# Accreditation Methods

## Description

There has been discussion about how accessible websites are accredited. Some methods involve an external accreditation groups, using the W3C WCAG 2.0 certificate, and self-accreditation schemes.

## Background

Does the fact that a website carries an accreditation necessarily guarantee that a website is accessible? This is probably not the case. We should look at which accreditation schemes are most reliable, and how often a website should be re-evaluated. There is also the problem that websites are evaluated on a page by page basis. Some websites are mostly WCAG 2.0 A compliant, with a number of the pages being at a greater or lesser level of compliance. Information currently states that this website is therefore compliant only to the lowest page level.

The WCAG-EM is being developed by the WCAG Evaluation Methodology Task force under the WCAG Working Group. This document is current in draft form and the Task Force is working through public comments. The document deals with the issue of how to assess a whole website as opposed to the page-by-page formal compliance testing currently stipulated by WCAG 2.0 documents.

Numerous companies offer some form of third-party or external accreditation as can be seen from the resources listed below. Other organisations self-certify their website stating that it conforms to certain guidelines. The discussion questions deal with some of the issues of accreditation and invite discussion as to whether there is merit in third-party or self-certification of websites, how this is awarded and the role W3C might play in providing guidance to organisations offering accreditation.

Accreditation is closely bounded by accessibility testing. As a result, all of the strengths and weaknesses of accessibility testing are inherited by accreditation methods. A few of the weaknesses include (references appear below the discussion questions):

* Guidelines are proposed by consensus rather than by systematic experimentation, which may hard their validity
* While guidelines address many user needs, their coverage is not full [Power, 2012]
* The over-reliance on tools, which perform badly and rely on the above mentioned guidelines [Vigo et al, 2013]
* The problem of reaching an agreement with manual reviews [Brajnik, 2011]
* The problems of sampling [Brajnik, 2007]

Yet accreditation is often sought by organisations as a means of displaying the level of work or accomplishment they have put into making sure that their website is accessible. Organisations may believe they should have some means of displaying the external validation they have sought on the accessibility of the website. Or they may believe that the effort they have put into the accessibility of the website entitles them to display some sort of self-certification or accessibility compliance claim.

On September 11 during the scheduled RDGW teleconference call, we will be hosting a Catalogue Topic Discussion about this issues. You are invited to read the proposed discussion questions below and prepare to shares your thoughts and ideas with the group. The discussion will be summarized into a Catalogue Entry after the discussion.

Because the discussion is limited to one hour, we will only be dealing with third-party or self-certification concepts, rather than delving into the issues of using certified methods to develop websites or applications. Issues such as developing workflows and processes as in ISO 9000 and BS8878 and other quality assurance schemes will need to be left for future discussions.

## Discussion

### Historical Perspective

1. In the past, many websites carried some kind of badge such as the 'Bobby' tick and many included the W3C logo, in order to make statements about their accessibility. This has greatly diminished since WCAG 2.0 was launched. Why do you feel this has happened?

2. Has there ever been, or is there still, value in external or third-party accreditation schemes?

3. Has there ever been, or is there still, value in self-certification of websites, e.g. "This website meets WCAG 2.0 to Level AA"?

These questions prompted a discussion around the past use of logos and the attempts to use the now superseded ‘Bobby’ stamp. It was felt that in general they didn’t work because of a number of problems in determining the level of accessibility of web pages in general. One respondent stated that these attempts did not really reflect the real quality of the web pages and their standard of accessibility. It was stated that website evaluators should be careful to cover the different issues such as sampling, subjectivity, reliability of guidelines, coverage of guidelines, and usage of tools. If the tool used was not able to tell the evaluator if there were accessibility violations, they might think the website is accessible. Careful consideration is required before performing this type of accreditation.

A discussion ensued about the value of past accreditation schemes. It was stated that a good accreditation scheme would be based on the process – what kind of processes did you follow to develop the website? If you tell me the process you followed, then I could tell you if the website you developed in this or that way was likely to be accessible.

General consensus was that it might indeed be more beneficial to accredit the process rather than the end result.

