The Information Technology Industry Council (ITIC) has published recommended language to be used in completing VPAT documents that has been designed to create simplicity and uniformity/consistency in VPATs presented by a variety of suppliers. In preparing the VPAT, TFA has used the ITIC-recommended *VPAT Summary Description and Suggested Language for Completing VPAT* that can be found in *Appendix A*.

Based on this evaluation and on information published on the ITIC website (<http://www.itic.org>), TFA presents the following VPAT document for the Bookshelf *Online application*, as laid out in the following tables:

## Table 1: Section 1194.22 Web-based Internet Information and Applications – Detail

|  |  |  |
| --- | --- | --- |
| **Section 1194.22 Web-based Internet information and applications**  **Voluntary Product Accessibility Template** | | |
| **Criteria** | **Supporting Features** | **Remarks and explanations** |
| (a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content). | Supports. | Text alternatives are provided all images. |
| (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. | Not Applicable | There are no multimedia presentations in Bookshelf Online interface. |
| (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. | Supports | Color is not used as the sole means of communicating information. |
| (d) Documents shall be organized so they are readable without requiring an associated style sheet. | Does not Support | Style sheets are required for interactive screens. It should be noted that currently users of assistive technology would have full access to style sheets. |
| (e) Redundant text links shall be provided for each active region of a server-side image map. | Not Applicable | There are no server side image maps used in this site. |
| (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. | Not Applicable | There are no server side image maps used in this site. |
| (g) Row and column headers shall be identified for data tables. | Not Applicable | Bookshelf Online does not use tables. |
| (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. | Not Applicable | There were no complex data tables found. |
| (i) Frames shall be titled with text that facilitates frame identification and navigation | Does not Support. | iFrame in the Book Reader is not labeled. |
| (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. | Supports | Pages do not contain flashing elements. |
| (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes. | Does not Support | No accessible text page is provided. Nor it is practical to supply a text only page with equivalent functionality. Compliance with this paragraph can be achieved by fixing all other accessibility issues. |
| (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology. | Supports with Exceptions. | ARIA menus are not correctly implemented. |
| (m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with 1194.21(a) through (l). | Not Applicable | Plug-ins are not required. |
| (n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues. | Supports with Exceptions | Most of the application’s form controls are labeled with a couple of exceptions on My Account page and the Search edit box in the Book Reader. |
| (o) A method shall be provided that permits users to skip repetitive navigation links. | Supports | Heading and region navigation can be used to skip navigation links. |
| (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required. | Supports | Timed responses are not required. |

## Table 2: Section 1194.31 Functional Performance Criteria – Detail

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| --- | --- | --- |
| **Section 1194.31 Functional Performance Criteria Detail Voluntary Product Accessibility Template** | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| (a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for assistive technology used by people who are blind or visually impaired shall be provided. | Supports when combined with Compatible Assistive Technology | Most content can be accessed with screen readers. |
| (b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for assistive technology used by people who are visually impaired shall be provided. | Supports with Exceptions | Use of low contrast text styles causes poor visibility of some text elements. |
| (c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for assistive technology used by people who are deaf or hard of hearing shall be provided | Supports | Audio is not used. |
| (d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided. | Not Applicable | Audio is not used. |
| (e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for assistive technology used by people with disabilities shall be provided. | Not Applicable | Speech is not required to operate this web site. |
| (f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided. | Supports with Exceptions. | Most portions of the user interface are keyboard accessible, except selecting text for highlighting or adding notes. |

## Table 3: Section 1194.41 Information, Documentation, and Support

|  |  |  |
| --- | --- | --- |
| **Section 1194.41 Information, Documentation and Support**  **Voluntary Product Accessibility Template** | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| (a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge | Supports | Support documentation is available as online HTML help. |
| (b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge. | Does not Support | Accessibility features are not documented. |
| (c) Support services for products shall accommodate the communication needs of end-users with disabilities. | Supports | Support is provided by web, phone, or email. |

# 5. Concluding Remarks

The accessibility assessment conducted for this project indicates that the Bookshelf Online application mostly conforms to the Section 508 Accessibility Standards with some exceptions. However, these exceptions will pose significant accessibility barriers for users who are visually and mobility impaired.

TFA is confident that the issues identified are not unduly complex. By remediating the accessibility and usability issues listed in this report and by implementing TFA’s recommendations, VST can achieve not only conformance with the WCAG 2.0 (Level A & AA) Accessibility Guidelines andSection 508 requirements, but also be fully usable by its customers with disabilities.

