

Options for Bronze, Silver & Gold levels

This document is a high-level exploration of the directions we could pursue for Bronze, Silver and Gold level conformance.

These options have been reformatted as a list of questions. We expect the [List of Questions for Bronze Silver Gold options](#) will be the analysis document moving forward, and this document will not be further developed.

Option 1 - Current document and ideas for Silver Gold

Description

- Bronze - A/AA (with AAA integrated in with higher points and no critical errors)
- Silver - AT testing, Inclusive Design, and User/Usability testing
- Gold - Maturity Model (and possibly as its own note)

Notes: Bronze is required to meet Silver or Gold. This option is close to what is described in the FPWD.

Pros

- Addresses the disability disparity issue
- Gives motivation to improve and include the current AAA guidance
- Gives acknowledgement to companies that want to do more at Silver and Gold levels
- Allows governments that want to include more advanced testing and organizational best practices the ability to cite WCAG3. Some EU countries are very interested in this.

Cons

- Feedback from Makoto's talk that Bronze would need additional levels. [Note: Instead of extra levels, we need to lower the overall required score for Bronze anyway to have room for additional points for AAA.]
- It's hard to do Inclusive Design in a standard. This needs greater expertise than the current active group has.

Issues to Work Through

- Achieving Gold may not require changing anything about the product. However, in the current proposal Gold requires achieving Bronze first which should address this issue.
- There is a risk that high level AAA guideline scores could allow less attention to more-important level A guidelines.

- There may be a risk that if there is no bucket other than Bronze for a level AAA guideline and that if, while the scoring is tested, a level AAA guideline is deemed to throw off scores unfavorably, then the level AAA guideline might be dropped. [Note: there is no plan to drop existing AAA guidance. They are all in the Migration plan].

Option 2 - AAA to Silver

Description

- Bronze - A/AA, some AAA, and expand to contextual testing
- Silver - AAA and other outcomes that build on bronze
- Gold - AT and User/Usability testing
- Maturity Model as a 2nd Document

Notes: Bronze is required to meet Silver or Gold. This option is close to what is described in the FPWD.

Pros

- Lowers the feeling of change from WCAG 2.x.
- Allows Maturity Model to be used independently of WCAG3. This divides documents by scope (1 doc for website, 1 for org) and allows organizations to address maturity model separately from website.

Cons

- Feedback from Makoto's talk that Bronze would need additional levels. This still could be addressed by lowering the minimum score in Bronze.
- Does not address the disability disparity issue. Too many coga AAA would still be optional at a regulatory level. Splitting the outcomes across levels risks the same situation as WCAG 2.x with disability disparity.
- More confusing which outcomes are required for regulatory (unless Bronze was 2.5 and Silver was 3.5)
- No inclusive design included
- Does not include maturity model so does not incentivise organizational improvement.

Issues to Work Through

Option 3: One testing type for silver, both for gold

Description

- Bronze - A/AA (with AAA integrated in)
- Silver - AT testing **or** User/Usability Testing
- Gold - AT testing **and** User/Usability Testing
- Maturity Model as a 2nd Document

Pros

- Addresses the disability disparity issue
- Gives motivation to improve and include the current AAA guidance
- Gives acknowledgement to companies that want to do more at Silver and Gold levels
- Puts greater emphasis on multiple ways of user testing
- Allows Maturity Model to be used independently of WCAG3. This divides documents by scope (1 doc for website, 1 for org) and allows organizations to address maturity model separately from website.
- Flexible testing methodology - choice at Silver better accommodates different types of organization

Cons

- Feedback from Makoto's talk that Bronze would need additional levels. This still could be addressed by lowering the minimum score in Bronze.
- Does not include maturity model so does not incentivise organizational improvement.

