

Accessibility in Your Gateway: Key Elements of Proving a Gateway Usable by All

Presenter: Hiram Kuykendall, CTO, Microassist

Date: 11/11/2020

Societal Values – Laws

Rehabilitation Act of 1973

- Section 501
- Section 503
- **Section 504**
- Section 505
- Section 508

Americans with Disabilities Act

- Title I—employment
- Title II—public entities (and public transportation)
- Title III—public accommodations (and commercial facilities)
- Telecommunications
- Miscellaneous

Civil Rights Law Civil rights laws guarantee rights for individuals to receive equal treatment and prohibits discrimination in a number of settings, including **education**, employment, housing, lending, voting, and more. –FindLaw

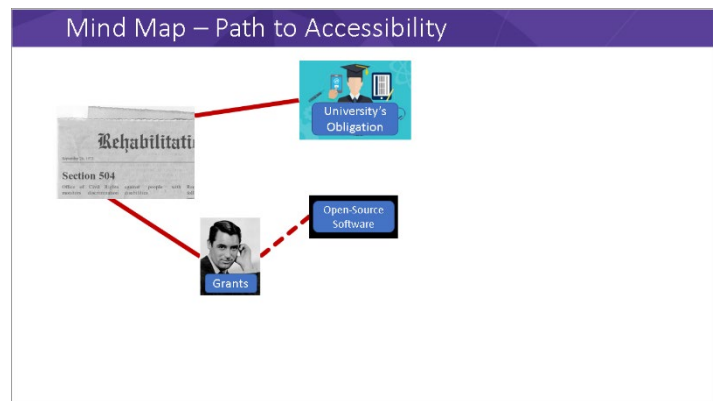
Section 504 Discrimination against people with disabilities in programs that receive federal financial assistance.

Takeaway: Universities are subject to 504.

Mind Map – Path to Accessibility



Universities are subject to Section 504.

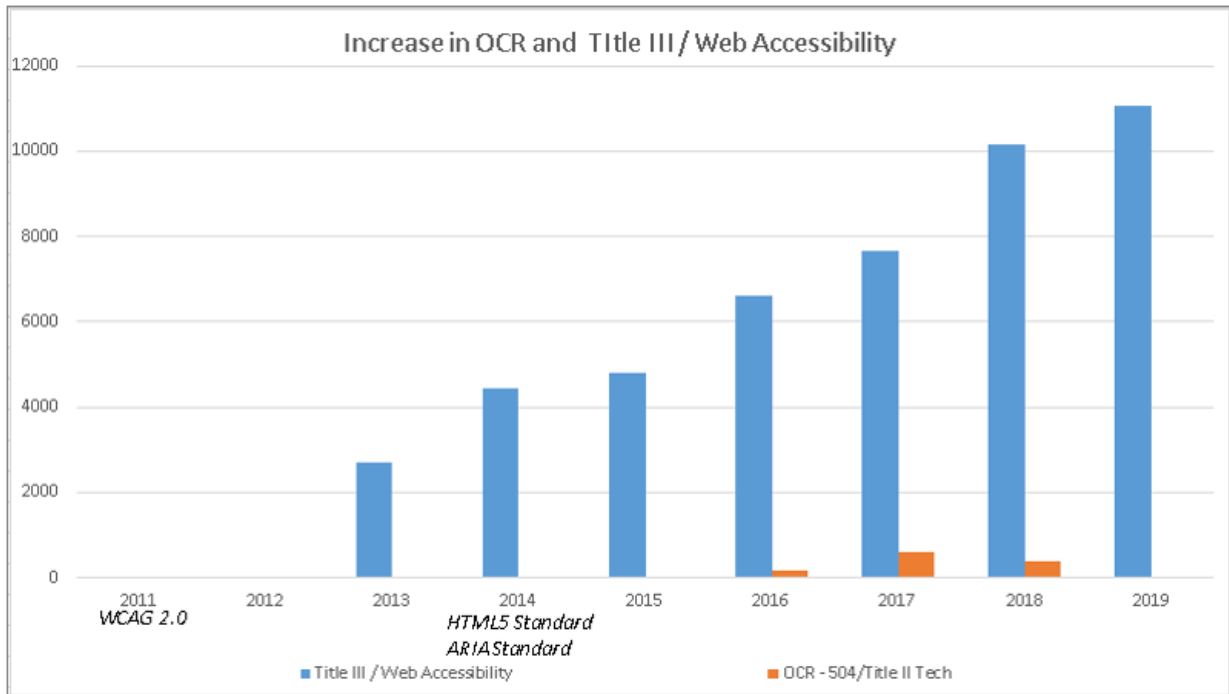
Open source products are not directly obligated unless they take federal funds such as grants.



