

Minutes and asynchronous work

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3rd Feb

We reviewed Jennie's proposal (see the tab), and discussed some of the Ongoing topics.

Conformance Model Voting

Homework:

1. Please review the ongoing topics and add points / counter-points.
2. If you have a different approach, please write it down. It could extend / adjust a previous approach.

18th Feb

Q&A with Eve Hill postponed, we discussed [Gregg's proposal](#) and started on the ["What goes where" exercise](#).

For next week, please review the items in the ["What goes where" exercise](#), and put any ideas for **core conformance** you have (or can find) into the table under each heading. You can also put counter-points next to each item, and add below where it might go into other documents.

Also, please reply to Alastair whether you can extend next week's meeting.

18th March

[See slides](#).

Question: For internationalisation and text-attributes, If we had core spec that references a registry, which references a series of documents that define readability for different scripts.

If we have nothing for a particular language, then get one for that language, then a conforming site in that language would no longer conform.

Can we date things? Perhaps associate versions?

Dated: State what date (in conformance claim) you are referencing the registry. Allows flexibility, and allows regulators to specify a registry version. Would allow people to reference an old version, unless their regulator was careful.

Or, the registry (or items within it) are given a version. WCAG 3 then references a version of the registry. We add new languages to the registry, but they aren't officially included until WCAG3 re-publishes.

15 April

Pro/Con Spreadsheet:

https://docs.google.com/spreadsheets/d/15lGVWj5W-Bp63fLhg6nbJ3hzq_Rz4QvumxABRthRXjk/edit?gid=0#gid=0

Conformance Discussion / Decisions

Conformance (writ large) Discussion / Decisions

ISO separates two concepts that common usage conflates:

- "Conformity" — the state of meeting requirements (general language term, not formally defined)
- "Conformity assessment" — the demonstration that specified requirements are fulfilled (formally defined in ISO/IEC 17000)

In / out of scope:

- Ruler & rule separation, we define the measures, not the enforcement.
- Want to say what scope conformance claims can apply to (eg WCAG 2 says they apply to full pages and processes only), to avoid loopholes and keep claims meaningful.
- Do need units of evaluation, referenced by each provision. Element, page etc.
- WCAG 2 allowed for scope of evaluation, but didn't require it.

Things we should cover elsewhere:

- From reporting, how does a user figure out whether something works for them?
- Who needs to meet the guidelines (policy doc)
- Can sampling be done / used to test (policy doc - which should probably not recommend that policy say anything quantitative about it since it is just a standard procedure for evaluating large amounts of anything in the world)
- Equivalent facilitation (policy)
- Technical infeasibility (policy) though we should not include anything that is not technically feasible to do for everything covered by the scope of each provision language.

Goal of this group

What we are trying to do: **Write down, given all requirements and assertions we have in WCAG 3, how someone can establish they conform with the standard.**

This could be in a conformance section of WCAG 3, and/or published as a separate document.

A successful conformance description includes that it can be used well by organisations to talk about their accessibility and can be picked up by regulators to assess.

Key issues

Key impediment to use of conformance reports: Products so rarely fully meet WCAG conformance that procurers cannot use full conformance for comparison. Possibly due to risk assessment, possibly more straightforward comparison.

Key impediment to discussions: People (outside the group) generally equate conformance with “being accessible”. I.e. A product meets WCAG conformance, therefore “it is accessible” (in a binary fashion).

What is / purpose of Conformance

([Slide 3](#))

- Conformance is how closely a “thing” meets the technical standard
- Measured against 100% of technical levels defined by the standard
- A conformance claim must clearly define the scope and time of testing
- Compliance with laws relies on the standard’s conformance model.
- Guide authors and content providers where to start etc

Other things build on conformance,

- especially “reporting”, which is what gets shared around.

Desired changes:

- A big barrier is that so many products fail, and so badly, people in the risk evaluations.

Topic

Setting a standard (conformance level) needs to be all or nothing?

Stakeholders

- Authors/developers
- Users (people with disabilities) helpers and user agents
- Evaluators
 - Testers
 - Regulators/Auditors
- Internal Risk evaluators of orgs
- Purchasing agents / procurement managers
- Policy/Regulation Writers (legislators, regulation writers and their advisors, staffs)
- Monitoring bodies?

- Decision makers funding accessibility testing, developing accessible products, auditing - money needing to be spent to conform.

Stakeholder Needs

- Clarity
 - Ability to report: we conform to WCAG...at this level.
 - Ability to understand how the conformance report impacts barriers for people with disabilities (at a level appropriate for the stakeholder)
-
- The users (End users) Accessibility: - need to have accessibility needs met! That is the whole point.
-

Current structure / building blocks:

- Units of measure / evaluation:
 - Elements
 - Pages/Views
 - Processes
 - Conformance claim scope
- Types of provision:
 - Foundational requirements
 - Supplemental
 - Assertions of process

Small ideas for improvements

- Embed “alternatives” more effectively (AC).
- For the current proposal, if we include percentages, we must require a conformance statement which says which provisions have been met.

Big ideas for different directions

- Identifying the impact of different barriers? (e.g. consider an evaluation rubric to accompany the normative WCAG 3 spec)
- Identifying the impact of different requirements? (e.g. revisit severity now that requirements are more granular than in WCAG 2)
- Identifying the required effort to meet a requirement (eg sign language more effort than adding an ARIA attribute)
- Identifying different types of systems that can help meet requirements (such as authoring tools, design systems,).

Lisa:

Process can include

- ☐ effort included process- testing feedback, having a timely response and action to feedback, user testing, with a wide range of disabilities (to be defined) for critical paths
- ☐ identifying critical paths and performing user testing, expert testing and automated testing

“Parking lot”, topics we need to cover but haven’t yet

- User generated / 3rd party content.

COGA questions

- New research modules, would it help to have an issue paper on usability testing? There’s some in content-usable, but would a specific-to-conformance paper help?
- New template for content-usable, does this group like how we’re handling testing.

Eve Hill Q&A

Eve Hill Q&A

Summary

Some conclusions after the discussion:

- (US) Regulations are improving, relieving some of the pressure from “must pass everything” problem, adding some reasonableness. (see next item on this page)
- Re-enforces our approach of having a separate policy document, which should recommend the reasonableness aspect.
- Rejection of percentage-based scoring for conformance, would undermine the legal process.
- Need to make distinction between what defines conformance (the standard) and how we test for it (the process).
- Assertions should be ok for things that can't be requirements, and for having done a process. We should consider it a fall-back for when we can't use objective tests.
- Assertions of outcome would be a big problem, e.g. asserting that you meet WCAG 2.1 when there might be issues on the site would have legal consequences.

Quote from new ADA regulation

[28 CFR § 35.205](#) — the “minimal impact” safe harbor

Noncompliance with WCAG 2.1 Level AA will **not** be deemed a violation if that noncompliance has:

“such a minimal impact on access that it would not affect the ability of individuals with disabilities to use the public entity's web content or mobile app to do any of the following in a manner that provides substantially equivalent timeliness, privacy, independence, and ease of use: (a) Access the same information as individuals without disabilities; (b) Engage in the same interactions as individuals without disabilities; (c) Conduct the same transactions as individuals without disabilities; and (d) Otherwise participate in or benefit from the same services, programs, and activities as individuals without disabilities.”

Question and answers from discussion with [Eve Hill](#)

Eve works at a well known law firm, and has worked with National Federation for the Blind. Advocacy & litigation. Tackling inaccessible websites, educational materials, other technologies (including kiosks).

She is a fan of the current standard (she mentioned that as WCAG 2.1), and it's been incorporated into ADA and other regs (an update to ADA comes into force 24 days from now).

What problems have you seen with the previous conformance model?

The main issue on the previous model was that it required accessibility of everything, even things which have no impact on usage. That's ok for me, but the clients find that tricky.

An audit might find one picky image with no impact, repeated on every page in the template, leading to a lot of "hits". It's more a psychological thing than a legal one.

The new ADA reg has done (hopefully) a good job of dealing with that. You don't have to make things accessible that don't affect people...

It comes from the over-arching standard, in POUR, if things don't affect a person in using the website, or have substantial equivalent ease of use. If it doesn't violate the over-arching standard, it can be ignored.

Percentages

Eve definitely does not want a percentage!

"If you talk about percentages, I would die"

Percentages don't distinguish between infrequent but important. It could undermine her work, and it's the regulations that should distinguish important from not-important.

Eve would worry about anything that focuses on a maturity model that leads to accessibility, because the model (or the process), no matter how good, will fail sometimes.

Sampling question on large scale sites

Would want to separate conformance from testing. E.g. in the medical field, we don't test everything. We test the big hits. Could say that if you've tested the "big hits", but would have to be a robust percentage. Wouldn't protect you if someone found an issue elsewhere.

(in a lawsuit defence) As part of due diligence you name pages you've randomly sampled, and it needs to be representative, and robust (significant percentage). Not sure %, but it needs to be reasonable. (Gregg added: Can't use the same sample twice. Each time you check you need to take a different random sample, Eve didn't disagree.)

You effectively have a safe harbour if you:

- Have followed a good testing process.
- Have a process for dealing with requests/issues.
- Cannot "preclude the substantive thing that the person can't use because it slipped through the cracks of your wonderful system". [AC: I think that means you can't exclude a particular area of the site if someone wants to use it.]

The goal is compliance, not more lawsuits.

- *Sydney: Does Eve have suggestions on how to minimize people creating lawsuits just to make money off of gaps they identify in the way WCAG 3 is crafted?*
- *Alastair: She would point to the regulations for that, not WCAG.*

Require conformance claims?

Should we / can we include a requirement that you cannot conform unless you also include a claim of conformance. Should we include a claim of conformance as a requirement for conformance?

- Eve would not wish to require a claim of conformance.

Differences across regions/countries

Haven't seen any better or worse models, I am not an international law expert. Fortunately I have not had to deal with that.

Assertions

No alarm bells for user-needs in the cognitive space, as it's much harder and more personalised. Black and white is harder to do there. Maybe a process based approach works there? Not sure, not the space I work in. It's not just that it's in plain language (as an example), it needs to be accurate. Best kept to the areas that need it, a fall-back. Better to have an outcome based standard where possible.

Not sure about whether it could/should be part of basic conformance. E.g. read many incorrect / shady ACRs.

- Could we include assertions at the base level of conformance?

- I am reluctant to talk about assertions of process. They don't actually mean that there would be an outcome.
- Lawyers *really* don't like assertions about outcomes, e.g. asserting they meet WCAG 2.1 that is a provable fraudulent statement.
- Talking about what you did (e.g. following checklist), raises less of threat, that sounds ok.
- If there was a legal process, that is when the documentation would come into play, and it could be within the court process, like under an NDA.
- Question around ISO2000, where anything you state publicly is true? (*Not answered, possibly because it's ISO9000!*)

Do you sense backlash about WCAG requiring everything?

There is some backlash about picky things. It's not getting anywhere as people settle over picky things. Making companies feel like it's a gotcha game. However, lawyers have to show impact, not just WCAG violations, so that reduces the overall effect.

Misc

Eve: I would separate conformance from testing Sampling is part of testing - not what defines conformance

Question: Would it be best to have a score come out of what we craft, and the regulators decide how much is acceptable in their jurisdiction? Instead of having specific levels.

Answered above: no to percentages!

Question: Do you have any thoughts on crafting a conformance model that encourages a high level of accessibility but doesn't set a bar so high as to make conformance very difficult. Is there scope for a scale that people work up through? (Also asked about levels)

Eve: Multiple paths helps to get the middle path, psychological benefit.

Questions we didn't have time for

- In the US, the ADA requires full access to information and services. Even full conformance with WCAG 2.x doesn't guarantee that level of access, but some regulations specify WCAG as a "safe harbor". Any thoughts on how to balance the need for clarity for developers with the need for full access for users?
 - With very large sites where testing every page may be unrealistic, are there ways you recommend us either having a supporting document for regulators, or having

a disclosure requirement which points to the scope of testing completed when reporting conformance?

- In your experience, have [conforming alternative version](#) been problematic? If they have been problematic, is it largely because the alternative version doesn't provide all of the same information or isn't up to date?
- Your thoughts on a conformance model that requires that certain paths through the site are accessible and doesn't require all paths are tested. ("if our important paths conform so we pass", and author gets to decide what is important)
- Site passes if only a (carefully selected) set of pages are accessible (without looking at other pages)
- **Assertions:** Is there any block on companies making an assertion? (An assertion here means claiming that you have undertaken a process and acted on the results.)
 - Legal block
 - Lawyers who 'prevent/advise against' a company making any assertions
 - ISO 9000/9001
- **Who else:** Who else should we be talking to from other countries to get the international take on these same questions.
- A combination of assertions and user testing would incorporate better inclusion for cognitive focused accessibility in conformance, are there issues with this approach?
- Do you have suggestions on how to minimize people creating lawsuits just to make money off of gaps they identify in the way WCAG 3 is crafted?
- Would it be best to have a score come out of what we craft, and the regulators decide how much is acceptable in their jurisdiction? Instead of having specific levels.

Also, this is [feedback from regulator-adjacent people on updating to WCAG 3](#).

Kristina and John Q&A

Kristina and John

Intros

Kristina - Attorney, with a private law firm, working in accessibility since 2012.

John - Attorney and has chaired various accessibility related groups.

Define conformance

How do people demonstrate / say that, given all requirements and assertions we have in WCAG 3, they conform with the standard.

In WCAG 2 that is:

- Pick pages to test, and test them.
- Say that you meet (or don't) the criteria.

That can go into a WCAG conformance statement or (more commonly) a VPAT or EU accessibility statement.

What problems have you seen with the previous conformance model?

- The term conformance - what does it mean technically
 - Individual criteria *and* overall
 - At what point does it mean accessible?
 - Orgs want some sense of confidence that their site is accessible
 - If one single element on one page is bad -- some claim you fail the law
 - Lack of awareness can be shocking, then people don't know how to implement the criteria.
 - Nor how to check if you conform
 - AI Overlay -- can it be achieved in this quick fix
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- Substantial conformance is defined, but don't get to that stage because there are so many issues.
 - We mostly see the file and settle model
 - If wheelchair can't negotiate bathroom

- If you fail - you can win and get lawyer fees
- On a web page if one thing is bad can get sued. Automated testing is contributing.

VIEW

If we spend all this on our website - we can still get sued

So lets spend our money battling this thing

- Moving target -- it keeps changing - we conform today but it changes we fail tomorrow
- IT IS A MOVING TARGET -- came up several times in conversation
 - Even if incremental -- not totally different -- it keeps changing

Legal community equates it to a regulation, like a design standard. If there's non-conforming element, that failure is actionable under the ADA. Then equated to WCAG criteria. Engenders view of it being a hopeless prospect, which none of us want. End up spending money dealing with lawsuits because it is seen as an easier path.

Hear that it's a constantly changing standard. Would help to make it easier.

What would make it better without undermining a "good" legal case?

Temporary things are not a violation of ADA. Could there be an equivalent?

Advocate an ongoing programme, and the standard comes from structured negotiation results. Having a policy, procedures, style guides, etc. Then can argue that bugs happen, it's dynamic, and non-accessibility bugs pop up as well. So long as you've got a process to deal with them, it's doing what it can.

Big variation in scale, some rely on shopify etc, some are more sophisticated. When they build a new website that's a good time. Could it recognise that?

Would it help to have a policy-guidance in hand when going to court? - Yes!

There is dimensional tolerances / ranges, could that be included? Also, on alt-text, not much guidance on what it should be, so lawsuits on not adequate text on that. Also, sometimes people get sued about something, when there is another way of doing it.

Useful concept is not having to "fundamentally alter" a service. Undue burden is another useful concept. They can be difficult to establish as a defence though, it takes a lot of work, wouldn't be a quick dismissal, even if we would all agree it's unfair. Expensive, therefore easier to settle.

[Q on procurement issues for small business?]

Responsibility is on the business, but these are contracts of adhesion, imbalance. There currently isn't enough incentive on the provider.

Talked to a dev this week, we're not agreeing to any conformance, it's a moving target, we put that entirely on the covered entity, we won't warranty anything. They had all their integrations with that dev.

Some platforms are positive, but then the customers don't do it accessibly. Have told small businesses to do away with the website, but that's not viable. E-com is essential, but they are tiny little business. Needs to go into the policy doc, the platform has a great responsibility, and there need to be best practices for this.

Jennie: Gov budgets shrinking, so like low/no cost solutions. Gov is a middle space who use something, could be employee-users, or public, and we often talk about things like open-source tools (multiple creators, no responsible body), small mobile-app creators, may only have discord for support. May have AI as a content-creator / code creator.

Could we put something into the conformance section (as well as policy document) that would support the policy document about 3rd party content/features that don't have clear responsibility?

Vendors aren't covered by ADA. From policy standpoint, that's an area of discussion for amending ADA. Should it go beyond procurement? This is different to the built environment, where something might be created (like an elevator), but in general you exert influence on everything in the building space.

Should the policy document address the issues Gov have? Should there be a different approach for different type of organisation?

Pre title 2, the only thing we could use was "effective communication", which was a fall back. So even if it didn't conform, could say we're doing the best we can. If unable to achieve, we are communicating about it as best we can. E.g. PDF remediation, where 1000s of PDFs could be remediated, have work-arounds. Make it on request, not doing all at once. Also, with VPATs, where we can't answer perfectly because it creates legal risk. We still try to explain how access to the content is provided, even if that one element isn't accessible.

The more we can frame something as "once you get this factored in to what already what you're already doing, it's easy".

Having alternatives: That's in the regulations for physical world, harder in the digital. How does the user know which to use? How does a shop know which to procure?

HOW to make it better but not less effective

- Don't want to go backward of course
- Temporary violation is not a failure

- Nice if shifting in std -- build new it needs to be accessible but not old.
- Have code access - don't have code access.
- Advocate for having a solid accessibility team -- most companies don't have
 - At least have policy and have it built into style guide
- Bugs

Do you sense backlash about WCAG requiring everything?

Do you have suggestions on how to minimize people creating lawsuits just to make money off of gaps they identify in the way WCAG 3 is crafted?

Percentages

Q. Would it be best to have a score come out of what we craft, and the regulators decide how much is acceptable in their jurisdiction? Instead of having specific levels.

So many clients would love this, have a company running tests with % scoring. But, you have to look at it quantitatively/quantitatively. It's so much easier to understand, but not sure how it would work.

We have provided some prioritisation by A /AA, but not for areas of website.

This area begs for prioritisation, clients have to put limited resources can do things. Might not be part of the standard, but it's very important.

Q. Are there other metrics that would be more useful?

E.g. Types of content of healthcare vs entertainment.

Interesting idea, some way of prioritising things differently. So difficult given the variability in websites. Perhaps category of website? Or types of content?

Overall, it's so technical an area for the regulators, they will defer to us on that side, including to a policy doc.

Gregg: Separating measure from what needs to be accessible. Outlining policy document.

Structured / random Sampling

With very large sites where testing every page may be unrealistic, are there ways you recommend us either having a supporting document for regulators, or having a disclosure requirement which points to the scope of testing completed when reporting conformance?

Your thoughts on a conformance model that requires that certain paths through the site are accessible and doesn't require all paths are tested. ("if our important paths conform so we pass", and author gets to decide what is important)

For websites, we tend to talk about core functionalities as most important. But, risk-mitigation, they don't let you off the hook on anything. Only things we could argue are ancillary, are little twitter icons at the bottom missing alt-text. *Really* not impacting use of the site. However, I wouldn't advise clients to neglect that.

