

ATTACHMENT 1
“ACCESS WEBINAR 20150430”

CATA

The US Access Board Information and Communication Technology Standards and Guidelines Conference
ETH 4/30/2015

Following are my notes from sitting in on the above mentioned online conference with approximately 35 other participants regarding proposed **“ATBCB-2015-0002_Info. and Comm. Tech. Standards and Guidelines-NPRM”** attached. These were generally referred to as v2.0 standards for improving accessibility to documents and information for those with visual, audio and dexterity disabilities. Most participants sounded like there where from other transit properties although some were clearly just industry experts.

Overview

It was acknowledged that the roughly 70 page document is very technical and a challenge to understand. But it was agreed that with v2.0, the goal is to:

- Address significant changes that have occurred in technology since v1.0.
- Encompass not only websites but all software, applications and even hardware.
- Extend the requirements beyond websites to all online content and also to eight (8) categories of non-public facing content that communicate agency official business including:

(1) Emergency notifications (e.g., an evacuation announcement in response to fires or other emergencies);

(2) initial or final decisions adjudicating administrative claims or proceedings;

(3) internal or external program or policy announcements (i.e., information promulgated by an agency relating to programs it offers or policy areas it deals with);

(4) notices of benefits, program eligibility, employment opportunities or personnel actions;

(5) formal acknowledgements or receipts (i.e., official replies by an agency that recognize the receipt of a communication);

(6) questionnaires or surveys;

(7) templates or forms; and

(8) educational or training materials.

- Transitioning from a product-based approach to a functional-based approach designed to be more outcome based as opposed to technically based.

A key definition is that the guidelines define “usable” as providing access to information about how to use a product, and direct that instructions, product information, documentation, and technical support for users with disabilities **be functionally equivalent to that provided to individuals without disabilities**. Broadly interpreted, this means that all electronic information and data published on websites, via email, blog sites, social media and even custom apps are covered by these requirements.

The standard discusses interoperability with assisted technologies which is to say that the solutions used must work with technologies available to assist the disabled in gaining access. And it seems like the standard is expanding that expectation beyond what may have been primarily visual disability to audio and dexterity disabilities. Modern gesture based interfaces like tablets, for example, can be a challenge for users with dexterity limitations. Therefore, the standard generally prescribes that all content must be navigable and accessible using standard keyboard capabilities.

The standard also addresses hardware designs for devices like phones and other devices that are used to communicate with the public such as via SMS and other text transmittal methods. Although primarily a hardware issue, the concept of RTT (Real Time Text) is proposed where characters are transmitted as they are typed.

The Board is considering making the 508 standards, which would apply to software, websites, and covered documents, effective six (6) months after publication of the final rule in the Federal Register.

The guidelines rely heavily on the WGAC v2.0 Documents which themselves are extensive and can be viewed at <https://www.w3.org/WAI/intro/wcag20>. A key proposal of the guidelines is that the acceptance criteria for accessibility previously applied to websites now also be substantially applied to documents and applications including mobile apps and the eight (8) categories of internal documents.

The standards would apply to all federal agencies including transit authorities, however, it was noted that most transit authorities are probably well ahead of most federal agencies in compliance.

There are 35 questions sprinkled throughout the document that the review board must submit responses to May 28th. For example, are current eight (8) categories of internal documents the correct categories? You have to dig for the questions. **The review board is requesting all questions and comments be submitted to jarusch@apta.com by May 14th to provide time for responses to be drafted and reviewed before submittal.**

Summary Group Comments & Questions

Following are comments made during the webinar by participants.

A lot of properties report that they are still struggling just to come into compliance with v1.0 standards. As Governors and other sources pressure agencies to roll out apps and expose more information, compliance seems to take a backseat or is visited as an afterthought.

Third-party apps like Trip Planners and documents including tables present a real challenge for compliance.

Concern over how compliance will be measured. If shifting from a process-based to a functional-based approach, how is functional measured? It seems it would be more subjective. Some standard for evaluation is needed so that agencies can obtain objective results on their level of compliance.

The effective date of six (6) months after publication is unreasonable. Procurement processes usually take longer than that. Five (5) years would more realistic.

If compliance applies to all published documentation, then extensive training will be required for in-house staff that routinely generate documents using tools like Adobe Pro to generate PDF UA-1 compliant documents.

It was asked if this standard applies to all graphs, charts, video, etc. and would it apply to all historically generated and published content or just content published after the standards to into effect? The standards suggest that it would apply to all content without regard to age. Some agencies reported already implement real-time closed captioning for video and webinars but acknowledge that it is very challenging and they usually subcontract to a third-party.

Some reviewed the cost benefit documents and asked if others agreed that the documents show that implementing this standard is not cost justified.

ETH Comments

The proposed standards are clearly very aggressive and will have a significant cost of compliance, especially if they must be deployed within six (6) months. If a several year timeframe is adopted, it is likely that underlying frameworks, applications and assistive technology will close the gap in effort required.

By the sounds of comments from other agencies, CATA is probably about in the middle of the pack in terms of compliance. When the entire Federal base is factored in, transit authorities as a whole are probably well ahead of most. If being ahead of most is sufficient, then CATA is probably on an acceptable trajectory. If strict compliance is expected, then CATA has a lot of work to do.

Recommended Comments

Major concerns that I would recommend CATA formally comment on include:

- Clarification and recommendation that the standards only apply to new procurements and information publications moving forward and not apply to information previously published.
- Deployment within six (6) months of publication is too aggressive unless it only applies to new procurements after that date.
- Clarification that it not apply to every mode of information distribution but rather that equivalent distribution of accessible content thru alternate methods would be acceptable. That is, as long as there is at least one way for accessible access to the content, not every mode of dissemination need be accessible.
- Clarification on how compliance will be measured especially in light of the shift from process to functional based criteria.

CATA Preparation

Some areas that CATA should start to prepare for include:

- Ensuring that key individuals involved in information distribution are familiar with the WCAG 2.0 standards <https://www.w3.org/WAI/intro/wcag20>. That likely includes marketing, IT, Customer Service, but will likely touch every department especially if they generate content that is in the eight (8) internal facing categories or provided for public distribution.

- Ensure that all future procurements related to websites, applications or other modes of information distribution required compliance to the new WGAC v2 standards.
- Learn about PDF/UA, see attachments, and establish policies, procure and deploy the tools or resources and provide necessary training for employees to be able to ensure content is compliant. For example, I ran Acrobat Pro accessibility audit tools against this document. Even though it seems like a fairly simple Word document, it fails in a couple areas. Using Acrobat XI, the accessibility report can be viewed from the left side navigation. Users would need to be trained in how to correct such errors prior to publication.

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