

# Evaluating Vendors' Voluntary Product Accessibility Templates (VPATs®)

Version: 3.00

## Purpose Statement

This best practice guidance is for the State of Minnesota [Accessibility and Usability Standard for Information Technology \(PDF\)](#). The State of Minnesota may evaluate the accessibility of vendors' proposed IT solutions using documents called Voluntary Product Assessment Templates®, or VPATs®. Vendors use these documents to self-identify their product's accessibility.<sup>1</sup> This guidance provides reviewers with best practices on evaluating the VPATs. This is a reference tool, designed to be a resource for reviewers who have received training in evaluating VPATs.

## Roles and Responsibilities

This guidance is to be followed by everyone involved in evaluating vendors to executive branch agencies, such as those who respond to a Request for Proposal (RFP) or similar solicitation. Non-executive branch entities are encouraged to use this guidance.

## Applicability

The State has adopted the Information Technology Industry Council's (ITI) [VPAT® template](#), version 2.0 or newer. Whether the vendor uses that template or a different version, the key is the document include all aspects of the [State Accessibility Standard](#) (Revised Section 508 and Web Content Accessibility Guidelines (WCAG) 2.0, levels A and AA). Complex systems, such as those with multiple interfaces, may require multiple VPAT documents, such as a WCAG 2.0 AA VPAT for each interface.

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<sup>1</sup> As with any vendor claims or guarantees, it is critical the contents of the VPATs regarding product accessibility are accurate as they may carry into the final contract language.

Note: a vendor who completes a VPAT may call the final document an Accessibility Conformance Report, or ACR, if it includes additional documentation such as evaluation methods used. The ITI’s VPAT documentation details the requirements for the ACR designation.

We recommend potential vendors be directed to the document “VPAT Guidance for Vendors.” We also recommend potential vendors also read this guidance as it provides a recommended approach to completing the template.

Each VPAT will have a raw score assigned to it by the evaluator. Scores are assigned from a range of 0 to 5, as defined below. The maximum possible score for each VPAT is 5.

In table 1 are the scoring ranges for VPATs:

| Score | Score Meaning   |
|-------|---|
| 0     | <b>Not enough information:</b> No data provided, same answers for multiple criteria, or copied criteria. The vendor has not met any of the requirements for Sections 508 or WCAG 2.0 or provided no information.  |
| 1     | <b>Inaccessible:</b> The vendor’s information indicates little to no awareness of the accessibility requirements or provides little or no data or clearly lacks significant accessible functionality.   |
| 2     | <b>Low accessibility:</b> The vendor’s information provides limited data on their ability to support the requirements.  |
| 3     | <b>Average:</b> The vendor’s information provides some data on how the solution supports the accessibility requirements defined in Section 508 and WCAG 2.0 levels A and AA. However, there is not enough data to be assured of accessibility or to be confident in the vendor’s ability to improve the solution’s accessibility. |
| 4     | <b>Good:</b> The vendor’s information indicates knowledge of how the solution supports each criterion and there is sufficient data to negotiate future improvements.  |
| 5     | <b>Exceptional:</b> The vendor demonstrates extensive knowledge of accessibility and is able to illustrate how the solution supports most or all criteria. Where the solution does not support criteria, the vendor provides a documented roadmap toward future compliance.   |

## Scoring a VPAT/ACR

Properly completing a VPAT **requires the vendor include comments for each item** in the “Remarks and Explanations” section. The detail in Remarks and Explanations should cite specific examples of how the vendor satisfies the criteria or show how the vendor resolved any key accessibility issues.