Issues to Work Through

Option 4 - AT testing options in Silver & Gold

Description

- Bronze - A/AA
- Silver - AAA **and** (AT testing **or** User/Usability Testing)
- Gold - AAA, AT testing **and** User/Usability Testing
- Maturity Model as a 2nd Document

Pros

- Addresses the disability disparity issue
- Gives motivation to improve and include the current AAA guidance
- Gives acknowledgement to companies that want to do more at Silver and Gold levels
- Puts greater emphasis on multiple ways of user testing
- Allows Maturity Model to be used independently of WCAG3. This divides documents by scope (1 doc for website, 1 for org) and allows organizations to address maturity model separately from website.
- Flexible testing methodology - choice at Silver better accommodates different types of organization

Cons

- Perpetuates structural bias by putting AAA SC, especially the ones related to Cognitive accessibility, at a non regulatory level. Splitting the outcomes across levels risks the same situation as WCAG 2.x with disability disparity.
- No Inclusive Design
- Does not include maturity model so does not incentivise organizational improvement.

Issues to Work Through

Option 5 - Point based system

Description

- Assign points each outcome using variety of approaches to testing
 - If points are used, consider assigning up to 2 points for A and AA like SC (2 for 100% correct within stated scope and 1 for partial). Allow an additional point for AAA-like SC
- Points consistent across outcomes
- Totals or percentage by category (disability functional need)
- Bronze, silver and gold is assigned based on the number of points accumulated
- Points evaluated across disability categories
- Maturity Model as a 2nd Document

Pros

- Not having clear lines between levels may encourage people to improve where they can
- Could simplify Conformance
- Removes the problem of a small change having a big impact because it crosses a level boundary

- Addresses the disability disparity issue
- Allows Maturity Model to be used independently of WCAG3. This divides documents by scope (1 doc for website, 1 for org) and allows organizations to address maturity model separately from website.

Cons

- No Inclusive Design
- Removes incentive from crossing level boundary
- Does not include maturity model so does not incentivise organizational improvement.

Issues to Work Through

- How many points is the right amount? Likely need to use % of total points in a disability category instead of total points so boundaries do not change during updates.
- Adequacy and Sensitivity: If the number of possible points is too small then the ability to show sensitivity is harder.
- May need more than simply 1-3 possible points to ensure we can show improvement over time. Risk that everyone gets a 1.

Option 6 (Gold is a separate idea that could be an add-on level, “gold” “platinum” “with honors, idk” after user-testing to any other approach | Bronze and Silver added based on Gregg Vanderheiden’s Response to the FPWD)

Description

- WCAG 2.x remains the “bucket” for Regulatory success criteria with objective tests. Point releases continue. Bronze is based on first meeting WCAG 2.x and then completing basic non-objective guidelines
- Silver is based on first meeting Bronze and then completing advanced non-objective guidelines
- Gold is based on first meeting Silver and then adding features in the product/site that move the industry forward such as:
 - Implementing markup that is not yet accessibility supported
 - Using a new technique (illustrating a new method) to meet a guideline that is more appropriate for the specific content through “equivalent facilitation”

Pros

- Organizing WCAG 2.x, Bronze and Silver in this way allows Bronze and Silver to fill a gap, rather replacing something we already have. (See also Gregg's document.)
- Organizing WCAG 2.x, Bronze and Silver in this way avoids devoting valuable resources to a simply re-writing WCAG 2.x
 - W3C/Member/Volunteer Resources now
 - Resources of companies and organizations around the globe as the new standard rolls out
- Gold:
 - May encourage AT vendors to support new markup/css designed for accessibility, since Gold sites would be places where the features will benefit users right away
 - There seems to be a desire for Gold to include extensive content AT testing and user testing, but the full benefit of these is often elusive. For example, when companies begin thorough screen reader testing of content (as opposed to just custom widgets / basic UI), the first thing they usually want to do is polish pronunciations. When this is not possible in a straightforward way, it is discouraging. This use of the Gold level would let such companies begin that type of polishing, and get credit for it, even before AT has fully implemented the solutions.
 - I think setting Gold to an innovation level will reduce frustration when teams encounter unfurrowed ground.

