

Accessibility in Technology Procurement and Use



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Introductions



- In Chat:
- Who are you?
- Organization, if you'd like
- What do you hope to get from today's workshop?

Logistics

- Ask questions any time
 - I will pause periodically to check in
- Brain break around halfway through the day

Context

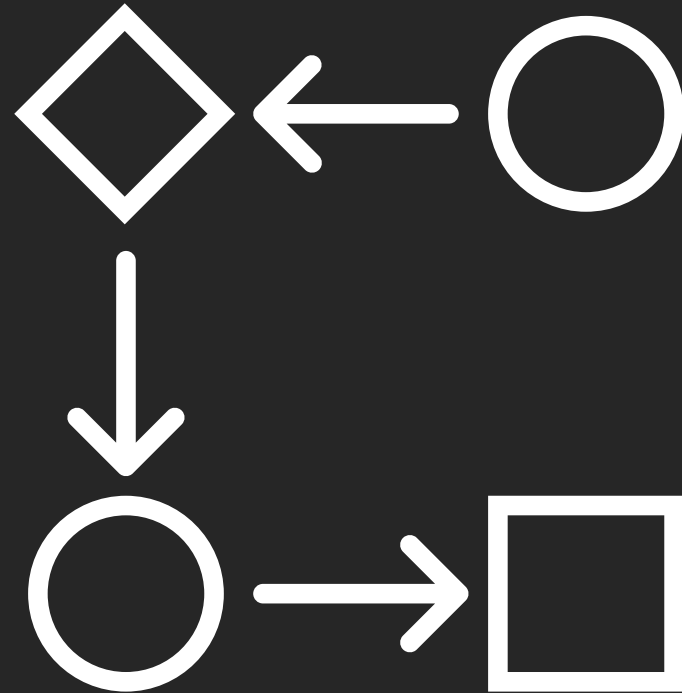
- Buying over building
- Bought or made doesn't matter to your audience
- Internal and external audience
- Civil rights issue
- Accessibility is a business need

Legal and Policy

- Civil Rights
 - Americans with Disabilities Act
 - Sections 503 and 504 of the US Rehabilitation Act
- Procurement policy
 - Section 508 of the US Rehabilitation Act
 - State policy or statute

Tools and Processes

- Must have both
- Process is critical
- Goals
 - Gather needed information
 - Protection



Balance

- Effort collecting information
- Value of the information
- Considering
 - People
 - Tools
 - Knowledge



Acceptable Slowing Down?

New tech stack or CMS



Implementing accessibility



Procurement Documentation

- Request for Information
- Request for Proposal
- Scoring Matrix
- Contract



Evaluation and Assessment

- Demonstrations
- Accessibility Conformance Report
- Direct Testing



Early Introduction

REQUESTS FOR INFORMATION/PROPOSAL

Goal

- Emphasize accessibility as a fundamental requirement
 - In writing
 - In meetings
 - In correspondence
- Reinforce with vendors and internally
- Specify what vendors must provide

Request for Information



- Conformance to the technical standard of reference



- Insight into vendor's accessibility practice

Accessibility in Vendor Practice

- Policy Driven Adoption of Accessibility
- Can scale this to fit
- Generally
 - How does the vendor address accessibility in its work/organization?
- Ideally: integrated into org, product lifecycle, etc.

Standard

- Web Content Accessibility Guidelines (WCAG)
 - Version (2.0, 2.1, 2.2)
 - Level (A, AA, AAA)
- Section 508
 - Scoping
 - Functional Performance Criteria
 - Agency Official Communication
- State or local

Americans with Disabilities Act Changes

- Specific to Title II
 - State and local government
- Requires WCAG 2.1 AA
- Includes products and content from a third party
 - Where there is “a contractual, licensing, or other arrangement...”

Section 504 Under Health and Human Services

- Aligns with Title II
 - Recipients of HHS funding
- Requires WCAG 2.1 AA
- Includes products and content from a third party
 - Where there is “a contractual, licensing, or other arrangement...”

Request for Proposal



- Product level
 - Good to ask about vendor level if no RFI issued
- Set high expectations
- Explain your vetting process

Require Specifics

- Accessibility demonstration
- Documentation about accessibility
- Expectations for documentation (current, complete, accurate, thorough)
- Direct testing requirements

Other RFI/P Considerations

- No response about accessibility?
 - Early indicator of **organizational will**
 - What do you do if a vendor doesn't send another piece of required information?
 - May be different for niche products
- Is all functionality addressed?
- Are response materials accessible?

