How well does the current conformance model for W3C Accessibility Guidelines serve accessibility for people with disabilities short-term and long-term?

Introduction and Background discussion

This is a list of candidate questions that seek to gather information on the effectiveness of the current conformance model. They are provided to start discussion and debate, and the list will need a lot of refinement. The exercise of drawing up questions will also help us decide how to ask the questions—for example:

- in a survey on conformance
- In a survey of a specific stakeholder group (like legal professionals or standards developers).

NB: At this point, we want to understand as much as possible about the current problem space, rather than ask respondents to feedback on our ideas for proposed fixes. That we we don't focus too quickly on solutions, before we have as full an understanding as possible of the problems. Respondents will still have the opportunity to share their suggestions for improvements.

Definition of the current conformance model

The WCAG 2.0 Conformance Model has 5 requirements, which are paraphrased below.

- 1. **Conformance Level**: The Level A, Level AA, Level AAA model: E.g. for Level A conformance with WCAG 2, need to pass every applicable Level A SC.
- 2. **Full pages**: All or nothing: There is no percentage of conformance, there is no exclusion for 3rd party content or for single page apps. Everything must pass.
- 3. **Complete processes**: If the page is part of a process (like create an account, or checkout) then all the pages in the process must conform.
- 4. [needs work] **Accessibility Supported**: supported by users' assistive technologies as well as the accessibility features in browsers and other user agents¹ .This is a complex topic with it's own section in "Understanding WCAG 2.0" Basically, any web technology used (e.g. HTML, Silverlight, PDF, Flash, SVG, something new?) must

¹ Understanding WCAG 2.0 definition of Accessibility Supported. <u>https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html#accessibility-supporteddef</u>

support the accessibility features in the human language of the content. And the user agents have to support it. (SVG) This gets complex in international sites that support multiple languages. If you are writing a web site in Hebrew and use SVG, the assistive technologies must support Hebrew language and the browsers must support SVG in Hebrew. The <u>definition</u> also has good information.

- 5. **Non-Interference:** If you use any technology that is not accessibility supported (assuming you have an HTML or text-only version elsewhere to pass #4), that technology cannot block user's access to the page. For example, an embedded object cannot be a keyboard trap. Any technology used MUST pass:
 - 1.4.2 Audio Control,
 - 2.1.2 No Keyboard Trap,
 - 2.3.1 Three Flashes or Below Threshold, and
 - 2.2.2 Pause, Stop, Hide.

[for our use, not for the survey] Additional Information from WCAG 2.0:

- The normative (official) text of <u>WCAG 2.0 Conformance</u> section
- <u>Understanding WCAG 2.0 Conformance</u>
- <u>Understanding Accessibility Supported</u>
- Definition of Accessibility Supported

The purpose of this survey is to determine how effectively the structure of W3C accessibility guidelines help to meet needs of the people with disabilities and the people that use W3C accessibility guidelines. We will be asking specific questions about WCAG conformance. In this survey, we are less concerned about specific success criteria and more about how the success criteria work together

Demographics questions:

https://docs.google.com/document/d/1LfJpyqdbtJW_79hniXf6HG0oQ8we_G9KP2J6uQZqbjl /edit

i. What is your current job title?

[open response]

1. What is your experience of using the accessibility standards from W3C*?

(* W3C is the organization that publishes internationally accepted accessibility guidelines that are often used to measure government accessibility regulations such as ADA (Americans with Disabilities Act), Section 508, Accessibility for Ontarians with Disabilities Act(AODA) find some more international regulations) [checkboxes]

- Building digital content that conform to WCAG (Web Content Accessibility Guidelines)
- Building authoring tools that conform to ATAG (Authoring Tool Accessibility Guidelines)
- Building user agents that conform to UAAG (User Agent Accessibility Guidelines)
- Building assistive technology
- Auditing digital resources against WCAG
- Auditing authoring tools against ATAG
- Using accessibility guidelines to define organizational accessibility policy
- Applying accessibility guidelines to the creation of regulations or legislation
- Investigating potential breaches of digital accessibility regulation or legislation
- Other

2. How effective are the accessibility standards (WCAG) when measuring accessibility of: ?

[response: 5 radio buttons for each: Very effective, effective, ambiguous, poor job, irrelevant]

- Static web sites (i.e. primarily collections of documents)
- Dynamic web applications
- Native mobile apps
- Electronic documents (e.g. PDF, EPUB)
- Kiosk/public access terminal-based resources

The definition of "effectiveness" would likely need to be broken down further, either into further questions or in the answer options we give.

Definition of effectiveness relates back to the definition of the conformance model.

3. Conformance requirement #1 Conformance Levels

Are you aware of the Conformance Levels (A, AA and AAA) requirement of WCAG 2.0?

- Yes
- No
- How many levels of conformance, if any, should there be?
 Please give a reason for your answer

If Yes:

WCAG Conformance Requirement Paraphrase:

#1. Conformance Level: The Level A, Level AA, Level AAA model: E.g. for Level A conformance with WCAG 2, need to pass every applicable Level A SC.

- 3.1 What level of conformance do you (or your organization) strive for? [answers: A, AA, AAA, or other]
- How confident are you that your organization understands how to meet the conformance level (A, AA, or AAA) you are striving for? (Very confident, confident, not sure, some ambiguity in requirements, don't understand the requirements) Explain: [open response]
- If there were challenge understanding the conformance levels, what were they? Explain: [open response]
- Are the current priority levels sufficiently well defined to support reliable evaluation and conformance claims? Please give as detailed an answer as you can

If No:

• Question?

4. Conformance requirement #2 Full Pages

Are you aware of the Full Pages requirement of WCAG 2.0?

- Yes
- No

If Yes:

- How important is it to accessibility conformance claims that all content on a page must satisfy all relevant WCAG SCs without exception, in order for the page to conform?
- Do you have suggestions for other ways to define scope of a conformance claim within a document, screen or page?

If No:

• Question?

5. Conformance requirement #3 Complete Processes

Are you aware of the Complete Processes requirement of WCAG 2.0?

- Yes
- No

WCAG Conformance Requirement Paraphrase:

3. Complete processes: If the page is part of a process (like create an account, or checkout) then all the pages in the process must conform.

If yes:

• In your experience, what impact does the Complete Process requirement have on the process of conformance testing?

• Do you have suggestions for other ways to document conformance of sequences of pages, screens or documents that make up a critical user journey? If so, please share them here:

If No:

• Question?

6. Conformance requirement #4 Accessibility Supported

Are you aware of the "accessibility supported" portion of the WCAG Conformance model?

- Yes
- No

If yes:

- In your experience, what impact does the "accessibility supported" requirement have on conformance claims?
- How effective is the concept of accessibility supported in defining conformance?

If No:

• Question?

7. Conformance requirement #5 Non-Interference

Are you aware of the Non-Interference requirement of WCAG 2.0?

- Yes
- No

If yes:

- In your experience, what impact does the non-interference requirement have on conformance claims?
- How effective is the concept of non-interference in defining conformance?

If No:

• Question?

8. Link to legislation

How effective do you think the current conformance model is in linking technical accessibility to meeting legal obligations? Please give details with reference to legislation you're most familiar with.

9. Declaration of conformance

What is the best way for digital resource providers (e.g. authors, vendors) to declare conformance for a resource in a reliable and trustworthy way?

How do we deal with constraints of scope (resource size) and time (resource changeability) of resources when claiming conformance?

10. Future of conformance

What would be the most important change you'd recommend is made to the current conformance model?

Can you give examples of effective conformance models that might be adopted by W3C accessibility guidelines?