Cons

- It does not provide a structure that does more to provide fair treatment of all disability needs. It is too easy in this structure to assign the hard-to-measure needs of people with low vision and cognitive disabilities to Silver and Gold levels, where they will be considered optional and not be met. Unless we can put in structure to ensure that the hard-to-measure needs of people with disabilities will be addressed at bronze level, then we should not go forward with this proposal.
- Adopting new markup/css before fully supported may impact individuals who become reliant on the early adoption and have the new markup/css get removed.
- Because it is based on WCAG2, it does not address the need for "perfection or fail" that precludes large or complex websites being able to claim conformance.
- It doesn't meet the Silver requirements

Issues to Work Through

- A company might withhold a method now, to be able to earn Gold compliance by introducing that method through their product later. lol

Option 7 - Profiles

Description

- Scoring based on Maximum Points available and “Profiles”
 - “Profiles” are based on types of content being evaluated/reported-on: the requirements for ePub are likely different than for XR, or RTC (Real Time Communication), or native mobile applications, or for Templates and Design Systems vs. hand-authored websites.
(We already know, for example, that PDF accessibility is a subset of WCAG today, as not all WCAG 2.x SC are applicable.)
 - Holistic approach to the final product’s conformance score.
(Example: a ‘website’ that features user-generated images may not have “awesome” text alternatives, but the site also features a color contrast ratio of 6:1 across all textual content, so the benefit there offsets - in part - the poor alt text. This presumes that there is a minimum ‘acceptable’ alt-text quality measurement.)

Pros

- Removes stratification imposed by the former A, AA, AAA structure and moves strictly to points.
- Recognizes that not all content can be measured using the same metrics: Allows COTS (Commercial Off The Shelf) applications to claim a level of conformance (based on a Profile) even when no actual content is present.
- Might be more compatible with the current approach to game accessibility
- Rather than saying “Level AA” or “Bronze,” which might mean more to specialists than to consumers/participants, the number of points next to a user profile might mean more to consumers/participants.
- **Added May 4th:** There could be profiles for social-media posts, etc. A new Website that requests/or allows something unique from users could create a profile specific to their user content.
 - Non-profits might then use the user-content profile to develop training programs, that could, for example, even be presented in middle schools, etc
 - Start to encourage a better spread of messaging and responsibility

Cons

- Adds another layer of complexity to the scoring mechanism: 'conformance reports' will need to reference which Profile the report is based on.
- Requires ongoing monitoring of Profiles - if tech changes or new tech emerges, "Profiles" will need to be modified or created new.

Issues to Work Through

Option 8 (If Subjectivity appears to be a significant concern as outlined in Gregg Vanderheiden's Response to the FPWD)

Description

- Bronze (Low subjectivity)
 - Guidelines that are not subjective
 - Subjective guidelines on a rudimentary ("everyone can agree") level
- Silver (Slight improvement in non-subjective. Bulk of subjective work falls here.)
 - Lower margins of error for large sites on Guidelines that are not subjective
 - Subjective guidelines require evidence:
 - a written explanation including some evidence such as:
 - User testing/Remediation/Re-testing report
 - User testimonies
 - ???
- Gold (Significant improvement in non-subjective.)
 - No margins of errors on Guidelines that are not subjective
 - Non-subjective guidelines require efficacy evidence:
 - a written explanation including some evidence such as:
 - Successful user testing
 - User testimonies
 - A published schedule of AT-testing by people with AT-relevant disabilities and publicly-available issue triage

Pros

- If Bronze is not appealing to regulators due to any subjectivity, Silver and Gold are options where subjectivity has been reduced, while all levels support all disabilities
- [none noted in the [meeting of 23 March 2021](#)]

Cons

- Published documentation: Where, who, accessibility of those statements? It would be a very large document for a large site.
- Why would we tie subjectivity of a guideline to the accessibility of a site?
- It is turning Bronze, Silver, Gold into a redux of A, AA, AAA.
- Machine testing only goes so far. At some point there is an evaluation if it is done correctly, which will always have an element of subjectivity.
- Would constantly need updating due to advances in automated testing which would require changing the rating of a guideline. That would not be acceptable to regulatory bodies.
- (same as Option 6) It does not provide a structure that does more to provide fair treatment of all disability needs. It is too easy in this structure to assign the hard-to-measure needs of people with low vision and cognitive disabilities to Silver and

Gold levels, where they will be considered optional and not be met. Unless we can put in structure to ensure that the hard-to-measure needs of people with disabilities will be addressed at bronze level, then we should not go forward with this proposal.

