How to read a VPAT (ACR)

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AccessibilityOz

Meet our team

- Dyslexia
- Moderate vision impairment
- Epilepsy
- Migraines
- Severe vision impairment
- Physical impairment
- PTSD
- Crohn’s Disease
- Multiple Sclerosis
- Cerebral Palsy
- Long COVID

It’s not just about vision impairments

About Gian

1998

Worked on first accessible website in Australia

Created Australia's first automated accessibility testing tool

Invited Expert to W3C WCAG2 Working Group

Worked on Melbourne 2006 Commonwealth Games

Managed Usability and Accessibility Services at Monash University

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Founded AccessibilityOz

AccessibilityOz

Released OzPlayer

OzPlayer

Released OzArt

OzART

Spoke at the United Nations on web accessibility

Inducted into the Australia's Hall of Fame as Accessibility Person of the Year 2019

Chair of Mobile Accessibility Testing Guidelines

2025

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What is the difference between a VPAT and ACR?

Where to find VPAT template

www.itic.org/policy/accessibility/vpat

What is an ACR?

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What is an ACR?

- An explanation of the accessibility compliance of a product
- Owned and often assessed by the product vendor
- Required by Section 508 and (almost all) Federal solicitations

What an ACR is not

- An accessibility audit report of a product
- Only for Government
- Only for web products
- Always accurate
- A good indicator of ATAG compliance

Some ACR categories

- Web products
- Operating systems
- Desktop software
- Photocopiers
- Telephones, tablets and smart phones

Sections of an ACR

- Title “[Company Name] Accessibility Conformance Report”
- Name of Product and version
- Product Description
- Report Date

Sections of an ACR

- Contact information
- Notes
- Evaluation Methods Used
- Report Information
- Terms

Sections of an ACR

- Tables for each WCAG standard or guideline
- Additional sections for Section 508 requirements

How to tell if an ACR is reasonable in 10 minutes or less

Red flags for ACRs

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Red flags for ACRs

- Have an inaccurate or unclear description of the product
- Does the Notes section explicitly says the VPAT does not cover essential features?
- Not dated or dated over 12 months*
- Template content included

About This Document

“Voluntary Product Accessibility Template” and “VPAT,” including the template format, are Federally Registered Service Marks of the Information Technology Industry Council (ITI). VPAT 2.4 users agree not to deviate materially from the template format provided by ITI, and to use the service mark (“®”) where appropriate.

The purpose of the Voluntary Product Accessibility Template, or VPAT™, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

There are three columns in each table, column one of the each Table describes the success criteria. The second column describes the “Conformance Level”, which are described in detail under ‘Terms’ section below. The third column contains any additional remarks and explanations regarding the product.

Red flags for ACRs

- Not using the latest version of the VPAT (which is 2.5: April 2025)*
- Missing sections

Accessibility Conformance Report

International Edition

VPAT® Version 2.3 (Revised)

Name of Product: [redacted]

September 2021

Contact information: Accessibility[redacted]

Evaluation Methods Used: Internal testing was conducted using the AXE and WAVE tools and manually tested using Non-Visual Desktop Access (NVDA) screen reader and JAWS on Firefox and Chrome.

Third party testing with a non-sighted user was conducted using the following OS/Browser/Screen Reader combinations:

Win 10/IE 11/Jaws 2018, Win 10/ Chrome 74/ JAWS 2018, Win 10/FF/ NVDA, Mac OS/Safari/VoiceOver

iPhone 14.2/Safari 13/VoiceOver Android 10/Chrome 87/Talkback Android Tab10/Chrome 87/Talkback iPad 14.2/Safari/VoiceOver

Red flags for ACRs

- Not contain details of testing undertaken ("evaluation methods used"), or generic descriptions

Notes:

Evaluation Methods Used: Conformance to the listed accessibility standards has been evaluated using static analysis tools and manual testing with assistive technologies.