Less Formal Documents

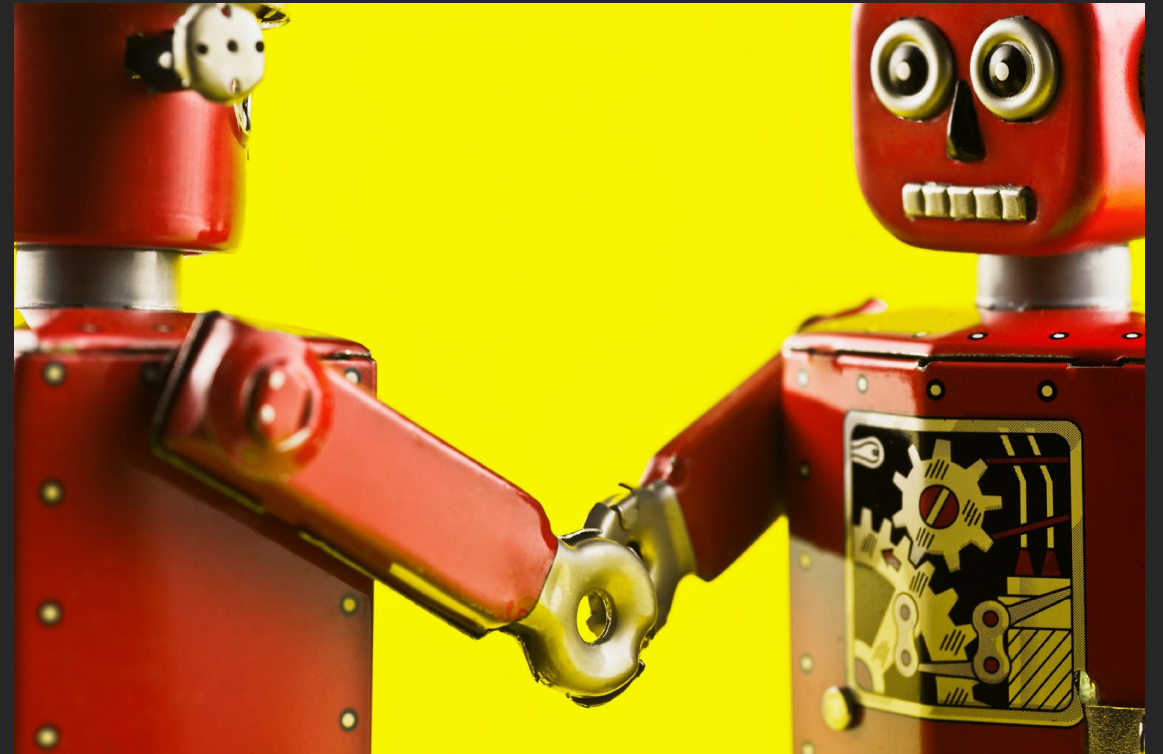
- Scope of Work
- Requirements Documentation

Hold Vendors Accountable

CONTRACTS

Goals

- Protect the purchasing organization
 - Invalid vendor claims
 - Incurring additional costs
 - Path for recourse
- Cautionary tales are common



Contract Language

- Codify what was in your RFP, etc.
 - Standards and such
- Detail what happens if barriers are discovered
 - Require roadmap for fixes
 - Detail timeline or who in your organization sets it
- How are fixes validated?
 - Third party? In-house?
- Terms to cancel contract (**organizational will** is key)

Something is Not Accessible

- How do you handle this with, say, information security?
- What is the risk of the barrier(s) identified?
- What is the risk tolerance overall?
- Emphasize: fixed at no cost to the purchaser
- [PEAT Works suggested language](#)

Similar Tool

- Memorandum of Understanding

Observe and Report

PRODUCT DEMONSTRATIONS

Structure



- Part of overall demo
- Have separate demo and Q and A
- Not either/or
- Accessibility-only is likely to gain more information
 - Recommended approach

Accessibility Demo Participants

- Purchaser
 - Likely, subset of overall team
 - Accessibility specialist, IT/web, product owner, etc.
- Vendor
 - Accessibility specialist, sales, UX design, web developer
- Make goals clear
- May require patience

Questions to Consider

- Vendor demos drag and drop
 - How can someone perform that action from the keyboard only?
- Can you tab to and through the navigation menu?
- How are those form fields and labels associated with each other?