Issues to Work Through

- Where and in what format would an assertion need to be recorded? However, we are not in the business of enforcement.
- There is a difference between subjective and non-ambiguous. “Does the title describe the page?” is subjective. If there is more than one way to understand the requirement that is ambiguous and that is a problem that needs to be addressed. Subjectivity is not the problem, WCAG2 is subjective and has worked well for over a decade. Ambiguous is the problem we have to work through.

Option 9 (Much of this could be used along with the ideas in Option 7, by assigning the different types of “evidence” to different point values and dropping the bronze, silver and gold buckets)

Description

- Bronze
 - Guidelines that are not subjective with a margin of error provided through scoring
 - (If a site with 500K pages can’t guarantee they won’t be missing heading markup on a few headings, or there is a lag in their cycle of checking user-added content, they still get official credit; whereas, in WCAG this still existed but is handled more loosely and may encourage documentation/VPAT inaccuracies.)
 - Guidelines of the nature that previously were not included because of concerns about subjectivity with:
 - Required basic evidence, by guideline, of compliance that an individual could be expected to put together on their own
 - For example, for plain language:
 - You might have a series of 3 drafts
 - You might have a statement as to why your plain language summary is sufficient
 - The non-subjective test becomes the existence of these materials
 - Additional care in the guideline design
 - Comparison during guideline design to existing Adjectival standards or requirements that are in legislation (I believe Bruce B mentioned he has some examples of this?) to ensure that these guidelines have the best chance possible

- Bruce's examples of adjectival ratings in the U.S. Federal government:
 - The procurement process where the general idea is that the procuring official creates metrics that will be used to evaluate incoming bid offers. Various technical aspects of the proposal will be rated on an integer scale (e.g., unacceptable, acceptable, superior) and then all those ratings bundled to derive an overall adjectival rating for the offer.
 - Annual personnel review. At the beginning of the rating cycle, employees and supervisors negotiate categories and performance metrics. At the end of the rating cycle, the supervisor assigns an adjectival rating for each of the metrics, and an overall rating for the employee.
 - With both of the above examples, the composite adjectival rating is typically *not* a mean average, but the rules for deriving the composite score are determined ahead of time. An example of that might be: If three of five technical requirements are rated superior, and neither of the other two technical requirements are rated as unacceptable, then the offer is rated as being superior.
 - Bruce notes that he does *not* have examples of adjectival rating in legislation or regulation. The main point of these two examples is that adjectival ratings are defensible in high-stakes situations subject to significant legal scrutiny. But these examples are specific and tuned to one particular procurement action or one individual employee. A universal adjectival rating system that would work for all procurements or all employees is obviously not feasible. An adjectival rating system that allows WCAG3 to apply across all web content may be a challenge.
- The WCAG 3 initiative should keep a record of the precedents used in helping to fine-tune these guidelines.
- It is possible there should be a companion document that houses concerns and responses, so that anyone presenting on this down-the-road has the information on-hand (*Presenter's Companion to WCAG 3.0*)
 - Would include plain language description of the Adjectival precedents used in helping to fine-tune these guidelines.

- Would include plain language chart of likely arguments against subjective standards, and how to address these arguments
 - The WCAG 3 initiative should get permission now to publish quotations from representatives (particularly those less likely to support accessibility) who have advocated for better representation of the following:
 - Low vision
 - Coga
 - Deaf/Blind
 -
- Silver
 - For Guidelines that are not subjective
 - Lower margins of error compared with Bronze
 - [Limited to Specific Widgets, etc] Additional Testing is required but is limited to particular guidelines and particular content types (such as a JavaScript-based widgets)
 - User testing that shows efficacy* OR
 - AT testing that shows efficacy* (unlike when WCAG 2 was finalized there is enough free AT and AT provided by operating systems to make this practical even for small enterprises)
 - * “that shows efficacy” means that, for example:
 - One round of testing that shows the product does not work well would not be enough to claim Silver.
 - One round of testing that shows the product *does* work well would be enough to claim Silver.
 - Several rounds of testing with remediation in between, so that the last round shows the product works well would be enough to claim Silver.
 - For Guidelines of the nature that previously were not included because of concerns about subjectivity:
 - [By Guideline] Required basic evidence of compliance by guideline such as:
 - User testing/Remediation/Re-testing report OR
 - User testimonies OR
 - WCAG 3.0 could provide other examples as well OR
 - Organizations could use types of evidence that are not listed but that they consider equivalent
- Gold
 - [The overall product] For all Guidelines:
 - Successful user testing OR
 - User testimonies OR
 - A published schedule of testing by people with disabilities and publicly-available issue triage