For example, compare these two vendors’ responses to the same question about keyboard accessibility:

In table 2, below, the vendor claims full support, but offers no documentation;

| Criteria  | Conformance Level   | Remarks and Explanations |
|---|---|--------------------------|
| <a href="#">2.1.1 Keyboard</a> (Level A)<br>Also applies to:<br>Revised Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Web: Supports<br><br>Electronic Docs:<br><br>Software:<br><br>Authoring Tool: |                          |

In table 3, below, the vendor claims less than full support, but details the issue;

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| <a href="#">2.1.1 Keyboard</a> (Level A)<br>Also applies to:<br>Revised Section 508 <ul style="list-style-type: none"> <li>• 501 (Web) (Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Web: Partially supports<br><br>Electronic Docs: Supports<br><br>Software:<br><br>Authoring Tool: | All features are keyboard accessible save for freehand drawing tools and the following exceptions:<br><br>In the “Task Complete” popup dialog, keyboard focus remains on the main page. Workaround available in alternate view.<br><br>Pop-up date picker not available to the keyboard in forms. Work-around in keyboard entry of dates.<br><br>All manuals and supporting documents are indexed by a Table of Contents so users can arrow or tab to the desired section. |

Even though the first vendor claims full support, if the entire VPAT is completed in this way, without useful documentation, the VPAT should score close to zero unless the reviewer has other information that somehow provides assurances for accessibility. In contrast, while the second vendor’s product is not fully accessible, the issues are clearly documented, including workarounds.

Also note that the second vendor answered the question for both the product and the supporting documentation.

If the entire document similarly demonstrates reasonably strong accessibility with relatively limited flaws, the vendor should score in the “Good” to “Exceptional” range.

## Role of comments in “Remarks and Explanations”

As stated earlier, comments are expected for all criteria. Note: the comments should reflect the **vendor’s unique understanding of the product’s accessibility**. For example, if the vendor simply pastes the criteria’s text into the comment field, evaluators would treat this as no comment. As an example, the criteria of WCAG [2.1.1 Keyboard](#) reads “All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user’s movement and not just the endpoints.”

Let’s compare a cut-and-paste with the second example from above:

| Criteria  | Conformance Level   | Remarks and Explanations  |
|---|---|---|
| <a href="#">2.1.1 Keyboard</a> (Level A)<br>Also applies to:<br>Revised Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Web: Supports<br>Electronic Docs:<br>Software:<br>Authoring Tool: | All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user’s movement and not just the endpoints. |

At first this looks like a good response, until you realize the vendor simply used the WCAG criteria for the remarks section. If the entire VPAT is like this, with no original content, then while you can appreciate the vendor’s effort in looking up the criteria and pasting it into the document, it doesn’t tell us anything about the product. Evaluators do not have sufficient information to have confidence the vendor has accurately assessed the product’s accessibility.

### *What about responses provided in a different format?*

Sometimes vendors provide the information in a proprietary or alternate format. The key question to address is: does the vendor demonstrate knowledge of how the product supports the state accessibility standard? Can the buyer use this information to effectively negotiate future improvements and other contractual requirements?

For example, one vendor used the following statements as the entirety of their response to the WCAG 2.0 subsection of the VPAT:

*We meet all the requirements of WCAG 2.0, Level AA of the VPAT.*

*We meet all the requirements of WCAG 2.0, Level A as well but there is one caveat*

*1.4.1 Use of Color: Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element*

*Our main indicator of status of logged in or out is via color except on Firefox where we have different shades or different icon choices available (for accessibility purposes)*

While the vendor does provide one piece of useful information, the statement remains too general to be helpful. Score any such responses a 1 at the most.

Overall, scoring should reflect document analysis on two levels:

- a. Quality of the content, especially in the “Remarks and Explanations” column, and
- b. Product/service’s stated accessibility (the assumption is the VPAT’s content is included in any resulting contract; any negative discrepancy is the vendor’s responsibility)

## **WCAG and Section 508 Scoring**

The scoring document breaks down the score into two buckets: WCAG and 508.

A product eligible for a VPAT can be one or any combination of the following technologies:

- Website or web application
- Software
- Video
- Electronic documentation
- Hardware
- Training delivered in electronic formats

For example, a web-based training program may be a combination of web application and video. A native mobile app is software. Microsoft Word is software that is also classified as an “authoring tool.” Electronic documentation is any electronic support information such as manuals, user guides, and other technical resources. The documentation could be in a variety of formats including Microsoft Word, PDF and web pages.

