Voluntary Product Accessibility Template® (VPAT®) WCAG Edition
Version 2.2
September 2019

About This Document

The VPAT is provided in four editions based on the guidelines/standards being evaluated. This is the WCAG edition of the VPAT. It includes the following standards/guidelines:

- Web Content Accessibility Guidelines 2.0, at
  http://www.w3.org/TR/2008/REC-WCAG20-20081211/

If you need a different combination of standards/guidelines then use the appropriate alternate edition of the VPAT found on https://www.itic.org/policy/accessibility/vpat. The choices are WCAG, Revised 508, EN 301 549 and International that includes all three.

This document is broken into two main sections:

- Essential Requirements and Best Practices for using the VPAT® to complete an Accessibility Conformance Report
- The VPAT Template

Please carefully review the Essential Requirements and Best Practices sections before using the VPAT to create an Accessibility Conformance Report. This edition of the VPAT 2.2 template includes criteria from WCAG 2.0.

Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors

This section provides guidance for reporting product conformance for three major accessibility standards and guidelines using the VPAT® to produce the Accessibility Conformance Report. Deviating from these guidelines precludes vendors from referencing the template by name and/or the VPAT acronym. The purpose of these essential requirements and best practices are to promote accurate and consistent reporting of product accessibility information.

The VPAT is a template used to document a product's conformance with accessibility standards and guidelines. The purpose of the VPAT is to assist customers and buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology," also referred to as "Information and Communication Technology" (ICT) products and services with features that support accessibility.

Getting Started

1. Before creating a report, read all of the materials provided in this document.

2. The Information Technology Industry Council (ITI) provides the VPAT. Use of the template and service mark does not require membership in ITI.

3. Determine which accessibility standards/guidelines will be included in the product conformance report.

4. It is the vendor's responsibility to maintain the integrity of the data in the report.

Essential Requirements for Authors

The following are the minimum requirements to be a VPAT®.

1. The VPAT name and template are registered service marks of ITI. Use of the VPAT template and name requires the inclusion of the registered service mark (i.e., "VPAT®"). Users of the VPAT agree not to deviate from the Essential Requirements for Authors.

2. The template file can be used as is or replicated in a different delivery format, for example as HTML or PDF. The only requirement is that the final conformance report must be accessible.

3. A report may contain a minimum of one applicable Standard/Guideline or any combination of the three Standards/Guidelines that are applicable to the product being reported.

4. A report must contain the following content at a minimum:

- **Report Title** – In the heading format of "[Company Name] Accessibility Conformance Report"

- **VPAT Heading Information** – Template version

- **Name of Product/Version** – Name of Product being reported, including version of the product

- **Product Description** – A brief description of the product

- **Date** – Date of report publication. At a minimum, provide the month and year of the report publication. For example, "May 2016". If date is included ensure it is clear "4 May 2016" or "May 4, 2016".

- **Contact Information** – Contact Information for follow-up questions. Listing an email is sufficient.

- **Notes** – Any details or further explanation about the product or the report. This section may be left blank.

- **Evaluation Methods Used** – Include a description of what evaluation methods were used to complete the VPAT for the product under test.

- **Applicable Standards/Guidelines** – A clear indication of which Standards/Guidelines this Conformance Report covers.
    - The list must include only the Standards/Guidelines that were used to develop the product.
    - A report must contain a minimum of one Standard/Guideline or any combination of the three Standards.
    - The applicable Standards/Guidelines that may be included are:
        - Revised Section 508 standards – the U.S. Federal accessibility standard, published by the U.S. Access Board in the Federal Register on January 18, 2017
        - Corrections to the ICT Final Rule – a correction to the Revised Section 508 standards, published by the US Access Board in the Federal Register on January 22, 2018
        - Web Content Accessibility Guidelines 2.0 or WCAG 2.0 (ISO/IEC 40500), at http://www.w3.org/TR/2008/REC-WCAG20-20081211/

- *EN 301 549 "Accessibility requirements suitable for public procurement of ICT products and services in Europe",* V1.1.2 (2015-04) at *http://mandate376.standards.eu/standard*

- This information can be in a table format at the top of the report with the table heading 'Standards/Guidelines' and the reported Standards/Guidelines identified.

