

# WCAG Silver Feedback

The Office of Accessibility at the state of Minnesota gathered a group of digital accessibility coordinators to review the draft of the WCAG 3.0 that was released in January 2021. The goal of the review was to:

* Learn more about the draft and proposed new structure.
* Discuss what will improve the experience for state employees and those with whom the state does business, when trying to understand and implement this new guideline format.
* Identify areas in the document or its structure which could pose great burden on the state should the state decide to adopt this new version of the guideline once it is finalized.
* Identify ways the new format may decrease the ability of those trying to understand and implement the new format.
* Suggest ways the WCAG 3.0 draft could be improved.

## Background

In 2009 and 2010 the state of Minnesota passed a law and a standard requiring executive branch agencies in Minnesota to follow Section 508 of the Rehabilitation Act of 1973 and the Web Content Accessibility Guidelines 2.0. The goal of the Accessibility Standard is to improve the accessibility and usability of information technology products and services for all government end-users in the State of Minnesota. This enables the state to provide better, more efficient services to more Minnesotans, and to hire a greater number of people with disabilities.

All executive branch state employees use some form of digital information and communication technologies including but not limited to: email, documents, websites, and web applications. Each employee creating content in digital technologies must follow the state’s [Digital Accessibility Standard](https://mn.gov/mnit/government/policies/accessibility/). With this in mind, the Office of Accessibility is grateful for the opportunity to bring together a review team and share the team’s comments on the draft of WCAG 3.0.

## Our Review Team and Process

8 state employees reviewed the draft then met to discuss it. As part of the discussion team members attempted to score information and communication technology with which they were familiar. Since there wasn’t enough time to review the entire document, discussion focused on representative samples. Again, the overall focus was how state employees, vendors, and other stakeholders would use the document as part of their processes.

## Kudos to the WCAG 3.0 Team

The group appreciated many aspects of the new format. In particular, the group found the following helpful:

* Table of Contents and heading structure.
* Plain language summaries.
* Graphics – helped break up the text and may support greater understanding.
* Greater inclusion of the needs of those with cognitive disabilities.
* Having complete barriers identified as critical errors and scored differently from other errors.
* The guidelines page with the different tabs. Having all the details in this location was helpful.
* The editor’s notes were much appreciated. They made sense to a developer that participated in the review. The group felt this was a good synopsis, helped understand the background, and general expectations. The group is hoping that this type of information will be present in the final version (and not just part of the draft). This was commented on in reference to [7.5, Visual contrast of text](https://www.w3.org/TR/wcag-3.0/#visual-contrast-of-text), among other places in the document.
* The How-to links were beneficial.
* The scoring for [text alternatives](https://www.w3.org/TR/wcag-3.0/#text-alternatives) provides uniform ways to score – combining both a way to score in general, and a process for scoring critical errors.
* The logic of the Text Alternatives section made sense – the different levels, how to figure out what makes each category of error.
* The resources provided in 7.5 about color perception and research the group found helpful. The group found it encouraging that the document looks at accessibility through a spectrum of acceptability. They also found the APCA Contrast Calculator helpful.

## Items that Caused Confusion

### General Comments

* While the content is good, there is so much that it can be overwhelming, especially to those newer to the content or this version.
* The group was unclear if there was a distinction between clear words and plain language. There was no definition for plain language found in the glossary.
* Group members struggled being able to scan the content without jumping between multiple pages. Many needed multiple browser tabs open in order to understand the sections. The number of browser windows that would be required by some users to have open was difficult for many users, including one that was using a screen reader. This could become even more difficult when trying to use this information while testing (which requires more windows to be open).
* Tab panels resulted in needing to scroll back to the top to move to the next one. While getting into the tab panel was easy with a screen reader, getting out of them was more difficult. A previous and next button within the tab panels may improve the experience.