Another participant stated that in looking at the historical perspective, he would slightly disagree that early accreditation schemes were without value. Early accreditation schemes did work if we judge success by raising awareness of accessibility. The emergence of the ‘Bobby Approved’ logo and the RNIB ‘See It Right’ scheme sponsored by Standard Life, demonstrated a corporate effort to promote accessibility and corporate social responsibility. It raised awareness that website accessibility requirements existed and were important, however it wasn’t particularly helpful in defining a level of accessibility. Whether it was associated with specific tools such as Bobby didn’t mean too much but made people aware that this was an aspect of equality. However this participant agreed that now we should be looking as much as process as in product.

In web accessibility evaluation and accreditation we are focusing too much on the end product and end-process or post-development, but the process is equally important. It is out of scope for this discussion, but needs to be raised as one of the missing elements. The other aspect is to remind people that none of the previous labels such as ‘Bobby’ or the use or misuse of the W3C logo are so-called self-declaration of conformance. They don’t follow the procedures for self-declaration which would mean that the evaluation results would need to be posted along with those labels so that people could verify that it was correct. The W3C logo was meant for awareness-raising and not for self-certification.

The developing WCAG-Evaluation Methodology (WCAG-EM) is looking at the processes of how you evaluate a website, while BS8878 and others looks at the development proposal.

We need to note that accreditation is valuable only if you involve the end users by providing a feedback form so that they can note accessibility problems. The idea is that if you find any issues you should tell the website owner who promise to act within a certain time frame, which can be an important part of the process. One participants stated that they have implemented such a process making the statement, “This website has been found to be compliant, but if you find any issues please let us know and we will ensure that this is addressed and will let you know”. Other participants stated they are seeing more of this process, using crowd-sourcing strategies to improve the accessibility of websites.

An additional issue that is necessary and beneficial for the accreditation process is the traceability of what happens to the page. This involves tracing how the website was created and the journey towards accessibility. It also involves following the feedback form, how the complaint was dealt with, the changes that were made, how the accessibility checks were done and how this is accessible and reachable behind an accessibility logo. This could be presented on an accessibility page or saved on a server for a large-scale accreditation. It would show what happens on the page and why this web page is labelled as accessible at a certain level. Another method might be to black-box the website or pages to preserve the state of the website or page at the time of evaluation.

We also need to communicate whether the check was self-declared, used an expert, a group of experts, end-users etc. It is also important to consider the level of complexity and if the process would be feasible in practice. We also need to think about what happens after label fades out after the stated period, be it 1 or 2 years or whatever timeline has been set, and determine what that means about the accessibility after that expired time period.

It was stated that ideally the label should also be visible as well as the method, declaring whether it was due to self-accreditation, external expert, or checks by end-users. It should state who has declared the website to be accessible and to what level, what evaluation they are basing the claim on and what level of expertise they have to make such a statement. We also need to consider the level of complexity for the system, looking at whether it is feasible for those working in practice.

## Current practices

### Design and Management

4. How do third-party accreditation schemes handle website changes?

### Discussion

While it is difficult to locate any track-keeping in the web accreditation domain, in accessibility research there have been some papers in the evolution of accessibility over time. In Giorgio Brajnik’s paper (get ref) people use archive.org to store websites which gives a snapshot of the website at the time or evaluation, for which they can use archieve.org. The process should be replicable and we should be keeping a track of that. It requires a huge infrastructure to keep this information as they change so often. The question was asked whether large organisations generally keep an archive of their website.

A commercial organisation that provides accessibility support to different sectors may need to provide website accessibility support and evaluation to different standards, such as Section 508 or WCAG 2.0 with the driver being quality assurance and legislation. An organisation may require evidence that they have taken due steps to ensure that their website meets a certain level of accessibility. To some extent this is related to the commercial agreement between the customer and service provider. It doesn’t necessarily state that it covers a 12 month term. It is often up to the budget or contractual agreement that says a re-test can take place over a given time period. From the evaluator’s perspective, they don’t see the approach driven by a given standard but by the client’s budget or quality assurance process that decides how often a re-evaluation should occur. For example, one UK accrediting organisation that tells clients their accreditation is good for one year after which time a re-evaluation must occur for the accreditation to remain valid. However we know that 5 minutes after the client has the website and starts making changes, you have a problem.

