Cost of Silver Discussion

This is a more active email thread than is common in Silver email list, and we have received several requests to consolidate the arguments in a single document which will make it easier to track and discuss.

The question has been raised whether Silver should consider the cost of testing and evaluation when writing guidance. Subsequent emails clarified that **this was NOT saying that guidance that is needed by people with disabilities should be left out.** Instead, they wanted to have a discussion whether Silver should have a goal of also considering how to optimize the structure and phrasing of Silver guidance so that the costs of testing would be minimized. Specific examples have been proposed.

This document attempts to summarize the discussion. Where statements are presented as facts, I have tried to mark whether or not the assertion was substantiated. Where a statement is not obviously an opinion, I marked it as such. This has been a much larger job than I originally volunteered for, so please help.

Please feel free to edit, if you have permissions, and comment if you do not. If you are not able to comment in Google docs or use Google docs for whatever reason, please send an email with your corrections or suggestions to jspellman@paciellogroup.com.

The first thread can be viewed as an HTML page at:
https://lists.w3.org/Archives/Public/public-silver/2018Aug/0052.html
The thread can be navigated by selecting the "Next in Thread" link below the email message. Please contact jspellman@paciellogroup.com privately if you have difficulty with the accessibility of the email archive.

Arguments

- WCAG 2 had a substantial increase in the cost of conformance evaluation and testing between WCAG 1.0 and WCAG 2.0. (double the cost, the original email stated with no evidence quoted).
- Small organizations with limited accessibility budgets are increasingly doing nothing about accessibility because of the increased cost. (anecdotal evidence)
- Making the guidance easier to understand could help reduce costs. (unsubstantiated)
- If Silver considers cost, then some disability needs will be left out. This could proportionately fall more on people with cognitive disabilities and other disabilities that have needs that are more difficult to test.

- Any discussion of cost also has to include the cost of and to people who do not have access.
- Unit testing is part of development workflow. If organizations are developing correctly, there isn't a need for conformance evaluation testing, just unit testing.
- The cost to accessibility consultancies for updating their testing tools and reports is normal cost-of-doing-business and should not be considered.
- Silver should not consider cost, because it too difficult to draw a circle around "what is a cost". Silver would need an entire framework for how that cost can be calculated.
- Eventually there is always a cost that is "too high a cost" and we should discuss and see what that is.
- Many companies start accessibility with an audit, often by an outside organization. If Silver lowers that cost, then it makes it easier for organizations to devote more resources to implementing more accessibility.
- An audit is often an organization's first introduction to accessibility. Cost matters.
- There are 3 different types of testing that are being merged in this discussion and should be kept separate:
    - Conformance or validation testing of a product or project
    - Identifying possible accessibility improvements
    - Accessibility progress monitoring
- Silver should not only provide guidance on making accessible web content, but at the same time provide tangible and testable accessibility requirements. Much of the testing cost comes from ambiguous statements. (unsubstantiated)
- For cost reduction purposes, using technology for automated or semi-automated, as well as tool assisted, evaluations should be a priority.
- Discussing accessibility as an expense in ANY context is fundamentally flawed and gets us further away from our end goal of an accessible web. (opinion)
- My organization has a 25% increase in assessment cost going from 2.0 to 2.1 alone. I agree that some of these assessments will be educational (the dev/content creator/team will run it once, learn from mistakes and then hopefully never make it again) but in a large organization the verification of accessibility is often split between developers/team and vendors who run test passes. Here cost also incurs, since the assessment has to be performed independent of the learnings.
- Take testing cost into consideration since it lowers the barrier to entry, instills trust and good development behavior at a smaller scale and lower cost.
- I'm concerned at the risk that this conversation might lead to the perception that certain requirements that would benefit specific disability groups are more likely to be rejected on cost grounds.
- Any perception that Silver might be the product of a more aggressive cost/benefit analysis before defining requirements might be damaging, especially by members of disability groups who argue that Silver should better represent their needs than WCAG does currently. I hope the conversation can continue in a way that recognises and addresses this risk.