Pros

- As long as all guidelines are at Bronze level, then having Silver level support more AT testing would be acceptable.
- Margin of error and testing type separate Bronze and Silver
- Addresses the problem that requiring testing with assistive technology at bronze level is too great a burden for small sites, so AT testing is at Silver level.
- **Targeted AT testing or** Usability testing limited to specific guidelines and content types where the impact is greatest at Silver level causes W3C to provide guidance on where such testing is most efficient

Cons

- Putting some guidelines at Bronze and some at Silver is not treating all disabilities equally.
- There are few websites now with pure HTML, so putting Javascript at Silver level is not workable. [Meeting agreed that javascript testing did not belong at Silver level, but widget testing with assistive tech does.

Issues to Work Through

- (based on Jemma's comment) The way this Option uses "Limited to Specific Widgets" in the Silver level is misleading/ an error - the idea should just be increased testing from the Bronze level. "Limited to Specific Widgets" was only meant to indicate that to distinguish between Silver and Gold, certain testing might be limited in Silver to those widgets where that testing is most needed. However, that testing is even needed at the Bronze level, as you shouldn't say that a widget is accessible without at least some AT testing. **(Not planning to polish this at this time, since the final proposal will likely take ideas from multiple Options.)**
- Items listed under Gold need to be more clearly defined. JF is concerned how we would say what disabilities would need to be tested with. Define what would work for them.

Option 10: Conformance in multiple WCAG 3 documents *(from Wilco)*

The key idea behind this is to write WCAG 3 into multiple recommendations, where different "types" of testing are separated into their own documents. These documents are closely connected in the same way that CSS 3 has multiple recommendations that are inter-connected. Each of these documents has a bronze, silver, and gold conformance level. This could be done (for example) like this:

- WCAG 3: Outcomes: This document describes universally expected outcomes for accessible content. It is applied to individual views. This document contains what WCAG 3 currently refers to as "atomic" tests.

- WCAG 3: Usability: This document is scoped to processes and tasks. It outlines how to work with users, with personas, and with assistive technologies to discover and address accessibility needs specific for the process/task under test. This document contains what WCAG 3 currently refers to as “holistic” tests.
- WCAG 3: Sites & Apps: This document is scoped to collections of views, and transitions between them. This document allows testing based on sampling. Thresholds are built in, so that sites and apps can conform, even if not all views in the sample are fully conformant. This threshold is used to handle the “spoons” issue.
- WCAG 3: Organisation Maturity: This document describes quality assurance measures an organisation should have in place to ensure the accessibility of digital products and services.

Each of these documents has its own Bronze, Silver and Gold conformance levels. Unlike WCAG 2.x, for WCAG 3 it should be far more common for both the lowest, and the highest conformance level to be used by organizations. The levels attempt to each strike a different balance between on the one hand the required knowledge and effort of the content provider, and on the other hand the experience of people with disabilities.

- Bronze conformance: Ensure content is free of issues that is likely to block people with disabilities. This level focuses on making good decisions with commonly available tools. Bronze is achievable by content providers without experience with web technologies, and with limited to no budget. Amateur blogs, self-employed businesses, etc. This should also serve both as an entry-level to accessibility.
- Silver conformance: Ensure a good experience for people with disabilities when common solutions are readily available, and an acceptable experience when they are not (such as through alternatives). Silver is achievable for content providers with a professional understanding of web technologies, commonly available tools and training materials and occasional access to a digital accessibility specialist.
- Gold conformance: Ensure an excellent experience for people with disabilities. Gold will require extensive understanding of web technologies and digital accessibility, and will involve creating research-driven solutions tailored to primary and secondary demographics of the software. Gold conformance should be used in combination with silver conformance to achieve excellent accessibility for the most important areas of an organisation’s software, and silver for everything else.

