VPAT Guidance for Vendors

Overview
This document provides general guidance for vendors in completing VPAT (voluntary product assessment template) documents. This guidance is purely advisory; it is intended as a tool to help vendors understand their obligations when communicating the accessibility of their product and services.

If your company has a Section 508 VPAT on file for the product in question, you still have to complete a WCAG 2.0 VPAT.

The Purpose of VPATs
VPATs provide the potential buyer with your company’s assessment of your product’s accessibility. The VPAT documents are based on the State’s accessibility standard, which combines Section 508 of the 1973 Rehabilitation Act and the World Wide Web Consortium’s (W3C) Web Content Accessibility Guidelines (WCAG) 2.0. (When Section 508 completes its “refresh” it will map to WCAG where appropriate and there will be only one VPAT document.)

How To Complete a VPAT
We recommend that technical staff with training in accessibility complete your VPAT forms. If there is no such person on your staff, you may want to hire a vendor that specializes in accessibility assessments to perform the task. In addition, we recommend you refer to the Resources section at the bottom of this document for additional information.

Should the State enter into a contract with your company, your VPATs will most likely become part of the final contract as legal documents detailing your offering’s capabilities and creating specific expectations for deliverables. So it is critical that you have confidence in your VPATs’ clarity and accuracy.

General process
The VPATS are organized in tables with four columns.

- **Item:** Identifies the segment of the relevant standard.
- **Description:** The technical requirement.
- **Supports?:** Your product’s level of support for the technical requirement. This cannot be a yes or no answer. See “Recommended language” below.
- **Comments:** The rationale for your answer in the previous column.

Comments are mandatory. They enable you to validate your answers in the “Supports?” column. The quality of the comments also indicate the skill level of the person who completed the document. This is a key indicator of the vendor’s approach toward accessibility and therefore the product’s viability as a candidate for procurement.
**Recommended Language**
The recommended language is based on guidance from Section 508. There are five core terms:

- Supports
- Supports with Exceptions
- Supports through Equivalent Facilitation
- Does not Support
- Not Applicable

This table outlines each term’s meaning:

<table>
<thead>
<tr>
<th>Language</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supports</td>
<td>Product FULLY meets the letter and intent of the Criteria.</td>
</tr>
<tr>
<td>Supports with Exceptions</td>
<td>Product does not ENTIRELY meet the letter and intent of the Criteria, but does provides some level of access.</td>
</tr>
<tr>
<td>Supports through Equivalent Facilitation</td>
<td>Product provides alternative methods to meet the intent of the Criteria.</td>
</tr>
<tr>
<td>Does not Support</td>
<td>Product does not meet the letter or intent of the Criteria.</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>The Criteria does not apply to the product.</td>
</tr>
</tbody>
</table>

This table provides some information on the level of detail expected in the Comments column:

<table>
<thead>
<tr>
<th>If 2nd column states…</th>
<th>Then…</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supports</td>
<td>List exactly what features of the product do meet and describe how they are used to support the Criteria.</td>
</tr>
<tr>
<td>Supports with Exceptions</td>
<td>List exactly what features of the product do meet and describe how they are used to support the Criteria. AND List exactly what parts of the product do not meet and describe how they fail to support the Criteria.</td>
</tr>
<tr>
<td>Supports through Equivalent Facilitation</td>
<td>List exactly what other methods exist in the product and describe how they are used to support the Criteria.</td>
</tr>
</tbody>
</table>
| Does not Support      | Describe exactly how the product does not support the
If 2\textsuperscript{nd} column states… | Then…
---|---
Criteria. |
Not Applicable | Describe exactly \textbf{why} the Criteria is not applicable to the product.

In addition to these terms, there are some instances where vendors may want to use other terms. Specifically in:

- WCAG 2.0 Guideline 4.1, Compatible: Maximize compatibility with current and future user agents, including assistive technologies.
- Section 508 Subpart C (1194.31): Functional Support Criteria.

These two segments focus on how well the technology works with user agents or assistive technology. Respondents must take care to ensure that the answers dovetail with previous answers. For example, if a vendor were to state that a feature “Supports when combined with Compatible Assistive Technology,” we would expect that the technology would also Support accessibility in the relevant earlier sections. In other words, the vendor cannot use assistive technology in place of technical compliance elsewhere.

If 2\textsuperscript{nd} column states… | Then…
---|---
Supports when combined with Compatible Assistive Technology | Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible Assistive Technology. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for people who are blind).

Not Applicable -- Fundamental Alteration Exception Supplies | Use this language when you determine a Fundamental Alteration to the product would be required to meet the Criteria (see the Access Board standards for the definition of “fundamental alteration”).

Resources

- Section 508: [http://section508.gov/summary-section508-standards](http://section508.gov/summary-section508-standards)
- WCAG 2.0: [http://www.w3.org/TR/WCAG20/](http://www.w3.org/TR/WCAG20/)
- SSA guidance for contractors: [http://www.ssa.gov/accessibility/contractor_resources.html](http://www.ssa.gov/accessibility/contractor_resources.html)