Scoring a Demo

- Aim for consistency
- Put accessibility along side other scripted tasks
- Weigh meaningfully



Scoring a Question

- How are those form fields and labels associated with each other?
 - They aren't: 0 points
 - Incorrectly: 0 points
 - Using HTML “for” and “id”, “aria-labelledby”, “aria-label”, or implicit labeling: 5 points

The Details

VOLUNTARY PRODUCT ACCESSIBILITY TEMPLATE AND ACCESSIBILITY CONFORMANCE REPORT

Voluntary Product Accessibility Template

- Or, [VPAT](#)
- Template for vendors to self-disclose accessibility
- Based on different standards
- Tool that we can use more effectively
- [Making VPATs and ACRs More Effective](#)

Accessibility Conformance Report

- Or, ACR
- A completed VPAT
 - What you require
- Current
- Complete
- Accurate
- Thorough
- Let's look at an ACR

Vetting the ACR: General Information

- Information before technical conformance is critical
 - Product Information
 - Applicable Standards

Product Information

- Version
- Date
- Contact
 - Ask to specify role; nice to see an accessibility address or role
- Notes
 - Ask to include overview of vendor accessibility program
- Evaluation Methods Used
 - Ask for details, including if done by third party

Applicable Standards

- Does not show overall conformance
- Specifies which standards vendor uses

Vetting the ACR: Technical Information

- Technical conformance
 - Team with accessibility specialist, IT, etc.
 - Nitpick
 - Supports: ask specifically how
 - Partially supports: ask for specific locations where not supported, timeline for fixes
 - Does not support: ask for timeline for fixes

Supports: Example

- Supports: Product uses ARIA and alt attributes to provide images with text alternatives.
 - Possible Questions
 - How do you validate that these text alternatives convey intended meaning?
 - (Bigger picture): what guidance do you provide designers, developers, or content authors on writing text alternatives?

Supports: Example 2

- Form elements are programmatically associated with labels.
 - Possible questions
 - What technique(s) are used to make this association?
 - How do you validate this throughout the website?

Supports: Example 3

- Form elements are programmatically associated with labels using “for” and the “id” on the form elements.
 - Possible question
 - How do you validate this throughout the website?

Partially Supports

- Most structure and relationship information is provided through object information
 - Possible questions
 - Specifically, where is this not supported?
 - What techniques does the product use to implement this where it is supported?
 - What is the timeline for full support?

Does Not Support

- When will it?
- How is this part of the product roadmap overall?

Exercise

- [Read ACR](#)
- Discuss and document
 - Observations overall
 - Questions you would ask

Considerations and Thoughts

DIRECT TESTING

Necessary or Unnecessary?

- Free products, such as plugins
 - Higher likelihood: necessary
 - Many, such as in WordPress, will have documentation
- Paid products, with vetted accessibility documentation
 - Lower likelihood: necessary
 - If your vetting process, contract language, etc. is tip-top
- Why?
 - Have information to compare relatively

Perform Testing: How Much?

- Representative sample of pages or workflows
 - Most critical for people's user journeys
 - May have to ask for examples from live sites
 - Common with design projects
- Aim for consistency across products
 - Date picker in one, date picker in all
- Can get granular in RFP

Performing Tests



- WAVE or similar automated tool on representative sample
- Consider scaled back manual checks

Possible Manual Checks

- Accuracy of the web page's defined language
- Appropriateness of image alternative text
- Impact of empty links and buttons, if present
- Impact of labeled or unlabeled form inputs
- Impact of low contrast content
- Appropriateness of page title
- Presence and prevalence of animation and movement
- Presence of keyboard focus indicators
- Impact of other keyboard accessibility issues
- Page support for reflow and responsive design

Flexibility

- Track document vetting and direct testing to compare scores
- If they track consistently the same, may lessen testing
- Consider testing only some possible products
 - Larger audience
 - Specific audience
 - Business considerations
 - Program for people with disabilities, healthcare, finance, etc.
 - Internal audience, too