Pros:

- Greater flexibility and extensibility for now and in the future
- Encourages organisations to work on different parts of accessibility at once, instead of encouraging them to complete their “atomic test level” before starting on the “holistic test level”
- Reduce the impact that delays in one part of WCAG 3 can have on everything else
- Encourages good behavior both from very small organisations (for whom WCAG 2 A is currently often far too hard), and from very large organisations (for whom WCAG 2 AA is too low a bar, and AAA often isn’t a good fit)

Cons:

- Adds complexity at the highest level of WCAG. Something isn’t either bronze, silver or gold, different “things” will meet at different levels.
- Bronze will probably require some very painful and controversial omission. This could be made more acceptable by adding a fourth or fifth conformance level.
- May make it easier for organisations to “opt out” of specific documents. I.e. an organisation could say they’ll work on outcomes but not usability.
- Is it fair that the smaller organizations would have trouble reaching Gold? (based on Gemma’s comment)

Issues to Work Through:

- The devil is in the details.
- How to adapt this so that even small organizations can reach gold.
- Does Gold require more tools only, or also more knowledge of user needs? (based on Gemma’s comment)
- Potential for a lower level than bronze? Scoring gives a way to show score below bronze. Consideration: race to the bottom.
- Perhaps a WCAG3 for small business, a WCAG3 for Component Libraries, etc.
- (There was an idea mentioned about assistance for small businesses, pro-bono work, in the meetings - may not be addressable in this context though)

Option 11: Agency

Definition of Agency as Used Here: The ability of organizations that wish to be accessible to act independently. Empowerment. The ability to accomplish things or make decisions by yourself without needing help.

WCAG 3.0 Automated* Foundation (inspired by Github 451) [Agency comes through automation]

- WCAG 3 would define a set of outcomes that have these characteristics:
 - Provide a high level of benefit

- Can be tested with an automated evaluation tool
 - WCAG 3 would provide specific requirements for the set of tests that a tool must include to be used for this
- *Just because a tool can test for something does not mean it is part of this level.

WCAG 3.0 Full Foundation [Agency comes through automation + Q&A testing support]

- WCAG 3 would define a set of outcomes/scores to create the following high-level outcomes:
 - Users are not blocked from accomplishing tasks
 - All user profiles considered equally
 - Friction and frustration caused by a mismatch between user needs and sites/products is reduced
 - All user profiles considered equally
 - Goal is to significantly reduce the likelihood of friction becoming a blocker or a competitive disadvantage
 - Goal is not perfect usability and much usability would fall into the higher-level Badge categories
- Each outcome/score required can be tested through either:
 - An automated evaluation tool
 - Detailed work would be needed to decide if everything here is part of the Automated Foundation or if anything else is added here. There may be Outcomes that are testable with a tool, but where the user impact is not quite severe enough to be in the very first level, and those might be placed here.
 - Or a Question-and-Answer (Q&A) Script / Wizard
 - WCAG 3 would provide the Clear Words script
 - Vendors would be likely to create Wizards, and related / built-in tutorials, etc

Badges (inspired by Github #466) [Agency comes through high level decision makers' ability to choose a badge]

- Much like the badges used for on consumer food packaging (<https://hamacher.com/so-many-certifications-non-gmo-project-certified-gluten-free-certified-vegan-usda-organic-and-ewg-verified/>)
- Once you meet Full Foundation, you can start claiming badges
- Badges are the only “levels” that allow you to use public-facing W3C-Designed icons.
- Badges can be available for a variety of different types of accomplishments:
 - Completing (or reaching a very high score for) all universally applicable outcomes for a user profile
 - Completing just one previously-Level-AAA guideline that is not part of the universally applicable set