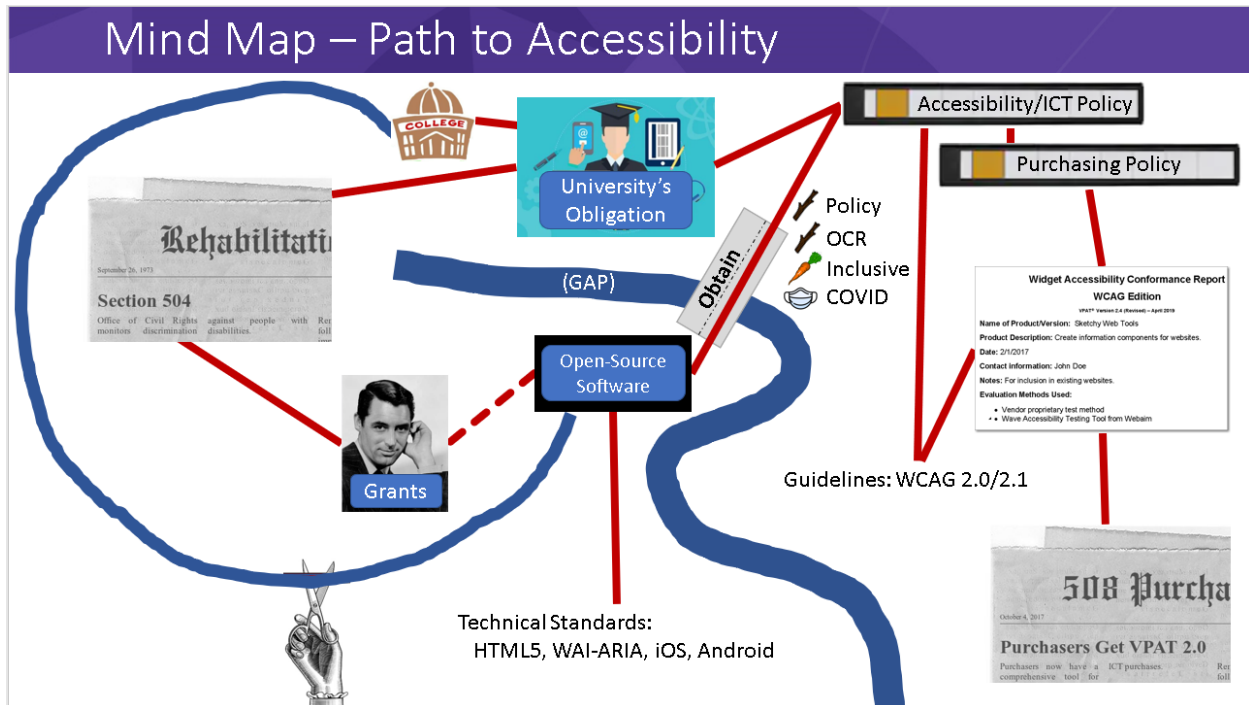
Section 508 and Information and Communication Technology (ICT)

Federal law - Federal agencies when they develop, **procure**, maintain, or use electronic and information technology.

 <p>Standards</p>	<ul style="list-style-type: none"> • 1999 Web Content Accessibility Guidelines 1.0 • 1999 HTML 4.01 Specification • 2001 VPAT - Create by Information Technology Industry (ITI)
 <p>Standards</p>	<ul style="list-style-type: none"> • 2008 Web Content Accessibility Guidelines 2.0 • 2014 HTML5 – W3C Recommendation • 2014 WAI-ARIA – W3C Recommendation • 2017 VPAT 2.0 – ITI <ul style="list-style-type: none"> ○ VPAT 2.4 508 edition ○ VPAT 2.4 WCAG edition ○ VPAT 2.4 EU edition ○ VPAT 2.4 INT edition • 2018 WCAG 2.1 W3C Recommendation



- [Federal ADA Title III Lawsuit Numbers Drop 15% for the First Half of 2020 But a Strong Rebound Is Likely](#)
- [VPAT Download](#)



- Mind Map shows purchasers under Section 508 or the Rehabilitation Act use the VPAT as part of the purchasing process.
- The VPAT includes the WCAG 2.0 and/or 2.1 accessibility guidelines.
- Most universities have evolved to have evolved to have an Accessibility/ICT Policy.
- Accessibility/ICT policies include directly or by reference a requirement to adhere to WCAG 2.0 and/or 2.1.
- All universities have purchasing policies. Most have adopted using a VPAT as part of the procurement process even if they are not subject to Section 508.
- From the university side, colleges and departments have been bringing open source software inhouse which bypasses the purchasing process. This caused a gap where inaccessible open source software is able to enter a university without accessibility checks.
- The gap is being closed for a variety of reasons to include: policy changes, OCR intervention, desire for inclusiveness, and changes in attitude and understanding resulting from COVID-19. These reasons are causing universities to adopt policies that evaluate open source software through the same lens as procured software.