- Alternatively, the Standard/Guideline being reported can be clearly identified in the introductory text of the report. If multiple Standards or Guideline tables are included, each table should also be clearly identified as to the Standard or Guideline the criteria that table represents.

- **Terms** – Conformance level terms description section

- **Tables for Each Standard or Guideline** – Tables showing the responses to the criteria.

5. WCAG Conformance Tables – The answers in the WCAG success criteria tables are based on the level of conformance being reported (Level A, AA or AAA).

   o These tables are used to answer:
   - Revised Section 508:
     - Chapter 5 Software
     - Chapter 6 Support Documentation
   - EN 301 549 Standard:
     - Chapter 9 Web
     - Chapter 10 Non-Web
     - Chapter 11 Software
     - Chapter 12 Documentation and Support Services
   - The selected levels of WCAG 2.0 Guidelines.

   o Due to answers applying to multiple criteria, when answering for the Revised Section 508 or EN 301 549, the answers need to be clear in what individual criteria the answer applies to. It is possible to either use a summary, selecting the worst case for the criteria, or to have separate answers or even tables for software, support documentation, authoring tools, etc., so long as the methodology used is made clear.

   o If not completing a set of Standards such as Section 508 or EN 301 549, then remove the breakdown information and answer only for the WCAG criteria.

6. Conformance Levels – The report must list the definition of the terms used in the Conformance Level column. ITI recommends the following terms. If a vendor deviates from the ITI definitions, the vendor shall reference this change in the heading Notes section. If a term is not used it can be removed from the list. The ITI definitions are:

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

- **Partially Supports**: Some functionality of the product does not meet the criterion.

- **Does Not Support**: The majority of product functionality does not meet the criterion.

- **Not Applicable**: The criterion is not relevant to the product.

- **Not Evaluated**: The product has not been evaluated against the criterion. This can only be used in WCAG 2.0 Level AAA.

Note: When filling in the WCAG tables, a response may use 'Supports' where one might otherwise be inclined to use 'Not Applicable'. This is in keeping with [WCAG 2.0 Understanding Conformance](#): 'This means that if there is no content to which a success criterion applies, the success criterion is satisfied.

7. 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.

8. In the Section 508 tables, when subsections of criteria do not apply to the product, the section may be summarized or removed as long as an explanation is provided explaining why a criterion does not apply. Another alternative is to leave the table and add a summary why the section doesn't apply. For example, in Chapter 5 the criteria in 502 and 503 will not apply to a web only application, thus those sections can be removed with a summary in the notes for the chapter, or a row in the table.

Best Practices for Authors

ITI suggests that authors adopt the following best practices when using the VPAT® to create an Accessibility Conformance Report.

- **Branding Header:** Company logo or branding information

- **Date Changes:** If a report is revised, change the report date and explain the revision in the Notes section. Alternately, create a new report and explain in the Notes section that it supersedes an earlier version of the report.

- **Notes:** Add any notes applicable to product or the report

  - Additional information about the product version that the document references

  - Any revisions to the document

  - Links to any related documents

  - Additional information describing the product

  - Additional information about what the document does or does not cover

  - Information suggested by the WCAG 2.0 Conformance Claim, at http://www.w3.org/TR/WCAG20/#conformance-claims

  - Information needed to satisfy ISO/IEC 17050-1:2004, Supplier's Declaration of Conformity

- **Evaluation Methods Used –** Information to enter may include the following:

  - Testing is based on general product knowledge

  - Similar to another evaluated product

  - Testing with assistive technologies

  - Published test method (provide name, publisher, URL link)

  - Vendor proprietary test method

  - Other test method

- **Remarks and Explanations:** This section may include:

  - Information regarding the testing of a given criteria.

  - Information on application dependencies to support accessibility (e.g. OS, app frameworks, browsers recommended).

- How the customer can find more information about accessibility issues. One method can be to include the bug ID where customers can call the company's customer support to get additional information.

- Known workarounds for accessibility issues.

- **Legal Disclaimer:** Area for any legal disclaimer text required by your organization.

