(introductions from SSC)

John Sullivan:

* GSA. Gov’t wide IT a11y program. Strategic planning. Work with USAB to set up accessibility programs, from procurement to development/testing/standards. We meet under federal CIO accessibility COP. Betsy is-co-chair

Betsy Kirk:

* Focuses on vendor engagement within a11y COP. Working with vendors on VPAT/ACR, and also leading 508 within NASA. “NASA SOUP” is a gov’t wide contract vehicle for IT acquisition. > 9 billion last year. We promote accessibility through procurement when these vehicles are used.

Andrew Nielson:

* Work on John’s team at GSA. Mainly works on ICT testing baseline. Formerly from DHS where worked on Trusted Tester process and training materials.

Michael Horton:

* Also GSA. Prior to that, worked as FEMA 508 program manager. Works on GSA 508 website and baseline, testing, support.

Bruce Bailey:

* Works on 508 standards at USAB. USAB is main avenue for technical support on 508, to anyone who asks! Not just feds. Also work with W3C. We have a **new website** FYI

Tim Creagan:

* USAB a11y specialist, working with Bruce and Cathy. Work closely with GSA. Our work is at section508.gov . Co-chair for the webinars series. **This month, we’re having our first webinar geared towards developers about USWDS. (Jules note: this is like WET). Sign up now!** I’m also on the EN 301 549 committee. Right now they are debating whether to make EN 301 549 an ISO standard. Also on W3C working group for cognition AT.

Kathy Eng:

* Work on ICT testing baseline. Primarily support testing at USAB.

Antonia Harward:

* Work with John at GSA. Keeping us on track.

Shared reporting methods:

* Microsoft said the US gov’t asked them not to use the VPAT format
  + Andrew: No.. we didn’t. Actually the ACRT
  + Bruce: Maybe it is confusing about “don’t call it a VPAT, call it an ACR?”
  + Betsy: I work with vendors. All we care about is if the information is captured. If you look at page 10 of the US 508 VPAT, it starts with “ACR”. So MS doesn’t have to follow the format as long as they report against the standard.
  + John: I think it’s in everyone’s best interest to have all the ACRs in the same format. In our world, if the agency puts it into the proposal that you must respond in X format, then it is a requirement. We don’t have any plans to make sure a specific format is used.
  + Bruce: We’d be happy to rebut MS claim if you get it in writing.
  + John: Some of it is semantics. We’d like to know who said that…
  + Tim: A lot of state and federal agencies ask us about ACR formats. What we say is, the important thing is to provide the information. This is the minimum, not to use the template. What people don’t understand usually is “how to test”, the baseline, etc. There are a lot of moving pieces. We get discussion with a lot of people with partial understanding. Because the validation process is not mandated by the 508 standards themselves, people have flexibility. We’re trying to give a clear message
  + Jules: I wasn’t sure if you were actually asking for specific ACR formats… Is there interest here to require vendors to use the VPAT format for ACRs?
  + John: We’ve done a lot of effort to get the VPAT standard. The FAR isn’t clear on this yet, but it would certainly be advantageous to require everything in that format. I don’t think we’ll ever be able to mandate that though.
  + Bruce: Requirement means “regulation”, and that’s not likely to happen.
  + Betsy: John and I were part of a panel with ITI accessibility recently. We want to promote awareness and understanding of the standard. The key point is: An ACR \*is\* required, which has to describe meets/partially meets/etc. Regardless if they are in the VPAT template, it still counts as an ACR. To the issue John raised, it’s always hard to evaluate. There’s always a judgement call. I’ve rarely seen something come through that isn’t based on the template. ACR doesn’t require documenting testing method.
* MS said that US depts had been asking for “rolled up” ACRs for suites of products.
  + Bruce: That doesn’t really make sense to me, I’d rather see the individual products. You’d just get lowest common denominator for all products. It is because non-SMEs are evaluating ACRs. This could also be involved with DoJ – maybe a court was asking for this? We aren’t the ones saying this.
* John:
  + Jay Wyatt from Minnesota has a scoring mechanism for ACRs, based on a SME interpreting the ACRs. Our next round of training materials will include something about this.
  + I’m very interested in finding a way to evaluate ACRs.
* Jules: “Shared risk classification”: Is this like scoring? Some of our departments are doing this.
  + John: Risk can be related to “how many people are going to use this”. What’s the likelihood this is going to be a problem for somebody, with no AT workaround, are you going to get a lawsuit? e.g. if its your payroll system for a huge organization, that’s much higher risk than an admin panel facing 6 employees.
  + Andrew: Agree, risks are based on level of severity of issues but also the user base, type of information in the system, etc. Some of our difficulty in informing decision makers has to do with the level of expertise among the people describing the accessibility risks. Perhaps we could broadly categorize WCAG SC by importance (affects larger # of disability groups, and/or leads to more serious issues). What I’ve tried to advocate… evaluate accessibility issues similarly to other bugs. You can set a severity scale. e.g. If a “critical” bug means the whole app can’t be used… you can reframe this as “critical” when some disability groups completely can’t use it. Robert Baker at DHS has put together a risk categorization. This could be useful to collaborate on.
  + Betsy: A challenge in industry is that they look into government and see we all require different things. We’re constantly, through education/training internally, and industry outreach, trying to get a consistent message. Risk is a factor to consider, but the bottom line is that we need to have disclosed the level of accessibility. Section 508 has exceptions, but you have to know what the level of accessibility is for what you’re buying. So you can make informed decisions.
    - Question to Canada: How much of what you’re buying is COTS vs Custom development? Because with VPATs we’re talking about COTS.
    - Mike Hertzog: We’ll get back to you on that, and we’d like to keep of track of whether we’re moving more in one direction or the other.
    - Betsy: It’s a very different situation in terms of requirements for each.
  + Leah: We’ve been putting in a requirement for vendors to fix accessibility issues within X months. Microsoft said “our lawyers wouldn’t like that!” What do you do about this? Do you ask for conformance improvement during the contract?
  + John: Depends on the contract. If you are putting it in the contract just to buy this ICT, sure. If you are buying off a pre-qualified supply list, probably no.
  + Betsy: What we’re looking at is the opportunity in the contract. When NASA did our outsourcing for desktop compute, we made a mistake here. You need to state that “the contractor shall…”. If you’ve specified “must be fixed within X months” then you do have the leverage. And incentive for the vendor to do that.
* Out of time; let’s have another conversation.
  + **John: Specifically, let’s work together with ITI. Let’s find out what Microsoft etc. said and maybe bring those people in too. And let’s work out what our topics are.**
    - **For me, the best week of the month is December 14th – let’s look at the schedule**
  + Andrew: We didn’t get to talk about the ICT testing baseline, but **we actually have regular meetings on the baseline every 2 weeks. You could join in, to get a start on it!**