- More educational resources and more examples that are relevant to the topic, then this would help the overall goal. (unsubstantiated)
- I think we need to be cognisant of cost, not necessarily capping it, but providing options for requirements that could incur a lot of time/cost. Not doing so would prevent the standard being taken up.
- "Reasonable cost" was part of the WCAG 2.x development. (There were counter arguments that it wasn't true, but seem to have been resolved to as a part of feasibility and testability.) Reasonable cost has not been quantified, and was based on the expert opinion of the working group. Some examples where "cost" was considered in WCAG 2.1 were:
  - non-text contrast, where the difficulty (and presumably cost) was cited as a reason not to include that SC.
  - There were multiple COGA SC where the difficulty (and therefore cost) of testing were factors, such as plain language..
  - Accessible authentication didn't get in due to concerns about feasibility. There already were expensive options for supporting it, but that wasn't enough, there had to be reasonable solutions that work across any website. Hence that was a "cost" consideration.
- We might have to tease out differences between cost, feasibility & testability. For me 'cost' is an umbrella for those. Something that is less feasible is more costly etc.
- My overarching concern however is that we don't start to perpetuate the idea that "70% Accessible is Good Enough(TM)", or that somehow "accessible" is measured as an aggregate score of how many check-boxes you've ticked off - we have far too many examples of that failing in the wild today.
- The requirements for Silver should help ensure that the learning curve for the initial uptake is as flat as possible, which should decrease the cost of initial uptake.
- I hope that Silver will make not only accessibility available to a wider audience, but also accessibility testing. In jurisdictions where organisations can be obliged to prove their accessibility conformance, it is necessary that this obligation will not bring the organization to its knees.
- Cost is not as important as results that support people with disabilities and improve the ability of organization to support people with disabilities.
- Most experts can look at a site for 5 minutes and tell you if that site has structural accessibility issues. It takes another 2 days of testing to decide if that site conforms to WCAG. (anecdotal).
- One of the problems with WCAG today is that most people focus almost exclusively on the actual SC, and not on the Principles and Guidelines. A renewed focus on the understanding piece, as opposed to measuring compliance to specific checkpoints, is to me the more critical piece. Silver should be focused on that.
- We moved off of WCAG 1.0 for solid reasons (including the very fact that you could meet each of the WCAG 1.0 "tick-boxes" and still have a very inaccessible web page/site). Returning to a model that repeats some of the problems from the past is going backward

IMHO, and I continue to fail to see how it benefits anyone except entities and sites that want to appear to be doing something, yet aren't prepared to do the hard miles required.

Stopped scribing at September 5:
https://lists.w3.org/Archives/Public/public-silver/2018Sep/0013.html

- There was also a side discussion about how guidelines are used in legislation, which is not directly related to this discussion.

Solutions

- Silver Bronze level be all automated testing. (Bronze level is one proposal for Conformance and has not been tested or decided.)
- Let's solve the problem of making it easier to be more accessible to more people, and let the market adapt to any process change that results from that improvement.
- Providing options for requirements that could incur a lot of time/cost.
- If Silver is structured around slightly higher-level user-requirements, each with general and/or tech-specific criteria to fulfil, we could include guidance on the more costly/subjective requirements without making them criteria for silver/bronze levels.
- Some requirements will need to be met by following a process rather than trying to apply a subjective test (e.g. tick that you've tested the navigation with a UCD-method). That does incur cost, but rather than assigning it to 'accessibility' it's being assigned to design process.
- Include every user-requirement, regardless of whether there are reasonable solutions or tests. Conformance levels should account for there being reasonable solutions / tests. There will be gaps, and those gaps are acknowledgement that more work needs to be done. For example:

   Description:
   "Chunking content, whether it is visual or auditory, supports those with working memory deficits, such as those with learning disabilities and brain injury. The breaking down of content into small sections, whether it is developed as audio or video output; mathematical symbols; or a paragraph of text; improves levels of comprehension."

   Bronze level criteria: None.
   Silver level criteria (General): "Statements which instruct a user to make a choice or take an action have only one instruction per sentence…"
   Gold level criteria: "Usability testing of the journey is conducted with at least 6 participants who have working memory deficits or learning disabilities."

- Where Silver has an opportunity to improve the situation is:
  - Providing means of passing criteria that are not a simple yes/no answers.
  - Providing levels that can be applied differently by different organisations.
- None of this means we have to ignore the needs of people with disabilities. What it might mean is that we ignore the needs of some developers to have their edge cases. We may also add some requirements that simplify how things are tested. For instance, don't skip heading levels, and make sure links to the same page have the same link text. Or that within a form / fieldset, all form fields have a unique name. There are things we can do at the start level so that we can move some of the more resource-intensive testing to a higher level.
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