VPAT 2.4 INT Edition Extract Requirements

Evaluation Method Used

Automated Testing

- Catches 30% to 40% of Accessibility Errors
- Technical Standards Adherence
- Tools: WAVE, Axe, IBM Equal Access Checker, etc.

Manual Testing

- Assistive Technologies (Screen Reader)
- Usability – Techniques
- Tools: JAWS, NVDA, Voiceover, Talkback

Standard/Guideline

- Higher Education – Significant Mobile Use
 - Varies Greatly
 - WCAG 2.1 Level AA (Private)
 - WCAG 2.0 Level AA (Public)
- Federal Government – Section 508 (Law)
 - WCAG 2.0 Level AA

[Company] Accessibility Conformance Report
International Edition
 (Based on VPAT® Version 2.4)

Name of Product/Version:
 Report Date:
 Product Description:
 Contact Information:
 Notes:
Evaluation Methods Used:
Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included in Report
Web Content Accessibility Guidelines 2.0	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)
Web Content Accessibility Guidelines 2.1	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)

Full Product (Product + Documentation + Support)

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p>1.1.1 Non-text Content (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Electronic Docs: Software: Closed: Authoring Tool:</p>	<p>Web: Electronic Docs: Software: Closed: Authoring Tool:</p>

Conformance Level

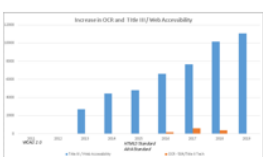
- Web: Web-based Product
- Electronic Documents: Supporting documentation (Training, Documentation, Guides)
- Software: Non-web Software Products
- Closed: Standalone – Kiosk

Terms

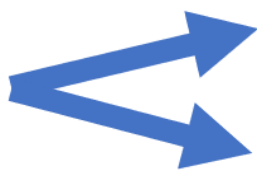
- Supports
- Partially Supports
- Does Not Support
- Not Applicable
- Not Evaluated

Compliance Vs. Usability

Supports: The functionality of the product has at **least one method** that meets the criterion without known defects or meets with **equivalent facilitation**.

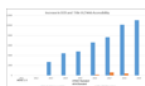


Graph Graphic



	2008	2011	2012	2013	2014	2015	2016	2017	2018	2019
Title III / Web A	0	0	0	2700	4436	4789	6601	7663	10163	11053
OCR - 504/Title	0	9	7	8	16	15	154	598	381	

One Method: Export to Excel, Word



Equivalent Facilitation: Accessible SVG Graphic

Full Product (Continued)

Table 1: Success Criteria, Level A
Notes:

Criteria	Conformance Level	Remarks and Explanations
<p>3.1.1 Non-text Content (Level A) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Electronic Docs: Software: Closed: Authoring Tool:</p>	<p>Web: Electronic Docs: Software: Closed: Authoring Tool:</p>

Remarks and Explanations

- Detailed remarks should be provided in the Remarks and Explanations column to justify your answer in the Conformance Level column.
- When the conformance level is 'Partially Supports' or 'Does Not Support', the remarks should identify:
 1. The **functions or features with issues**
 2. How they do not fully support
- If the criterion **does not apply**, explain why.
- If an **accessible alternative** is used, describe it.

Chapter 3: Functional Performance Criteria (FPC)

Future Technology

Chapter 4: Hardware

Phone Systems, Fax Machines, Kiosks

Chapter 5: Software

Non-web Software: Desktop, Command Line

Chapter 6: Support Documentation and Services

Examples: 603.1: General: help desks, call centers, training services, and automated self-service technical support, ...

Vocabulary: **Information and Communication Technology**

- Software used to create public-facing websites
- Software used by employees in the performance of their work
- Externally hosted websites or services used by the public or agency employees
- Copiers and fax machines
- Telephone systems
- Interactive voice response (IVR) systems
- Smartphones
- Mobile Apps
- Software (web, desktop, mobile app)
- Digital documents
- Kiosks