### Main Document

* On the main 3.0 page the editor’s note takes up more visual space on the page than the content, which felt odd to the group.
* This is not formatted the same as the other pages – not an accordion.
* The color and it being exposed did draw the attention of the developers in the group.

### Figure 1

This does not communicate that guidelines have many outcomes.

### Figure 3

* Figure 3 ([documentation and scoring structure](https://www.w3.org/TR/wcag-3.0/#additional-documentation-and-scoring-information)) does not relate exactly to figure 1 ([core structure](https://www.w3.org/TR/wcag-3.0/#guidelines-structure)). This may cause confusion for readers.
  + Users were expecting figure 3’s bolded boxes to correspond to figure 1
* Some readers found it unclear, complicated, challenging to understand
* Methods goes nowhere/is orphaned.
* Functional needs appears without having something it comes from, even though it is in the middle of the flow diagram.

### 7.1 Text Alternatives

The qualification of “appropriate” may cause some confusion in the information about the critical error.

The title of “Outcomes page” – why this is called Outcomes was unclear to one reviewer. They thought it would show them what they should look like. This may have been because of the way the information was presented.

### 7.2 – Clear Words

One reviewer found the visual structure of the sections confusing. They found it difficult to easily determine which information was a heading, and which was a link. Example: Under Exceptions, Common Clear Words didn’t feel like a section heading. Also they didn’t understand it was an H4. They thought they needed to click something and tried clicking the words and the icon. The visual layout and use of icons did not help them navigate.

The reviewers found the purpose of the [Outcomes page](https://www.w3.org/WAI/GL/WCAG3/2020/outcomes/common-clear-words) difficult to understand. This listed the same items as on the drop down for functional categories. This layout is also similar to the How-tos. The link at the bottom of this page at first seemed like a duplicate. It linked to content that was similar but different.

Using terms like “nested clause” – reviewers were unsure if everyone needing to review content for clear words will know what this is, how to identify one.

### 7.4 Structured Content - Use Visually Distinct Headings

The information about requiring visually distinct headings led to discussions among group members about what would pass. There is not a rubric for helping to identify which qualify. This confusion could lead to different digital accessibility experts in the state providing different scores when presented with the same visual content.

### Scoring

* There are still many areas that the group felt were “grey” – for both explaining how to implement correctly and for scoring.
* Because not all the scoring information was present in this draft the group was unclear if this information will solve some questions but also cause other questions to arise.
* One reviewer did not understand how to score 7.2, but this became clearer when the group discussed it together.
* In addition, the ratings included 0-4, the test procedure in Method – test only has 0-2. Reviewers were unclear on how to translate the findings from the test into the rating.
* For example, when reading the section on “[scoring atomic tests](https://www.w3.org/TR/wcag-3.0/#scoring-atomic-tests),” the text veers between binary and rating scales but is unclear when to apply each type.
* The reviewers were also unclear of how this would roll into the functional categories portion of the scoring.
* For places where a glossary requirement may feel odd – how would this be scored? For example, print materials that are also available online, such as a quick card (example: [State of Minnesota accessibility quick cards - PDF](https://mn.gov/mnit/assets/CompleteSetAccessibilityQuickCards2017_tcm38-294078.pdf)).
* Scoring for 7.4 felt like a judgement call rather than a clear test process to follow when scoring. How distinct do they need to be? A process for measuring “visually distinct enough” would be helpful. And, how to apply the scoring was unclear. The group had similar issues with “organized content.”
* Also, group members were unclear of what to do in situations where (possibly) no headings were felt to be required. In discussion with group members about various scenarios and how to handle them – the importance for having at least one heading – the group member reviewing this section had not gathered this from the materials.
* The group discussed how to score a page like this [Microsoft page](https://www.microsoft.com/en-us/?ql=4) because the middle of the page has headings that are not available visibly but those with cognitive disabilities may need those headings. They may not be using assistive technology that can expose them. The group also discussed that individuals with needs to reduce their screen time (due to a disability) will require the headings to help them quickly decode sections of the page to help them use the pages more efficiently. These use cases should be addressed as part of the materials and the scoring.
* The rating for common clear words (accordion section) should link to information about how to rate, not just what each rating equals for criteria.
* Group members read the scoring system differently.
* How will qualitative items be scored?
* The group members asked about scores that fell in between the numbers provided. What to do then?

