

Voluntary Product Accessibility Template® (VPAT®)

WCAG Edition

Version 2.3 (Revised) - April 2019

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About This Document

The VPAT is provided in four editions based on the guidelines/standards being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International that includes all of the standards.

This is the WCAG edition of the VPAT. It includes the following standards/guidelines:

- [Web Content Accessibility Guidelines 2.0](#)
- [Web Content Accessibility Guidelines 2.1](#); use is optional; included for reference purposes

If you need to report on a different combination of standards/guidelines, use the appropriate alternate edition of the VPAT found on <https://www.itic.org/policy/accessibility/vpat>.

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.

“Voluntary Product Accessibility Template” and “VPAT,” including the template format, are Federally Registered Service Marks of the Information Technology Industry Council (ITI). VPAT users agree not to deviate materially from the template format provided by ITI, and to use the service mark (“®”) where appropriate.

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 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
 - **Report 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 and corrected on January 22, 2018
 - [Web Content Accessibility Guidelines 2.0](#) or WCAG 2.0 (ISO/IEC 40500)
 - [Web Content Accessibility Guidelines 2.1](#) or WCAG 2.1

- [EN 301 549 Accessibility requirements suitable for public procurement of ICT products and services in Europe](#), V2.1.2 (2018-08)
 - 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 Information – The answers in the WCAG success criteria are based on the level of conformance being reported (Level A, AA or AAA).
- 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.x Guidelines.
 - The WCAG 2.1 conformance information can be included as a separate table which is referenced from the EN 301 549 responses, or as responses to specific criteria within the EN 304 549 table that map to WCAG success criteria.
 - If using a summary table, 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.

- 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.
 - When reporting on WCAG 2.0 criteria it is acceptable to remove the WCAG 2.1-specific criteria from the table. These are marked '2.1 only' within the row.
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.x 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.
 - When reporting on WCAG 2.0 criteria it is acceptable to remove the WCAG 2.1-specific criteria from the table. These are marked '2.1 only' within the row.
 - 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.x Tables:** The WCAG 2.x criteria are 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 for the particular version of WCAG that the report includes.
- **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 2.3 (Revised)” heading
 - Name of Product/Version

- **Product Description**
- **Report 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.

Rittenhouse Book Distributors, Inc.

Accessibility Conformance Report

WCAG Edition

VPAT® Version 2.3 (Revised) – April 2019

Name of Product/Version: R2 Digital Library

Product Description: Web-based database of eBooks from more than 80 medical, nursing and allied health publishers

Report Date: 10/18/19

Contact Information: Meg White (meg.white@rittenhouse.com)

Notes:

Evaluation Methods Used: Review and remediation by third party accessibility engineer (August 2019) review by UARC at Michigan State University (May 2019)

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)

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.x Report

Note: When reporting on conformance with the WCAG 2.x 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)	Partially supports	Continuing to evaluate compatibility options
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Does Not Support	Publisher-supplied content
1.2.2 Captions (Prerecorded) (Level A)	Does Not Support	Publisher-supplied content
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Does Not Support	Publisher-supplied content
1.3.1 Info and Relationships (Level A)	Supports	
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	
2.1.2 No Keyboard Trap (Level A)	Supports	
2.1.4 Character Key Shortcuts (Level A 2.1 only)	Partially Supports	
2.2.1 Timing Adjustable (Level A)	Supports	
2.2.2 Pause, Stop, Hide (Level A)	Partially supports	Some marketing material does not meet standard. All eBook content is fully supported
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	
2.4.1 Bypass Blocks (Level A)	Partially Supports	
2.4.2 Page Titled (Level A)	Supports	
2.4.3 Focus Order (Level A)	Supports	
2.4.4 Link Purpose (In Context) (Level A)	Supports	
2.5.1 Pointer Gestures (Level A 2.1 only)	Not Applicable	
2.5.2 Pointer Cancellation (Level A 2.1 only)	Not Applicable	
2.5.3 Label in Name (Level A 2.1 only)	Supports	
2.5.4 Motion Actuation (Level A 2.1 only)	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
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	
3.3.1 Error Identification (Level A)	Partially Supports	
3.3.2 Labels or Instructions (Level A)	Supports	
4.1.1 Parsing (Level A)	Supports	
4.1.2 Name, Role, Value (Level A)	Partially Supports	

