Accessibility in IT Procurement

Part 2: The PDAA Components

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NASCIO represents state chief information officers and information technology executives and managers from state governments across the United States.

The National Association of State Chief Information Officers (NASCIO) has long advocated for a broad interpretation of enterprise architecture, a governance model with a connection to business processes and a roadmap that informs both the state's procurement of IT and the supplier community. One issue that has not received enough attention and is an imperative in today's society is accessibility in information and communications technology (ICT) and the process to integrate these requirements in state government procurement. As significant buyers of ICT, states have an obligation to set the public policy direction and the opportunity to stimulate the capabilities of the supplier community.

In July 2015, NASCIO released Part I of this publication, which introduced a new, policy driven approach to information and communications technology (ICT) accessibility for State CIOs, procurement organizations and vendors. Policy-Driven Adoption for Accessibility (PDAA) can help strategically drive a culture of accessibility, generating accessible products and services. This publication, Part II, includes states in practice and adoption information for states.

To read Part I, please visit www.nascio.org/PDAA

The PDAA Components

Over the course of a series of meetings and work sessions, a workgroup of NASCIO members developed and agreed to a set of components that can be used by both government procurement and vendor organizations:

1. The PDAA Core Criteria – A set of governance criteria that guides and measures the implementation of accessibility initiatives within an organization.

PDAA Core Criteria for Vendors
1. **Develop, implement, and maintain an ICT accessibility policy.** – The information and communications technology (ICT) accessibility policy is the foundation on which accessibility programs and initiatives can be built. Without it, accessibility work is tactical, and not part of a holistic organization-wide strategy.
2. **Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.** – Ensures that ICT accessibility is positioned appropriately within the organization, and that accessibility related position roles and responsibilities across the organization are defined, including the designation of an executive sponsor.
3. **Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.** – Ensures that ICT accessibility happens in a consistent, repeatable fashion, and not dependent on a specific individual(s) who "carries the torch" for any specific event or project where ICT accessibility is required.
4. **Provide a process for addressing inaccessible ICT.** – Ensures that plans are developed to address ICT accessibility issues once identified. Corrective actions in project plans, procurement of more accessible ICT, and providing alternate means of access to the ICT product or service are examples.
5. **Ensure the availability of relevant ICT accessibility skills and other resources within (or to) the organization.** – Ensures that the organization has the skills, tools, or external resources needed to create and maintain accessible ICT.
6. **Make information regarding ICT accessibility policy, plans, and progress available to customers.** – Providing information about how Core Criteria numbers 1 through 5 are met gives procurement organizations additional data points on vendors' ability and commitment to ICT accessibility beyond just VPAT™ or other documentation.

2. The PDAA Maturity Model – A qualitative metric set used to assess maturity and progress of an organization towards meeting the PDAA Core Criteria.

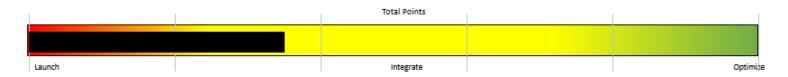|	PDAA Core Criteria	Launch	Integrate	Optimize
1.	Develop, implement, and maintain an ICT accessibility policy.	Have an ICT accessibility policy.	Have appropriate plans in place to implement and maintain the policy.	Establish metrics and track progress towards achieving compliance to the policy.
2.	Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.	Develop an organization wide governance system.	Designate one or more individuals responsible for implementation.	Implement reporting/ decision mechanism and maintain records.
3.	Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.	Identify candidate processes for criteria integration.	Implement process changes.	Integrate fully into all key processes.
4.	Provide processes for addressing inaccessible ICT.	Create plans that include dates for compliance of inaccessible ICT.	Provide alternate means of access until the ICT is accessible; implement corrective actions process for handling accessibility technical issues and defects	Maintain records of identified inaccessible ICT, corrective action, and tracking.
5.	Ensure the availability of relevant ICT accessibility skills within (or to) the organization.	Define skills/job descriptions.	Identify existing resources that match up and address gaps.	Manage progress in acquiring skills and allocating qualified resources.
6.	Make information regarding ICT accessibility policy, plans, and progress available to customers.	Make Launch level information available.	Make Integrate level information available.	Make Optimize level information available.

