

CSU Product Accessibility Documentation Guidelines (Draft 1.07)

Background

The California State University (CSU) system is committed to ensuring that all of its programs and services are accessible and usable by all students, staff, and faculty, including those with disabilities. A critical component of this effort involves ensuring that all electronic and information technology (E&IT) products meet recognized accessibility and usability standards, including Section 508 of the Rehabilitation Act (<http://www.section508.gov/>), at the time of procurement or adoption.

The *CSU Product Accessibility Documentation Guidelines* are intended to assist vendors in preparing accessibility documentation for their E&IT products in a manner that meets CSU-specific requirements.

Accessibility-Specific Documentation

The CSU requires that vendors complete a Voluntary Product Accessibility Template (VPAT)¹ for all E&IT products covered under the Section 508 standards. The VPAT is the product of a partnership between the Information Technology Industry Council and the U.S. General Services Administration to develop an industry-standard rubric for documenting the extent to which E&IT products conform with Section 508 accessibility standards. The CSU website section on Accessible Electronic and Information Technology (E&IT) Procurement (http://www.calstate.edu/accessibility/EIT_Procurement/) contains a variety of information for vendors including guidance on when and how to complete a VPAT and links to additional information and best practices on documenting product accessibility.

Vendors should ensure that their **accessibility documentation** meets the following criteria:

- A VPAT is created for each unique E&IT product (rather than a single VPAT for a line of products).
- The VPAT is completed by a company representative with sufficient technical knowledge of the product to accurately and credibly complete the document.
- The VPAT is completely filled-out (indicating which subsections are applicable for the product as well as addressing every point of that subsection).
- The VPAT is descriptive (indicating not just whether a particular subpoint is met/not met but also providing specific examples and describing how this was determined).
- The VPAT is available on the vendor's website.
- The VPAT is available in an accessible, electronic format².
- The VPAT contains versioning information (including the document version number—if applicable—as well as the date completed, and identification of the document author).

¹ The “voluntary” part of the VPAT refers to the fact that only those vendors who wish to sell products to the federal or state government require a VPAT. For the CSU system, VPATs are required for all procurements.

² Examples of how to author electronic documents that meet this standard can be found at <http://www.calstate.edu/accessibility/resources/>.

General Product Documentation

Vendors should ensure that the **product documentation** meets the following criteria:

- All product documentation includes information regarding known accessibility features, limitations, and workarounds of the product (e.g. keyboard equivalent, display modification options, etc.).
- All production documentation is available in an accessible, electronic format³.
- Priority should be given to ensuring that the product documentation is accessible in its native (default) format. If the native format does not provide adequate support for accessibility, then the vendor may elect to provide a separate, alternative-format version of the product documentation.
- Any alternate-format version should provide access to the same information contained within the native format in its entirety as well as retain the same functionality as the native format (to the fullest extent possible).

Company Accessibility Commitment

The CSU encourages that vendors dedicate a portion of their company website specifically to accessibility information. This provides an opportunity not only to streamline the identification of accessibility information for customers, but also provides a comprehensive portal of accessibility information. Some suggested components of an effective accessibility web presence include:

- An aggregated list of all accessibility documentation including product VPATs.
- A company accessibility policy statement .
- Any additional accessibility-oriented documentation (e.g., white papers, case studies, tutorials, FAQs, best practices, links to external information).
- An indication that the company has dedicated specific resources to handling accessibility questions/concerns, including contact information for doing so.
- Information regarding support for accessible communications channels (e.g., TTY, relay services).
- An intuitive URL for the company accessibility site (e.g. <http://www.company.com/accessibility> or <http://access.company.com>).

In addition, vendors are encouraged to take meaningful steps to incorporate accessibility into corporate culture by targeting internal business practices and infrastructure (e.g., developer trainings and guidelines, partnering with disability organizations or individuals with disabilities to conduct beta testing, developing a disability advisory group, establishing a disabled employee group, and/or incorporating accessibility as a recognized support topic in the Knowledge Base and Discussion Forum).

Accessibility Testing

The California State University reserves the right to perform testing on a contractor's product or E&IT solution in order to ensure the accuracy of their documentation regarding its compliance with Section 508 standards and California State University Accessibility requirements.

For additional information regarding this document, please visit the Accessible Technology Initiative website at http://www.calstate.edu/accessibility/EIT_Procurement/ or send an email to the CSU Accessible Technology Initiative at ati@calstate.edu.

³ If the documentation is delivered in an electronic document format, it should conform to Section 508 standards for Web-based Information (1194.22). If the product documentation is delivered as an executable application, it should conform to Section 508 standards for Software Applications (1194.21)