Did you know your VPAT does not indicate compliance with federal law?

Your Voluntary Product Accessibility Template (VPAT) is outdated, or lower than version 2.x.

What is “version 2”?
When U.S. Section 508 was revised in 2017, the required accessibility standards switched from Web Content Accessibility Guidelines (WCAG) 1.x to WCAG 2.0 AA. The Information Technology Industry Council (ITI) updated their VPAT to version 2 to address all the compliance issues in the updated accessibility standards in Section 508.

Differences

VPAT 1.x
Depending on your product, you filled out:

• 1194.21 - Software Applications and Operating Systems
• 1194.22 - Web-based Intranet and Internet Information and Applications
• 1194.23 - Telecommunications Products
• 1194.24 - Video or Multimedia Products
• 1194.25 - Self Contained, Closed Products
• 1194.26 - Desktop and Portable Computers

You were required to fill out:

• 1194.31 - Functional Performance Criteria
• 1194.41 - Information, Documentation, and Support

VPAT 2.x
You are required to fill out:

• WCAG 2.0 Report’s Table 1: Success Criteria, Level A
• WCAG 2.0 Report’s Table 2: Success Criteria, Level AA
• Revised Section 508 Report’s Chapter 3: Functional Performance Criteria (FPC)
• Revised Section 508 Report’s Chapter 6: Support Documentation and Services

You can optionally fill out:

• WCAG 2.0 Report’s Table 3: Success Criteria, Level AAA

Depending on your product, you fill out:

• Revised Section 508 Report’s Chapter 4: Hardware
• Revised Section 508 Report’s Chapter 5: Software

Once you complete a VPAT version 2.x, it is called an Accessibility Conformance Report (ACR).

Why update to version 2.x?
The U.S. Department of Justice started using WCAG 2.0 standards before Revised Section 508 was published. Items such as Section 1194.22 (k) (text-only versions) were removed from standards due to their discriminatory nature, since recent technical options exist now to avoid separate solutions. (See Consent Order to Scandinavian Airlines System Docket DOT-OST-2018-0001)