Assertions

Assertions: Is there any block on companies making an assertion? (An assertion here means claiming that you have undertaken a process and acted on the results.)

- Legal block
- Lawyers who 'prevent/advise against' a company making any assertions
- ISO 9000/9001

A combination of assertions and user testing would incorporate better inclusion for cognitive focused accessibility in conformance, are there issues with this approach?

If the covered entity makes that assertion, would there be protection? If it were amorphous, and it turns out not to be true, then could be subject to enhanced liability (e.g. in NY with punitive damages).

Would also require entities to hire a consultant, if it were something to certify?

Have to consider the cottage industry of private equity funded companies that promise the world and don't deliver (e.g. overlays). Would it develop another industry? What does success look like institutionally.

What does success look like? How do you avoid traps of companies which don't really do the job as well as it should.

Other

- In your experience, have [conforming alternative version](#) been problematic? If they have been problematic, is it largely because the alternative version doesn't provide all of the same information or isn't up to date?
- **Who else:** Who else should we be talking to from other countries to get the international take on these same questions.

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- Are there ways that the conformance model (the ruler - this is accessible, or is not accessible) for large systems needs to point to supportive policy documents (or support them in the wording of the conformance model criteria) to address things like critical information and paths within that system? For example we don't want to say something is not accessible if it is, but at the same point: if content changes occur very rapidly (such as during COVID), a lot of user generated content happens and cannot be validated for accessibility prior to publishing, satellite map information which rapidly updates, etc. These could be things which have safety and health information.

Path to Consensus -Basics to Details to Model

Path to Consensus - Basics to Details to Model

Questions and opinions

Below are questions that have to do with fundamental topics or decisions on which our final Conformance must be Built. Not all committee members agree and some are not viewed as a yes / no so different columns are provided for different views. People's initials accompany the opinions they agree with. If they have a different opinion they can enter it in the first empty square to the right of the question. (Columns do not relate to people, just the number of different opinions on any one question.

Binary principles?	OPINION 1 on Question	OPINION 2 on Question	OPINION 3 on Question	OPINION 4 on Question	OPINION 5 on Question
We want to have WCAG3 adopted by regulators as they did WCAG2 -	YES- or regulations will continue to use WCAG2 and WCAG3 will just be recommended. GV, AC Adding to this - and WCAG3 could become largely ignored or thought to be impossible, like AAA. JD Prefer to split the question - We want to have WCAG3 adopted by regulators - agree, "as they did WCAG2" - do not agree. JD	Our priority is the best technical a11y standards, not regulatory adoption. - Google, SAZ , lisa If WCAG 3 can address the compliance issues that have been caused with regulations requiring WCAG 2, then yes. (these issues include the belief that products with user generated content can be 100% conforming, that full conformance is a requirement of products, etc.)	Balance between best standard (maximal coverage?) and adoptable by regulators. AWK	The priority needs to be guidance for accessibility. The legislation aspect is great but not at the cost of accessibility . Lisa	Hopefully better than WCAG2 was adopted, because it was often used as regulatory compliance rather than the technical standard that it is. SAZ
We want WCAG3 to be the regulation of choice by regulators as the standard for accessibility going forward.	Yes - or else there is no need to worry about testability if we don't want adoption by regulators.	Not necessarily to replace WCAG2 because chances are that future policies may need to change to adapt to current technologies and that might change how they refer to and adopt technical standards. SAZ , Lisa			

Should WCAG 3 be structured in a way to easily be referenced in regulation?"then the answer would be "yes, as long as it's verifiable and achievable"	YES SC, Google	Yes but I would remove the word "easily". GV		Yes but The priority needs to be guidance for accessibility. (Lisa)	
We are willing to have WCAG3 be restricted in what we can do in order to be adopted by regulations. Consensus (1 objection): Yes, but we should also include "best practices" and other things that go beyond conformance.	Yes - definitely. It is what causes us too much pain GV	Depends on what these restrictions are. SAZ	Not at the price of inclusion	Not much if we include processes as they do with security etc. Lisa: I object to the consensus. -1	
Can we rely on things that don't exist yet? E.g. tools that haven't been created.				It depends on where they are in different environments, such as machine assisted translation with some open source scripts give all the tools for common words etc. (and were ready for wcag 2!)	
				It depends. The priority needs to be guidance for accessibility but can be common sense applied. (Lisa)	
It is important that the web accessibility regulations cite the requirements in the same way, or use the same technical standard(s). Consensus: Generally agree.	YES - or it is very hard to conform when your content spans different jurisdictions. Also makes training materials harder, more expensive and more confusing GV, AC, +1-Google Adding to this: it makes it easier for smaller organizations to request a site vendor (someone who makes an ICT tool) comply because more people ask for the same level of compliance. JD	This is something that we would imagine ITI and other groups would be more effective at advocating for. - Google We need to have one focused goal to avoid having conflicting requirements.	The priority needs to be guidance for accessibility. Again, this is great, but should not be at the expense of user needs - lisa	I think you might mean the technical provisions of regulations? SAZ	

We expect that some places will tweak WCAG3 (add a couple - drop a couple) but we want to minimize this as much as possible. Ideally none. Consensus: Generally agree.	YES - already happening. But would like to do all we can to minimize. GV, AC, Google +1	Challenges to this may increase depending on the WCAG3 criteria impacting security requirements for different levels of data used between tools, and potentially other requirements for areas like government, banking, medical in terms of securing data and privacy. JD	We want as much as consistency as possible so +1. - Google Ideally, WCAG 3 conformance should be flexible enough to cater to different needs, if we achieve that, modifications would be minimal I feel it could be inevitable that there are some variances around the world. We should try to minimize it. eg: Africa is a mobile-first continent that will place heavier emphasis on mobile accessibility than other regions, and may be more likely to include additional requirements. Regions that are starting with their first accessibility requirements may set tiered rollout requirements (The government of Ontario Canada did this).	The priority needs to be guidance for accessibility. Again, this is great, but should not be at the expense of user needs - lisa	
All requirements need to be objective - that is, when different informed people evaluate based on language of requirements at least 8/10 will come up with the same judgement. Consensus: Generally agree (as amended).	YES - a) basic requirement for requirements in standards. b) a company cannot be expected to ship an conforming product if they can't reliably determine if their product conforms prior to release. GV,	Yes, with similar flexibility to WCAG2, where most (8/10?) knowledgeable evaluators would agree with how something is tested. AC, SAZ, JD Lisa- the 8 out of ten is important Also a process is objective. It was followed or it wasn't	+1 - Google yes. We want definitions for the requirements. The key here is verification reliability so if you ask different humans they all agree on the answer. e.g. All requirements should provide objective measurements. If a requirement says "clear", there needs to be objective guidance on how to determine if something is "clear".		

Conformance means you conform to all of the requirements of the standard. This can include levels of conformance that add additional requirements	YES. Otherwise they are not requirements - they are options. GV,	Yes, but outside of core "conformance" we can add other things, e.g. score towards the next level. Also, informative documents such as policy/wcag-em help to moderate the 100% pass/fail aspect. AC	No: it's fine for a standard to define conformance levels, like A, AA, AAA, Bronze, Silver, Gold, etc, and a function from set-of-met-requirements-on-particular-page-regions to the level(s) the website conforms to. What's critical is that it's easy to evaluate this function objectively. WCAG 2 even sort of acknowledges the challenges of 100% conforming content in regards to WCAG AAA criteria: "Note: It is not recommended that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA success criteria for some content."	No: conformance could define things like tolerances and other types of calculations (that are not necessarily percentages). SAZ LS Adding to this: if conformance requires conforming to all of the requirements 100% we may see regulators who experienced challenges with WCAG2 where most products/tools do not meet 100% (therefore are not conformant) may drop both WCAG2 and WCAG3 in the future. JD	
We want to include guidance beyond what we can objectively require.	YES - we are not able to create objective measures for many things that are very important to accessibility. GV.	Yes. AC	I don't think that anything outside of the requirements should factor into the conformance model. A "Best practice" failure should not impact any conformance score. I am comfortable with best practices being part of conformance somehow for higher levels. For example, the debate around user studies, it's unarguably a best practice to run them and I think products should get some credit otherwise no one will do it, but it should be a requirement or part of the baseline level - Google	Depends on the need. SAZ, lisa	Guidance material is largely ignored by groups who are already overwhelmed with requirements already in the standard, plus all the other standards they need to conform to (cybersecurity, governmental regulations, etc.). Building anything important into the standard will be the way to get attention to the issue. JD

Two forms of guidance beyond requirements are Recommendations (this should be done/true if you possibly can) and best practice (ideally this should be done/true.)	YES. One we recommend everywhere for all implementations unless not possible Best practice is described if an author really wants to make thing optimum GV	I'm not sure there's much difference between a recommendation and a best-practice, but in principle we do need something.	It is OK to have different recommendations and requirements, but it is unclear how this is defined and what is part of the conformance model/scoring. - Google The 'two levels of should' is VERY CONFUSING. Requirement Types: Core Supplemental	No, best practices should never be for things that are essential for inclusion. They are just left out. Best practices can be used for enhanced user experience, but not for anything essential (lisa)	Same as above. An assertion (we did this, we have this) that in my opinion is different than here's a best practice to follow (which some might find and use) and here's a recommendation that is not a requirement. JD
A key challenge will be ensuring that author will see all of our guidance, and not just the requirements, when they are authoring.	YES. Authors often just focus on the bare minimums. If we make it easy they will just ignore everything but - even if they would follow the advice if they read it. GV	Yes	[content authors] I think that the requirements need to be explicitly identifiable and distinct from the additional supporting guidance, otherwise the non-requirements can be misinterpreted as requirements. -Google		The different types of authors needs to be clearer for those new to accessibility or have limited technical roles. E.g. content authors for documents and web who provide this information to technical teams for implementation. They need their type of information within the standard easily distinguishable from the guidance for more technical authors. JD
A standard that will be used in regulations can have different levels of conformance.	YES. If each level has clearly defined requirements - one can conform at different levels by meeting all requirements for that level. And regulators can specify which level they require. GV, AC	No: it's fine for a standard to define conformance levels, like A, AA, AAA, Bronze, Silver, Gold, etc, and a function from set-of-met-requirements-on-particular-page-regions to the level(s) the website conforms to. What's critical is that it's easy to evaluate this function objectively. WCAG 2 even sort of acknowledges the challenges of 100% conforming content in regards to WCAG AAA criteria: "Note: It is not recommended that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA success criteria for some content."	This implies conformance has levels and does not consider other forms of conformance models. SAZ, JD, lisa		

There are standards where you only need to conform to a percentage of the requirements to conform.	NO. No safety or regulated standards have been yet identified by our working group where this is true. There are "goodness" standards and voluntary standards (where you don't actually have to meet the standard) but they are not built into regulations. There are options within standards (this or that) but not any x % of these. ALSO it is hard to go to court and say these requirements are all essential to minimum accessibility - if we say that any x % of them can be skipped. That x% is clearly not essential and any provisions that can be in the x% clearly are not essential. GV	Question from Google: Would it be acceptable to have Silver achieved by a % of higher targets? For example, all content has 3:1 contrast ratio to achieve bronze, but if half of the content has 4.5:1 or higher, that's enough for silver. something around "X% of the time that users are looking at text, that text has higher contrast" might be firm enough.	Percentage is not the only way to make calculations. SAZ, JD		
WCAG conformance could specify which parts of a site/product need to be tested in order to claim conformance.	No, my understanding is that it undermines the legal/regulatory process. You either specify what is tested and conforms, or make a beyond strict-conformance statement about the whole, and have some process for providing confidence in the result. AC GV	This is really important and we need to weigh in on this via our Policy document GV (GV - I predict that there will be widespread agreement on what should be covered in Policy document and much discussion about the details of the recommendations. But all good and all critical to implementation and practical use/enforcement of WCAG.	This implies that there is only one level of conformance. One level of basic conformance could require that critical paths need to meet certain requirements, and a higher level of conformance could require all paths meet all requirements etc. SAZ, Lisa Lisa: also scope could be on the platform or by feature. Such as critical paths. (for example sending the email is more important than labelling it)		
User testing can be a requirement in a standard	YES - but not practical. One can require it but only if the requirement (not the claim) clearly lays out the exact procedure and the users that would be used - so that multiple testers can carry out the test and come up with the same result. It would also have to specify what that result would be to pass. Since it is not possible for the users nor the outcome to be specified in advance it is not practical. GV	Not for core conformance, the results are too variable. However, it could be required at a higher-level on a "we have done testing and considered the results" point of view. +1 from Google	user studies can be expensive, and favor biasing. For example, for years we would run studies exclusively with Blind users since we were working on strengthening our relationship with advocacy organizations, but that led to some product optimizations that hurt other populations User Testing would need to have its own standard with objective testing requirements in order for it to be useful. -Google	Depends. Example: simple web page, updated frequently - need a way to either make the user testing only required for more complex sites, or not fail totally the page/unit of measurement. JD	Yes, but that doesn't mean the whole site needs to be tested. It could be giving feedback, health and safety and / or critical paths. (Lisa

User testing should be a part of any quality development process.	YES - it should wherever possible. Even following all requirements will not identify all aspects that can be, and often can easily be, done to improve accessibility. Also users with a wide variety of type, degree, and combination of disabilities should be used. However it is expensive and outside of the ability of small companies, single authored sites, and others. It should absolutely be recommended most strongly though. GV	No. Not sure of the definition of "quality development process", but not all organisations can afford to do usability testing, at least to the degree that would be needed to cover their functionality. (E.g. some budgets are <\$10k for the whole site/product.)	It should be a recommendation as it can be extremely useful, but having it as a requirement would put it out of reach of smaller businesses due to the cost, plus the lack of an objective standard for the results to be trusted. -Google	Development process, unless specifically called out in an assertion (and even then can only be done in a limited way) cannot be required because there is too much variability within development teams. JD	Part of the process - yes Lisa
All terms in regulations and definitions that are either not used to mean their common meaning in a language, or that have multiple common meanings in the language and the context does not make it clear which is intended, need to be defined.	YES - this is required of all standards especially if they are to be used in regulation. GV Yes, part of good drafting. AC, lisa	Yes - If words are not used to mean what they are commonly interpreted as, they should have definitions provided. Citation: https://www.w3.org/TR/qframe-sec/#define-terms-section -Google			
A proper definition can be directly substituted for the term in the sentence where it is being used and the sentence will make sense - even if long and awkward.	YES - that is one of the common test/requirements of a good definition. GV +1 lisa	Yes, although we should allow for more content to be included after that core part of the content (examples, notes etc). AC +1 Google	Yes, however there should be efforts made to rephrase for clarity whenever possible. I also agree with Opinion 2 (the ability to provide additional information) In case anyone is lost with this one, here's an example: "I went to the ATM to get some money out" would be "I went to the Automated Teller Machine to get some money out". The definition for ATM could be swapped into the sentence and the sentence will still make sense.		

Authors should be able to claim conformance of a whole site if just some parts of it are accessible, or some paths through it are accessible.	YES & NO - If we allow claims for only part of a page or section or site - or if there are accessible paths that provide the same functionality as any inaccessible paths. But a site cannot be called accessible (as a site) if only parts or paths are accessible. And it is likely that policy and regulation will require that all parts be accessible so it would come out the same. All current accessibility regulations are based on non-discrimination and to date none have said that it is ok to discriminate in access to things that are public as long as you don't for some thing.. GV	No, this needs to be part of advice that builds on conformance. AC	A website should be able to claim that a defined subset of its content conforms to a particular WCAG3 conformance level. For example, a blogging platform might be able to guarantee that the non-UGC portions of its content conform to WCAG3 Gold, even if it can't guarantee that its users always give images useful alt text. It will be up to regulators to define which subsets they care about. -Google	Same as above, this implies that there is only one level of conformance. One level of basic conformance could require that critical paths need to meet certain requirements, and a higher level of conformance could require all paths meet all requirements etc. SAZ	I think authors can claim conformance on the path / features that are accessible. However a policy can allow some parts to have different levels of conformance. Or even no conformance. For example hundreds of legacy financial reports that need to be in the public domain and are unlikely to ever be looked at could be accessible by specific request (new content should be accessible) - Lisa
Assertion are testable	YES -- as long as the test I just "wa an assertion made". The test is binary - the assertion was made or not. Assertion do not provide any promise of outcome and no outcome test of an assertion can be made if the assertion is other than an assertion that a requirement has been met. Nor can there be a test of whether the assertion is true without requiring documentation that would put them out of reach. We have to rely on reputation and/or ISO 9000 standards to ensure followthrough. GV	Yes (was this in doubt?) AC.	No: if a provision is testable, it should be a requirement, not an assertion. - Google (see comment on question for definition confusion) -	An assertion as part of a requirement is "testable" - meaning you can answer yes/no, get the same results if a different tester (8/10 people with knowledge) runs the "test." JD I think people do not understand the question. Of course they are testable, in that you can test if the assertion exists (eg in metadata or a conformance statement) , it would also be relatively easy to prove in court if it was true (eg produce the style guided that you asserted existed etc) Lisa	-
Assertions can therefore be requirements.	YES but at what level we do not yet know - They do meet the requirement that they are objective and objectively testable (assertion is made or not). We have not determined if companies are willing to make assertions. If not then including them at base regulated level of conformance may bar those companies from conforming even if they do the activities/processes described in the assertion requirement.. GV	Confusing, requirements are a separate thing. I assume it is asking "can assertions be required for conformance?" I think yes, but will see what feedback we get.	See comment - google	Yes. Lisa	

Automated Testing should be a level of conformance	NO -1) there is nothing about whether something is automatically testable or not that relates in a definitive way with the importance of a requirement for accessibility. In fact some of the most important aspects are not automatically testable. 2) what is automatically testable will change over time - so one would never know what was required at the level or not 3) the more money you have to spend on testing tools the more you would be required to do. (See WHERE TO START below) GV	No, it could be part of assertions but automated testing has low coverage and reliability -Google, AC		Be aware that automated testing with AI could soon be the better than expert training. So lets not rule it out! Lisa	
We should be writing provisions as "Is available" in form	YES - with conditions. We should be writing provision to say what is true but not specify where or what level should be making it true. If all platform OSs and/or common browsers will do something - an author can rely on that (if they don't interfere) and do not need to do it over themselves. HOWEVER, there would have to be some documentation that something was done by all platform OSs and/or common browsers did something before authors can just 'rely' on it and not address the requirement GV, AC	[provisions are the WCAG 3 items (previously "Guidelines"), which include the Core and Supplemental requirements, plus assertions.]		Agrees, but I think we should have definition of what we mean by available, and possible conditions on it, such as widely available, affordable maybe? Lisa	

