

Eightfold Way Consultants

Accessibility Policy

May 25, 2018

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Objective

The purpose of this Accessibility Policy is to establish strong practices and processes to ensure a high level of accessibility for Eightfold Way Consultants (EFW) products.

Guideline

Eightfold Way Consultants adopts Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and Section 508 A through D as its target success criteria for accessibility compliance for all products.

Governance

The governance is designed to be highly transparent and responsive.

Accessibility Committee

The Accessibility Committee meets quarterly and produces minutes based on Robert's Rules of Order.

The voting members of the Accessibility Committee are:

James Eastman	President
Gabriel Many	Director of Content Development
Brad Silen	IT Consultant
Julia Steinberg	Director of Operations

Other non-voting members may be invited to attend and consult to the committee.

The President will be the designated "Accessibility Officer" and is responsible to track issues and call Accessibility Committee meetings.

Annual Reporting

An annual report is generated in October of each year.

Escalation Process

Any EFW Employee or contractor can submit an issue to be discussed before the Accessibility Committee. In addition, any EFW staff member may choose to escalate any accessibility issue encountered during testing or from an external report to the Accessibility Committee.

A submitted issue will be addressed at the next standing meeting of the Accessibility Committee unless the submitter requests an expedited response, in which case the Accessibility Committee will meet within 7 days.

The Accessibility Committee will acknowledge a report with a written response.

Submission Format

All submission will contain a one-page summary and as many supporting documents as required. The one-page can be submitted by email.

The one-page summary will include the following sections:

- Title
- Date of Submission
- Description of the Risk
- Proposed Solution including Estimated Cost

Accessibility Roles

Accessibility Officer: Person responsible for product accessibility overall.

Programmer: Has access to the code; ensures that code conforms to chosen accessibility guidelines.

Writer: Ensures that all content conforms to chosen accessibility guidelines.

Project Manager: Ensures that accessibility assessment is scheduled and performed at appropriate points in each development cycle.

Accessibility Methodology

Personnel Policies

All EFW employees and contractors who deal with code or content must read and understand the WCAG 2.0 Level AA guidelines. This WCAG orientation should be repeated every two years.

Development Practices

Programmers working on EFW products are required to certify the product's compliance with the appropriate accessibility guidelines and to fill out the Voluntary Product Accessibility Template (VPAT). The Accessibility Officer will review the VPAT with the programmers.

Testing Practices

Accessibility testing is a key component of quality assurance. All product development plans must include a scheduled accessibility test.

Automated Testing

Automated testing can find malformed HTML and nonconformant HTML and CSS elements. Our preferred automated testing tool is WAVE Web Accessibility Evaluation Tool (<https://wave.webaim.org/>).

Human Testing

EFW stresses the importance of real-world human accessibility testing to bring to light barriers that individuals with disabilities may encounter with the product, even when the product complies with accessibility guidelines. The Product Manager will schedule human accessibility testing in each major development cycle, including testing by at least one person using a screen reader program.

Record-Keeping

Project managers are responsible for making sure that a Voluntary Product Accessibility Template (VPAT, <https://www.section508.gov/content/sell/vpat>) is completed for each major version release of each product. Prior versions of the VPAT will be kept on file. Records in the incident tracking system regarding accessibility compliance issues and accessibility information requests will be retained.

Accessibility Metrics

VPAT Metrics

- All accessibility measures required for WCAG 2.0 Level AA must be identified in the VPAT as being “Supported” or “Supported with exceptions.”
- Items marked as “Exceptions” in the VPAT must not be material in day-to-day operations of the product; or must have accessible alternatives.
- Items marked as “Exceptions” must be explained in the VPAT.

Testing Metrics

- Generally, Errors identified in the WAVE testing tool must be resolved.
 - Exception: Items identified as Errors which do not in fact violate the guidelines (example: “Empty header” that will be filled by script before being presented to the user) may be left unresolved, but must be identified and explained in the relevant section of the VPAT.
 - Exception: Items identified as Errors which in fact *increase* real-world accessibility may be allowed to stand, but must be identified and explained in the VPAT.
 - Please note, however, that Errors that are allowed to stand for good reason can nevertheless affect the reputation of the company, if external parties find them without referring to the VPAT. Therefore the number of such exceptions should be kept to an absolute minimum.
- Generally, accessibility issues raised by real-world testers should be resolved.
 - All incidents of non-conformity with WCAG guidelines must be resolved, subject only to the exceptions noted above.
 - Issues affecting day-to-day operation of the product must be resolved.
 - Issues that can be categorized by the Project Manager as the opinion of the tester, feature enhancement requests, or “judgement calls,” may be deferred, logged and prioritized along with other outstanding development issues for future work.

Policy Dissemination

Posting the Policy and Product Accessibility Information

Each website product will post this Accessibility Policy and the product’s VPAT on the website, making them available in the website’s Policies area.

Handling Inquiries

Inquiries about the accessibility of the product will be handled through the company’s existing triage system.

- Inquiries sent through the websites’ Feedback forms are sent to the Triage queue of our incident tracking system.
- The Triage operator either answers the inquiry directly, or escalates the inquiry to another staff member.
- The Accessibility Officer will ensure that all accessibility inquiries are ultimately responded to within five business days.

Annual Audit

The Audit will start on September 1st of each calendar year and the audit results will be delivered to the Accessibility Committee by October 1st.

The following items will be included in the audit report:

- Compliance with processes and procedures
- Suggested changes and/or improvements
- Status of reported accessibility compliance issues
- List of those people who have access to code and content