Share Results? Some Concerns

- Wrong message to vendors
- Internalization of costs by purchaser
- Sustain a market imbalance



Reducing Subjectivity

SCORING MATRIX

Due Diligence

- Document a thorough best effort
- Less subjectivity = less chance of accessibility disappearing
- (Hopefully) less likely that you'll need to demonstrate due diligence
- Be sure to review tools and processes regularly

Overall

- Consistently weigh accessibility
- Reinforce accessibility internally
- **Organizational will**



Scoring: The ACR

- Prioritize impact of items on ACR and set score, EG:
 - Critical, 0 points
 - Bad, 1 point
 - Moderate, 2 points
 - Recommended, 3 points
 - No issue, 4 points
- Similar approach to rate non-technical items
- An example from the [State of Minnesota](#), [University of Indiana](#)

Scoring Other Material

- Direct testing results
 - Like how you would rate technical ACR elements
- Vendor program maturity
 - Some in non-technical ACR elements
 - Policy Driven Adoption of Accessibility

Weighing Accessibility

- **Organizational will**
- Another internal reinforcer
- Is the organization OK if someone asks about it?
- Heavily enough to rule out product with bad accessibility
- Anyone willing to share if already done?



Planning for Inaccessibility

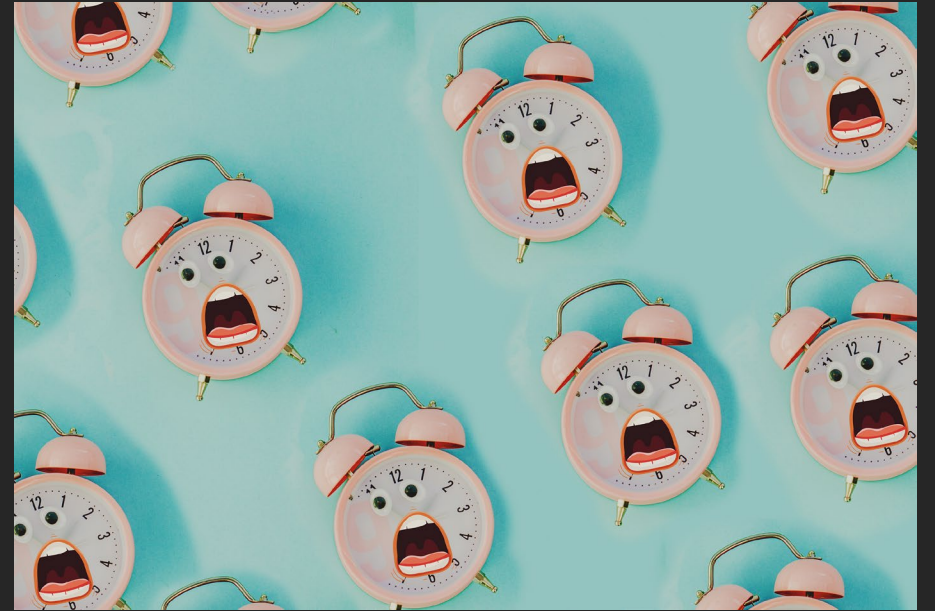
- Equally Effective Alternate Access Plan (EEAAP)
 - Proactively plan for accommodations

We Already Use That

LEGACY PRODUCTS

It's Not Too Late

- A different conversation
- Introduce vendors to your work
 - Discuss the “why”
 - Discuss the ask(s)
- Good relationships are key
- Messaging
 - Internally
 - Vendors



Internally



- Inventory third-party products
- Anticipate questions
 - Why?
 - Why now?
 - Why not before?
 - Do we have to?
 - Who says?
- **Organizational will**

Empathy

- Tone is key
- Focus on impact on audience
- Avoid “it’s accessibility’s fault”
- Understand
 - Some products are very familiar
 - Change is very difficult
 - Part of broader cultural change

Externally: Use Tools and Processes

- VPAT/ACR
- Contract, statement of work, etc.
- Conversations
- Meetings

Put Into Context for Vendors

- Focus on impact on audience
- You need their help to meet your goals
- Introduce at contract renewal or review period
 - Will vary based on relationship

Thank You!

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- E-mail discussion list
- Monthly newsletter
- Tutorials, articles, and resources
- Blog
- Fall conference