### *Websites, web applications, and video*

The vendor is expected to complete the following sections:

- WCAG A and AA (for both the product and electronic documents)
- Section 508 Chapter 3 Functional Support Criteria (only if WCAG information is limited or documents limited support for accessibility). See Appendix A for more detail on Chapter 3.
- Section 508 Chapter 6 Support Documentation and Services

The WCAG section typically contains the bulk of the useful information. If there is little to no information in the Section 508 material, the reviewer will need to determine whether the WCAG content applies to Chapters 3 and 5. For example, if the vendor includes documentation information in both conformance data and comments, then that can answer the issues raised in Chapter 6. In those cases, the reviewer can score the 508 sections as if content was provided.

### *Software*

The vendor is expected to complete the following sections:

- WCAG A and AA (for both the product and electronic documents)
- Section 508 Chapter 5: Software
- Section 508 Chapter 3: Functional Support Criteria (only if the WCAG and Chapter 5 information is limited or documents limited support for accessibility) See Appendix A for more detail on Chapter 3.
- Section 508 Chapter 6 Support Documentation and Services

### *Hardware*

The vendor is expected to complete the following sections:

- WCAG A and AA (for electronic documents)
- Section 508 Chapter 4: Hardware
- Section 508 Chapter 6 Support Documentation and Services

Nearly all products should have supporting documentation. Exceptions may include web sites, reseller contracts where the product is an online catalog, or when the deliverable is a document.

### *Electronic documentation*

The vendor is expected to complete the following sections:

- WCAG A and AA

Section 508 is not relevant for this deliverable, as the electronic document is expected to be accessible. For example, if a vendor uses Section 508 Chapter 3 to list workarounds, then the document will not be accessible.

## **Completing the score sheet**

The VPAT score sheet provides space for both WCAG and Section 508 scores. Except for hardware, the WCAG score is the more critical of the two. So when evaluating websites, web applications, software, and authoring tools, double the WCAG score, add the 508 score, then divide by three:

$$\frac{2(WCAG\ Score) + (508\ Score)}{3}$$

For hardware products, the vendor should use WCAG for the documentation, so weigh both WCAG and 508 scores equally then divide by two for the average, as in the following formula:

$$\frac{(WCAG\ Score) + (508\ Score)}{2}$$

For electronic documents, use only the WCAG score.

## **Related Information**

- [Section 508 \(Revised\)](#) of the Rehabilitation Act of 1973
- [Web Content Accessibility Guidelines \(WCAG\) 2.0](#)
- Office of Accessibility: [public resources](#)

## History

Table 4 is a version history for this document.

| Version | Description                                    | Date       |
|---------|--|------------|
| 1.0     | Initial Release                                | 12/06/2013 |
| 1.5     | Reformatted                                    | 10/31/2014 |
| 2.0     | Updated and reformatted                        | 02/09/2015 |
| 3.0     | Updated to incorporate 508 refresh and VPAT2.x | 01/11/2023 |

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# Appendix A: Functional Support Criteria

Vendor should complete Section 508 Chapter 3, Functional Support Criteria (FSC) when:

- The technology is innovative or works in a way which WCAG, or other 508 criteria, only partially applies (e.g., success criteria has yet to be written).
- Vendor does not support or partially supports WCAG success criteria that is relevant to the 302 criteria
- Vendor provides a workaround or alternative means/equivalent facilitation

How to evaluate Chapter 3:

- Response is considered acceptable for scoring if one of the following is true:
  - Chapter 3 is blank, but rest of document provides detailed information
  - FSC content reiterates where vendor is unable to provide support in WCAG.
  - FSC content identifies workarounds to WCAG failures
- Response receives a 0 if either of the following is true:
  - WCAG portion provides limited information and Chapter 3 is blank
  - WCAG portion notes areas where solution “does not support” or “partially supports” with no workaround or alternative and Chapter 3 is blank
- Scoring rubric: still needs to be defined