There needs to be some way to measure goodness other than 100% conformance.	YES - 100% conformance is rare and non-existent for all or almost all non-simple sites or products. There needs to be some way to 1) Compare to products to see which is better 2) to measure progress over time on improvement of accessibility 3) provide incentive for moving toward full conformance 4) demonstrate that a site is largely conforming. GV 5) provide an expectation for end-users on how (in)accessible something is. SAZ	Yes – There is a part of the EN 301 549 accessibility standard that requires evaluating the authoring tool itself to determine if it is capable of producing content that conforms to WCAG. (11.8.2 Accessible Content Creation). If you could separate the actual user generated content portion out from the product's capabilities themselves, it solves a lot of the conformance challenges that products like WCAG will face. So I would frame it as "product capabilities" versus "content generated through the platform" in this case. You could say "Product is capable of generating fully conforming content", even if users are able - Google	-	Yeah. Lisa	
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What method might be used to meet the above need for a metric other than conformance..	A "Progress Toward Conformance" (PTC) Metric is proposed that would fulfill all the needs above. It is expected to be very difficult to make linear with a high degree of validity but anticipate it would need to be segmented in some way to ensure equity across disabilities GV. Extending... With the above PTC metric, you could add non-conformance based levels/awards/badges when you hit a certain number. AC Warning on how easy this may be to game ... Lisa	This could be context based, depending on the functionalities of a product, or on who the author of the content is. You can have a "First party content" conformance model. This allows authors to report on the accessibility conformance of their product. For websites that allow users to create content, you can have an additional conformance model: "User generated content conformance" which can illustrate issues that are present with user generated content. This provides visibility on the content that is authored by users. This could be expanded upon for other conformance challenges. - Google		The conformance model itself. SAZ Lisa	
Can we include Policy recommendations (how legislators, regulators, and enforcers should use WCAG3 in their work) in WCAG3	NO we can't BUT we absolutely need to share your insights/wisdom/experience etc. with these groups to avoid misapplication or other problems that we can see. A separate Policy Recommendations document that describes how we think WCAG3 can best be referenced in Law or regulations and how it should be enforced or who should be required or what types of content or situations it should be enforced on. GV, AC	Ideally we don't need to. We can build out a comprehensive conformance model, and provide enough guidance on how to make conformance claims. This seems like more of a legal question though. Is the W3 able to make policy recommendations? If they can, it could be worthwhile, although I think it might be difficult to get consensus on it. - Google		I think so, but as examples of policy maybe Note we had an appendix in Making content useable to this affect. Lisa	

Should WCAG3 be process or outcome focused.	MIXED Processes never guarantee that any outcome will result. And experience with process oriented regulation in the past have shown they are easily gamed and not nearly as effective as outcome requirements. So primary focus should be on outcome. HOWEVER, we do not know how to create objective outcome measures for some important things. In these cases assertions of process may be the best we can do - even though we cannot do outcome testing of the processes (or else we would have been able to create an outcome requirement in the first place). GV	I think it's important to provide a set of "things people should do for accessibility", concrete things to look for. Being primarily a process-based standard makes it more expensive to start (like IOS27001). So we should bring in process-oriented things people should do, but not base the whole thing on a process. AC	Better might be to just try to define some processes fairly rigorously, and let regulations target them independently of the more-objective outcome-based requirements, if and when particular regulators think particular processes are defined well enough -Google	It can be a process where it aids accessibility better LS	
Should WCAG conformance be a meaningful metric that reflects the relative level of accessibility of a website or remain an arbitrary set of levels that has no meaning to users?	I don't think this is an achievable goal given the variety of products and context there are. Any set of levels, or score is going to be arbitrary if you don't know the specific context of the site/product and only compare it to a similar thing. AC		Clearly it should be meaningful Lisa	The Research Report on Web Accessibility Metrics describes the attribute of "validity". SAZ	
Is it important that needs and accommodation that are essential for people with cognitive disabilities are included on an equal level as other disabilities			Clearly. Anything else is appalling. Lisa		

Between the following priorities what do you feel is most important (levels 1 as most, 3 as less) you can give the same number to more then one item. - needs and accommodation that are essential for people with disabilities is included - legislation integration - web accessibility regulations be the same everywhere or be as alike as possible - needs to be some way to measure goodness other than 100% conformance.	1 - adopted by regulators = otherwise it won't replace WCAG2. And it would become a best practice document in which case we already have a great document from COGA to start from and we can dispense with testability and everything else. But then WCAG2 would stay the regulatory standard. 2 -given 1 above, include provisions that meet as many needs as we possibly can.		- needs and accommodation that are essential for people with disabilities is included (1 Lisa) - legislation integration (2 Lisa) - web accessibility regulations be the same everywhere or be as alike as possible (3 Lisa) - needs to be some way to measure goodness other than 100% conformance. (2.5 Lisa)		
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Proposals

Proposals comparison

Naming of proposals

I'll rename the proposals so we're not comparing people's names, happy to update these names if you don't think it's suitable! The names won't represent the whole, but the key differences, just so we can differentiate them in discussions.

Current name	Proposal name
WCAG 3 Draft (i.e. the one in the current draft)	WCAG3 draft
Lisa ideas	Paths & usability testing
AC meta assertions	WCAG2 refined + assertions for silver/gold
WCAG3 progression and assertions	WCAG3 progression model
Jennie proposal	Complexity adjustments
Gregg new proposal	WCAG2 refined + progress score
Logius proposal	WCAG 2 refined + graduated partial
Andrew's proposal	Automated & workflows
Shadi's proposal	Essential paths

Structure of requirements

Most started with the current two levels of requirements (core/supplemental), perhaps with different names. Two (highlighted) did not differentiate levels but focused on other things, two added another level.

WCAG3 draft	Core / Supplemental
Paths & usability testing	Essential / Advized
WCAG3 progression model	Core / Further (TBC) / Recommendations / Scope-level Assertions
Complexity adjustments	Only "core" for requirements, one level.

WCAG2 refined + progress score	Requirements / Recommendations / Best practices
WCAG 2 refined + graduated partial	Only “core” for requirements, one level.
Automated & workflows	Automated, core, core+
Essential paths	Basic / improved / good

How to scope a claim

The default seems to be pages/view + process (as per WCAG 2). Highlighting those which took a completely different approach, using either path or risk-based selection criteria.

WCAG3 draft	Choose pages/views, including complete processes.
Paths & usability testing	Paths/pages/views, with some paths prioritised at different conformance levels. Can have different scopes for automated/expert/usability testing, with rules about what is included at each level.
WCAG3 progression model	Similar to WCAG2 for conformance, but then adds separate things to aim for (WCAG silver/gold) with certain assertions needed to claim.
Complexity adjustments	Risk-based testing approach to selecting paths, and must declare % coverage.
WCAG2 refined + progress score	Choose pages/views, including complete processes.
WCAG 2 refined + graduated partial	[Not stated?] Choose pages/views, including complete processes + claiming “full” conformance must be of the whole product.
Automated & workflows	Automated for “site”, workflows + random sampling
Essential paths	Paths are the main basis, with those deemed as needed for the purpose of the site to meet a higher level of requirement.

Additional types of testing included

WCAG3 draft	[Not applicable - Baseline]
Paths & usability testing	Usability testing and automated testing can be reported on, but are not required for base level conformance if you do expert-testing. Higher levels require usability testing.
WCAG3 progression model	Usability testing for the not-conformance targets.
Complexity adjustments	“Innovation credits”, with user-centered design methods.
WCAG2 refined + progress score	Optional higher levels.
WCAG 2 refined + graduated partial	(None)
Automated & workflows	Automated, usability testing at higher levels.
Essential paths	Assertions?

Key differences (aspects that differ between the proposals above)

Paths/workflows are required to be included in a conformance claim (one or more)

(NDA issue, releasing results)

PROS

CONS

- Hard to define what a path is
 - would have to leave it to the claimant to define and state them.

- Similar to process, but could be more narrow, not including page content which isn't relevant.
- Scalability: Some sites may not have more than 1 or more than 2
 - Maybe say "X paths unless you have less"
- Scalability: Some sites may have 1000s of potential paths.
 - Maybe say some percentage?
- Would require that site describe the X paths, which opens the site up to criticism about why those paths and not others.
 - Could be random, or set parameters by regulators (outlined in policy doc).
- Why are there only x accessibility paths if there are many more
 - Why not limit the site to just the accessible paths
 - If other paths are important enough to include - why are they not important enough to make accessible
- Do we only require that a subset of products or rooms or books or classes be accessible?
 - Not different from selecting pages?
- Don't people with disabilities have a right to access all paths/parts of a site?
 - OK if there are two equiv paths to the same destination and only one is accessible? (if there is nothing special about the two paths)
 - State the assumption that not everything is tested.

Key problem: Regulators are asking for "site" accessibility, in practice no-one can do the testing to show whole-site accessibility. If they were asking for reasonable methods to show accessibility (rather than 100% conformance across all pages), this would be less of a problem.

Ameliorating aspect: Sampling is accepted by regulatory agencies in general as long as the sample is representative of the whole (i.e. it is random and of sufficient size given the variance of the pages/views)

Conclusion: Could include a concept of task/path/workflow as a definition, not in conformance, but would have to leave the selection of tasks (number and type) to the policy & reporting.

Could include an assertion (not at base level) that people have done something, e.g. gone through a selection process and included a reasonable sample.

Could have levels "above" conformance?

- Level 1: base (sub-set) conformance (like Level-A)
- Level 2: conformance
- Level 3: WCAG conformance + scoping and sampling?
- Level 4: ??

Automated testing as either required, or optional part of claim

Issues with doing this:

- Hard to define, there's lots of types.
 - Need to say what requirements are included, regardless of method?
- Tests what is easy to test, not what is important. Sets focus on less important things, doesn't line up with the experience.
 -
- What can be tested changes often.
 - Versioning.
 -
- "Easy" is partly what's easy to test, but also what's easy to fix (remediation).
- Useful to broaden sample.

Could be used if:

- **Not specified by us** as automated testing, but there is a level of requirements that aligns with automated testing.
- It is in an assertion, where you are claiming you've done a process.

Usability testing as either required, or optional part of claim

(Wait for Lisa for this one)

Possibly adding requirements on claims made at a level higher than base conformance level for regulation (bronze) in order to scope testing

Issues:

- Should not be any part of level of claim on a page/view -- it is the SCOPE of the claim (that is which pages) not which parts of a page.
- Should not be "scoping" which provisions - only which pages/views.
- Need to keep in mind very large corps(Megacorp) if we require higher levels to broaden any scope requirements beyond process -- if it would include requiring pages outside of

a unit of that organization when a unit of the organization wants to claim a higher level for the scope (part) of the site covered by that unit.

Could be used maybe if:

- We have a high level requirement that adds to what is mandatory about the scope of a claim.

For example -- for silver level requires that all help pages related to a claim have to be included in the claim (instead of the base level of conformance that only requires Complete Processes to be included).

Complexity adjustment to weight more difficult provisions

(Need Jennie for this one.)

- Type vs instance importance.

Conformance Progression score / Partial conformance score

(See [proposal](#))

Pros:

- Shows progression.

Issues:

-

- Could be multi-dimensional

Higher level progression score

Random sampling

- Can it be required by the conformance model?
 - Some companies currently require NDAs before releasing any information. They state that the reason is - releasing any information on their testing results would open them to litigation. This seems to imply that they would not be able to conform to any standard that **requires** that as part of conformance they must include a claim - or worse yet - a report.
 - **For sampling** - it would seem to require that you report what sample you used - and this will never happen. Not realistic and leads both to litigation and to then only working on those pages going forward
 - Sampling only works if you random sample (or systematically random sample) and that each time you take different samples.
- Could it be done with a process-assertion? The list of pages would only be released as part of a legal process.
 - If we do this then we are not requiring a claim (which would be public) as part of conformance.
- The “ruler” is what the measure is, not the sample.
 - For example - the ruler may be % of cacao - the rule is it must be X% to be called chocolate -- and you sample your mix (or an inspector does) to see if you have that % or more
 - Another example -- the ruler is stopping at stop sign -
- What can be set (in conformance) without knowing the context?

Number of levels

- How many levels can we have?
- Feeling expressed that there are really only two - recommended and required
- If we define X levels -- and different countries all chose a different level - international web sites all need to meet the highest level -- so it comes down to being binary (pass or not pass at the level of the highest we are required) however - we have now shifted the decision about minimum level from our group to some random countries choice.
 - Solution - we create a single level of minimum conformance that we say should be required -- and then define additional levels for higher accessibility and say they should not be required
- Other opinions that having more levels might be useful to help organizations show progress against conformance.
 - The Progress To Conformance measure/scale could be helpful here.

- Also helps regulators assess progress. E.g., lower fines for orgs that are making progress toward full conformance goal or higher fines for the opposite.
- If there were more levels, in a linear way (have to do level 4 before level 5), could easily get stuck on a level 3 issue.

Weighting of risk / process for assessing impact (or risk), same ruler across all

WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	

WCAG 2 refined + graduated partial	
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WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

WCAG3 draft	
Paths & usability testing	

WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

WCAG3 draft	
Paths & usability testing	
WCAG2 refined + assertions for silver/gold	
Complexity adjustments	
WCAG2 refined + progress score	
WCAG 2 refined + graduated partial	

Lisa ideas - Updated process focus

Proposal 1: Flexible Framework (Merged proposal)

Summary / Overview

This proposal is about building a framework for conformance or policies so that groups can make the policy that works with their needs.

It allows for people to incorporate things like

- Multiple granularity, for example paths which can be features, frameworks, critical paths or the whole site (default).
- Different types of testing such as expert testing, automated testing or user testing. Note that **no one has to have user testing** at any level in their policy. However they **can** incorporate it where they want to, for example, in critical paths in critical service. If they want to incorporate different types of testing they have a way of saying that they did it!

The advantages are:

- Flexibility allows people to adapt the policy as time changes or with different practical concerns.
- That flexibility allows for the best accommodation for the user critical content. User needs do not have to be sacrificed for the sake of practicality.
- Lets user groups ask for better accommodation without our implying it is less necessary.
- We can make a base policy which allows legislation to be similar to each other , but can add
- Easy for procurement to check that the features they need have the accessibility they need
- Allows people to focus on content that is the most important, but not ignore legacy content

The framework allows for different types of

- provisions,
- paths though site, and
- testing mechanisms. Note we could get rid of this stage if necessary

It then provided a **mechanism and some terms** to build conformance statements and conformance policies.

I have also made some **sample policies**. We don't need to do this but it **allows people to have a sample policy that can be easily adopted** without further work.

Notes: This is an outline of an idea. There would need to be more details worked out and issues to be resolved. I have tried here to use the different places we can put things to accommodate different perspectives. (No percentages, address real world concerns of sites, and addresses user considerations ect). Also I made drafts of some of the definitions in my other proposal (Proposal 2) they are more or less the same terms)

In the provisions

There are two types of provisions (terms may change)

Essential: These provisions are essential for autonomous use of the content by some people with disabilities. Note assertions can be essential!

Advized : These provisions are recommended so that the user experience for people with disabilities is similar to a wider audience (although not necessarily the same)

- The provision defines how to conform to the provision for a given scope.
- The provision (or group of provisions) gives user testing criteria as a way of testing for each provision towards and outcome (subjects to the rules in the conformance section)

In the conformance section

1. We have definitions and rules

2. We define scopes. For example (subject to change)

- Paths to achieve a task
- A page
- A view
- A set of web pages
- An app
- A feature or set of features (like a tool bar)
- The framework ?
-

3. We make some rules such as: (Just examples, more will be required, just drafts etc..)

- Any path must start from the main entry point, and most appropriate landing page
- Any feature must start from the main entry point, and most appropriate landing page
- Any set of pages must start from the main entry point, and most appropriate landing page

4. We define testing methods (see rules bellow)

- Automated (may include reading the assertion)
- Expert

- User testing (Note no one has to incorporate user testing in their policy. If they do we can recommend this as well as another form of testing if we can not get the reliability addressed)
- 5. We can have some rules for testing, to include:
 - You can not have a conformance claim on a scope as advised without essential
 - User testing must have diverse users. It must include representatives of different subgroups, people belonging to multiple disability groups and all functional need related usegroup including from coga and low vision. Also to include use of AT, such as text to speech. However because one person can have multiple disabilities, it should be a minimum of 5 people.
 - User testing must include users completing tasks independently! **And** without significant or inappropriate mood changes (for example, taxes may be a bit depressing, but the interface should not make it worse!)
 -

6. Then we have conformance statements

- We have the language (similar to EARL) to say Assertions for a given scope
- We have the language (similar to EARL) to say conformance for a given scope. Such as (in pheudo-code)
 - i. The following scopes conform to essential accessibility with automated testing
 - ii. The following scopes conform to advised conformance for these provisions
 - iii. The following scopes conform to essential accessibility with usability testing
 - iv. The following scopes conform to essential and advised accessibility with usability testing

In the policy section

1. We need to define terms like **critical paths** and **common paths** (done in proposal two), as well as **wide audience**, or **critical service**.
2. We have advice on what statements you can require in different scenarios

For example: (Examples may change a lot, they just show just for the idea)

Wide audience, not a critical service

- The whole site conform to essential conformance with automated testing
- Critical paths have essential conformance with automated testing and user testing

- Getting help / contact us conform with advised conformance with automated testing, expert testing and user testing

Alternatively we could create something like this and call it **silver example** (a bit like Alastair's idea)

If we call this gold we can put it in conformance.

Or we can have both example policies and a few prebaked ones for gold, silver, bronze so if people want a ready made conformance policy they can use this.

Critical services (police, health care, apps that affect safety and wellbeing, etc.)

- The whole site conform to essential conformance with automated testing
- Common paths have essential and advised conformance with expert testing or user testing
- Critical features, Critical paths, help, contact us, conform with advised conformance with automated testing, expert testing and user testing

Alternatively we could create something link this and call it **Gold example**

Procurement requirements

We can suggest granule conformance statements for each feature/ path to help procurement teams get a really good feel for how well their requirements support accessibility. Also if a feature is not on their procurement requirements, they can be more relaxed, but they can want a scope that is critical to them to be expert or user tested.

That is it. I hope we are all happy (LOL)

(second proposal - feel free to ignore) Process
focus conformance

This is an outline of an idea. There would need to be a lot of details worked out and issues to be resolved. I can put in more work if we like the direction.

Definitions needed

If we like the idea we will need good definitions for

Essential paths: This must include

- being able to give feedback,
- items necessary for health and wellbeing;
- get human help, if it available

Critical paths: definitions should include most of the traffic to the website and tasks people come for. For example, buying things on a shopping website. Adding your address, even though not often done, is necessary for the path to be completed , so it should be included.

(Possibly include all “advertised” functions?)

Common path: Assume the definition will include 75% the traffic to the website. Note all the different option on the path are included, such as different items in the online shop in the basic shopping path.

Most paths: Assume the definition will include 95% (almost all) the traffic to the website.

Basically what is left is old content and unpopular content.

Diverse users: Assume the definition will include representatives of different subgroups, people belonging to multiple disability groups and all functional need related user group, including from coga and low vision. Also to include use of AT, such as text to speech. However because one person can have multiple disabilities, it should be a minimum of 5 people.

User testing: To include users completing tasks **independently!** Without significant or inappropriate mood changes (for example, taxes may be a bit depressing, but the interface should not make it worse!) This may be a whole section to define requirements.

Minimal user testing: To include any user Using at, and simulated disabilities for diverse users

Important criteria: Outcomes essential to some users to use the content

Relevant criteria: Outcomes helpful to some users to use the content but not essential to any users

Conformance

We have two ways to conform: User testing or other testing.