3. The PDAA Vendor Self-Assessment Tool – A questionnaire that procurement organizations can send to vendors regarding the vendor's ICT accessibility policy and progress against the PDAA Core Criteria. The questionnaire and results can be used by both procurement organizations and vendors but in somewhat different yet complementary ways.

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tal Points	21
rcent mplete	35%

For procurement organizations, the responses can be used to:

- Help assess a vendor's ability to produce accessible offerings
- Gauge confidence in the quality of a vendor's VPAT™ or other accessibility documentation
- Track vendor progress and improvement in ICT accessibility initiatives over time
- Factor into vendor selection decisions

For vendors, the responses can be used to:

- Guide the implementation of organization wide accessibility programs and initiatives
- Help achieve more accessible offerings over the long term

Download PDAA Self-Assessment Example Spreadsheet (Minnesota)

The PDAA Generic Implementation Timetable – ICT accessibility is a journey; it won't occur overnight and will always require monitoring, therefore a sample schedule was established based on a 24 month timetable (See page 5). It can be used as a guide by vendors to plan the implementation of PDAA Core Criteria within their organizations.

Criteria (begins when vendor is informed of PDAA)	6mo	12mo	18mo	24mo
1. Develop, implement, and maintain an ICT accessibility policy.			■ (green)	
a. Have an ICT accessibility policy.	■ (blue)			
b. Have appropriate plans in place to implement and maintain the policy.		■ (blue)		
c. Establish metrics and track progress towards achieving compliance to the policy			■ (blue)	
2. Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.		■ (green)		
a. Develop an organization wide governance system.		■ (blue)		
b. Designate of one or more individuals responsible for implementation	■ (blue)			
c. Implement reporting/decision mechanism and maintain records.		■ (blue)		
3. Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.			■ (green)	
a. Identify candidate processes for criteria integration.	■ (blue)			
b. Implement process changes.		■ (blue)		
c. Integrate fully into all key processes.			■ (blue)	
4. Provide a process for addressing inaccessible ICT including:		■ (green)		
a. a plan / date for compliance of an inaccessible ICT.		■ (blue)		
b. an alternate means of access until the ICT is accessible.		■ (blue)		
c. a corrective actions process for handling accessibility technical issues and defects.		■ (blue)		
5. Ensure the availability of relevant ICT accessibility skills within (or to) the organization.				■ (green)
a. Define skills/job descriptions.	■ (blue)			
b. Identify existing resources that match up and address gaps.			■ (blue)	
c. Manage progress in acquiring skills and allocating qualified resources.				■ (blue)
6. Make information regarding ICT accessibility policy, plans, and progress available to customers.		■ (green)		
a. Make Launch level information available.		■ (blue)		
b. Make Integrate level information available.		■ (blue)		
c. Make Optimize level information available.		■ (blue)		

PDAA in Practice

Texas

In August of 2014, the Texas Department of Information Resources (DIR) Cooperative Contracts program began implementing PDAA. The 2014 "Education IT Products and Services" request for offerings (RFO) DIR-TSO-TMP-213 was selected as the initial solicitation using the PDAA resources.

PDAA RFO requirements were presented in the vendor pre-bid conference, and the PDAA self-assessment form was included in the solicitation bid package. Vendors were required to complete the form as part of their solicitation response.

The PDAA self-assessment form responses were not included in the scoring criteria used in awarding contracts, as scoring criteria is controlled statutorily; however the assessment results are being used to establish PDAA baselines for responding vendors. These results can then be compared to PDAA responses received in future solicitations as a way to track vendor progress in their accessibility initiatives. Additionally, the PDAA self-assessment results will be made available to individual DIR customers (agencies) upon request so that customers can consider the results in conjunction with other accessibility related information provided (such as VPAT™) as part of their own decision making processes.