Red flags for ACRs

- Automated testing only in the Evaluation Methods
- Mention only of screen readers in the Evaluation Methods
- No mention of mobile and mobile assistive technology testing*

Red flags for ACRs

- No manual testing in Evaluation methods

Report Date: August 2022

Product Description:

Contact Information: accessibility[redacted]

Notes:

Evaluation Methods Used: Testing was conducted using Deque System's automated AXE tool and manually tested using Non-Visual Desktop Access (NVDA) screen reader software.

Red flags in ACRs

- Generic “automated” and “manual” testing – no list of actual tools used

Evaluation Methods Used: Evaluation of the product involved a combination of automated, manual, and functional testing against the applicable success criteria within the Web Content Accessibility Guidelines (WCAG) 2.1 Conformance Level A and AA. [redacted]tested a selection of the product using a representative sample to cover the components and functionality of use flows. Below is a list of the assistive technologies (ATs) used:

- VoiceOver/iOS

Red flags for ACRs

- Missing or inaccurate Contact information
- “Not evaluated” in Level A or AA
- One VPAT for multiple products*
- The same VPAT for multiple products
- Cells without content

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Partially supports	Web: Form controls without visible labels use aria-labels to communicate purpose and those with visible labels use aria to associate label and input. All non-text UI elements use either title, alt or aria to communicate purpose/describe. Topic finder and highlights & notes don't work properly with all assistive technology. Electronic Docs: charts, graphs and images within eBooks don't always have alt or descriptive text, depending on the source.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: EN 301 549 Criteria • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Partially Supports	Web: Form controls without visible labels use aria-labels to communicate purpose and those with visible labels use aria to associate label and input. All non-text UI elements use either title, alt or aria to communicate purpose/describe. Electronic Docs: 3rd party charts, graphs and images don't always have alt or descriptive text, depending on the source.

Red flags for ACRs

- “Supports” without an explanation

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 and 2.2)	Supports	

Red flags for ACRs

- Terminology such as “Passes”, “Fails”
- A lot of “NA”
- All “Supports”*
- Cells with random or repeated content

CRITERIA	CONFORMANCE LEVEL	REMARKS AND EXPLANATIONS
1.3.1 Info and Relationships (Level A)	Partially Supports	**Test methods: TBT; ATP; MAT** **Header** recurring component does not completely support this criterion: • Duplicated ID attribute value • Element with aria-controls attribute refers to a missing element • h5 element has been used for visual effect **Homepage & Global elements** user journey does not completely support this criterion: • **Carousels not fully accessible** The carousels of this page are not fully accessible. Only the visible "slide" should be readable from the Assistive Technologies, and using the carousel control elements (arrows or dots) the users should be able to change the visible slide. Ensure that the aria and role attributes are correctly set. Follow the w3c instructions to create fully accessible carousel widgets: https://www.w3.org/WAI/ARIA/apg/patterns/carousel/ • **Container is hidden to assistive technologies** The container is not ARIA-HIDDEN when closed, it becomes ARIA-HIDDEN when open. This is probably a bug. • **Elements not in a list** Please use unordered list (UL) and list item (LI) elements to mark up the highlighted sections. • **Empty heading and misuse of lists** The highlighted elements should be a single list (UL) on multiple columns with the same heading. Instead, the two columns are two separate lists; the second column also contains an empty heading. Please use CSS to distribute content on multiple columns and remove the empty heading. • **Fly-out sub navigation not accessible** The fly-out menus are powerful widgets to manage and structure hierarchically the main links of the website.

Interactive Article user journey does not completely support this criterion:

- **Carousel not fully accessible**
  The carousel of this page is not fully accessible.
  Only the visible "slide" should be readable from the Assistive Technologies, and using the carousel control elements (arrows or dots) the users should be able to change the visible slide.
  Ensure that the aria and role attributes are correctly set. Follow the w3c instructions to create fully accessible carousel widgets:
  https://www.w3.org/WAI/ARIA/apg/patterns/carousel/
- **Charts not fully accessible**
  Please re-factor the code of these components as nested lists, so their structure is conveyed clearly to assistive technologies:

```
<ul>
<li>State Senate
<ul>
<li>21 Dem.</li>
<li>19 Rep.</li>
</ul>
</li>
<li>House of delegates
<ul>
<li>51 Dem.</li>
<li>48 Rep.</li>
</ul>
</li>
</ul>
```

A DL is also appropriate, but it is less supported by assistive technologies.