Conformance level 1 (or A , bronze etc) :

- Success on user testing at least for all **Essential paths** , or
- traditional conformance to include:
 - traditional conformance on at least all essential paths for all important criteria (machine testing with expert testing and minimal user testing)
- All content does no harm and/or other super essential stuff

Conformance level 2 (or AA , Silver etc):

- Success on user testing on at least all **Critical paths**, or
 - We could add requirements here on machine testing for essential paths if we feel it is necessary.
- traditional conformance to include:
 - traditional conformance on at least all important criteria on **Critical paths** (machine testing with expert testing, minimal user testing) AND
 - User testing on all essential paths for all relevant criteria

Conformance level 3 (or AAA , Gold etc):

- Success on user testing on at least all **Common paths**:, or
 - We could add requirements here on traditional or machine tasting for essential paths if we feel it is necessary.
- traditional conformance to include:
 - traditional conformance on at least all important criteria on **Common paths**: (Machine testing with expert testing, minimal user testing) AND
 - all critical paths are tested (traditional conformance) for all relevant criteria And
 - Success on user testing at least for all **Essential paths**

Conformance level 4 (or AAAA , Platinum etc):

- Success on user testing on at least all **Most paths**, or
 - (We could add requirements here on traditional or machine tasting for essential paths or critical paths if we feel it is necessary.)
- traditional conformance to include:
 - traditional conformance on at least all **Most paths**: (Machine testing with expert testing, minimal user testing) AND
 - all critical paths are tested for all relevant criteria and
 - Success on user testing on at least all **Critical paths**,

Advantages

- Old conformance mechanisms still work, such as sending it to an expert.
- Path focused and need focused. so that the most important thing get the focus, less time is wasted on rarely used content.
- User testing option means it works for users and does not require learning how to test all of wcag
- Unimportant violations are not picked up in user testing such as a blank alt text on an unimportant image.
- Old content that is not often used does not have to be taken down.

Issues

We need to work out. Some of them we will need to make different use cases, and make sure the definition works how we want it to.

- Some content is more important for people with disabilities. Does it then become essential, even if it is not usually looked at?
- How do different options in a path relate, if they themselves are not common.
 - For example, vegan options on a menu (Lol) or
 - Getting a new passport may be popular on the embassy site, however getting one under certain conditions may be unusual, such as if you have triplets babies on your passport.
- (and difficult to conduct enough testing to cover all user types/user needs)

2nd proposal:

I made a second proposal that is more similar to Rachael's. It is at:

[WCAG conformance model -Scratch pad \(Lisa's suggestion\)](#)

REVIEW COMMENTS

WCAG progression model

Proposal 2: WCAG3 progression and assertions

Starting with [a previous proposal](#), then taking the other proposals and discussions and trying to refine into one proposal.

Structure

Core provisions

Have a core level of safety and “Detectable” requirements. Things that allow AT to work; it isn't deliberately hidden etc. Roughly 30-40 of the current requirements. It should include / align with things that are automatically testable. We want to make sure this is relatively easy to achieve for any scale of product.

Examples:

- No flashing (allowing for user-settings to achieve this, if supported)
- Alt text available/set (but no equivalence assessment, could be achieved by the user-agent if that's supported)
- Captions / audio-desc are available
- Text is detectable.
- The page can be customised if the user has the user-agent & knowledge to do so.

[Further] provisions

Have another level of requirements that are objectively testable, or are guideline-level assertions.

Examples:

- heading levels are useful.
- Captions are accurate.
- Audio description provides “sufficient” information or there is an alternative.
- Style guide that covers alt-text.
- Usability testing assertions for specific guidelines (e.g. navigation).

Recommendations

Similar to the [Further] requirements, but not as universally applicable across types of product, or not objectively testable.

These are listed with the requirements under each guideline.

Examples:

- Use standard keyboard controls (not universal across platforms).
- TOC-style heading structure (not universal across types of site/product).

Product (claim level) assertions

A small set of assertions that apply to the organisation, or at least the part that produces the product that the conformance claim is for. Examples:

- Using a WCAG-EM (style) methodology for sampled testing.
- Applying automated testing to increase the coverage.
- Ongoing usability testing programme (not provision-level, product level)

Other adjustments to the guidelines content

- Provisions could be tagged with “environments” where they are particularly important, e.g. education, training. This would not form part of conformance, but could provide prioritised listings of things for authors.
- Provisions are written so that user-agents can take on the responsibility without needing to update the guideline. E.g. “X is available”. (Not an adjustment, but listing here for emphasis.)
- Provisions will be tagged by functional need for working group purposes, but this isn’t something that would be visible on the face of the spec.
- The WCAG-EM style assertion should build on a paths/workflows definition and make sure “Critical paths” and “critical services” are included (like [Lisa’s proposal](#)).
- Some methods within requirements could be tagged with applying to user-generated content. These would be the ATAG type things where end-users could be adding content.

Conformance levels

These levels are like WCAG 2 levels, they are based on meeting all the provisions at the core and [further] levels.

WCAG Core Conformance

- Meets all the provisions at the core level for the pages/views included.

WCAG Full conformance

- Meets all the provisions at the **core** level for the pages/views included.
- Meets all the provisions at the **[further]** level for the pages/views included.

Partial conformance for user-generated content (TBC)

Where a site/product presents content from end-users (or other people outside of their organisation) AND provides the interface for creating that content, an additional conformance point might be to require certain ATAG style methods (within requirements) to be used for this content.

If those methods are used, they could claim partial conformance. (Or another word for this, as it's really "we've done our best but don't control those pesky users" conformance.)

Other levels (Names TBD)

Outside of the conformance, we could define a "conformance progression score", as per [Gregg's proposal](#) for the requirements and assertions **at the [further] level**. (Core should be 100% first.)

The Score may involve (we need to figure this out):

- the % of provisions met
- the % of a site that meets
- a combination
- Or anything else that would be a meaningful measure of progress
- Divided by disability type?

Then we could define two other "levels", or "badges", or something. This proposal just uses the names Silver and Gold. These build on conformance to have for a goal that is above each level of conformance.

WCAG Silver

This can be claimed if:

- All the provisions at the core level are met.
- The conformance progression score is at least 60% (percentage TBD) for the provisions at the [further] level.
- The (WCAG-EM style) methodology assertion is met, which means people go through a process to select an appropriate sample for their testing. This process generates the pages that should be included in the a conformance claim.

WCAG Gold

WCAG Silver and:

- **All** the provisions at the [further] level are met.
- Two other product-level assertions are met (TBD)

Policy guidance

We could include some guidance that says something like: “WCAG conformance is the recommended level for regulatory compliance, but it is useful to allow for WCAG Silver to be used on the way to conformance.”

Potential Issues

It relies on assertions (which is currently being investigated).

The methodology assertion would need a lot of guidance on how to scope sampling and tasks. It is an area of potential gaming.

Jennie proposal

Basis for this proposal includes:

- Book: Crucial Conversations - this is why it begins with an explanation of the goals which I think are most likely shared amongst this group.
- The concepts of greater inclusion - something everyone in this groups.
- The request from users of WCAG - we cannot be 100% all the time. We need the opportunity to improve so we don't think we have to be perfect or stop trying.
- I (Jennie) worked with an AI to refine this proposal.
- A smart person told me to ensure we measure what matters. It matters that something is accessible. We can also measure behaviors (I did better, I did these steps, I got this amount of feedback), changes (last year I got this %, this year I got this %), etc. Each measurement can receive a score and be a part of an overall score.

Note: this is the basis of my thoughts with the time I had. Apologies - I did not get it to where it is truly where I want it. But, it has the spirit of a direction I think we could consider. For example, this does not yet include success criteria which could be considered beyond the mandatory core. These could be added into the variable bonus (weighted) section. Also, apologies if this repeats what someone else already added!

Core Principles

1. **Start with Heart:** Shared goal is equitable access for all, including those historically excluded.
2. **Transparency and Safety:** Encourage honest reporting without fear of punitive measures.
3. **Continuous Improvement:** Reward progress, not just static compliance.

Enhanced Accessibility Conformance Model

1. Mandatory Core

- **Baseline compliance across all functional need areas**, including cognitive accessibility.
- **Critical paths** (essential user journeys like health info, service applications) must be tested.
- **Scope disclosure:** % of pages tested and critical paths covered.

2. Variable Bonus (Weighted)

- **User Testing (Highest Weight):**
 - Above mandatory core, user testing with people with disabilities earns the **highest bonus weight**.
 - Rationale: Real-world validation is more impactful than automated checks.
 - Known issue needing more work - how to provide bonuses for this, while acknowledging variability in the possible results, thoroughness, etc.
- **Complexity Adjustment (Prioritize Cognitive Accessibility and more challenging areas to implement):**
 - Higher weight for improvements in:
 1. **Cognitive accessibility** (clear language, understandable navigation, meaningful alt text - needed by multiple user groups, and this is just an example).
 2. Dynamic content.
 3. Multimedia accessibility (e.g. quality audio description)

- **Innovation Credits (Standardized):**
 - Reduce subjectivity by referencing **ISO 9241-210 (Human-Centered Design)** and **EN 301 549** principles:
 - **User Satisfaction Scores** (ISO usability metrics).
 - **Efficiency & Effectiveness Metrics** (time to complete tasks, error rates).
 - **Adoption of User Needs** (documented user requirements integrated into design).
 - **Accessibility in Emerging Tech** (voice interfaces, AI-driven personalization).
 - **Inclusive Design Practices** (co-design with people with disabilities).
 - **Continuous Feedback Loops** (iterative improvements based on user input).
 - These elements can be explicitly listed in the standard as qualifying for innovation credits.
 - **Progress Incentive:**
 - Year-over-year improvement scoring, factoring complexity and resource burden.
-

3. Critical Path Testing Model

- Adapt **IEEE 29119 Risk-Based Testing** stages to focus on **risks for the user**, not system:
 - **Identify User-Critical Risks:** Missing health/safety info, inability to complete essential tasks, legal compliance gaps.
 - **Prioritize Testing:** Based on severity of user impact.
 - **Test Design:** Ensure essential tasks are accessible first.
 - **References:**
 - **Business Process Testing (BPT)** and **User Journey Mapping** from QA frameworks.
 - **ISO/IEC/IEEE 29119** for risk-based approach.
 - **Complexity Scaling:**
 - For **small sites** (few pages): Lower complexity weight, but **higher bar for accessibility score**.
 - For **large sites**: Higher complexity weight, acknowledging planning burden for critical paths.
-

4. Complexity-Adjusted Score

- Based on **ISO/IEC 25010 (Software Quality Model)** principles:
 - Factors:
 - % of pages tested.
 - Dynamic content complexity.
 - Functional diversity (visual, auditory, cognitive). The AI put this in here, and I would want to understand more about how this could work.
 - Size of site (scales complexity weighting).
-

5. Reporting Template

- **Overall Score**
- **Complexity-Adjusted Score**

- **Critical Path Score**
 - **User Testing Score**
 - **Year-over-Year Improvement**
 - **Functional Need Breakdown**
 - **Scope Disclosure**
-

Key Enhancements Added

- User testing weighted highest among bonuses
- Cognitive accessibility prioritized in complexity adjustment
- Innovation credits tied to ISO/EN standards with concrete metrics
- Critical path testing adapted to user-risk focus
- Complexity scaling for site size
- References to ISO 9241-210, EN 301 549, ISO/IEC 25010, IEEE 29119

Additional section added after the meeting - apologies for not including this!

Propose only providing a score. No levels like A, AA, AAA; or bronze, silver, gold, etc.

Rationale: whatever we end up with, it measures what it measures.

- Regulators can set their minimum thresholds.
- A number, like a percentage, can enable comparisons like:
 - Improvement over time
 - Scores for one website/product/system vs another
- If we weight our scoring method it can already account for ensuring minimums we decide are present.

I know this really changes things from the way they are currently done. I think the levels were necessary for earlier versions of WCAG and appreciate all that went into setting them. I am just wondering if at this level of maturity of accessibility in the world if now they enable people staying comfortable with lower levels of conformance, whereas, just having a number score is similar to a ruler.

- It measures, but doesn't say "this number is enough."

Gregg New Proposal

Proposal 4: Enhanced and Future-Adapting Conformance Model

(this proposal draws from all the other proposals and seeks to address all of the concerns/holes we have identified - and with an eye to creating something that can be accepted by other standards bodies and regulators.)

- **There are requirements -- and recommendations**

- **Requirements are always required**
- **Recommendations are never required**
 - But are listed as ways to make things more accessible beyond what we think just need to be required
 - Recommendations could also list particular environments (education, training) where they are especially important - but probably(?) they are going to be important everywhere (for the users who need them) and are recommended everywhere - not just where we think they are important.
 - A percentage of recommendations could be used for 'conformance plus' scoring. Scoring for going above the basic level required for conformance.

- **Best Practices -**

- To include things that are not testable but just as important to get in front of authors eyes we would include best practices.
 - These would be posted immediately under (as part of) the requirements they relate to so they are seen along with the requirement (rather than being off somewhere else)
- They could also be included more progressive level beyond recommendations
- Things that only apply in certain situations could also be included as best practices for those situations

- **All requirements are written as “available”.**

- Requirements are written to say that “xxx is available”
 - This allows authors to stop having to do a thing when (and ONLY when) the thing was already and automatically fully available to users via browser functionality
 - Something would have to be in all of the major browsers before it could be relied upon as being 'available'
 - Need some threshold for when a function like this in the browsers was good enough
 - Suggest the test be **“When what the browser provided was as at least as good as most authors** (i.e. the

browsers are as good or better than most authors at providing the functionality) as determined by people with disabilities.

- - We create a big push for smart browsers that can do this as they are in a position to make content maximally useful to individuals since they can be tuned to the needs of each user by a user. They can also do things that we cannot require because they are not “testable” or because there is no correct value for all people with disabilities. For example, there is no reading level that is optimal for all users with cognitive disabilities. Also even contrast ratio needs to be high for some and lower for others.
- **All requirements have a precondition that scopes their coverage.**
 - They take the form “Where xxxx has yyyy, (then) zzzz must be true (or must be available)
 - If they always apply then the precondition is “Where xxx,”
 - This takes the place of a separate apply note after the requirement
 - By being up front (rather than in an apply note later) it allows authors to see that a provision does not apply before they read and try to figure out how it can apply - or get worry/fret/get upset as they read the requirement and don't see how to apply it to their situation. It also helps when the provision is quoted out of context and the apply section is left off (see below)
 - It allows simpler filtering by precondition - so only the requirements that apply can be viewed
 - We get beat-up and criticized a lot with our requirements quoted out of context. Having the “apply” be separate from the basic requirement encourages misunderstanding and misquoting in forums we may not even be present in.
- **There are different conformance levels- but each is binary**
 - **The Base level of conformance**
 - all requirements must be met for conformance (hence the name requirements)
 - Recommendations (and best practice) are mixed in with requirements so they are seen and followed as deemed possible
 - There are no assertions in the first level - unless it is felt that everyone must make that assertion (it is required)
 - There are no percentages -- but if there are more than one way to achieve a goal - they can be options within a single requirement.
 - **The next level is for those who want to go beyond what is strictly required.**

- This level is never required by regulation but can be rewarded in procurement and other ways
 - This level can have optional items
 - Percentages can be used here since it is “extra credit” - but should be within categories
- **A high level**
 - Similar to level 2 but harder

● **WCAG define what is MINIMALLY accessible - Policy says who had to so what**

- WCAG has levels
 - Bronze/Essential - only talks about whether something is minimally accessible or not
 - Include recommendations for better accessibility
 - Silver - talks about additional things that can be done
- WCAG does not say anything about
 - WHO - has to make thing conform
 - Who I responsible when there are different players involved
 - WHAT ORDER - one should work on things
 - When starting out
 - If receive a large amount -- or if incoming is too fast
 - WHAT IS MORE IMPORTANT for different content types or situations
 - (these are done in Policy Document_

● **Progress Toward Conformance (PTC)**

- **Separate from Conformance - we define a Progress Toward Conformance (PTC) Score (PTC)**
- This Progress Toward Conformance metric/score provides a way of dealing with the binary nature of conformance and
 - Allows Authors, companies, regulators the ability to measure progress over time
 - Allows purchasing agents and others to compare similar products against each other for accessibility
- The Score may involve (we need to figure this out)
 - the % of provisions met
 - the % of a site that meets
 - a combination
 - Or anything else that would be a meaningful measure of progress
 - Divided by disability type?

Logius proposal

Conformance model proposal Hidde / Logius

Prerequisites

Goal

What the subgroup tries to do:

Write down, given all requirements and assertions we have in WCAG 3, how someone can establish they conform with the standard.

Goals of the WCAG 3 conformance model:

1. Describe the criteria to meet the technical standard.
2. Describe meaningful steps that can be measured on a digital product's road towards conformance to/for both owner and users
3. Correspond reasonably well with user needs: users including users with disabilities should be able to use digital products that are conformant with WCAG 3.

Improving from WCAG 2

What Logius want to improve from WCAG 2.2 conformance:

- that WCAG 2.2 conformance is de facto binary, having a scale would do more justice to the nature of accessibility and be more useful to regulators
- that WCAG 2.2 conformance can be seen as a one-off, we should build in encouragement to continuously improve

What we think does not need solving in WCAG 3 conformance:

- That not every digital product conforms to WCAG 2.2. This is not a technical problem or a problem in the standard, we have seen many types of websites conform meaningfully and believe it is technically very much reasonable to meet. If it is not met, this is due to insufficient effort, organisational challenges or lack of technical expertise.
- Sampling (it can be covered in a future WCAG-EM).

Tests

Tests this subgroup can check the conformance section against (these should all be true when we're done; taken from many discussions and notes in the conformance discussion doc):

- ☐ It establishes without doubt that a digital product conforms to WCAG 3 (in some specified way)
- ☐ It encourages people responsible for a digital product to improve accessibility continuously
- ☐ It meaningfully distinguishes different levels of conformance while not lowering the bar from WCAG 2.2 AA, and while equally supporting all disability groups in each level.
- ☐ It meaningfully avoids equitywashing: it can't help make companies look good without making user's experience good.
- ☐ ...

Usages we need the conformance model to serve:

1. **People responsible for a digital product** want to a. show how accessible it is via some kind of label ('our product is accessible on ') so they can stand out in tenders, comply with regulation, show their corporate responsibility b. know what to improve
2. **Regulators/legislators** who want to ensure digital products are accessible for end users want to have a way to make distinctions so they can go after organisations where legal expectations aren't met.
3. **End users** can know what the level of accessibility of a digital product is supposed to be, and challenge it if statements are false or the level is too low.

Considerations

- gradual conformance seems fine and useful, but anything gradual should be clearly distinguished as a lower achievement than what's currently WCAG 2 AA

Proposed model

Statuses

Distinguish three statuses, where only "partial" is gradual, and the others are binary:

1. Not checked (Unknown)
 - This status applies to digital products that have never been checked.
2. Partially conformant
 - This status is gradual and has defined scores so that stakeholders can know where they are.
 - It is equivalent to 'has been evaluated against WCAG 2 but issues were found' today, but with defined statuses.
3. Fully conformant
 - This status can be seen as binary 'is accessible' and is what our policy doc could recommend legislators to require being on / working towards / staying on.

- A digital product can be “Fully conformant with Core requirements” or “Fully conformant with Core requirements + 1 or more specified Supplemental requirements”.
- Claimant needs to specify:
 - Which set (Core, or Core + which Supplemental requirements)
 - Scope of conformance.

Exceptions

“Fully conformant” can only be claimed if:

- Requirements are met using methods that are [accessibility supported].
- Claim is about a whole digital product, of all processes all steps must be included.

Andrew proposal

Proposal 6

Problems with current conformance

- There is too much to evaluate, and too much effort/not enough time to guarantee is 100% conforming.
- User experience suffers when content isn't conforming.
- Regulations require conformance for *sites*.

This model incorporates a few concepts that are found in a mix of security/privacy/WCAG-EM

- Automated continuous monitoring
- Prioritized workflow expert testing
- Random sampling
- Management assertions

In this draft (emphasizing draft as a work in progress) I'm going to say "site" but this could also apply to a "page" or "web app" or "collection of documents". There are also specific numbers (e.g., three workflows) - please regard these as placeholders rather than an absolute value.

