product does not meet a requirement or only partially meets a requirement, then this must also be described in detail.
<ul style="list-style-type: none"> ✗ Everything marked as 'Supported' – 100% conformance is unlikely and may warrant further review. 	<ul style="list-style-type: none"> ✗ Too many 'not applicable' – many VPATs say 'Not Applicable' instead of 'Does Not Support'. Only when a product does not have a feature can the specification 'Not Applicable' be used. For example, if a VPAT for a video player specified 'Not Applicable' for the Captions requirement, then that would be a red flag.
<ul style="list-style-type: none"> ✗ Lots of marketing language – a VPAT is not the place for talking about how amazing and cost-effective a product is, it should be a 'warts and all' statement of fact 	<ul style="list-style-type: none"> ✗ Only automated testing is listed in the 'Evaluation Methods' section – automated testing tools can only test approximately 30% of all errors. If an audit consists only of automated testing, then the accessibility conformance cannot be accurately judged.

VPAT checklist

You can use this checklist to help you assess the quality of your supplier's VPAT. The answer to all these questions should be YES. If any of them is a NO, you need to go back to your supplier and ask for clarification.



Is the VPAT in the latest recommended format?	✓
Was the latest update within the last 12 months?	✓
Are scores provided in all the relevant columns?	✓
Are some criteria listed as 'Does Not Support' or 'Partially Supports'? (Remember, claims of 100% conformance can be a warning sign)	✓
Is the 'Remarks' column complete and examples provided where applicable?	✓
Are 'Not Applicable' criteria explained?	
Does the product documentation make reference to accessibility or the VPAT?	
Was the VPAT written by someone with adequate understanding? (A third party expert or a dedicated internal specialist)	
Does the VPAT list numerous assistive technologies that have been used to test the product?	
Does it indicate what has not been tested?	
Is the VPAT publicly available?	
Has contact information been provided so you can ask any follow-up questions?	



Other ways of judging an organization's accessibility



Once you've trawled through a VPAT and ticked the necessary boxes, you're likely to have a better idea of how a product meets accessibility standards. But it still doesn't give you the whole picture. How can you judge if a potential supplier is really serious about ensuring accessibility? Here are a few additional questions you can ask to help weed out the wheat from the chaff:

- Do they have people responsible for accessibility?
- Do they have a person – or a team – dedicated solely to accessibility?
- How senior are the people responsible for accessibility? A large organization that cares about accessibility will have recognized the need for it to be addressed across the organization, with support at a senior level.
- How long has the organization been addressing accessibility for?
- Who on their product teams is responsible for accessibility?
- Is the supplier part of [The Valuable 500](#) or similar organizations dedicated to improving accessibility?
- Do they develop sites with, not just for, people with disabilities?

Vendors that show an ongoing and serious commitment to the issue of accessibility are more likely to maintain and even improve the accessibility of their products over time, and that is what this issue demands. To succeed over the long-term, organizations must place accessibility front and center in all stages of design and development – e.g. “inclusive design”.

Conclusion

The need for digital content to be accessible is clear. Section 508 goes some way to ensure that the products and services you are purchasing meet the needs of your users. You can use this guide to help you to question the empty cells, the 100% conformance claims, unusual terminology in the VPAT and any other bad signs.

However, if your institution is serious about accessibility, don't be afraid to go further. Ask additional questions beyond the VPAT and speak to someone within the organization who is responsible for accessibility. This can help prevent problems further down the line and ultimately may benefit your users.

