Accessibility in Higher Ed Purchasing with the New HECVAT 4

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full project writeup and details:
Asking the Right Questions for Procuring Inclusive, Accessible Technology
in *EDUCAUSE Review* (2021)
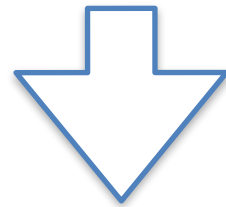
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Introduction

Postsecondary institutions have obligations to ensure the accessibility of electronic content, especially content purchased from third parties. Higher education accessibility experts from fifteen colleges and universities synthesized best practices across many institutions. The resulting assessment questions for vendors were incorporated into version 3 of the Higher Education Community Vendor Assessment Toolkit (HECVAT), a widely used tool that previously focused on assessing risk for security compliance. Now the HECVAT has been updated to version 4, with streamlined formatting and new or updated questions, including for AI, Privacy and Accessibility. The HECVAT (now trademarked and with a copyright) is maintained and supported by EDUCAUSE in partnership with Internet2, REN-ISAC and volunteers from higher ed.

About the HECVAT

- Shared framework of questions to assess vendor products for IT Security & Privacy standards
- Adopted by hundreds of postsecondary institutions
- Streamlines vendor processes because they can complete the assessment about their product once (with annual updates) & make it easily available for any prospective customer institution
- Incorporates measures beyond technical standards
- Toolkit is released as a spreadsheet with automated scoring & ability to supplement notes
- HECVAT 4 captures Accessibility, Security, Privacy & AI

How the Questions were Developed

- Hundreds of higher ed accessibility expert practitioners reviewed, shared, submitted questions
- Voted on by IT Accessibility Community Group (CG) members
- Expert working group deliberated and decided on HECVAT 3 questions, refined by core team
- Multi-university accessibility professionals developed Accessibility updates for HECVAT 4

HECVAT 4 Updates

Privacy & AI Questions

- Core focus: work with experts to incorporate Privacy & AI questions into HECVAT 4
- Separate tabs allow experts in those topics to easily navigate to and complete these questions

Easier to Find Accessibility Information

- Previous placement was in one tab with all other questions and was challenging to locate
- In HECVAT 4, IT Accessibility is located in a dedicated tab
- Other areas of expertise are also in their own tabs

Required Screener Questions

- Required questions point vendors to the sections they must complete, including accessibility
- Question "REQU-02 Does your product or service have an interface?"
  - Yes response requires vendor to complete IT Accessibility tab
  - Help text, "This includes any interface for end users and interfaces used by administrators at the institution."

Two New Accessibility Questions in v4

- ITAC-07: Will your company agree to meet your stated accessibility standard or WCAG 2.1 AA as part of your contractual agreement for the solution?
- ITAC-08: Does the solution substantially conform to WCAG 2.1 AA?
- These two new questions align with regulatory changes and gauge vendor commitment
- ITAC-07 and ITAC-08 are marked as Critical Importance (higher weight for scoring)
- Other critical importance q's: ITAC-06 on VPATs/ACRs & ITAC-09 on process for reporting a11y issues

Updated Guidance for Vendors

- Previous versions had limited guidance for vendors
- General guidance now available on 10 additional ITAC questions
- More specific guidance is presented after yes/no responses are selected
- Ex, ITAC-09 "Do you have a documented & implemented process for reporting & tracking a11y issues?"
  - General, "Reporting and fixing accessibility issues is critical to a mature process. If the process for this question is merely a "feature request" and tracker, the answer to this question should be "no."
  - Yes, "Describe the process and any recent examples of fixes as a result of the process."
  - No, "State how users should report accessibility issues. Describe any expected related process updates."