### Editorial Issues

* Table of contents and all bolded text in the table of contents are H2s
* Our reviewing group found some broken links, places where content appeared out of date with the rest of the current content, or unfinished.
* Guidelines page of 7.2: the bullet list doesn’t use parallel structure.

## Concerns

### 7.2 Clear Words Requirement

How will groups prepare for having a dictionary for 3000 words to assist with scoring?

How much work is it to have each group customize their dictionary?

Will automatic testing tools and artificial intelligence (AI) be available at this time to support this type of testing or act as a resource?

Scenario related to state government work: each state agency and division of a state agency uses many terms that are integral to their work and would require a 3000-word dictionary. Some divisions have a very limited number of staff and resources dedicated to this type of work. Here are some examples of divisions of varying size and topic focus:

* Newborn screening from the Minnesota Department of Health
* Division of Forestry from the Minnesota Department of Natural Resources
* Cybersecurity division of the state’s IT Department (Minnesota IT Services)
* Forensic services for investigations of inpatient hospital, supervised residential settings and nursing homes

### 7.5 Visual Contrast of Text

Reviewers felt this section was very text-heavy, with lots of information that could overwhelm some readers.

Reviewers found it hard to image how a tool would be used and a rating system that would apply, especially for those newer to digital accessibility testing.

### Scoring

Some group members felt that “If you tell people how much they have to do to get a specific level (example bronze), they most likely won’t go further. I have concerns that the bronze level is not set high enough.”

## Recommendations

### Figure 3 Recommendations

This image may be trying to convey too much information at the same time.

* A description of how different pieces of content are related to each other.
* Show you how to get from the guidelines to a score.
* This is showing both a workflow and relationships.

The group recommends breaking this into at least 2 graphics: one for concepts and relationships, one for workflow leading to a score.

### Other Graphics

The group recommends a graphic that is more like a tree or family tree to demonstrate the relationship between the outcomes and the methods. This could communicate that there are multiple outcomes, and that outcomes have multiple methods.

### Editor’s Note on the Main Page

Moving the editor’s note earlier in the document would be helpful (by the beginning). It is possible that some of this information should be moved into the main body text if appropriate. In other sections it was more background information – sometimes good at the end as “bonus material.”

### Text Alternatives How-Tos

These sections would benefit from more connection between all the information in the how-to and the scoring. For example, in the alternative text there was only one sub-bullet about context. Possibly including information like what is found in the [WebAIM article](https://webaim.org/techniques/alttext/) (which uses images) would be helpful.

The word “meaningful” may be helpful as a descriptor.

The group recommends that a file name as alternative text for an image should not enable you to get to 95%.

### Clear Words

The “Outcome, details, and methods” – tab 4 “Tests” – the exception is not written here. It would be important to include exceptions under the test procedure.

We also recommend including a different tool rather than Simplewriter – this was blocked for use by some of the reviewers’ agencies. While it could be unblocked after a security review, selecting tools that are less likely to be flagged and require work to get unblocked would be recommended.

### Visually Distinct Headings Recommendations

Technical descriptions and a rubric to help identify which headings pass as visually distinct would ensure that those evaluating content score more consistently. This would possibly enable automated tools to be used for verification.

### Visual Contrast of Text

It would be helpful to bring the How-to into the beginning of 7.5 because reviewers felt that a link may not necessarily be followed.

### General/Miscellaneous

When selecting information on the left-hand side of the page, the change does not register in the address bar. It would be helpful to some if it did.

When referencing information, it is best not to use Wikipedia (such as in 7.2’s How-to).