- **Saving Space:** To reduce the size of the report it is acceptable to remove sections. Individual criteria cannot be removed, only sections at a time. Section removal is acceptable in four situations:

  - When an entire standard is not being reported on, for example EN 301 549, there should be no references of it in the report.

  - When an entire section is not being reported on because it doesn't apply to the product, for example:

    - Chapter 4: Hardware. Information should be included in the notes for that section why it has been removed.

    - A card reader that doesn't have sound could remove the criteria in section 413 Closed Caption Processing Technologies and just note the why the criteria doesn't apply.

  - If the product is not being evaluated for a level of the criteria (for example Level AAA) then that table may be deleted.

  - If a requesting customer has identified that a section of the standard does not apply, information should be included in the notes that the section has been removed.

- **WCAG 2.0 Tables:** The WCAG 2.0 criteria is shown in three tables, Level A, Level AA, and Level AAA.

  - If desired, these tables can be combined into one table.

  - When reporting on a level (A, AA or AAA) all criteria for that level must be answered.

- **Language:** Use text appropriate for your audience.

- **Multiple Reports:** When using the VPAT to create an Accessibility Conformance Report for complex products it may be helpful to separate answers into multiple reports. For example, when a product is an Authoring Tool that also has web content and documentation. When multiple reports are used for a complex product, it is required to explain this and how to reach the other reports in the Notes section of each report.

- **Criteria Text:** To help conserve space in the ITI template only the criteria ID number and a short title have been included. Where possible, links have been included to the standard/guideline.

    - It is acceptable to add the full text of the criteria into the cell if desired to help with understanding.

    - The links to the standards/guidelines can be removed.

- **Ordering of Tables:** The order that the standards/guideline tables appear may be changed to facilitate reading. For example, if the Accessibility Conformance Report is for Section 508 only, the WCAG tables may be moved to follow the numbering scheme used in the Section 508 criteria.
- **Guideline Section Heading Rows in Tables:** The tables include heading rows to facilitate understanding the context of the criteria.
    - The cells in these rows do not require answers as indicated by "Heading cell – no response required."
    - It is optional to add a response if desired.
    - The shading of the row is also optional.
    - If removing the heading rows, edit the criteria titles so it's clear where they apply.

Posting the Final Document

- Remove the *Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors* section from the template when publishing your Accessibility Conformance Report in final form. A link on page one in the template footnotes contains a hyperlink to this document on the Information Technology Industry Council (ITI) website at: http://www.itic.org.

- Check for each required item in the VPAT® document:

    - The report title **[Company Name] Accessibility Conformance Report**

    - The **"VPAT® Version 2.1" heading**

    - **Name of Product/Version**

    - **Product Description**

    - **Date**

    - **Contact Information**

    - **Notes**

    - **Evaluation methods used**

- **Applicable Standards/Guidelines**

- **Terms**

- **Report Information**

  · Check that there is a response for each criterion for 'Conformance Level' and 'Remarks and Explanations.'

- Post your final document on your company's web site, or make the document available to customers upon request.

- Your final document should be accessible.

Table Information for VPAT® Readers

For each of the standards, the criteria are listed by chapter in a table. The structures of the tables are: the first column contains the criteria being evaluated, the second column describes the level of conformance of the product regarding the criteria and the third column contains any additional remarks and explanations regarding the product.

- When sections of criteria do not apply, or deemed by the customer as not applicable, the section is noted as such and the rest of that table may be removed for that section.

- When multiple standards are being recorded in this document, the duplicative sections are noted and responded to only one time. The duplicate entry will note the cross reference to the data.

Kuali Accessibility Conformance Report WCAG Edition

VPAT® **Version 2.2 – July 2018**

Name of Product/Version: Kuali Ready

Product Description: Kuali Ready is a tool designed to help higher ed institutions effectively prepare for adverse events and improve institutional resilience. Ready guides users to use continuity planning best practices through question-based form completion and helps continuity managers easily harness departmental user expertise from across campus. Ready is cloud-based, secure, accessible, and mobile-ready.