Updated Guidance for Analysts

- Updated and clarified information for analysts (at schools) in the "Reason for Question" column
- Follow-up Inquiries/Responses guidance were added to multiple ITAC questions to support analysts
- Ex, ITAC-10, "Do you have documentation to support the accessibility features of your solution?"
  - Reason for Question, "Has the solution provider documented any additional information needed by users in order to create accessible products with the solution? Are there tutorials, if needed, on how assistive technology users can best use the solution (platforms tested and works best, shortcuts) etc.? In other words, are they taking care of the end users? Accessibility is more than completing checklists."
  - Follow-up Inquiries/Responses, "If claims are made about accessibility and there is no supporting documentation on how they can be achieved, ensure that intended configurations and uses of the product in question were assessed for any accessibility documentation or claims."

Refreshed Scoring for Accessibility

- Higher weighting for four critical accessibility questions: ITAC-06, ITAC-07, ITAC-08 & ITAC-09
- Analysts can override response compliance & importance level in full scoring sheet
- Critical importance scoring (marked by asterisk) is found in a separate "High Risk Evaluation" tab
- Analysts can perform a "lite" evaluation by reviewing questions marked with an * in the "Institution Evaluation" or "Privacy Analyst Evaluation" tabs and viewing results in the "High Risk Evaluation" tab

Questions to Ask Vendors

HECVAT scoring constrained questions to be asked in a yes / no format, needing to add a limited number of questions to achieve project objectives. Below are four sets of questions grouped thematically followed by the questions labeled as they appear in the HECVAT rubric.

Primary Accessibility Contact

Time is wasted and accuracy lost when accessibility information is exclusively conveyed through an account executive or relationship manager who is not well versed in accessibility. These questions document the solution provider's accessibility contact information, as well as requesting accessibility statement or VPAT link.

- **ITAC-01 - ITAC-04:** Solution Provider Accessibility Contact Name, Title, Email, Phone Number
- **ITAC-05:** Web Link to Accessibility Statement or VPAT

Product Conformance for Accessibility Standards

Conformance to technical standards is critical using widely available reporting formats. When products do not conform, available information about roadmaps is useful to effectively plan for enterprise adoption.
- **ITAC-06:** Has a VPAT or ACR been created or updated for the solution and version under consideration within the past 12 months?
- **ITAC-07:** Will your company agree to meet your stated accessibility standard or WCAG 2.1 AA as part of your contractual agreement for the solution?
- **ITAC-08:** Does the solution substantially conform to WCAG 2.1 AA?
- **ITAC-11:** Has a third-party expert conducted an audit of the most recent version of your solution?
- **ITAC-12:** Do you have a documented and implemented process for verifying accessibility conformance?
- **ITAC-13:** Have you adopted a technical or legal standard of conformance for the solution?
- **ITAC-14:** Can you provide a current, detailed accessibility roadmap with delivery timelines?

Organizational Maturity Toward Accessibility

Enterprise customers need this understanding to determine if a provider can maintain accessible products and close any gaps that exist over time. Vendors that consistently release new products features and then later "fix" accessibility undercut any public commitment they may have to building inclusive products.

- **ITAC-09:** Do you have a documented and implemented process for reporting and tracking accessibility issues?
- **ITAC-15:** Do you expect your staff to maintain a current skill set in IT accessibility?
- **ITAC-16:** Do you have documented processes and procedures for implementing accessibility into your development lifecycle?

Accessibility via User Experience, Support, and Documentation

Beyond Standards conformance, true accessibility is is determined by the user experience. Also, if accessibility is dependent on settings, themes or other restrictions it is important that be disclosed and documented for institutional product owners.

- **ITAC-10:** Do you have documentation to support the accessibility features of your solution?
- **ITAC-17:** Can all functions of the application or service be performed using only the keyboard?
- **ITAC-18:** Does your product rely on activating a special "accessibility mode," a "lite version," or using an alternate interface (including "overlay" or AI-based alternates) for accessibility purposes?

The Path Ahead

The HECVAT is maintained by the HECVAT Advisory Committee and interested volunteers with periodic minor maintenance releases and major updates every few years. Ongoing collaborations between HECVAT maintainers and the EDUCAUSE IT Accessibility Community group work to help refine questions over time and keep assessment criteria responsive to institutional and vendor needs into the future.

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