# Minimal Functional Accessibility Requirements for Software Candidates

Candidates considered for purchase must be readily usable and accessible and provide, at a minimum, functionality outlined in the W3C Web Content Accessibility Guidelines (WCAG) 2.0, Level A and AA. Each vendor's claim of accessibility shall be verifiably true. If no candidate exists that meets this criteria at time of purchase, the candidate vendor must demonstrate a willingness to provide a timely road-map for correcting each accessibility issue found during formal assessment and must make meaningful progress toward meeting that time-line. Purchases for high-impact services must be accessible at time of deployment.

**NOTE:** The Office of Civil Rights (OCR) has stated that an application must be "readily usable and accessible": Software cannot be considered accessible unless it is actually usable by disabled users, regardless of conformance to accessibility standards and guidelines.

## 1. Minimum Functional Accessibility Checklist

The University of Illinois at Urbana-Champaign interprets "readily usable and accessible" as mandating the following minimum functionality[1]:

1. **All critical functionality of a given application must be operable via the keyboard without relying on key shortcuts. This includes all menus, other navigation, and dynamic objects (such as image slide-shows).**

2. **A clear visual indicator of the current item in focus must be displayed (similarly to how mouse hover works in a web page).**

3. **Color alone must not be used to convey application state and other information.**

4. **Multimedia must be captioned, must have transcripts, and must have audio descriptions (where appropriate). Any associated media players used must also conform to these accessibility standards.**

5. **Challenge and response mechanisms (such as CAPTCHAs) must not require vision to complete and must conform to these accessibility standards.**

6. **Form fields and buttons must have valid programmatic labels that are available to assistive technologies.**

7. **Informational images, charts and graphs must have descriptive alternative text. Charts and graphs must also have additional detailed descriptions of their content.**

8. **The reading order and tab order for an application must be logical for the program.**

9. **The application must have a logical and programmatically discernible structure that follows the visual structure of the application.**

10. **Color contrast of text must meet specified minimums to ensure readability[2].**

11. **The user interface must remain usable in high-contrast color modes.**

Failure to meet the criteria above indicates that the vendor either has a low understanding of accessibility or low motivation to make their application accessible. Choosing a product from another vendor may be indicated in that case.

---

1 To be fully conformant, the software must meet W3C Web Content Accessibility Guidelines 2.0, Level A and AA.
2 http://www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast-contrast.html

# 2. Vendor Assessment Checklist

1. **Has the vendor supplied a name and contact info for a person in their company to handle accessibility issues?**      Yes / No
*Note:* **If vendor does not have accessibility staff, the product is likely not accessible and the vendor may not be able to correct any issues found.**

2. **Was the vendor responsive regarding any issued found from the minimum functional accessibility check performed in Step 1?**      Yes / No

3. **Did Vendor supply a thorough and accurate Voluntary Product Accessibility Template (VPAT) for the purchase candidate?**      Yes / No

4. **Have the VPAT claims been verified by an accessibility specialist at the university?**      Yes / No

5. **If this software is under serious consideration, was the vendor responsive to the results of a formal accessibility assessment performed by an accessibility specialist at the university?**      Yes / No

6. **Has the vendor agreed or indicated willingness to agree contractually to correct identified accessibility issues in an appropriate, mutually agreed upon time frame?**      Yes / No

# 3. Determination of Candidacy

If a purchase candidate meets most or all of the minimum accessibility requirements and requirements 1-6 of the Vendor Assessment Checklist the product can be considered a strong candidate for purchase and to have met accessibility requirements for purchase.

If the above conditions cannot be met and no accessible alternative exists for the purchase candidate may be obtained under an Undue Burden exclusion. The university must be able to demonstrate proper due-diligence when justifying an Undue Burden exclusion.

# Undue Burden and Non-Availability Exemption

The following conditions may qualify for an undue burden and non-availability exemption to accessibility requirements:

1. **Compliance with accessibility laws and guidelines is not technically possible.**

   *OR*

2. **Extraordinary measures would be required to make the application compliant due to the nature of the intent of the application.**

A lack of the funding required to correct a candidate's accessibility issues or to purchase an accessible alternative is not sufficient to qualify for an undue burden exemption (Office of Civil Rights).