1st level:

- Site passes automated scan against **Automated Core** tests. This scan can be against the production site or could be a process whereby automatically-generated pages are scanned as part of the generation process.
- Functionality which impacts user safety or emergency access is expert tested and all **Core** requirements are met.

2nd level:

- Meets 1st level.
- Functionality related to user privacy and security is expert tested and all **Core** requirements are met.
- Top three workflows defined by the site owner are expert tested and all **Core** requirements are met.

3rd level:

- Meets 2nd level
- Top five workflows defined by site owner are expert tested and all **Core+** requirements are met.
- Random sample of pages (need to define methodology for this?) are expert tested and all **Core** requirements are met.
- Functionality which impacts user safety or emergency access is expert tested and all **Core+** requirements are met.
- Management assertion defining process for users to gain access to critical functionality in the event of accessibility blocking issues. [SLA expectations can be defined in regulation]
 - Perhaps there is a "core assertions" set that includes this?

4th level:

- Meets 3rd level
- Random sample of pages are expert tested and all **Core+** requirements are met.
- User studies of some set, somehow...

Policy Doc

This proposal does not leave much for a policy recommendation document. A policy recommendation will be treated as optional/configurable by policy makers, and is likely to result in deharmonization.

Regulators can select whether to apply level 1-4 to different sectors differently, but shouldn't be provided with a suggestion that they can assemble a custom set of criteria.

Table-view of conformance model					
Level	Automated tests	Safety/Emergency	Workflows	Random Sampling	Process assertions
1st	Must pass	Expert testing - Core			
2nd	Must pass	Expert testing - Core	Top 3 - Core		
3rd	Must pass	Expert testing - Core+	Top 5 - Core+	Core	Yes

Table-view of conformance model					
4th	Must pass	Expert testing - Core+	Top 5 - Core+ and UAT(?)	Core+	Yes

Automated Core requirements: requirements that are able to be programmatically identified. The WG will define and update this set of rules on a regular interval, so the set of criteria that need to be met at the base level will evolve over time, but to meet higher levels there is no change to what needs to be met, just the expected methodology to meet it.

Notes

Legal basis for automated level.

Whether something is automated will change over time, causes issues for standards. Needs to exist before you did it.

Cost -

Claim would have to include which workflows are selected.
(How is this different from including pages?)

Suggestions from Jennie

- For the updating of automated tests - how will regulators point to the proposed version?
Example: will there be a version for the standard which is backwards compatible and include like a 3.1, 3.2, etc.?
- Could there be a disqualification from level 1 being an option for certain sites? (I.e. if you collect certain info, must do level 2 or more)

- Example: government, anything requiring payment or financial information (a type of safety), or sites of a certain level or use of personally identifying data?
 - While some of this could be legislative, I wonder if conformance should already stipulate some of this.
- Consideration of non-disclosure agreements for the workflows and core information.

Shadi

- Automated testing, perhaps use a registry approach?
- However, agree that people need stability, shouldn't change too quickly.
- Disqualification of level 1 (Jennie's comment), similar to WCAG2's comment about not requiring AAA, could work that way?
- Workflows: Would really help things to have this, bring it closer to user-experience.

Alastair

- Don't label it "automated" level. Have a lowest level that happens to align with things that can be tested now.
- Cost for automated testing requirement
- Workflows - what if there aren't three or five?

Shadi proposal

Proposal 7

Definitions

- **Process (from WCAG2):** series of user actions where each action is required in order to complete an activity
- **Essential (from WCAG 2):** if removed, would fundamentally change the information or functionality of the content, **and** information and functionality cannot be achieved in another way that would conform
- **Path (new term):** content involved in a process, including content involved in series of user actions to get to the process with webpages/views
- **Scope Purpose (new term based on Page Titled in WCAG 2):** topics or purposes of the scope
- **Essential Path (new term):** if removed, would fundamentally change the scope purpose, **and** scope purpose cannot be achieved in another way that would conform

Criteria Types

- **Basic Accessibility:** non-interference, safety, privacy, blockers (= things like: no text alternative, no captions, no accessible name, ...) [maybe similar to “Core Conformance” in AC proposal]
- **Improved Accessibility:** Basic Accessibility + enablers (= things with higher quality attributes for text alternatives, captions, contrast, ...) [maybe similar to “Full Conformance” in AC proposal]
- **Good Accessibility:** Improved Accessibility + delighters (= things with yet higher quality attributes, assertions, best practices, ...) [maybe similar to “Recommendations” in AC proposal]

Conformance Levels

- **Level 1:** all essential paths have basic accessibility + getting help
- **Level 2:** all paths have basic accessibility, essential paths have improved accessibility + getting help
- **Level 3:** all paths have improved accessibility or beyond + getting help

Issues

- How to differentiate essential paths from non-essential paths.
- Legal issue(?) of missing content along the path.

- how would one define **essential** in a way that everyone would come up with the same classification of paths. Not an objective term? No high level of inter tester agreement?
- What is the legal justification for saying something is accessible if only parts of it are accessible?
- If this said that inconsequential bits were not accessible - it might make sense - but that is best handled at the regulation level (such as in ADA above)

Examples

Scope purpose: Make an appointment to get a new passport

Essential Path: Navigation menu, appointment form elements (calendar, text fields, pop-ups, form error messages)

Conformance level examples:

- Level 1: Menu is keyboard accessible, form elements are linked, datepicker is keyboard accessible
- Level 2: Menu is
- Level 3:

Process: **Ordering a product on an ecommerce platform**

Essential: order a t-shirt on a platform

Path:

Scope purpose:

Essential Path:

Google Responses

Here's our feedback on the proposals 1-4:

TL;DR - Google is most in favor of proposal #3 with some serious adjustments.

1) Binary - Gregg

- Pros:
 - Clear bar and requirements, reduces room for interpretation
 - Sets a consistent baseline across the industry
 - Similar to how it works today, no massive change management, re-education required
- Cons:
 - Inflexible, doesn't account for variety/complexity of products and platforms, especially important for Google.
 - Not feasible! Today, I believe it's impossible to maintain 100% conformance at all times
 - Does not encourage transparency, as products will avoid disclosing any issues due to the rigid score focusing only on ACR generation with no detail or "does not support" statements to game procurement
 - Pushes teams to optimize for conformance only since the bar is so high, not usability or innovation

2) Process - Lisa

User Testing typically hasn't been a requirement due to a perceived burden on smaller organizations without dedicated teams and resources for user testing, as well as the lack of consistent user testing standards that can ensure products are evaluated equally (which is often necessary for procurements).

It would likely incentivize false claims, or as minimal user testing as possible, without clear requirements and guardrails against dishonesty. Standards conformance should be made easier to understand and achieve. User testing requirements should be left to be required by procurement officials.

- Pros:
 - Flexible, allows products to define what journeys are important for their users
 - Included user testing as part of minimal conformance testing
 - Recognizes machine testing as viable part of conformance testing
- Cons:
 - While some guidance can be provided on what paths/journeys should be essential/critical and it focuses on the most website traffic, it leaves too much room for interpretation, leading to inconsistent processes and making it easier to game the system.

- Very few companies have enough expertise on disability and user groups to be able to effectively define what diverse users means, or run meaningful user testing.
- While user testing is great, it can be tricky. As mentioned above, if the company doesn't have the expertise to run effective user testing with a wide variety of disabilities, they might optimize for a specific group only at the cost of another. Another pitfall if the company does not have expertise, is that they might optimize for an individual user preference that doesn't represent the majority of users and might break system consistency.
- User testing, even simulation by experts, is hard because it requires specialized staffing, which is scarce and not all companies can afford, and recruiting users and running studies/simulations is also expensive (even for Google!). This would create an unfair market competition for smaller companies who might not be able to conform to minimal levels.

3) Scaled progression - Alastair's ***

- Pros:
 - Most flexible as it allows for products to decide how they want to go beyond minimum
 - Most aligned with Google internal processes
 - Creates a consistent min bar for the industry
 - Potentially makes the requirements more clear and verifiable, and less subjective as the core level should be "detectable"
 - Offers a progression path for products, without compromising on the baseline or allowing teams to pick what they want to compromise
 - Encourages higher transparency, since products would be allowed to have quality bugs they are working on without failing min conformance
 - I really like usability testing as an assertion. It could also provide more detail on the issues that were reported, such as "user testing has been conducted and all use cases can be completed with assistive technology" (which informs that the issues that were reported were not barriers to the usability).
 - In my opinion, this option could be a win/win/win for companies, customers, and users, as it allows a more fair playing field for the procurement market where it's easier to reach min requirements and companies will compete by what they chose to do more, which then gives teams more flexibility to optimize for usability, quality and innovation, ultimately benefiting users.
- Cons:
 - It's a very different paradigm, and would require significant re-education for the industry
 - By lowering the min bar, it might lower accessibility levels across the industry, if companies decide to stick to the bare minimum (this is a bet, I hope the "going

beyond" flexibility will give companies more choices for meaningful competition)

- Flexibility for what parts of the product teams will optimize for quality can be gamed, or encourages a "bare minimum" effort where teams will pick the easiest part to improve quality, not the most meaningful
- The levels are more complex to understand and might lead to more inconsistency across the industry

Key changes to #3:

1. Keep conformance testing the same across all levels. Quality can be scoped to the safety/detectable requirements as listed below, but it should apply to all content. "Quality" needs to be treated the same. This proposal suggests splitting "quality" into a different scope of testing which is problematic.

2. "Quality" should be the conformance goal, but acknowledge that it is an intended target, not an expected state. "The goal is progress over perfection" is mentioned here, and this should be conveyed more openly. The expectation of full conformance has been a real challenge with regulations and WCAG 2.

3. Use "assertions" with the key tasks/scoping change. Applying these only to assertions would still allow a common baseline for procurements to compare conformance across products, and still give advantages to products that conduct user testing or additional use case testing to ensure that the conformance issues are not barriers to users.

4) Score based - Jennie

- Pros:
 - Moves away from levels, providing a more progressive scale
 - References more standards, potentially simplifying conformance efforts for companies
 - Tries to include more users by including cognitive accessibility
 - Potential for a weighted scale, allowing us to adjust scores based on priority/criticality, and even changing it over time without changing the standards
- Cons:
 - This proposal was the hardest to understand, and it seems to be based on too much room for interpretation. For ex, allows teams to define: what % of "pages" (so web focused...) they want to test as they can get a score for other things, complexity/size of a site (again, so web focused..) which could be different from company to company and even same company

- We should not expect regulators to set the min bar/level as they are not experts, while I like the idea of a score that actually measures what's happening, **I still think there should be a notion of leveling. I wonder if a notion of score could be incorporated to proposal 3)**
 - Cognitive accessibility guidelines are still not mature enough to be part of the requirements, some are very open to interpretation, or not consistently verifiable. I believe COGA efforts should be incorporated into general success criteria as they mature, instead of having an additional vague requirement for cognitive accessibility.
 - Referencing other standards will increase complexity, for ex, EN already references WCAG, so we would have a circular reference loop. I think the principles listed are valuable, but they could be part of the meta-guidelines on how to verify conformance and develop products, not conformance levels. I am ok with giving people bonus points for having additional processes like user testing, but ultimately, conformance should be about the state of the product. Overall, I think those efforts should be listed, and assessed in procurement processes instead.
 - Unclear how user testing would be scored
-

Ongoing topics

Ongoing topics

[Ongoing topics](#)

[The binary nature of WCAG2 conformance](#)

[Severity: Type of issue does not correlate to user-experience \(per instance\)](#)

[Usability testing as part of “required” level of WCAG](#)

[What don't lawyers like?](#)

[An easy to achieve level](#)

[Effort & resources vs what is discrimination](#)

[Does a lower \(minimum\) bar increase or decrease overall accessibility?](#)

[Sampling - regulators assume that we'd test 100% of a site](#)

[Who decides which provisions must be done at each level?](#)

The binary nature of WCAG2 conformance

Point: In the last decade or so, now that regulations requiring WCAG 2.x are being enforced, WCAG conformance is taken as a binary “is accessible”. If you meet WCAG 2 at AA it's accessible, otherwise it is not.

- **Counterpoint:** This is true of every accessibility standard even though WCAG says that you can fully conform and you are still not accessible. Many can still not use. You have just met the “minimum requirements” for accessibility.
- **Continued point:** Levels in WCAG 2 were a mechanism for encouraging regulators to take a view on what is included.

Point: Products so rarely fully meet WCAG conformance that procurers cannot use full conformance for comparison. If no-one “conforms”, how useful is it?

- **Counterpoint:** This confuses conformance with reporting. All standards (including all of our different proposals) have some criterion for “passing”. As such they are all binary and have a pass or fail criterion whether it is “these items” or “this % of items”.

Despite this one can (and VPATS do) report how products address each requirement and it is possible to compare different products by comparing their VPATs to see which are more conformant -- and which are conformant in key areas that might be of interest to the organization.

- **Continued point:** If conformance is only pass/fail (in total), then reporting will continue to be binary. We need to make the gradations more apparent.

Point: Laws/Regulations often (naively) require full conformance. Some areas are more pragmatic, but without more “notches on the ruler”, it is likely to continue in this fashion.

- **Counterpoint:** all regulations, by their nature, have requirements or some criteria that one must meet. (as do all our proposals - even the % ones). You either meet them or

not. Even speed limits are binary. You are at or below or you are above. **Enforcement** however is not binary. Different places use different criteria for fines for speeding and for enforcement. Ditto for every other regulation.

Point: “Drive-by” lawsuits can be achieved with an automated accessibility check and an [AI generated complaint](#). If there were a more incremental approach (so any fail isn’t seen as full failure), it should be easier to defend.

Point: Adding notches to WCAG is not truly binary - at least not more than any other scheme we propose.

- You can easily report on which provisions you meet or do not meet -- and which pages you include and do not include. It IS true that if you want to Fully Conform - you must meet all. **But no matter what format we use** regulations will have to say you have to do at least X and that means it will again be binary. You either meet X or you do not. So all of our proposals are binary in that respect.
- Notches in the ruler do not help. We can add all the notches we like - and regulators will still have to say “**you have to reach this notch**”. If you do - you pass. If you don't - you fail. Laws are always binary.
 - Do not confuse enforcement with the law. Speed limits are absolute but enforcement is not. Ditto for any regulation enforcement. The latitude differs for safety vs other - but is always there.
- No one is successfully sued because they are mostly accessible but there are some minor things wrong
- Drive-by lawsuits will always continue because they (as well as overlays) base their model on the threat of or fear of lawsuits rather than successful suits.

Counterpoint: If regulators say “you have to do X”, and X = silver level. Can we then define that Silver level has multiple ways to do that? E.g. meeting 60% of supplemental provisions.

Solutions to the binary nature issue

- Prioritisation based on task / purpose / path, so that effort can be prioritised.
- Question: is this an accessibility standard or an “effort to do things for pwd” standard
- Setting a level of conformance that includes more than 0/100%, e.g. scoring / percentages.

Severity: Type of issue does not correlate to user-experience (per instance)

Point: A type of issue that is a blocker in some scenarios (e.g. keyboard inaccessible submit button) may be inconsequential in others (e.g. the same button on a feature they never use).

Everything in the provisions is important to someone, to some degree. That degree will depend on the context of the interface / content / task. Few instances of issues are complete blockers for the end-user, many are things which impede progress.

This means that setting levels for each type of issue is arbitrary, the instances of each issue will vary in their impact. That is why impact based on issue-type does not correlate (well) to the end-user experience.

Usability testing as part of “required” level of WCAG

Generally agree points:

- Usability testing gives the best positive results.
- Incontrovertible value.
- Does not address all type, degree, and combination of disability - since one cannot find nor afford tests with all of those
-
- Best way to focus on what actually makes content useable for people with disabilities.
- Great way to improve access to people with cognitive disabilities, including things that are not required formally but important for this group, including things that are more dependent on context.
- Usability testing identifies problems of the testers (and those like them) but does not in itself say anything about whether those problems are addressed.

Point: Usability testing results are not objective so great for “extra”, catching things that requirements do not.

Counter point: While usability testing is not objective - an assertion that it has been done - is objective (since it only relates to the assertion and not the actual test - or any results).

Point: Assertions ask for a process, not a result.

We would need to have a mechanism to say “if you’ve done this type of usability testing, you can say that is equivalent to or replaces X requirement(s).)

Scale/effectiveness argument:

Point: For effective testing (giving you a “does this thing work for most people” answer) you would need a lot of participants. 2-3 of each type and level of disability (150??).

Counter point: Even testing with 3 people with the right disability combination makes a huge difference! (and we don’t want the perfect to be the enemy of the good)

What don't lawyers like?

(Let's leave this one to the discussion with Eve Hill.)

An easy to achieve level / Does a lower minimum bar increase or decrease overall accessibility?

Fulfilling WCAG to get to conformance is often a big task, particularly if you are starting with a product that hasn't been built with accessibility in mind.

We've had multiple reports of people/organisations essentially giving up: "Why bother, we won't get to a [full] pass".

Point: Having one (or more) levels under the regulated level could give people more of a ladder, showing progress. If they don't give up, they can get further.

Counter points:

- Levels under the regulated level tend to be ignored.
- Some people might do the minimum and stop.

Effort & resources vs what is discrimination

Sampling - regulators assume that you test 100% of a site

People outside accessibility tend to assume that testing a site means testing everything. In practice everyone samples. Suppliers may not be transparent about that.

With no guidance about how or what to sample, there is a disconnect:

- Regulators / procurers think "everything".
- Suppliers / product-creators want minimal scope.

Proposal: Include scoping advice in policy doc and/or an equivalent of WCAG-EM.

Who decides which provisions must be done at each level?

AG decides without context of the product.

Claimants decide with context (but without as much accessibility knowledge?)

How to adjust responsibility for third party content without undermining the ruler?

Wider View

Wider View

Conformance is whether something meets the standard or not. But there is much more to using a standard than simple "does it conform or not"

This page is a place to capture these other aspects -- all of which need to be fleshed out and addressed. With recommendations on how to handle

Comments on these are welcome

Conformance

- Whether something meets a standard or not
- This aspect is covered on other pages - not here

Reporting

- Reporting against a standard is more than just did one meet every requirement
- **Types of reporting**
 - Binary/conformance - you meet all the **requirements** or you don't - this is the definition of conformance
 - Partial - you meet some but not all **requirements**. Good for comparing of products and plotting progress
- **Uses of Partial reporting**
 - To compare two things to say which is better
 - To track progress toward full conformance - and better accessibility
- No limit on what other reporting could be used
 - If provisions are tagged with applicability to functional-needs, reporting could use that.

Using the standard in daily life

- Use of W3 by authors to know what is important
- Use of W3 by users to know which to buy - which is better
- Use of W3 by enforcement agencies to tell if something is

Could include a reporting doc, e.g. WCAG-EM is how to conduct testing,

Policy and Enforcement

- **User generated (uncompensated) content**

- Content generated by users after the product is released and not in control of the product author (e.g. email program)

- **3 Party Content**

- **Contracted by site owner - under control of site owner**
 - Instead of writing the code themselves they have someone else write it or they buy it or they use code or service provided by others.
 - **RECOMMENDATIONS for addressing**
 - Owner is responsible for content - as if they created it themselves
- **Rewarded by site author - and “compensation model for site” depends on it**
 - Site owner pays/compensates others to add content to site
 - **RECOMMENDATIONS for addressing**
 -
- **Added by others after the launch who are not compensated**
 - We are calling this “User generated uncompensated content” and covering it separately under that topic
 - **RECOMMENDATIONS for addressing**
- **Syndicated content**
 - Included in the site from another source.