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	There is no live content on the R2 Library
1.2.5 Audio Description (Prerecorded) (Level AA)	Does Not Support	Publisher-supplied content
1.3.4 Orientation (Level AA 2.1 only)	Supports	
1.3.5 Identify Input Purpose (Level AA 2.1 only)	Not Applicable	
1.4.3 Contrast (Minimum) (Level AA)	Supports	
1.4.4 Resize text (Level AA)	Supports	
1.4.5 Images of Text (Level AA)	Partially Supports	Some marketing material does not meet standard. All eBook content is fully supported
1.4.10 Reflow (Level AA 2.1 only)	Does Not Support	When 400% zoom, scroll bars are required horizontally and vertically. Evaluating for future development.
1.4.11 Non-text Contrast (Level AA 2.1 only)	Partially Supports	Evaluating for future development.
1.4.12 Text Spacing (Level AA 2.1 only)	Supports	
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Partially Supports	Some marketing material does not meet standard. All eBook content is fully supported
2.4.5 Multiple Ways (Level AA)	Supports	
2.4.6 Headings and Labels (Level AA)	Supports	

Criteria	Conformance Level	Remarks and Explanations
2.4.7 Focus Visible (Level AA)	Partially Supports	Working on changing graphical buttons into styles
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)	Partially Supports	Text descriptions are provided, but are not programmatically related to the field that produced the error
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not Applicable	The R2 Library does not contain legal or financial data
4.1.3 Status Messages (Level AA 2.1 only)	Does Not Support	Role “status” is not currently implemented on search results information. Evaluating for future development.

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Not Evaluated	
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Not Evaluated	
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Not Evaluated	
1.2.9 Audio-only (Live) (Level AAA)	Not Evaluated	
1.3.6 Identify Purpose (Level AAA 2.1 only)	Not Evaluated	
1.4.6 Contrast Enhanced (Level AAA)	Not Evaluated	
1.4.7 Low or No Background Audio (Level AAA)	Not Evaluated	
1.4.8 Visual Presentation (Level AAA)	Not Evaluated	
1.4.9 Images of Text (No Exception) Control (Level AAA)	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
2.1.3 Keyboard (No Exception) (Level AAA)	Not Evaluated	
2.2.3 No Timing (Level AAA)	Not Evaluated	
2.2.4 Interruptions (Level AAA)	Not Evaluated	
2.2.5 Re-authenticating (Level AAA)	Not Evaluated	
2.2.6 Timeouts (Level AAA 2.1 only)	Not Evaluated	
2.3.2 Three Flashes (Level AAA)	Not Evaluated	
2.3.3 Animation from Interactions (Level AAA 2.1 only)	Not Evaluated	
2.4.8 Location (Level AAA)	Not Evaluated	
2.4.9 Link Purpose (Link Only) (Level AAA)	Not Evaluated	
2.4.10 Section Headings (Level AAA)	Not Evaluated	
2.5.5 Target Size (Level AAA 2.1 only)	Not Evaluated	
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only)	Not Evaluated	
3.1.3 Unusual Words (Level AAA)	Not Evaluated	
3.1.4 Abbreviations (Level AAA)	Not Evaluated	
3.1.5 Reading Level (Level AAA)	Not Evaluated	
3.1.6 Pronunciation (Level AAA)	Not Evaluated	
3.2.5 Change on Request (Level AAA)	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
3.3.5 Help (Level AAA)	Not Evaluated	
3.3.6 Error Prevention (All) (Level AAA)	Not Evaluated	

Legal Disclaimer (Company)

Include your company legal disclaimer here, if needed