1.4.3 Contrast (Minimum) (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
1.4.4 Resize text (Level AA)	N/A	Not relevant for the solution
1.4.5 Images of Text (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
1.4.10 Reflow (Level AA 2.1 and 2.2)	N/A	Not relevant for the solution
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	N/A	Not relevant for the solution
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	N/A	Not relevant for the solution
2.4.5 Multiple Ways (Level AA)	N/A	Not relevant for the solution
2.4.6 Headings and Labels (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
2.4.7 Focus Visible (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)	N/A	Not relevant for the solution
2.5.7 Dragging Movements (Level AA 2.2 only)	N/A	Not relevant for the solution
2.5.8 Target Size (Minimum) (Level AA 2.2 only)	N/A	Not relevant for the solution
3.1.2 Language of Parts (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
3.2.3 Consistent Navigation (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
3.2.4 Consistent Identification (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
3.3.3 Error Suggestion (Level AA)	Supports	[redacted] scored 100% by a recent 3rd-party audit, via Google Lighthouse and other assessment tools
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	N/A	Not relevant for the solution
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)	N/A	Not relevant for the solution
4.1.3 Status Messages (Level AA 2.1 and 2.2)	N/A	Not relevant for the solution

What does a good ACR look like?

A good ACR will…

- Have explanations for each criteria
- Uses conventional wording: “Supports”, “Partially Supports”, “Does not Support”, “Not Applicable”
- Stand up to questioning

A good ACR will…

- Have been written by someone other than the product vendor*
- Have a clear description of the product, including associated features
- Refer to existing accessibility testing tools in the testing undertaken

Assessing the accuracy of an ACR

First, read through the ACR

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Read through the ACR

- Does the ACR contain reference to known accessibility issues with the product? If you don’t know the product – Google it!
- Read through the description – does it accurately describe the product and its essential features?

Read through the ACR

- Read through the Evaluation Methods. Do they sound reasonable?
- Are there NAs for features the product definitely has?

Read through the ACR

- Are the exceptions reasonable or will they block access to essential functionality?

Second, do some testing

Testing the accuracy of an ACR- keyboard

2.1.1: Keyboard: Test the product with the keyboard. If you find any issues are they indicated in the ACR?

Testing the accuracy of an ACR- movement

2.2.2 Pause, Stop, Hide: Is there movement in the site? Does it have an accessible (mouse, keyboard, touch) pause feature or does it stop within 5 seconds. If not, is this included in the ACR?

Testing the accuracy of an ACR – skip links

2.4.1: Bypass Blocks: Does every page have a skip link and is it the first focusable link on the page? If not, is this included in the ACR?

Testing the accuracy of an ACR – errors

3.3.1: Error identification: Submit an empty or incorrect form. Are the errors described appropriately? Do they have suggestions? If not, is this included in the ACR?”

Testing the accuracy of an ACR – accessibility testing

Conduct a high-level accessibility audit (or hire someone to do it)

Testing the accuracy of an ACR – user testing with people with disabilities with assistive technologies

Ask potential users to see if they can use the product with their assistive technology*

Third, reach out to the vendor

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What do you do if there are red flags?

Question, question, question!

- “Why is this dated 14 months ago? Has the product not been updated in 14 months?”
- “Why did you say this section is NA when the product has this feature?”

More questions

- “What kind of testing did you do to ensure compliance?”
- “Why did you decide to fill out this ACR internally?”
- “Why does the description omit essential features of the product?”

More questions

- “Why did you decide to test with only one screen reader?”
- “There are a lot of Partially Supports. Do you have a timeline as to when these issues will be fixed?”

What next?

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What next?

- Develop a timeline
- Update the contract
- Develop an EEAAP (Equally Effective Alternate Access Plan)

Q&A

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