- Completing a type of testing or evaluation that the Accessibility/UX Field generally agrees is advisable
 - For example, there could be a Badge for “Improved through User Testing”
- Anything else that is discovered through work on WCAG 3 that should be encouraged

Pros

Pros for Automated Foundation

- Gives people creating sites/products agency to make progress without the need for outside experts.
 - Tools can provide immediate feedback during development.
 - Tool can provide some level of training, making this a good place to start for smaller teams.
 - Providing requirements for a specific set of tests as part of WCAG 3 should help with repeatability (We should see, though, if ACT agrees.)
- Organizations do this (limit efforts to what a tool reports) anyway. Making an official level for it:
 - Provides clarity about what it is and what it is not
 - If WCAG defines a specific set of tests, this also make this type of activity less arbitrary
 - This can help avoid rumors about accessibility that tools that simply test everything testable can perpetuate (For example, it is believed by many that all content needs to be forced into an outline structure.)

Pros for Full Foundation

- Q&A script continues to provide “agency.” Once teams are comfortable with the Automated Foundation, moving into use of this script should be a natural progression.
 - Providing the script for the tool as part of WCAG 3 will help with repeatability.
- “Foundation” implies a beginning, but still probably sounds better than “Bronze”.
 - “WCAG 2.1 Level AA” sounds better than “WCAG 3.0 Bronze.” Companies may not want to do additional work on their products to move from “WCAG 2.1 Level AA” to “WCAG 3.0 Bronze” with Gold and even Silver perhaps seeming out of reach. But, moving to “WCAG 3.0 Full Foundation”, which comes with additional testing supports, and the promise of badges for incremental work, may be appealing.

Pros for Badges

- Motivation to continue to improve in small steps (credit for incremental improvements)
- Justifies ongoing investment
- Accomplishments are not hidden behind a complex VPAT document
- Gives agency to non-experts

- For example, a business person managing a memory care center can decide independently, without relying on outside experts, to tell their Web development team to ensure they have the badge for the user profile related to memory.
- Far more “fun” than a VPAT
- Consumers can appreciate badges
- Has benefits of Profiles, while also ensuring some attention across disabilities, to help avoid de-prioritization of lower-incidence disabilities.

Cons

Issues to Work Through

- Would need to ensure this does not lead to uneven disability to disability (the disability disparity issue)
 - Is concern that automation would favor the disabilities favored by WCAG 2, given that automated testing is currently based on WCAG 2?
 - Or, is the concern that Profiles (at the Badge level) could, in practice, favor higher-incidence disabilities?

Option 12 - (address on Tuesday 20th when PK is present)

Automated

- If an automated test can test for it, it is required at this level (caveat: where there are levels e.g. 4.5:1 contrast vs. 7:1, though an automated test may be able to test for both 4.5:1 and 7:1, 7:1 wouldn't be required for the “Automated level”).
- Expands as automation becomes more robust - as we develop new automated techniques for testing things, those test become part of the Automated level within a not unreasonable amount of time after discovery, allowing for broad dissemination of the technique and incorporation into website test automation
- Not frozen to the current technology
- Includes AI (unless extremely expensive computing costs)
- Updated at least once a year

Pros for Option 12 Automated

- Speaks to GitHub #451
- Addresses some of the key challenges faced by highly dynamic websites
- Organizations do this (limit efforts to what a tool reports) anyway. Making an official level for it:
 - Provides clarity about what it is and what it is not
 - Unlike option 11, option 12 allows this level to become more and more robust overtime
- Broader interest in this sort of a level
- The process of requiring automated tests across all guidelines before starting to look at the tests by individual guidelines AND requiring that you pass the automated tests before going on to the guidelines test.

Cons

- The maintenance would be very high and dependent on the group. It could consume all oxygen in the group.
- Making a level for automation could encourage organizations to choose a lower level that could undermine the advances of WCAG 2
- Automated tests will always be ahead of the standard.
- Including automation in scoring MAY require that automation be normative

Issues to Work Through

- What if one tool has a proprietary test or far excels at AI testing?
- Is there a higher level which defines a cap for the automated level? (e.g. Imagine a future where all of WCAG 3.0 can be tested through automation, what is included then in the Automated Level?)