Date: September 10, 2019

Contact information: Terri Eikenbary, terri.eikenbary@kuali.co

Notes:

Evaluation Methods Used:

Each view was tested with Chrome version 76, and Firefox 69.0 with Jaws for Windows 2019.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines: Web Content Accessibility Guidelines 2.0, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/ levels A and AA.

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports**: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- **Not Applicable**: The criterion is not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports With Exceptions	Many images are not labeled, but they are also unlikely to have a significant impact on disabled users.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Supports	
1.2.2 Captions (Prerecorded) (Level A)	Supports	
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	
1.3.1 Info and Relationships (Level A)	Supports With Exceptions	Headings are not always in a logical order. Table headers also lack scope attributes. However, neither of these are likely to have a significant impact on disabled users.
1.3.2 Meaningful Sequence (Level A)	Supports	
1.3.3 Sensory Characteristics (Level A)	Supports	
1.4.1 Use of Color (Level A)	Supports	
1.4.2 Audio Control (Level A)	Supports	
2.1.1 Keyboard (Level A)	Supports With Exceptions	Table sorting, date pickers, and certain confirmation modals are not accessible via the keyboard.
2.1.2 No Keyboard Trap (Level A)	Supports	
2.2.1 Timing Adjustable (Level A)	Supports	
2.2.2 Pause, Stop, Hide (Level A)	Supports	
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	
2.4.1 Bypass Blocks (Level A)	Supports	
2.4.2 Page Titled (Level A)	Does Not Support	Although the titles on each page contain the name of the product instance, they are not specific to each view. Instead, they remain the same across all pages on the site.
2.4.3 Focus Order (Level A)	Supports With Exceptions	Occasionally focus is lost unexpectedly. In addition, focus is rarely handled in an expected manner when opening or closing modals.

Criteria	Conformance Level	Remarks and Explanations
2.4.4 Link Purpose (In Context) (Level A)	Supports With Exceptions	The vast majority of links and other elements used for navigation are labeled, but there are a couple of exceptions. Only one of these exceptions is likely to be critical to users ability to utilize the application.
3.1.1 Language of Page (Level A)	Supports	
3.2.1 On Focus (Level A)	Supports	
3.2.2 On Input (Level A)	Supports With Exceptions	A select drop-down was encountered that, when change, caused focus to be lost. Otherwise, no other failures of this criterion were identified.
3.3.1 Error Identification (Level A)	Supports With Exceptions	While errors were identified in text, the fields with errors are not automatically communicated to screen reader users.
3.3.2 Labels or Instructions (Level A)	Supports With Exceptions	In a few instances, form fields are not properly associated with their labels or legends.
4.1.1 Parsing (Level A)	Supports	
4.1.2 Name, Role, Value (Level A)	Supports With Exceptions	Elements which act as links or buttons are not properly marked up as such. Characters from the icon font are not hidden for screen reader users. Menus and tabs lack the proper ARIA markup to function properly. The aria-hidden attribute is misused. Modal dialogs lack some requisite ARIA markup.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Supports	
1.2.5 Audio Description (Prerecorded) (Level AA)	Supports	
1.4.3 Contrast (Minimum) (Level AA)	Supports With Exceptions	The SAVE button used across the app does not have sufficient contrast. Otherwise, no other contrast issues were identified.
1.4.4 Resize text (Level AA)	Supports	
1.4.5 Images of Text (Level AA)	Supports	
2.4.5 Multiple Ways (Level AA)	Supports	

[2.4.6 Headings and Labels](#) (Level AA)	Supports With Exceptions	The first heading on most pages contains an image which is not labeled. Otherwise, this criterion appears to be met throughout the application.
[2.4.7 Focus Visible](#) (Level AA)	Supports With Exceptions	Only one failure of this criterion was identified, and it is highly unlikely to pose a barrier to disabled users.
[3.1.2 Language of Parts](#) (Level AA)	Supports	
[3.2.3 Consistent Navigation](#) (Level AA)	Supports	
[3.2.4 Consistent Identification](#) (Level AA)	Supports	
[3.3.3 Error Suggestion](#) (Level AA)	Supports	
[3.3.4 Error Prevention (Legal, Financial, Data)](#) (Level AA)	Supports	

Legal Disclaimer (Company)

Include your company legal disclaimer here, if needed