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FAQ: Voluntary Product Accessibility Template (VPAT)

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Best Practices for Electronic & Information Technology Vendors

What is the Voluntary Product Accessibility Template™?

The Information Technology Industry Council (ITI) is committed to helping the Federal Government implement [Section 508 of the Rehabilitation Act](#). In 2001, ITI partnered with the U.S. General Services Administration (GSA) to create a simple, Internet-based tool to assist Federal contracting and procurement officials in fulfilling the new [market research requirements](#) contained in the Section 508 implementing regulations. The result: the Voluntary Product Accessibility Template™, or VPAT™.

Today, a number of electronic & information technology (E&IT) companies now routinely produce VPATs™, post them on their company web sites, and link them to [GSA's "Buy Accessible" web site](#). Feedback from E&IT companies and government procurement officials suggests:

1. VPATs™ significantly assist procurement officials in making preliminary assessments regarding the availability of commercial Electronic and Information Technology products and services by highlighting features that support the Section 508 accessibility criteria;
2. E&IT vendors would like further assistance regarding how to complete a VPAT™, and
3. VPATs™ will be of even greater value to the procurement official if E&IT vendors use consistent language when filling out a VPAT™.

ITI has responded to this feedback by developing this Best Practices document. We welcome your comments regarding this document.

[The VPAT™ \(template\) can be viewed here.](#)

When to Complete the VPAT™

A VPAT™ may be completed whenever a product is determined to be E&IT and is to be sold in the federal space. The following information is from [www.section508.gov](#) - Acquisition FAQs:

"EIT is information technology (IT), as defined at FAR 2.101, and any equipment or interconnected system or subsystem of equipment, that is used in the creation, conversion, or duplication of data or information. EIT includes:

- o telecommunication products, such as telephones;
- o information kiosks;
- o transaction machines;
- o World Wide Web sites;
- o Software and Operating Systems
- o Computers
- o multimedia (including videotapes); and
- o office equipment, such as copiers and fax machines.

EIT is defined by the Access Board at 36 CFR 1194.4 and in the FAR at 2.101.

How to Get Started

Begin with your product's specification or a list of its known features:

1. Determine which subsection(s) of the technical standards ([Subpart B-1194.21-26](#)) apply to your product. Your company's Legal Advisor or technical leads may be able to help you identify these, though it is best to review your product against all standard categories initially. You may also wish to review ITI's [Suggested Guidelines](#) for Applying Section 508 Subpart B Standards. Document your product's ability to meet the standards in the applicable areas (such as software, operating system, and so on) including the Functional Performance Criteria (Subpart C)
2. For each standard in the applicable area(s), determine if your product meets or supports the standard.
 - o If your product appears to meet or support the standard, then you have the option of providing examples of features that are accessible or of specific accessibility

features that exist.

- o If your product appears to not meet the standard, remember that Section 508 allows for products to meet the Access Board Standards in innovative, non-traditional ways. Your product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user. This is called "functional equivalency."
3. When your VPAT™ draft is complete, translate the technical language into language that will be understood by a procurement officer or customer. We encourage you to use the ITI suggested language in the section "Suggested Language for Filling out the VPAT™".
 4. Post your final VPAT™ on your company's web site. Then, link your VPAT(s)™ to GSA's Buy Accessible [web site](#) so that government procurement officials can easily access your information during their market research. Note that you need to provide a link for each product and its respective VPAT™ which resides on your web site. Vendors may provide additional contact information on the VPAT™ to facilitate more detailed customer inquiries.
 5. Remember, it's the vendor's responsibility to maintain the integrity of the data on the VPAT™. The information provided on your VPAT™ is considered to be a self-representation unless expressly affirmed otherwise. The following disclaimer is posted on the Buy Accessible web site:

NOTE: All information provided and obtained via Buy Accessible is based upon vendor self-representations. Buy Accessible does not warrant the accuracy of the information. Unless expressly affirmed by the vendors in your procurement, information provided via Buy Accessible is not contractually binding. This information is provided to facilitate market research on the accessibility of products.

6. You may find it helpful to see how other vendors have filled out their VPATs™ by visiting GSA's Buy Accessible Site at www.section508.gov/index.cfm?FuseAction=Content&ID=2/ and clicking on "Search for Products and Service Providers."

How the VPAT is Organized

The VPAT™ consists of a series of tables, which are divided into three columns. The first or Summary Table provides a snapshot of the Section 508 Standards. It is divided into subsections (numbers and headings) with hyperlinks that take you directly to the corresponding table in the template. Each subsequent table contains the actual language of the referenced subsection, divided into its respective subparagraphs.

Column one of the Summary Table describes the subsections of subparts B and C of the Standards. In the second column, the vendor will either enter information describing whether the product has features that support the accessibility criteria of the corresponding subsection or, when appropriate, the words 'Not Applicable.' In the third column, the vendor can enter any additional general remarks and explanations regarding the product.

In the subsequent tables, the first column contains the lettered subparagraphs of the respective subsection. In the second column, the vendor will either enter information describing whether the product has features that support the accessibility criteria of the corresponding subparagraph or, when appropriate, the words 'Not Applicable.' In the third column, the vendor can enter any additional remarks and explanations regarding the product.

Suggested Language for Filling out the VPAT™

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITI has developed suggested language for use when filling out a VPAT™. You may choose to employ all or some of the language below. Once you determine what language you intend to use, we recommend that use it consistently throughout all of your company's VPATs™.

Supporting Features (second column on VPAT™)	
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 AT	Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible AT. 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").

Remarks & Explanations (third column on VPAT™)

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; and
- Explaining equivalent methods of facilitation (definition of "equivalent facilitation" See 36 CFR 1194.5.).

Additional Resources

U.S. ACCESS BOARD

Section 508 of the Rehabilitation Act: Electronic and Information Technology Accessibility Standards: Technical Assistance to Ensure Successful Implementation

Contact Information:

Website: <http://www.access-board.gov/508.htm>
Phone: 800-872-2253 (voice) or 800-993-2822 (TTY)
Weekdays 10:00 am - 5:30 pm EST (Wed. 10:00 am - 2:00 pm)
E-mail: 508@access-board.gov
Fax: 202-272-0081
Mail: Office of Technical and Information Services
1331 F Street NW Suite 1000
Washington, DC 20004-1111

GSA - SECTION 508 HOME PAGE and BUY ACCESSIBLE

Contact Information:

Section 508 Home Page www.section508.gov
Buy Accessible <http://www.section508.gov/index.cfm?FuseAction=Content&ID=2>

Mail: Center for IT Accommodation (CITA)
Office of Governmentwide Policy
U.S. General Services Administration
1800 F Street NW Room 1234
Washington, DC 20405
Phone: 202-501-4906
Fax: 202-501-6269

ITI - INFORMATION TECHNOLOGY INDUSTRY COUNCIL

Voluntary Product Accessibility Template™ (VPAT™) and Supporting Information

Contact Information:

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E-mail: ITI-508@itic.org
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