

SSA GUIDE TO COMPLETING THE VOLUNTARY PRODUCT ACCESSIBILITY TEMPLATE

PURPOSE

This document will provide Vendors with instructions as to how they are expected to complete the Voluntary Product Accessibility Template (VPAT) for the Social Security Administration (SSA).

BACKGROUND

Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998, is a federal law that requires agencies to provide individuals with disabilities equal access to electronic information and data comparable to those who do not have disabilities. As an agency, the Social Security Administration (SSA) is committed to making its Electronic and Information Technologies (EIT) accessible to individuals with disabilities by meeting or exceeding the requirements of Section 508.

The Social Security Administration is responsible for administering national social insurance programs and social welfare programs. SSA programs provide retirement, survivors, and disability insurance benefits to workers and their dependents or survivors to offset any loss of income due to retirement, death or disability. Given the duties of the agency, and the life situation of most of our core clients, we consider information accessibility a priority for all internal and external customers.

SSA requires that any EIT procured, developed, maintained, or utilized consider the accessibility requirements under Section 508. When first planning a purchase, we take into account all applicable accessibility standards, starting during our market research phase. Each solicitation must include the appropriate standards, as well as detailed instructions to contractors on how to provide the agency with Section 508 information about their solutions.

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the VPAT – a simple, web-based checklist that allows Vendors to document how their product **did** or **did not** meet the various Section 508 Requirements.

HOW THE VPAT IS ORGANIZED

The VPAT consists of a long series of tables. The initial one, the **Summary Table**, is used to provide a sense of your product's **overall** "level-of-compliance" with the Section 508 Standards. Subsequently, the **Section 1194.xx Tables** contain the detailed subparagraphs that a Section 508 Standard is composed of. It is within this **Section 1194.xx Tables** that you will define in detail how your product **did** or **did not** comply with each of the individual standards.

UNDERSTANDING THE COLUMNS

Use the following to understand the use of the three columns in the VPAT's tables:

Summary Table

Column Name	Use
Criteria:	Describes Subparts B, C, and D of the Section 508 Standards.
Supporting Features:	To Enter information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify Not Applicable .
Remarks/Explanations:	To Enter general comments regarding a product's overall "level-of-compliance" with the Applicable Subpart.

Section 1194.xx Tables

Column Name	Use
Criteria:	Describes a specific guideline a Subpart is composed of.
Supporting Features:	To Enter information summarizing a product's "level-of-support" for a specific guideline.
Remarks/Explanations:	To Enter detailed information on how the product did or did not support a specific guideline.

WHAT INFORMATION DO I ENTER IN COLUMNS 2 & 3

The **Supporting Features** and **Remarks/Explanations** columns in the VPAT are used to document exactly how a product conforms or does not conform to each of the Section 508 standards applied in the solicitation. In order to promote consistency in offeror responses the columns shall be answered in the following manner:

Supporting Features (second column)

Language	Description
Supports	Product FULLY meets the letter and intent of the Criteria.
Supports with Exceptions	Product does not ENTIRELY meet the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Product(s) provide <i>alternative</i> methods to meet the intent of the Criteria.
Does not Support	Product does not meet the letter or intent of the Criteria.
Not Applicable	The Criteria does not apply to the product.

Remarks & Explanations (third column))

If 2 nd column states...	Then...
Supports	List exactly what features of the product do meet and describe how they are used to support the Criteria.
Supports with Exceptions	List exactly what features of the product do meet and describe how they are used to support the Criteria. AND List exactly what parts of the product do not meet and describe how they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly what <i>other</i> methods exist in the product and describe how they are used to support the Criteria.
Does not Support	Describe exactly how the product does not support the Criteria.
Not Applicable	Describe exactly why the criteria are not applicable to the product.

QUALITY STANDARDS RELATIVE TO RESPONSES TO APPLICABLE SECTION 508 STANDARDS

When responding to SSA, the offeror shall state exactly how the proposed EIT solution meets the applicable standards in the remarks/explanations column, or through additional narrative. In addition, all “not applicable” (N/A) responses shall be supported in the remarks/explanations column or through additional narrative. The offeror is cautioned to address each standards **individually and with specificity**, and to be clear whether conformance is achieved throughout the entire EIT solution (i.e. both user functionality and administrator functionality), or only in limited areas of the EIT solution.

In addition, the offeror shall also disclose the method used to validate conformance claims (i.e. expert review, manual testing, automated testing, no method used, other - please describe), and who validated conformance (offeror, third party name, none).

NOTE: Failure to meet these quality standards may prevent the Social Security Administration from evaluating your offer, potentially result in your offer not being considered for award.

TYPICAL SCENARIO FOR COMPLETING A VPAT

To begin the process of completing the VPAT, you should enlist the services of your company’s technical specialist for the product being sought for purchase. The reason for this is because SSA requires a measure of technical detail in your responses. Once you’ve enlisted their assistance:

- 1) Determine which sections of the Technical Standards (Subpart B-1194.21-26) apply to your product.* Keep in mind that you always must complete the Functional Performance Criteria

(Subpart C – 1194.31) and Information, Documentation, and Support (Subpart D – 1194.41) sections of the VPAT.

- 2) For each section that applies, determine if your product does or does not meet the individual standards.
- 3) Using the information found in the **How the VPAT is organized** section, document in the Section 1194.xx Tables exactly how your product did or did not meet the applicable standard. If your product supports the standard, provide detailed examples of what accessibility features or qualities exist and how they are used to support the standard.
 - If your product does not support the standard, remember that Section 508 allows for products to meet the Access Board Standards in innovative, non-traditional ways. Your product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user.
 - If your product does not possess an alternative means of access to the standard, provide detailed examples of exactly how the product did not meet the standard and what affect it may have on users with disabilities.
- 4) Once you've documented in the Section 1194.xx Tables exactly how your product did or did not meet, return to the Summary Table and document the product's overall "level-of-compliance" in each of the applicable sections.
- 5) Post your final VPAT on your company's web site. You may also want to link to your VPAT through GSA's Buy Accessible web site, a resource that many government procurement officials use when conducting their market research.
- 6) Please keep in mind that it is the Vendor's responsibility to maintain the integrity of the data on the VPAT. The information provided on your VPAT is considered to be a self-representation unless expressly affirmed otherwise.

Note: Any WEB application being purchased by SSA also requires the Vendor to complete *Section 1194.21* of the VPAT in addition to *Sections 1194.22, 1194.31, and 1194.41*.