- **Bugs**

- All products have bugs.
- **RECOMMENDATIONS** to how to handle bugs include
 - Tolerance of bugs
 - Severity of bugs (blocking, hampering, slowing down) (note that something that slows down a typical user by momentarily confusing them - may be a total blocker for those with cognitive disabilities,)
 - What is blocked, hampered etc.)
 - Time to repair
 - Order of remediation

● Large Volumes - at once

- Example - a company purchases a tranche of media or documents
- **RECOMMENDATIONS** on how to handle enforcement of WCAG3 include
 - Practical timelines before enforcement
 - Order of remediation
 - Nature of the volume or parts of the (see Archival)

● Large Volume flow

- Example - content flows in at a rate that is beyond what can be addressed
- **RECOMMENDATIONS for addressing**
 - Practicality / Feasibility of conformance
 - Nature of content
 - See also Archival
 - Order of remediation

● Archival - rarely viewed

- Large volumes of content that are archived for history or legal reasons but are rarely ever viewed
- Examples
 - A library has an archive of every sample of media or content that has ever been generated or submitted to it
 - A company keeps an archive of every complaint ever sent to it and the response
- **RECOMMENDATIONS for addressing**
 - Accessible versions are made available on demand with reasonable responsiveness

● Equity of application/enforcement

- Whether all disability groups are treated equally in policy and enforcement
- **RECOMMENDATIONS for addressing**
 - If decisions are made about enforcement based on less than full conformance - that decisions take equity into account so that sites are not allowed to escape enforcement while ignoring or largely ignoring any class of disability

● Sampling

- Different types of sampling
 - Representative Sampling (random)

- Purpose to determine the probability that a site is accessible if it is not possible to test the whole site
- Process - Probability of accuracy of the sample is a function of **variance, sample size, and probability**). However variance is not something one can set - it is a measure of reality. That is - you measure (or estimate and confirm) variance and can then either a) specify the desired probability of accuracy and calculate the size of the sample you need, or b) specify sample size and calculate the probability of accuracy of your results. Each time a test is run a new random sample must be taken. The same sample (randomly chosen items) cannot be used in more than one test.
- TYPES of Representative Sampling
 - **Omnibus** - random sample of whole site at once
 - **Segmented** - site is divided into a comprehensive list of subsets - and they are each random sampled and reported separately
 - Segments can be by pages, by components or anything else that matches the evaluation units of the requirements. But it must be a comprehensive list - that cumulatively equals the full site - or it is not representative - it is selective
- **Selective sampling (not representative)**
 - Only some parts of a site/thing are tested
 - The sample is not representative and cannot be used to make a claim against the whole
 - Only thing that can be said is that these particular pages/things meet/don't meet the requirements
- **Hybrid Sample**
 - Where some particular pages are essential - a hybrid sampling approach may be used where the thing as a whole has to meet the standard absolutely (100% probability) for some pages and another percent for the rest
 - The only way to have 100% probability is to have a "sample of the whole" (i.e. test every page)
 - So a hybrid might be "the site must achieve (be random sampled to demonstrate) a xx% probability of conformance but the following parts of the site must be each tested separately to ensure (100% probability) conformance."
- **RECOMMENDATIONS for addressing**
 - That policy/enforcement **not** require a "sample of the whole" for making or defending against claims of conformance
 - That policy use a hybrid model where pages that must be accessible are objectively specified/defined and it is stated that they must 100% be

included in the hybrid sample. All other pages would be tested using a random sample of the site.

- Any non-randomly sampled pages not be used as evidence of non-conformance UNLESS those pages are explicitly named in regulations as requiring 100% probability of conformance..
- A single random sample of the site could be used to defend against enforcement.
- Random samples by plaintiffs or defendants should be taken in supervised situation so that only one sample is taken (because taking multiple samples to find one that fails - reduces the probability of each.
 - (MATH OR SAMPLING EXPERTS CAN SKIP THIS - THEY ALREADY KNOW) if multiple random samples are taken in order to find one that fails - then according to the laws of probability on which sampling is based the measures probability would be reduced by the calculated probability times itself for the number of samples taken. That is, If the required probability is 90% and one takes 4 samples in order to find a sample that failed, and the probability of each sample would have to have been above 97% (a monstrous sample) in order to meet the 90% probability ($.97 \times .97 \times .97 \times .97 = .885$ which is just 88.5%.)

● Paths

- Some paths through a site may be deemed more important than others.
 - This does not affect the determination of whether the site as a whole is accessible or not (the purpose of WCAG3 being to measure accessibility).
 - But for policy or enforcement - the importance of paths may be something important to consider on a case by case basis
 - This is very similar to the SELECTIVE SAMPLING discussion above where some part of a site may be given more priority for meeting WCAG3 than others.
- **RECOMMENDATIONS for addressing**
 - This be a consideration and handled as discussed above under Hybrid Sample

● Libraries

- Sites often are built using libraries, frameworks or other collections of code/objects written by others.
- Sometimes authors can choose between libraries and choose those with accessible components
- Sometimes authors can modify code that came from libraries to make it accessible
- Sometimes authors can write their own when they cannot find a component that is accessible

- But sometimes they may not be able to find, repair, or replace a library for a legal or other reason.
 - This does not mean that they would be accessible or would meet WCAG3
 - But consideration should be given in enforcement to situations that genuinely can be justified
- **RECOMMENDATIONS for addressing**
 - That policy/enforcement should take into consideration situations where an author is not be able to find, repair, or replace an inaccessible component for a legal or other justifiable reason.

- **Small Businesses (and other WHO exceptions)**

- Any question of WHO has to follow the guidelines - is policy - not whether a site is accessible or not
- **RECOMMENDATIONS for addressing**
 - policy/enforcement take into account the different constraints of different author/owners and adjust the application of WCAG3 to their sites as appropriate

What goes where (policy/eval/reporting)

What goes where (core/policy/scoping/reporting)

Summary

Summarising what could be part of core conformance per topic:

- **Accessibility supported:** Part of conformance (see other discussions)
- **Authoring tools:** Could require editing interfaces are included in claims (in some circumstances); Could tag some methods within requirements as necessary when it is an editing interface.
- **Equity evidence:** Provisions are tagged for internal (AG) usage.
- **Reporting:** Minimum info for an (optional) claim.
- **Sampling/Setting scope:** Building blocks for a claim (page/view/process) are normative, but there is no clear path to requiring particular ones across sites.
- **Component libraries:** Provisions and/or methods could be tagged for internal (AG) usage.
- **Paths:** Paths (and/or processes) can be defined, but there is no clear path to requiring particular ones across sites.
- **Third-party content (procured):** No conformance solution found, policy only.
- **UAAG:** Write WCAG provisions so that as (all) user agents do more authors naturally have to do less.
- **Bugs:** No conformance solution found, policy only.
- **Large volumes of content:** Possibly include an assertion?
- **User generated content:** Could tag provisions which apply to user-generated content and have ATAG-type methods. Fulfilling the ATAG methods could allow for a “partial conformance” type claim for that content.
- **Live content:** We rely on consensus to get to a feasible set of requirements.
- **Art / games content:** We tackle at the provision level, scoping each provision to the types of content it’s applicable to, but not scoping out experiences just because it is an experience. Noting the essential exception for some things.
- **Rarely used content:** No conformance solution found, policy only.
- **Experimental content:** No conformance solution found, policy only.
- **Not applicable to all content:** Include pre-conditions (“applies when”) in the provision.
- **Small business challenges:** Could have filters to show only provisions which are applicable. For example, to small businesses, if they can be identified. But the granularity of provisions helps. This is mostly a policy thing.

Suggested activity:

Run through the scenarios from the [“Use Cases for WCAG 3.0 Conformance”](#) and see which are best dealt with in conformance vs a policy document.

Also, the table below is drawn from the [WCAG 3 core issues list](#).

Item	WCAG 3 Core	Other docs (Policy, registries, scoping & reporting, other)
Accessibility supported	Accessibility supported concept is used to relieve author from providing something where it is appropriate and provided elsewhere.	WCAG 3 default accessibility support set (possibly as a registry)
Authoring tools	- Requirements on functionality that allow users to author content that is intended to be published (can address some of third party content) - That it checks basic accessibility - That there are means to author all richness that the publication requires (eg headings, lists) - That there are means to add all accessibility information, eg alternative text if images supported - Requirements on supporting users with creating accessible content - Methods where authoring tools. - Plain language: authoring tool itself (by authors and administrators) must follow WCAG 3, tool must allow publishing content which meets WCAG 3. Correct? - Examples in current use:	ATAG-like aspects can go in as methods to support requirements. Could provide a reporting example/template for authoring tools. Policy advice: Make sure back-end screens for things are included, particularly for staff-users. Next steps: - Hidde: Test some potential ATAG type requirements that don't fit into current requirements. - Alastair: Draft an addition to the conformance model that requires ATAG type methods/requirements if the claimant is responsible for the editing interface. - Lisa: See if there are other requirements that are not currently included based on collaborative / authoring tools.

Item	WCAG 3 Core	Other docs (Policy, registries, scoping & reporting, other)
	tools which remediate PDFs sometimes are not accessible for the administrators, those who remediate. But they can improve accessibility of PDFs which are published. • Conclusion: WCAG requirements are for end-users, methods are how those are achieved, which can be authoring-tool things.	
Equity evidence	Provisions are assigned one or more functional needs Conformance could require a set spread of provisions/level	Reporting - Claims / reports could show which functional needs are affected. Note: The EN 301 549 table mapping functional needs to criteria. Next step: Include comments on the tagging, so there is some understanding of why each is included.
Policy uptake		Have a parallel (informative) policy document. Next steps: Will start off the policy group after this group concludes.
Reporting	Minimum information for a claim if one is made. Claims are optional If a claim is made we may require that certain parts be included	Examples of reports showing different scales and results Reporting options Include something on this in policy document.
Sampling / Setting scope	Scoping definitions (e.g. page/view). It could include tasks/paths if we can agree how that would work.	A WCAG-EM like informative doc to outline both sampling approach and reporting. 1. Guidance for policy makers on what samples should be required by different / particular types of

Item	WCAG 3 Core	Other docs (Policy, registries, scoping & reporting, other)
	Assertions could apply more broadly, for example, apply more widely than the sample taken of page-tests.	organisation. Next step: - Draft what we would say to policy makers about taking a sample / setting a scope.
Component libraries	Provisions that apply at the component level could be identified / tagged. Possibly include an assertion that applies to components from a library? Paths ???	A WCAG-EM like doc could cover this, or... A separate document that explains what can be tested on individual components (avoiding 'what is conformant about' a component or 'what is accessible about' a component, and going for 'what can be tested' instead). Next steps: - Put component libraries on the authoring tools CG radar? - Consider including this in the intro to conformance, i.e. specifying that we don't conform at this level, but still good to do.
Paths: A way of including pages/views that are included to aid prioritisation of issues and scope of claim.		Next steps: - Consider incorporating into WCAG-EM, how you would select and apply prioritisation via paths. - If that works, also have something that matches in the policy doc. Potential paths sources: -
Third party content	??? (See below)	Policy guidance
UAAG	Write WCAG provisions so that as (all) user agents do more authors naturally have to do less. Accessibility supported (and sets) provides defining line for responsibilities, and a mechanism to transfer responsibility from author to user-agent if/as user-agents improve. Hidde: There is a lot user agents can do for requirements to be	Methods could be included to show how user-agents meet provisions.

Item	WCAG 3 Core	Other docs (Policy, registries, scoping & reporting, other)
	'automatically' met (eg forced focus indicators), we should (and do) write all WCAG 3 requirements such that we don't care if UAs or authors did the effort of meeting them.	

See the [wiki page](#) on the below items for more details.

What about companies that say “we can meet the reg -but we cannot make a claim of conformance” due to ISO-900x and our lawyers advice/rules.

Bugs and other issues of oversight occur in content

Please add any ideas for things that could go into WCAG 3 core conformance. We will agree (or not) about these things in-meeting:

Idea	What would be needed to make it work?
[Made up example] Conformance could allow for a 10% margin of error on an instance basis. E.g. there could be instances of the issue on 10% of the pages sampled.	Instance-counting got a very negative reaction on the FPWD. The 10% could be critical features, so would need a mechanism (e.g. tasks) to prioritize.

Bugs(and oversights?) are in every product -- including those covered by standard and regulation. They should be handled here like they are in every other standard and regulation.

QUESTION what is oversight? Another name for a bug? In programming an oversight that affects outcome is a bug - in code or code logic.

AC - I think it just means mistakes.

What could be done in other documents?

- Policy guidance: Encourage policy people not to start enforcement actions when issues appear to be bugs rather than consistent barriers.
- Put advice on how bugs and oversights would be understood and handled in the policy document and make recommendations on how they should be handled in policy/regulation/enforcement.

When large volumes of content are accumulating too rapidly to make fully conforming

User cases / examples:

- Satellite imagery being updated every 5 minutes.
- A sudden event (e.g. covid) meaning a huge amount of content had to be published immediately.

Please add any ideas for things that could go into WCAG 3 core conformance. We will agree (or not) about these things in-meeting:

Idea for core conformance	What would be needed to make it work?
(Jennie) Point in additional documents (not sure which one) for ways to use other IT standards to identify critical paths, then use those to indicate how samples were selected. Something like user-centric risk.	E.g. ISO/IEC/IEEE 29119 adapted - identify tasks where failure harms users (e.g. cannot read offer, miss interview, cannot submit application) and prioritize testing. Authors could also identify industry-specific critical path standards they used.
(Not conformance model) An assertion that provides a process for explaining / dealing with something that can't (reasonably) be made accessible? Demonstrating that you aren't ignoring the problem.	
(Not conformance model) An assertion showing a process where you have a process prioritise both content and provisions that are most important in the circumstances.	

Not a core issue. Does not determine if content is accessible or not.

What could be done in other documents?

- This should be covered in policy document. It is about what is reasonable to enforce and the time that should be allowed to handle - or even if they should not have to be made accessible (dead archives).
- Exception within the policy document.
- Advice on prioritisation for content.

Notes

When making large volumes of content fully conform is not achievable immediately

Idea for core conformance	What would be needed to make it work?

Not a core issue. Does not determine if content is accessible or not.

What could be done in other documents?

- This should be covered in policy document. It is about what is reasonable to enforce and the time that should be allowed to handle - or even if they should not have to be made accessible (dead archives).

Notes

Content provider does not own or directly control the content

Idea for core conformance	What would be needed to make it work?
(AC) Certain provisions could be tagged as applicable to user-generated content, with methods based on ATAG type things, e.g. instructions for alt-text for user-gen-content, how to do headings. Then have some form of partial conformance where those aspects are listed, and people can claim that they have fulfilled the ATAG parts of those provisions.	Tagging, and a section in conformance to explain how to do it.
(Jennie) Differentiate between advertising content, content loaded by product team (e.g. company authors, not social media users); end users (e.g. social media users). AC - concluding this is more of a policy thing.	Examples to support understanding. If I sell a spot to an advertiser, I must make it a requirement for them to load accessible content either in the system or in a contract. If a teacher uses a learning management system and uploads a video they should be required to ensure it is accessible before loading. But, a company cannot control how accessible a social media participant's content is or is not.
Allow claims to name & shame???	

Not a core issue. Does not determine if content is accessible or not.

What could be done in other documents?

(Gregg) This should be covered in policy document. It is about what is reasonable for author

- Also deals with legal issues like "control". If I contract for something and don't put accessibility in contract - then I had control and gave it up.
- If I rent a service (checkout) I do not own it --but I can and do affect what services it provides and also can choose between services that do or don't provide
- But something authors/servers do not control and should not be responsible for -- e.g I make an email program that ALLOWS content to be accessible but email writers do not create accessible emails.

But again this is a policy or enforcement issue / decision that we can advise on - but we should not be putting in WCAG3 since it does not have to do with determining if something is accessible -- but rather who is responsible or not for making it accessible.

It SHOULD be in policy doc though

Notes

When content providers have dependencies on other services

Idea for core conformance	What would be needed to make it work?

This is the same as the question above. A policy question not a WCAG question since it does not have to do with whether something is accessible -- but who is responsible for the accessibility.

What could be done in other documents?

-

Notes

Current limitations in providing the same level of conformance for live content

Idea for core conformance	What would be needed to make it work?

What could be done in other documents?

-

Notes

Current limitations in making some types of content fully conform

Idea for core conformance	What would be needed to make it work?
We tackle at the provision level, scoping each provision to the types of content it's applicable to, but not scoping out experiences just because it is an experience. Noting the essential exception for some things.	

What could be done in other documents?

- Information about games, experiences etc. Things may be on a continuum (e.g. slowed down, or adjusted) so that competitions are fair to the end-user.
- Potential assertions for games which go through process of enabling adjustments.

Notes

When content is rarely used, if ever

Idea for core conformance	What would be needed to make it work?

What could be done in other documents?

-

Notes

Content is experimental for all users, including people with disabilities

Idea for core conformance	What would be needed to make it work?

What could be done in other documents?

-

Notes

Not all accessibility requirements are always applicable to all content

Idea for core conformance	What would be needed to make it work?

What could be done in other documents?

-

Notes

Small businesses face unique challenges

Idea for core conformance	What would be needed to make it work?
Could have filter on provisions which are applicable, but the granularity of provisions helps.	

What could be done in other documents?

- Explainer documents / filtering

Notes

Qs to Answer b4 we use

Qs to Answer b4 we use

Here are things we are discussing -- but we have questions to answer before we use them.

“DO X of Y items” in base level of conformance

- 1) **I don't see how we can justify having the base level of conformance have any optional or “do x of y of these” requirements.**
 - a) It is an oxymoron (self-contradiction) to say that there are “**optional requirements**” which is what we are saying if we say that some “requirements” at base level are not required.
 - b) The basis for enforcing our guidelines is that - if you don't do at least these basic things - then the page/site does not meet minimum requirements.
 - i) If you can pick x of y and conform - then clearly the items in the y list are not essential - since we declare that you met the minimum required level of accessibility without doing any one of them (as long as you do other ones that have nothing to do with covering the “essential need” of the ones you skip.
 - c) It is hard to argue in a court of law that someone should FAIL accessibility if they didnt do x of y -- if we already say that any of the y ones can be skipped and it is ok.
 - d) WCAG is not an ‘effort’ standard. “As long as you put in this much effort you pass -but it isnt really important which ones you do -as long as you do enough of them.
 - e) Letting authors pick can also result in some sites doing none of y if there are enough that they pass automatically. (and you can't say that automatic don't count or you end up with gratuitous additions of things in some non-important place so you can count it.
 - f) BUT THE BOTTOM LINE - is that we can't make a base for the essential nature of the provisions (ie that they should be legally required) if we say that only of the y items are not important enough to require them - and any one can be omitted.

Percentages

Conformance Checklist

CONFORMANCE MODEL CHECKLIST

Strategies needing answers before they can be considered

In this section we list strategies that have had showstopper questions raised that that have never been answered.