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# 6. Next Steps

Upon TFA’s submission of this report, TFA anticipates no additional work under this evaluation other than the recommended conference call with the VST technical staff. The purpose of that call is to clarify the contents of this report if needed and to answer any questions arising from TFA’s evaluation.

Given the number and severity of accessibility and usability barriers found to be present in the Bookshelf Online application, TFA recommends that VST integrates the TFA team into the development process for accessibility evaluation of the application prior to review by VST’s internal Q&A team. Using already approved T&M agreement, TFA is confident that this approach will result in a more streamlined and effective evaluation process for the entire VST team.

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# 7. Acknowledgement

The TFA team would like to express its gratitude for the support received from VST‘s technical and management staff. We would particularly like to express our appreciation to Rick Johnson for his commitment and efforts to plan, organize, coordinate, and execute this project. TFA also wishes to express its appreciation to Phil Burrows for his technical support throughout the evaluation process.

# Appendix A: Background On VPAT

To facilitate effective communication between producers of products and services and those who acquire them concerning the accessibility of specific products, an accessibility information template was created by a joint government and industry effort. The VPAT document was created by the Information Technology Industry Council ([www.itic.org](http://www.itic.org)) based on Section 508 Standards established by the United States Access Board ([www.access-board.gov](http://www.access-board.gov)) in 2001.

The use of the VPAT as an evaluation tool has enabled companies and organizations to self-document and formally attest to conformance and nonconformance with specific Section 508 accessibility requirements point by point. Its purpose is to assist federal and state contracting officials and other purchasers in making preliminary assessments regarding the availability of commercial Information and Communication Technologies (ICT) products and services with features that support accessibility. Vendors are frequently required to submit VPATs with their responses to RFPs and other government purchasing proposals.

For each ICT product category to which Section 508 applies, three different requirements need to be addressed. (Complete information regarding these requirements can be found at the [www.section508.gov](http://www.section508.gov) and [www.itic.org](http://www.itic.org) websites):

1. Specific Requirements, corresponding to specific product groups:
   * Section 1194.21 Software Applications and Operating Systems
   * Section 1194.22 Web-based Internet Information and Applications
   * Section 1194.23 Telecommunications Products
   * Section 1194.24 Video and Multimedia Products
   * Section 1194.25 Self-Contained, Closed Products
   * Section 1194.26 Desktop and Portable Computers
2. Section 1194.31 Functional Performance Criteria, “Functional Performance Criteria,” applying to all product groups
3. Section 1194.41 Information, Documentation, and Support: General Requirement, “Information, Documentation, and Support,” applying to the information provided *accompanying* all ICT products. Thus FAQ’s, Manuals and the like must all be accessible.

Considering that the VPAT carries important information for the procurement official, it is essential that a supplier/producer provide an accurately prepared VPAT that fairly and responsibly represents its product and/or service.

**Suggested Language For Completing VPAT**

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITIC ([www.itic.org](http://www.itic.org)) has developed suggested language for use when filling out a VPAT document. The following table provides the suggested language.

*Column 1 - Supporting Features*

*Column 2 - Remarks and Explanations*

Feedback from procurement officials and customers shows that providing further explanation regarding features and exceptions is especially helpful. Use this column to detail how the product addresses the standard or criteria by:

* Listing accessibility features or features that are accessible
* Detailing where in the product an exception occurs

Explaining equivalent methods of facilitation (definition of "equivalent facilitation" -see 36 CFR 1194.5.)

|  |  |
| --- | --- |
| **Supporting Features** | **Recommended Language** |
| Supports | Use this language when you determine the product fully meets the letter and intent of the Criteria. |
| Supports with Exceptions | Use this language when you determine the product does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria. |
| Supports through Equivalent Facilitation | Use this language when you have identified an alternate way to meet the intent of the Criteria or when the product does not fully meet the intent of the Criteria. |
| 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). |
| Does not Support | Use this language when you determine the product does not meet the letter or intent of the Criteria. |
| Not Applicable | Use this language when you determine that the Criteria do not apply to the specific product. |
| Not Applicable - Fundamental Alteration Exception Applies | Use this language when you determine a Fundamental Alteration of the product would be required to meet the Criteria (see the access board standards for the definition of "fundamental alteration"). |