Option 13 from [Results of the Attendees Survey - Japanese Webinar on FPWD](#)

WCAG 2.x Level AA too difficult, prefer something more like

- A → Bronze
- AA → Silver
- [something higher] → Gold

Pros

- Japanese attendees noted that WCAG AA is too difficult to meet. This would provide a conformance level more feasible to achieve.
- Would provide a familiar baseline built from the successes of WCAG 2.

Cons

- Doesn't address the issue of fairness with disability categories
- This would change the spelling of A, AA and AAA.

Issues to Work Through

- Could be addressed with the FPWD by reducing the minimum point score for Bronze.
- Identify the barriers that some geographies have in implementing WCAG AA
- Needs looking more into what makes WCAG 2.x AA too difficult to meet

Previous Discussion

Options

- Option 1
 - Bronze - A/AA (with AAA integrated in)
 - Silver - AT testing and User/Usability testing
 - Gold - Maturity Model (and possibly as its own note)
- Option 2
 - Bronze - A/AA (with AAA integrated in)
 - Silver - AT testing
 - Gold - User/Usability testing
 - Maturity Model as its own note
- Option 3
 - Bronze - A/AA (with AAA integrated in)
 - Silver - AT testing or User/Usability Testing
 - Gold - AT testing and User/Usability Testing
 - Maturity Model as its own note
- Option 4
 - Bronze - A/AA
 - Silver - AAA and AT testing or User/Usability Testing
 - Gold - AAA, AT testing and User/Usability Testing
 - Maturity Model as its own note
- Option 5
 - Score each functional outcome using maturity model and other approaches to testing
 - Based on score, the bronze, silver and gold is assigned

Notes:

Terminology

- **A, AA, and AAA:** WCAG3 guidelines comparable (but not identical) to WCAG 2.x SC. Includes scoring system for bronze level (includes manual WCAG2 testing)
- **Assistive Technology (AT) Testing:** Testing is testing with some pre-identified assistive technology or types of assistive technology. e.g. Full experience of product has been tested with a screen reader, with a screen magnifier, with AAC, etc
- **User/Usability Testing:** All ways that users can be integrated into the design and development lifecycle
- **Maturity Model:** Output of the maturity model subgroup
- **Manual Testing:** e.g. Human review of alternative text for appropriateness, limited review of widgets with screen reader, markup review, etc

Pros:

- It recognizes organizations that do more.
- Gives organizations a way to advance accessibility beyond WCAG2
- Although having better processes may not result in changes to the product, there is still a benefit to users - they have reassurance that the product has been tested with AT, etc
- Maturity model is aligning with evolving EU approach for accessibility
- By adding a quality control component of assistive technology testing we are right on track - early definitions of accessibility defined it as the web being interoperable with AT
- There is a W3C Community Group working on automation of testing with assistive technology. [ARIA and Assistive Technologies CG](#)

Cons:

- Worried that we will spend resources and fail because Silver and Gold levels aren't required by law.
- As described, many of the proposals above allow achieving Silver and Gold without changing anything about the product. As we currently propose in WCAG3 FPWD, we require Bronze level conformance to start working on Silver and Silver level conformance to start working on Gold.
- If one improve

- Mixing technical assessment of the output (legislature) with the process to get there (organizations) doesn't make sense. Should be 2 separate documents under the larger WCAG umbrella
- There is no way for an assistive tech user to know if a site, app, or service is bronze, silver, or gold, so the user will discover it is unusable by using it, or miss information.
- How will those charged with meeting accessibility compliance know that, for example, Section 508 (once it exceeds WCAG 2.0) requires bronze and silver in order to meet minimums? Will this be clear to those building digital services? Specificity would help.
- By calling out AT Testing as Silver, it is likely to confuse teams between the manual testing for Bronze and the AT Testing for Silver (I know it confuses me).

Other comments:

- Would be helpful to validate the bronze, silver, and gold levels framework with more tests, and recommend user interviews to better understand our audience, if this is something we can do. Conversations I've had with lay users reveal confusion and concern. I worry it could dilute the trust of WCAG.
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