We need answers to these questions before we can use these strategies in our conformance models

{answers can be provided inline below in curly brackets}

- **If it includes % at the base level that we expect to be required by regulation**
 - How do we say that the base level provisions are so important that authors must do them - and then say - well except for these few -- the rest are optional as long as you do x% of them.
 - Does that not give lie to the supposition that these are critical to do for minimum accessibility
 - How do we say that Human rights/discrimination an “effort” thing - rather than a barrier removal thing?
 - How do we prevent people from gaming it?
 - Doing the easy ones - or the ones that do not apply?
 - Adding a single instance of something in an obscure place so you can count it in your positive column?
 - What about simple pages that don't involve many technologies?
Depending on how you calculate the % they could be trivial to pass with many problems or very difficult to pass because they don't involve lots of easy things to count.
- **If it includes weighting**
 - Does it specify how we will value one provision over another?
 - By number of individuals affected? (Then total blindness provisions would have very small weight compared to almost all others)
 - By severity of disability?
 - By whether they are showstoppers or not (everything is a showstopper for the person with a severe enough disability) (also - there is danger around cognitive, language, and learning disabilities where provisions are often labeled as ‘usability’ rather than showstoppers - when they can be

showstoppers for some.

- **If it requires reporting (WCAG2 does not)**
 - Have we determined that companies can make assertions of compliance or non-compliance
- **If it requires reporting (WCAG2 does not)**
 - Have we determined that companies can make assertions of compliance or non-compliance
- **If it is not binary (does not have thresholds for requirement) - and leaves it up to regulators to set the thresholds when they regulate**
 - What provisions do we have to prevent different countries from setting different thresholds?
 - How would companies with international websites - be able to handle different thresholds for the same content?

Desired attributes for a conformance model

- **Supports reporting of progress - outside of full conformance**
 - **Any conformance model tends to be binary - or become binary when it is adopted in regulation.**
 - But that does not stop us from creating a way to track progress toward conformance (a CPM - conformance progress metric) that can be used to
 - Measure progress over time
 - Compare the accessibility of two different products to determine the more accessible one
- **Is in a form that will work for regulators**
 - Clear and with good inter-rater reliability
 - In a form that can be legally required, tested, and enforced.

Assumptions - Realities we need to recognise and work with

1. **If we want WCAG3 to be adopted in legislation/regulation --**
 - a. WCAG3 itself needs to be legal in nature.
2. **If we want it to be advisory to regulators/legislators**
 - a. and have them **craft their own Legal Nature documents**
 - b. Then we have much greater freedom and can create “pick from menu” approaches (or these PLUS pick from menu)
 - i. BUT - we will then end up with different legal documents from different countries/jurisdictions
3. **If we want AUTHORS to decide** what constitutes conformance
 - a. Again more freedom - we can give them “pick form menu” (or
4. **Regulatory standards differ from voluntary standards**
(most of what industry and W3C creates are voluntary)
 - a. **Voluntary** - you can use what you want - and maybe meet x amount
 - b. **Regulatory standards** - you need to do what the standard requires. You can pick and choose unless things are specifically stated as options
5. **Requirements** are required. **Recommendations** are optional.
6. We need several different things -
 - a. and need to think of conformance in context
 - b. And need to provide mechanisms for all of them

- c. WE NEED SOMETHING THAT CAN BE USED BY
 - i. Legislators

Key points of this model

1. It **SEPARATES** (and provides a path to each)
 - a. **Conformance** (which is binary - but can have different levels (that are binary))
 - b. **Progress toward conformance** - which can be analog (33.7% of provisions are met)- even within a single provision (e.g 80% now have captions)
 - c. **Encouragement to go further** - a good place for recommendations and best practice - esp if they are included as part of requirement text as notes.
 - d. **Where to start** - which can be related to importance, ease, process, topic/use area
- 2.

It does not do everything that everyone would like a conformance model to do

- But it does look at all the ideas and incorporate them where it can
- And where it provides a rationale as to why that feature cannot be used.
 - I welcome and analysis or rebuttal or modification to my analyses below

I tried to use every idea I could figure out how to use.

PS Don't confuse pointing out a hole in the boat (or our thinking) with poking a hole in the boat.
On the other hand - if I make a mistake and there is no hole - please point that out with your rationale as to why it is not.

OK lets start with **things I don't think we can use- and why.**

- 1) **how we can justify having the base level of conformance have any optional or “do x of y of these” requirements.**
 - a) It is an oxymoron (self-contradiction) to say that there are “**optional requirements**” which is what we are saying if we say that some “requirements” at base level are not required.
 - b) The basis for enforcing our guidelines is that - if you don't do at least these basic things - then the page/site does not meet minimum requirements.
 - i) If you can pick x of y and conform - then clearly the items in the y list are not essential - since we declare that you met the minimum required level of accessibility without doing any one of them (as long as you do other ones that have nothing to do with covering the “essential need” of the ones you skip.

- c) It is hard to argue in a court of law that someone should FAIL accessibility if they didn't do x of y -- if we already say that any of the y ones can be skipped and it is ok.
- d) WCAG is not an 'effort' standard. "As long as you put in this much effort you pass -but it isn't really important which ones you do -as long as you do enough of them.
- e) Letting authors pick can also result in some sites doing none of y if there are enough that they pass automatically. (and you can't say that automatic don't count or you end up with gratuitous additions of things in some non-important place so you can count it.
- f) BUT THE BOTTOM LINE - is that we can't make a base for the essential nature of the provisions (ie that they should be legally required) if we say that only of the y items are not important enough to require them - and any one can be omitted.

ISO 27001 flexibility

ISO 27001 Q&A with ChatGPT

Prompt: “Pretend you are an auditor for ISO 27001. How does an organization claim conformance? For example, are there specific things you have to do for security, or do you choose which things you need to do? I'm interested in how flexible the specifics are.”

As an ISO 27001 auditor, here's how I would explain it.

1 What Does It Mean to “Claim Conformance” to ISO 27001?

An organization claims conformance by demonstrating that it has implemented an **Information Security Management System (ISMS)** that meets all the requirements of:

- **ISO/IEC 27001**

There are two ways this happens:

A. Internal (Self-Declared) Conformance

The organization states it complies based on internal audits.

⚠ This is *not* certification.

B. Accredited Certification (Most Common)

An independent certification body audits the organization and issues a certificate.

In both cases, the organization must comply with **all mandatory clauses (4–10)** of the standard.

2 Are There Specific Security Controls You Must Implement?

Here's where flexibility comes in.

ISO 27001 has:

- **Mandatory management system requirements (Clauses 4–10)** → NOT optional
- A catalog of security controls in **Annex A** → Flexible and risk-based

The current control set comes from:

- **ISO/IEC 27002**
-

What Is Mandatory vs. Flexible?

Mandatory (No Flexibility)

You **MUST**:

- Define ISMS scope
- Perform a risk assessment
- Perform risk treatment
- Maintain a Statement of Applicability (SoA)
- Conduct internal audits
- Hold management reviews
- Continually improve the ISMS

These are structural requirements. You cannot opt out.

Flexible (Risk-Based Controls)

You do **NOT** have to implement every Annex A control.

Instead:

1. You identify information security risks.
2. You decide how to treat them.
3. You select controls to mitigate them.
4. You justify exclusions.

This is documented in the **Statement of Applicability (SoA)**.

As an auditor, I do NOT ask:

“Did you implement control A.5.1?”

I ask:

“Why did you implement or exclude this control, and is your decision justified based on risk?”

4 How Flexible Is It in Practice?

Very flexible — but not arbitrary.

You cannot say:

“We chose not to do access control.”

If you process sensitive data, that would fail risk treatment logic.

But you *can* say:

“We excluded physical media handling controls because we are 100% cloud-native with no physical media.”

Flexibility exists in:

- Depth of implementation
- Technical solutions used
- Documentation format
- Tools chosen
- Control selection

Flexibility does NOT exist in:

- Performing risk assessment
 - Documenting decisions
 - Having leadership oversight
 - Continuous improvement
-

5 What an Auditor Actually Checks

As an auditor, I verify:

- 1. Is the risk assessment method defined and consistently applied?**
- 2. Are risks identified logically?**
- 3. Are selected controls appropriate?**
- 4. Are excluded controls justified?**
- 5. Is the ISMS operating effectively?**

If controls don't logically map to risks → nonconformity.

If risks exist without treatment → nonconformity.

If documentation exists but isn't followed → nonconformity.

6 Key Concept: ISO 27001 Is a Management System Standard

It does **NOT** prescribe:

- Specific encryption algorithms
- Specific firewall brands
- Specific password lengths
- Specific SIEM tools

It requires that you:

- Assess risk
- Apply appropriate controls
- Justify decisions
- Review and improve

Two companies in the same industry can both be certified and have very different control implementations — if both are risk-justified.

7 Common Misunderstanding

People often think ISO 27001 is a checklist of technical controls.

It is not.

It is a **risk-driven governance framework** with a selectable control library.

8 Simple Summary

Area	Mandatory?	Flexible ?
ISMS structure	✓ Yes	✗ No
Risk assessment	✓ Yes	✗ No
Annex A control selection	✗ No	✓ Yes
Justification of exclusions	✓ Yes	✗ No
Technical implementation details	✗ No	✓ Yes

Bottom Line

An organization does **not** choose whether to implement security.

It chooses **how** to implement security based on risk — but must justify every decision within a formal, auditable ISMS framework.

If you'd like, I can also explain:

- How certification audits are structured (Stage 1 vs Stage 2)
- What typically causes organizations to fail
- How ISO 27001 compares to SOC 2 in flexibility
- How startups usually scope ISO 27001 to reduce burden

ARCHIVE - old tabs kept for reference
only

ARCHIVE - old tab kept for reference only

To include in conformance

Things the conformance model should include

- Conformance is meeting 100% of the requirements (at that level), but this is not sufficient holistically - that is to say: other parts of WCAG3 need to go beyond binary pass/fail. E.g. a scoring mechanism on the way to conformance, and policy guidance to talk about sampling.
- A way of showing what “good” is, so the difference between good and minimum is apparent. Not “conformance” as such, but shows when you are cutting it close to minimum.
- A requirement for editing interfaces to be able to generate accessible content.
- Include processes, so that journeys that cross out of the “site” are included.
-

AC - Meta-assertions

AC - Meta-assertions

REPLACED, please see the [“WCAG3 progression model” tab](#).

Archive version

Problems this is trying to tackle:

- Everything in the provisions is important to someone, to some degree. That degree will depend on the context of the interface / content / task. Few instances of issues are complete blockers for the end-user, many are things which impede progress.
- Us as a group, forming provisions for the entirety of the web (and digital interfaces) cannot predict or know all the possible interfaces and contexts.
- To differentiate levels of accessibility between products, there needs to be a scale, not just levels.
- People can (currently) choose which requirements to meet (if they don't meet full conformance), but there is no accepted progress indicator and no incentive to do so.
- If we allow people to choose, they might choose in an inequitable fashion (likely based on time/cost to achieve).
- The goal is progress over perfection, and something where the level / score achieved correlates to the experience of people with disabilities.

Proposal:

- **Foundational:** Have a core level of safety and “Detectable” **requirements**. Things that allow AT to work; it isn't deliberately hidden etc. Probably about 30-50 of the current requirements. Examples:
 - No flashing (allowing for user-settings to achieve this)
 - Alt text included (but no quality/equivalence assessment, could be achieved by the user-agent if that's supported)
 - Captions / audio-desc are available

- Text which looks like headings is marked up as such.
- Page can be customised if the user has the user-agent & knowledge to do so.
- **Quality:** Have a quality level of things that are objectively testable, or are provision-level assertions. Examples:
 - heading levels are useful.
 - Captions are accurate.
 - Audio description provides “sufficient” information or there is an alternative.
- **Recommendations:** Similar to the quality provisions, but not as universally applicable across types of product, or not objectively testable.
 - Use standard keyboard controls.
- **Meta-assertions:** Have a level of “meta-assertions” that apply across the product.
 - **Scoping:** I have followed the guidance on how to choose a sample based on key tasks, and with sufficient coverage for my product.
 - All the instances of issues raised for the key tasks are now met.
 - I have identified a number of quality provisions that are important for my content/context.
 - Need to cross-check with functional needs, so people don’t favour/miss particular disabilities. Should maintain the categorisation of provisions against functional needs, and allow for reporting of this.
 - **Usability testing:** I have identified areas of weakness from the requirements, resolved those, and have run usability testing to improve those areas further.
 - **Automated testing:** We have good coverage of the product with automated testing, and have a policy to resolve the issues found within one quarter.

Conformance levels could be:

- Foundational: All Foundational
- Bronze: All Foundational + quality provisions either for specified pages, or a grouping such as “everything under this URL”, or “everything within this product”.
 - Highlight that reporting can include the scale aspect, showing which provisions are met and allowing for that to be turned into a score of some kind, but perhaps not specified by this conformance model..
- Silver: Foundational + the scoping assertion that means you’ve met the quality provisions deemed important for key journeys/tasks.
- Gold: Foundational + scoping + usability testing + automated testing (+ applicable recommendations?).

Catch: Reaching bronze could be much harder than reaching silver.

At bronze level, if you are trying to claim conformance for a product, a whole website, or anything of scale, you are saying that *everything* passes across every page/view.

At silver/gold, you go through a process to prioritise areas of the product for meeting conformance. Therefore you have a narrower scope of pages/view/processes to ensure meet the guidelines.

So bronze is simple but difficult (at scale), whereas silver is more complex but achievable. If you want a list of stuff to do, go for bronze. If you want to meet regulations or product an accessibility report, accept the complexity of working out your tasks and sample.

Question: At silver level (assumed regulatory level for larger businesses / organisations), should we require foundational for everything and “quality” level for the scoped area? Or keep everything to the scoped area?

Issues

The assertions would need a lot of guidance on how to scope sampling and tasks. It is an area of potential gaming.

The complexity spikes after the bronze level.

- Legal aspects of people not using assertions to testify against themselves. Also, as a safety spec you can't choose which bits have to be accessible.
- Recommendations - would be useful to get in.

AC reply to Jennie's use case example:

- If they meet “bronze” their scope should be indicated by pages, or say “everything”. There would be provision-level assertions (e.g. clear language), but not the “meta-assertions”.
- You should be able to see what pages & tasks were chosen to be part of the scope. That would be part of a conformance claim. Cross-checking against the general features should give you a “sniff test” of whether it is a reasonable scope.
- We should allow for a progress indicator, e.g. number of provisions met at foundational / quality / recommendation level.

LSH: The important thing to my mind is user testing. This is always the best way to test. Maybe we can take that aspect from my proposal and integrate that in

Survey notes

Survey notes & resolutions

Alastair's notes from the large AG [survey](#) on conformance features, see also the [minutes from day 1](#) and [day 2](#).

Q1 - WCAG 3 and regulation

- What would the compromises be?
- What assumptions about that are we making?
- Need group to focus on one standard, not 2 versions.
- Several ideas for policy advice.

Conclusion from Kevin? "First and foremost we are creating a standard that allows for anyone to make a claim that content assessed against the standard meets the accessibility bar that has been created."

No resolutions.

Q2. Conformance idea: Define "essential paths" and allow for site conformance for some paths

- Useful for carving out an area of site to make accessible, whilst the rest isn't.
- *"If* there are reliable ways of to define such a path..." Can it be reliable?
- Concern about different products using paths equally / same way. Might require another document?
- Concern about it being a compliance thing rather than conformance thing.
- Additional documentation will be difficult to develop & track.
- Useful for "partial conformance".
- WCAG-EM would need updating.
- Need to define essential paths (probably different term).
- Every path on a page is there for a reason, if you remove it, the purpose of the page changes.
- Prioritization is understandable, but there should still be a clear expectation that the rest of the site will eventually be reviewed.
- Anything which allows for a conformance claim to be made against a whole based on a sample is problematic.
- Some v. large sites have limited paths, but masses of content. Paths not the best scoping mechanism.

What's needed:

- Clear definition, if used in conformance, to get around subjective differences in choice. Or leave it to content-owners.
- A way of saying what it is, that isn't "full conformance".
 - Say what proportion of product is included in statement.

Also - look at the quality management standard.

- "partial conformance" is when the scope does not meet all of the provisions.
- "conformance of parts" is when the scope is smaller than the full site/product.

Poll: Is it feasible to define a term that selects a sub-set of a product?

RESOLUTION: Adjust paths/task flows idea to: 1) Explore paths/task flows as a unit of conformance in scope, 2) Explore one or more levels of partial conformance that include paths/task flows. 3) Explore paths / task flows in external documentation such as policy, wcag-em, etc.

Still to do:

- Whether paths includes everything on the page or not?

Q3. Conformance idea: Usability testing as a way to meet conformance

- Usability testing doesn't (maybe can't?) test specific requirements. + many
- No repeatable methodology for this.
- Use it, but can't demand it.
- Should be in policy doc.
- Should not be creating a user-testing standard in WCAG3
- Variety of results is problematic, should be reproducible.
- Great as complementary.

RESOLUTION 1: For relevant provisions, we will include usability testing in procedures in the informative (understanding type) documents as a means of identifying issues and better meeting the guidelines.

RESOLUTION 2: In the conformance section we will not require testing of provisions. Conformance claims continue to be optional in WCAG 3, but we may explore requiring the author to describe the means for demonstrating conformance within any claims that they make..

Q4. Conformance idea: Automated testing as a first-level of conformance

- Little correlation between what is automatically testable and the impact/severity on the user experience.
- It's a tool thing, not a conformance thing.
- What can be automatically tested is changing rapidly.
- Different things might be automatable on different platforms.
-

What could we take from this concept?

- Labelling provisions that are more automatable? Have in the test-

RESOLUTION: Do not use automatic-testable as a conformance level but explore it as an onramp within external documentation including an invitation to test-tool makers to report what they can test automatically (which will change continually). Explore defining success and do not say anything negative against using automatic testing since it will be [a natural part of testing.]

Q5. Conformance idea: Labelled set of requirements / methods for platforms that provide user-generated content

- Being able to claim full "authoring capability" conformance but partial "authored content" conformance would be v useful.
- Mary-Jo: Having to claiming "partial conformance" when users are being bad actors is punishing the website provider for providing a content service, and could eventually cause legal ramifications for anything inaccessible being posted on their website.

Could have one provision "Where users are able to create or upload content, they are able to create or upload content that conforms to WCAG." and a NOTE: "A separate document provides guidance for things that are used to create content in accessible ways."

RESOLUTION: The group will: 1) identify provisions which could have methods that apply to authoring and uploading functionality, 2) explore an approach to claiming conformance that applies to authoring and uploading functionality, 3) Include challenges about user generated content in the policy document, 4) Coordinate with ATAG CG on the way forward for all of the above.

Q6. Conformance idea: Provision levels increase in accessibility for the user

- ALL requirements are an improvement of accessibility and experience for the user, and it is difficult to compare requirements.
- [see survey]

AC

- Difficulty in saying which improves experience more, same as severity.
- Ignores feasibility/difficulty.

TOPICS:

- How to determine level of improvement?
 - COGA said “essential to people, without it couldn’t use the content”, second was very difficult to use, then level 3 was optimised, making it pleasant.
- Should we consider other aspects?

Base level will have min requirements for co-horts?

Will not define specific approach for levels.