It should be noted that requesting such information is consistent with recently revised Texas Administrative Rules on ICT Accessibility which states that DIR and Texas agencies may obtain "… credible evidence of the vendor's capability or ability to produce accessible EIR products and services. Such evidence may include, but is not limited to, a vendor's internal accessibility policy documents, contractual warranties for accessibility, accessibility testing documents, and examples of prior work results."

PDAA vendor self-assessments are now included as an integral part of DIR's Cooperative Contracts solicitations. Vendors responding to these new solicitations may have also submitted responses to the Education IT Products and Services solicitation, thus creating the initial opportunities to compare responses and track progress.

Minnesota

Minnesota is in the process of launching a PDAA pilot program. The state will ask a small number of vendors representing a wide range of size and offerings to complete the self-evaluation. The state will use feedback from both administrative and vendor side to analyze the model and determine next steps. The state is promoting this pilot via their website's accessible procurement pages.

Final Thoughts on PDAA

Making ICT product and service offerings accessible by the vendor community has business value beyond compliance to technical standards; however ICT accessibility adoption has been slow due to technical and operational challenges occurring within organizations.

PDAA is a new approach that procurement organizations can use that can help vendors develop accessible offerings while strengthening existing procurement and contract requirements, including product and deliverable compliance with accessibility standards. PDAA provides a governance framework that can help vendor organizations address ICT accessibility systemically over the long term.

As more state and other procurement organizations include PDAA policy criteria and tools as part of their solicitation requirements, coupled with the increased visibility of ICT importance and regulations in the marketplace, vendors will need to place a much higher priority on ICT accessibility.

Building a critical mass of public sector organizations which adopt the PDAA policy criteria for their vendor communities provides the needed leverage to help vendors realize the benefits of building accessible offerings. Vendors can then use the PDAA criteria as a tool to help them develop and implement internal policies and processes which will ultimately yield more accessible and inclusive offerings.

The following individuals contributed heavily to this report. They may be contacted with additional questions or information on PDAA:

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Additional Resources

Frequently Asked Questions (FAQs) for PDAA - A collection of FAQs that help procurement organizations and vendors gain an understanding of PDAA and its value. These FAQs are integrated into the PDAA Vendor Self-Assessment Tool (Texas example).

Accessibility Implementation Framework (PPT) - Texas Department of Information Resources - A comprehensive framework and project plan to guide an organization's IT accessibility program and initiatives

PDAA Resources

An index of resources that can be used by procurement organizations or vendors to assist them in the planning and implementation of organization wide accessibility programs:

- Techcheck – On Line Assessment Tool developed by the Partnership on Employment and Accessible Technology (PEAT) and sponsored by the Office of Disability Employment Policy (ODEP), U.S. Department of Labor
- W3C – Web Accessibility Initiative - Planning and Implementing Web Accessibility
- British standard BS-8878 Web Accessibility Code of Practice - Accessibility business process integration
- Strategic IT Accessibility: Enabling the Organization – Reference book on organizational accessibility enablement, strategy, and implementation
- Digital Accessibility Maturity Model (DAMM) from SSB Bart Group - A Capability Maturity Model based framework to help digital accessibility programs measure their development against an objective yardstick

Additional references

National Disability Policy Progress Report - 2012

Section 508 Report to the President and Congress: Accessibility of Federal Electronic and Information Technology – 2012

US E-Government Website Quality Report (PDF) – 2012

European Commission research behind Proposed Directive on Accessibility of Public Sector Websites - 2012

G3ict: CRPD 2012 ICT Accessibility Progress Report

Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act (PDF) – Executive Office of the President, Office of Management and Budget – 2013

 List of Recent Web Accessibility-Related Litigation and Settlements – 2000 to Present

Higher Ed Accessibility Lawsuits Complaints, and Settlements