

UsableNet

# Why Creating Accessibility Policies and Statements is Essential for Compliance



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# Introductions

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## **Michele Lucchini, Vice President - Products, UsableNet**

Michele oversees the strategic product development initiatives focusing on ensuring UsableNet's services and technologies support clients in their digital accessibility program. Leveraging his 20+ years of experience, Michele is also the co-author of *Content for Everyone: A Practical Guide for Creative Entrepreneurs to Produce Accessible and Usable Web Content*.

## **Jeff Adams, Vice President - Accessibility Operations, UsableNet**

Jeff advises companies around the world on best practices in website accessibility and integrating accessibility into their processes. He's been with UsableNet for more than a decade and not only consults with UsableNet clients, but also leads the development of the company's educational programs. In addition, Jeff's a creative entrepreneur and co-wrote the book *Content for Everyone: A Practical Guide for Creative Entrepreneurs to Produce Accessible and Usable Web Content*.



**Question: Does Your Company Have an  
Accessibility Policy and/or Accessibility  
Statement?**

# Agenda

- Accessibility Policy: Documenting Accessibility Expectations Inside Your Organizations
- Accessibility Statement: Documenting Your Accessibility Work For Your Customers
  - US Standard Statements
  - EU/EAA Standard Statements
  - What EU Standards Mean for US/non-EU Organizations.



# Accessibility Policy

# Why an Accessibility Internal Policy Is Important

- Present the reasons why the organization is acting on accessibility
- Inform about:
  - This sites/apps covered
  - The requirements to be followed
  - Reporting processes
  - Accountability plans
  - Any other key information
- Clarify roles involved and how existing roles will change

## When the Policy Can Become External

- Legal/Regulatory Uses: The policy could be shared when you need to show proof that you have an accessibility program.
- Working with Vendors: Documenting for vendors the accessibility expectations.

## What Goes into an Accessibility Policy (1/2)

- Accessibility Mission Statement
- Digital properties
- WCAG conformance level
- Timelines to conformance
- How conformance is tracked
- Mechanisms to report the conformance level
- Access to subject matter experts

## What Goes into an Accessibility Policy (2/2)

- Expectations for conformance during remediations and once the desired baseline conformance level is reached.
- Expectations for ongoing conformance.
- Expectations from vendors working with the site
- Additional sections or documents, if needed.

# Accessibility Policy: More Than A Document to File

- Creating an Accessibility Policy is just the beginning.
  - Accountability is necessary for all digital properties and teams.
  - The Policy should be considered a living document that is reviewed and updated at regular intervals.
  - The Policy becomes the centerpiece of a sustainable accessibility program and informs changes to the software development lifecycle.

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# Accessibility Statement

# Scope of the Accessibility Statement

- Public facing document:
  - Tells visitors what you're doing for accessibility
  - Gives them a way to contact you if they're having issues with the site's accessibility.
- Should be available in the footer of all pages.
- In some cases, maybe required as part of regulations.

## US: What Goes into a Accessibility Statement

- The company that owns the website or app
- The website URL or the name of the app
- The WCAG level the site/app conforms to, and the efforts being done to conform
- Contact information: phone number and email address

# US: Sample Accessibility Statement

## General

{ABC Corp.}, is committed to facilitating and improving the accessibility and usability of its Website, {www.abc.com}. {ABC Corp.} strives to ensure that its Website services and content are accessible to persons with disabilities including users of screen reader technology. {ABC Corp.} remediates and maintains {www.abc.com} in-line with the Web Content Accessibility Guidelines (WCAG) 2.x AA, which also bring the Website into conformance with the Americans with Disabilities Act of 1990.

## Disclaimer

Please be aware that our efforts to maintain accessibility and usability are ongoing. While we strive to make the Website as accessible as possible some issues can be encountered by different assistive technology as the range of assistive technology is wide and varied.

## Contact Us

If, at any time, you have specific questions or concerns about the accessibility of any particular web page on this Website, please contact us at {email@abc.com}, {1-123-123456} {Times that support is available, if applicable}. If you do encounter an accessibility issue, please be sure to specify the web page and nature of the issue in your email and/or phone call, and we will make all reasonable efforts to make that page or the information contained therein accessible for you.

Another sample from the W3C: <https://www.w3.org/WAI/planning/statements/minimal-example/>

# EU: What Goes into an Accessibility Statement

- Introduction
- Description of the site/app and its accessibility measures
- Details on the ongoing efforts to maintain accessibility (training, testing, user feedback, and other updates)
- Conformance status (WCAG level, EN 301 549 conformance)
- Limitations and any alternatives that are available
- Disproportionate burden (if applicable)
- Enforcement and complaints (the authority complaints can be addressed to)
- Contact information so customers can reach out to you to report issues

**Some countries may have additional requirements**

## EU: Accessibility Statement Samples

- **EU Commission:**  
[https://commission.europa.eu/accessibility-statement\\_en](https://commission.europa.eu/accessibility-statement_en)
- **Finland: Business Joensuu:** <https://businessjoensuu.fi/en/accessibility-statement>
- **French Republic Sample Statement:**  
<https://accessibilite.numerique.gouv.fr/ressources/modele-de-declaration/>

# EU Statement Requirements for US Companies

- The EAA represents a legal floor
- Understand what countries you have a responsibility to and the requirements that they have
- Consider addendums to your US accessibility statement to cover those specific requirements...
  - **...but, doing this, make sure to be very strategic and balance all potential risks**



## Q&A

Contact Jeff: [jeff.adams@usablenet.com](mailto:jeff.adams@usablenet.com)  
or on LinkedIn: [linkedin.com/in/JeffreyAlanAdams/](https://www.linkedin.com/in/JeffreyAlanAdams/)

Contact Michele: [michele@usablenet.com](mailto:michele@usablenet.com)  
or on LinkedIn:  
<https://www.linkedin.com/in/MicheleLucchini/>



**Thank You**