RESOLUTION: The group will review criteria for which provisions go into which level in the near future

Q7. Conformance idea: WCAG 3 should have more levels of provision/conformance

- AI is rapidly removing the need for levels or cost analysis (no levels!).
- it could allow regulators to define timelines for improvement from one level to another.
- it could allow regulators to define different improvement speeds for different sectors.
- WCAG 3 should start at the same level as 2.2 Level AA and build. 2.2 Level AA is already a minimum that doesn't support everyone. Allowing for less accessibility than that is not an improvement.
- can be expanded to help resolve some of the existing conformance issues with WCAG 2.x (third party content, user generated content, large volumes of content, etc). *[AC - not necessarily linear levels, but types of product/content?]*
- reluctant to add more unless they're plainly useful and explainable to laypeople.
- Adds risk and complexity. E.g. If different countries choose different levels.
 - having many levels will encourage different places to have different regs

- Have seen a tiered conformance model in a company be helpful for maturing sites over time and creating urgency for essential sites to move to higher levels
- Prefer scoring.
- Useful if not too complicated.
- Would need good definitions of levels.
- it is very likely that one of these levels would still become the de facto reference point, and would then be adopted in legislation and policy as the expected benchmark. So what would be different?
- can see arguments over what belongs to what level continuing in perpetuity as there is no easy way to measure the importance of any requirement.
- It creates more confusion for regulators and more problems for implementors.
- More increments for site owners is beneficial for external review of progress.
- Don't want levels below [wcag22?], would like levels above.
- A lot of technologies don't even meet the existing WCAG 2.2 Level AA today. Having more levels that help developers prioritize and policy makers set timelines for implementation are useful.
- what is purpose of multiple levels that cannot be met by a PTC score (Progress toward conformance) ? (which also allows you to report progress and compare sites)
- a score approach is more useful, it doesn't create lots of gates you could get stuck on.

RESOLUTION: the conformance subgroup will have a “spike” to explore the definition of conformance levels

Q8. Idea: Progress Toward Conformance (PTC) score

- useful because it shows the path to full conformance explicitly and encourages improvements.
- depending on how it is used it opens them up to legal liability and hands the evidence to the plaintiff or regulatory agency. *[AC why? Ask NatT]*
- I do not believe that percentage of provisions or website content is a useful measure of accessibility. Even if we would come up with a "meaningful" measure of progress, it is still a measure of progress to something arbitrary -- not necessarily a measure of improved user experience. *[AC - How is that different from levels? Ask Shadi]*
- Useful, but not something WCAG should define. *[AC why? Ask SteveK]*
- Some testing tools already use proprietary methods to calculate something like a PTC score; this is our opportunity to develop a transparent standard for it.
- Useful, but Scores and percentages can be misleading and may hide barriers. It should be seen as a reporting tool, not as a measure of accessibility or a replacement for conformance.
- I don't think this could be developed in a broad method to serve the needs of a variety of sites. Could have a high % but still have blockers.
- Not convinced it is possible to do this meaningfully, but could change mind if we find a way to provide meaningful scoring.

- Only if it does not mean calculations, like percentages. This causes additional workload and argument, and also is kind of impossible to do on generated pages as well as pages basing on data. [Hidde]
 - not fully convinced about how this would be defined or used in practice [*Giacomo - didn't realise it is no "in" conformance?*]
- By making it possible to convey this subtle difference, content owners can more easily assess the current status and set goals for the next level of improvement. This is truly a case of "progress over perfection."
- What is the difference between this as comparing the number of SC met (or failed) for a set sample over a period of time.
- This can instead be handled with a greater number of conformance levels.
- I do not support reporting by functional need ... I would not recommended for regulatory purposes for private sector companies - too many lawsuits could be generated from making this information public. Could definitely be useful for government transparency of progress if their regulations require such a thing.
- Allows one to compare sites more than just whole levels. and allows one to track progress internally and externally.

RESOLUTION: we will separate into small teams to explore 1) concrete proposals for PTC scoring, 2) multiple levels approach, and 3) multiple documents to augment the conformance model

Q9. Idea: Levels that are not based on conformance

- sound more complex than necessary. If we have a full set of requirements needed for core conformance, the percentage of how many out of the set have been met is enough to show progress.
- I'm an advocate that there are no levels. You are complaint or not.
- it would not reflect the user experience and allow more meaningful ways of implementation.
- Still have an extremely steep curve to achieve Core, and would not improve the conformance model that we have today in WCAG 2.
- agree with the idea of more incremental steps in conformance levels, but I don't think assertions should be required for a conformance claim.
- I wonder if we're trying to engineer a solution that would be better left for the policy document (guiding regulators and procurements on what is reasonable to accept). I'm not sure what the goal is with this added complexity.
- Confusing !!! Better for a policy doc or recommendation vs. the standard itself.

OUTCOME: No resolution, this will depend on the activity from the above resolutions.

WCAG-EM parking lot

WCAG-EM parking lot

July-August Meetings

July-August Meetings

The last week in July and first week in August we came to a first draft definition of paths for presentation to the group at the August 4th meeting.

August Goal: Specify goals and create rough/first outlines for policy recommendations, reporting, and testing.

- Reference Document Breakdown [Survey Results](#), [breakdown](#), and minutes
 - [28 July: AGWG Teleconference](#)
 - [21 July: AGWG Teleconference](#)
 - [AGWG minutes, 4 August 2026](#)
- Include topics and identified decision points in outlines

Minutes

- Moved to IRC #ag-conformance
- [List of Minutes from IRC](#)

Ways to work

- Use numbered lists as they are easier to reference during discussions
- When suggesting alternative wording
 - Google suggestions are difficult to use with a screen reader
 - OK to correct a word but not any more
 - To change a sentence or two within a section add a subbullet “ALTERNATIVE: [new text]”
 - ALTERNATIVE: Add a bullet below the current sentences that you want to correct. Label them ALTERNATIVE.
 - To change a longer segment of content, create a new version directly below the segment of content you are changing. Label it ALTERNATIVE and include your name/
- Comments are OK

Policy & Enforcement advice

Policy & Enforcement advice

References

- Started from a [previous tab's content](#)
- [Survey on Document Breakdown](#)
- [AGWG minutes, 21 July 2026](#)
- [AGWG minutes, 28 July 2026](#)
- [AGWG minutes, 4 August 2026](#)

Goal(s)

- Provide advice to ensure laws, policy and enforcement of WCAG 3 are reasonable, effective, best represent true accessibility, and encourage adoption.
- Provide this guidance without undermining the use of WCAG

Audience

1. People who create local, national, or international laws and policy (Policy Makers)
 - a. To understand how to word laws to allow logical enforcement (e.g. no undue burden - allowing regulations with exceptions etc. See enforcement)
2. People who enforce laws and policy (Regulators, courts)
 - a. To understand how to appropriately write policy to enable enforcement but also accommodate the following
 - i. Technical achievability
 - ii. Undue Burden
 - iii. Reasonable accommodation of identified failures (bugs, newly failures created with updates)
 - iv. Content that arrives in a tranche (purchase company, bulk acquisition,
 - v. Archival content (mass storage of information seldom or never accessed by anyone)
 1. Old mass archives
 2. New archive-only content
 - vi. User generated content
 - vii. 3rd party contracted content when there is no alternative (and not able to do from scratch themselves)
 - viii. The fuzzy line of rewarded/remunerated contributions that are “offered” but not contracted for (e.g. YouTube)
 - ix. Small organizations and individuals and students and.... who do not have the ability to understand and/or apply all the rules
 - x. Time to conform when first made aware that accessibility rules even exist

3. People who create policy within organizations (same or separate document?)
 - a. To understand what their companies might be liable for
 - b. To understand how to break down responsibilities between different workgroups/disciplines in organization)
4. Procurers - People who do purchasing (use WCAG to enforce or influence purchase decisions)
 - a. To understand why different provision are made and the impact of not meeting them
 - b. To understand how to compare the accessibility of different products esp if they are not fully conforming - but also if some go beyond but not to a full next level.
5. ACR template makers (ex: VPATs)
 - a. To Understand how to create ACRs that are easier to fill out accurately for that orgs products
 - b. To place priority on most important aspects first when working toward conformance
6. People creating reports on effectiveness of policy regulation conformance.
 - a. To understand which aspects are most important for accessibility
 - b. To understand how to properly report effectiveness by properly addressing all the issues in 2 above.
7. Testers
 - a. To understand how their results will be used by policymakers and enforcement agencies/entities
 - b. To understand how to report results in a format most useful to the other audience members here
8. Organization accessibility strategists
 - a. To understand why different provision are made and the impact of not meeting them
 - b. To accommodate items in 2 in plans for working on accessibility within the org.
9. Users
 - a. To understand the issues in 2 that might need to be accommodated
 - b. To understand what is and is not required (many real accessibility needs are not required - so although important there is no legal requirement for them.
 - c. All of the above important for
 - i. identifying new areas to seek solutions, propose ideas, propose rules
 - ii. Understanding when they do or don't have strong cases for legal action
 - iii. Understanding the whole process so they can help improve it -- and make it align better with accessibility to them individually and collectively

Content Authors Can't Control

User Authored Content

- **User generated content interface + display**

- Where the site/product making a claim provides an interface for users to add content, and the platform displays the content.
- Could be internal or external users.
- Issues to tackle include:
 - Enabling people to create accessible content.
 - Encouraging people to create accessible content.
 - Allowing uploaded content to be accessible (e.g. uploading video and allowing for uploading associated captions.)
- What about products which create whole sites? E.g. LMS platform that allows you to create a whole website from base templates?
- User generated (uncompensated) content
 - Content generated by users after the product is released and not in control of the product author (e.g. email program)
- Reference ATAG or incorporate ATAG into WCAG 3.

Syndicated or Aggregated Content

- Content included in the site from another source.
- **RECOMMENDATIONS for addressing**
 - ??

Excludes 3 Party Content under Author Control?

- Contracted by site owner - under control of site owner
 - Instead of writing the code themselves they have someone else write it or they buy it or they use code or service provided by others.
 - **RECOMMENDATIONS for addressing**
 - Owner is responsible for content - as if they created it themselves
- Rewarded by site author - and “compensation model for site” depends on it
 - Site owner pays/compensates others to add content to site
 - **RECOMMENDATIONS for addressing**
 -
- Added by others after the launch who are not compensated
 - We are calling this “User generated uncompensated content” and covering it separately under that topic
 - **RECOMMENDATIONS for addressing**

Bugs

- All products have bugs.
- **RECOMMENDATIONS** to how to handle bugs include
 - Tolerance of bugs

- Severity of bugs (blocking, hampering, slowing down) (note that something that slows down a typical user by momentarily confusing them - may be a total blocker for those with cognitive disabilities,)
- What is blocked, hampered etc.)
- Time to repair
- Order of remediation

Large Volumes

Large volume at once

- Example - a company purchases a tranche of media or documents
- **RECOMMENDATIONS** on how to handle enforcement of WCAG3 include
 - Practical timelines before enforcement
 - Order of remediation
 - Nature of the volume or parts of the (see Archival)

Large Volume flow

- Example - content flows in at a rate that is beyond what can be addressed
- **RECOMMENDATIONS for addressing**
 - Practicality / Feasibility of conformance
 - Nature of content
 - See also Archival
 - Order of remediation

Archival - rarely viewed

- Large volumes of content that are archived for history or legal reasons but are rarely ever viewed
- Examples
 - A library has an archive of every sample of media or content that has ever been generated or submitted to it
 - A company keeps an archive of every complaint ever sent to it and the response
- **RECOMMENDATIONS for addressing**
 - Accessible versions are made available on demand with reasonable responsiveness

Equity of application/enforcement

- Whether all disability groups are treated equally in policy and enforcement

- **RECOMMENDATIONS for addressing**
 - If decisions are made about enforcement based on less than full conformance - that decisions take equity into account so that sites are not allowed to escape enforcement while ignoring or largely ignoring any class of disability

Reporting Requirements (Guardrails)

- Separate "reporting" from "public disclosure" — require standardized measurement/reporting but not that it be made public; visibility is a regulatory matter
- Define a minimum required claim content set such as the level claimed, WCAG version, scope, exclusions/limitations without mandating a specific report format
- Define "guardrails" for reports without making reporting itself mandatory

Demonstrating effort towards conformance & harm

Progress towards conformance

- How to consider sampling (section moved to [Testing document](#))
- How to consider paths (section moved to Testing document)

Evaluating Harm

- There should be an aspect of demonstrable harm, rather than a failure of WCAG being enough to sue organisations.
- How to use severity (If we decide to include it)
- **RECOMMENDATIONS for addressing**

Small Businesses (and other WHO exceptions)

- Any question of WHO has to follow the guidelines - is policy - not whether a site is accessible or not
- **RECOMMENDATIONS for addressing**
 - policy/enforcement take into account the different constraints of different author/owners and adjust the application of WCAG3 to their sites as appropriate

Accessibility in design and build process

Component Libraries

- Sites often are built using libraries, frameworks or other collections of code/objects written by others.

- Sometimes authors can choose between libraries and choose those with accessible components
- Sometimes authors can modify code that came from libraries to make it accessible
- Sometimes authors can write their own when they cannot find a component that is accessible
- But sometimes they may not be able to find, repair, or replace a library for a legal or other reason.
 - This does not mean that they would be accessible or would meet WCAG3
 - But consideration should be given in enforcement to situations that genuinely can be justified
- **RECOMMENDATIONS for addressing**
 - That policy/enforcement should take into consideration situations where an author is not be able to find, repair, or replace an inaccessible component for a legal or other justifiable reason.

Design Systems

- Impact of design systems (BruceB), examples:
 - <https://design-system.service.gov.uk/accessibility/>
 - USWDS: <https://designsystem.digital.gov/about/product-values/>

Potential additional topics:

- Sharing test results, with things that pass and fail.
- Frequency of revision, e.g. how often is the policy re-visited.
- Organizational maturity
-

Examples from legislation

EU excludes things you don't pay for:

<https://www.legislation.gov.uk/ukxi/2018/952#regulation-4-2-e>

Reporting

References

- [Survey on Document Breakdown](#)
- [AGWG minutes, 21 July 2026](#)
- [AGWG minutes, 28 July 2026](#)
- [AGWG minutes, 4 August 2026](#)

Goal(s)

10 August Brainstorm

1. Increase accuracy of Accessibility Conformance Reports (ACRs)
2. Provide a way of reporting progress towards conformance and progress after conformance
 - a. Provide a means to compare accessibility of products that do not meet full conformance at each level.
 - b. Provide a way to report incremental progress and progress on an assigned area of work (positive aspects)
 - c. Be able to determine the parts of the product that have the highest and lowest impact issues
 - d. Provide comparable metrics, a way to compare accessibility
3. Standardize accessibility reporting (beyond just full levels of conformance?)
4. Provide a way to evaluate and compare likelihood of actual accessibility based on ACR
5. A way to understand who is impacted and how
 - a. Provide a way to report on status by functional need
 - b. Allow to prioritize remediation efforts
 - c. When available, include the work around
6. Create reports that can be understood without technical knowledge of accessibility provisions (easily understood by a broad audience)
 - a. Make reports actionable by target audience?
 - b. Report on the state of the product (possibly in summary section)

Audience

- Policymakers?
- Organizations creating accessibility conformance reports
- ACR template makers (ex: VPATs)
- Testers
- Organization accessibility strategists
- Procurers
- Users

Progress towards conformance & beyond conformance

Scoring

- Reaching an aggregate conformance state
- Error tolerance?

Progress towards conformance (Levels?)

- Absence of blocking barriers
- Caps on high-severity issues

Demonstrating ongoing progress

Progress beyond conformance (Levels?)

-

Assertions

Functional Needs

Potential Additional Topics

- How to make reports actionable

Testing

References

- [Survey on Document Breakdown](#)
- [AGWG minutes, 21 July 2026](#)
- [AGWG minutes, 28 July 2026](#)
- [AGWG minutes, 4 August 2026](#)

Goal(s)

10 August Brainstorm

1. Provide a recommended way of assessing conformance to WCAG including progress towards conformance
 - Testing leads to comparable results internally and across products
2. Provide standard guardrails for any testing methodology
3. Provide guidance to standardize measuring severity and impact.
 - This is not how to test a requirement but how to report the impact of failing a requirement in a specific situation.
 - Repeatable rubrics for making subjective judgements (improve interrater reliability)
 - We need this to allow for easier comparison across products
4. Provide guidance on determining appropriate scope of report/conformance
 - Includes sampling and paths

Audience

- Accessibility and QA Testers
- Organization accessibility strategists/Subject matter experts
- Accessibility Audit Vendors
- Accessibility Tooling Vendors
- Organization's internal tool developers
- Regulators (specifically those developing test methodologies for regulatory processes)

Testing methodology

Using methods

Testing assertions

Sampling

- Different types of sampling
 - Representative Sampling (random)
 - Purpose to determine the probability that a site is accessible if it is not possible to test the whole site
 - Process - Probability of accuracy of the sample is a function of **variance**, **sample size**, and **probability**). However variance is not something one can set - it is a measure of reality. That is - you measure (or estimate and confirm) variance and can then either a) specify the desired probability of accuracy and calculate the size of the sample you need, or b) specify sample size and calculate the probability of accuracy of your results. Each time a test is run a new random sample must be taken. The same sample (randomly chosen items) cannot be used in more than one test.
 - TYPES of Representative Sampling
 - **Omnibus** - random sample of whole site at once
 - **Segmented** - site is divided into a comprehensive list of subsets - and they are each random sampled and reported separately
 - Segments can be by pages, by components or anything else that matches the evaluation units of the requirements. But it must be a comprehensive list - that cumulatively equals the full site - or it is not representative - it is selective
 - **Selective sampling (not representative)**
 - Only some parts of a site/thing are tested
 - The sample is not representative and cannot be used to make a claim against the whole
 - Only thing that can be said is that these particular pages/things meet/don't meet the requirements
 - **Hybrid Sample**
 - Where some particular pages are essential - a hybrid sampling approach may be used where the thing as a whole has to meet the standard absolutely (100% probability) for some pages and another percent for the rest
 - The only way to have 100% probability is to have a "sample of the whole" (i.e. test every page)
 - So a hybrid might be "the site must achieve (be random sampled to demonstrate) a xx% probability of conformance but the following parts of the site must be each tested separately to ensure (100% probability) conformance.
- **RECOMMENDATIONS for addressing**

- That policy/enforcement **not** require a “sample of the whole” for making or defending against claims of conformance
- That policy use a hybrid model where pages that must be accessible are objectively specified/defined and it is stated that they must 100% be included in the hybrid sample. All other pages would be tested using a random sample of the site.
- Any non-randomly sampled pages not be used as evidence of non-conformance UNLESS those pages are explicitly named in regulations as requiring 100% probability of conformance..
- A single random sample of the site could be used to defend against enforcement.
- Random samples by plaintiffs or defendants should be taken in supervised situation so that only one sample is taken (because taking multiple samples to find one that fails - reduces the probability of each.
 - (MATH OR SAMPLING EXPERTS CAN SKIP THIS - THEY ALREADY KNOW) if multiple random samples are taken in order to find one that fails - then according to the laws of probability on which sampling is based the measures probability would be reduced by the calculated probability times itself for the number of samples taken. That is, If the required probability is 90% and one takes 4 samples in order to find a sample that failed, and the probability of each sample would have to have been above 97% (a monstrous sample) in order to meet the 90% probability ($.97 \times .97 \times .97 \times .97 = .885$ which is just 88.5%.)

Paths

- Some paths through a site may be deemed more important than others.
 - This does not affect the determination of whether the site as a whole is accessible or not (the purpose of WCAG3 being to measure accessibility).
 - But for policy or enforcement - the importance of paths may be something important to consider on a case by case basis
 - This is very similar to the SELECTIVE SAMPLING discussion above where some part of a site may be given more priority for meeting WCAG3 than others.
- **RECOMMENDATIONS for addressing**
 - This be a consideration and handled as discussed above under Hybrid Sample

Evaluating severity

- Create a standardized definition and way of measuring severity
- Coni