The existence of a voluntary product accessibility template such as the VPAT, which is a way of describing a web product’s accessibility at a certain point in time but does not to allow for dynamic change of the content over time. It acts as a snapshot, this is the information for that particular period, which may no longer be strictly accurate. Theoretically by the time the evaluator has produced the report, the website has changed.

One participant mentioned the experience they had with monitoring web accessibility. They were examining a large number of websites and checking their accessibility and observing their change over time. There have been some approaches in the Netherlands and also in Norway where you have an expert evaluation that is carried out once a year to check the status of the website. Following this evaluation, you have regular updates where check the websites with automated tools. This enables an organisation to keep track of the website’s accessibility by doing this every month, using automated tools and then once a year you again perform the next full expert evaluation. In this way you can check to see if there are a large number of major changes such as a re-launch or the site has undergone a complete change. This would be an indication that you need to perform the expert check earlier.

Documentation about this plan can be found on:

* eGovMon which is a website where you can go in and see the monthly dates for a small selection of the sites. <http://accessibility.egovmon.no/en/benchmarking2.0/>
* Combination of monitoring: (<http://versie1.webrichtlijnen.nl/monitor/)>
* Accessibility label “drempelvrij” <http://www.accessibility.nl/ondersteuning/het-inspectieproces).>

There are many other approaches using observations where you use an automated evaluation tool. One participant described having developed an automatic evaluation tool which copies the website into the database and you can check it after 1 hour, 1 day, 1 month, comparing the see if the website has changed. Only if the website has changed does it need to be evaluated. This helps if you have a large website and you can reduce the time to check a website. They have created reports describing the improvement or worsening of the website. The organisations may save time and money if they are only checking the website if there is a certain percentage of change.

5. What features are included in a third-party accreditation scheme?

### Discussion

We need to ask ourselves what the problem is that we’re trying to solve with accreditation. We need to agree on a definition of the problem before we can scope the detail of the accreditation scheme. There are two possible answers – one of them is to provide a reliable, rigorous and ultimately trustworthy indication to web users with disabilities that a site with an accreditation mark is going to be usable by them for its intended purpose. That could be the most important thing that an accreditation scheme can offer. The other thing is a quality assurance mark between the organisation who wants the website and an organisation who provides the website and possibly a third party who might have an authority to implement legislation that relates to disability equality. So you’ve got that quality assurance process. At the beginning we need to look at what we can do to help people with disabilities use the web, what information do they need, and what use or credibility an accreditation mark could have, for example if someone using a screen reader found such a mark. Where should it appear on the website? Should it be presented in a way that the screen reader could provide an indication or starts reading out the page content? Should it relate to technical accessibility or should it relate to a more experiential aspect. Is it possible to use this page to complete certain tasks? We need to decide whether one accreditation scheme could meet this role of helping web users with disabilities and also a quality assurance mark. Or are they two separate things, we need to answer these questions and see what information each should provide.

We need to decide why an accreditation scheme should exist and what the benefits to both the user and the owning organisation should be because the owning organisation are not going to pay for it unless they see some benefits whether it is public relations or getting market recognition. Corporations are going to want some kind of benefit, but ultimately it needs to be the user who obtains the benefit whether it’s the ability to see/hear an accreditation mark and whether this will indicate that this will be a website they will be able to use.

This could be a fantastic research project to gather information from users with disability to gather their needs, to find more about what sort of attribute of a site currently help them predict whether it’s worth them using a site, is it referenced from other people with similar disabilities, it is referenced from some directory of accessible websites – that’s been tried before. We discussed a couple of recent things such as ‘Fix the Web’ which is reporting problems rather than showing examples of good websites. We can look at the \_\_\_ system which could be used as a way to report good websites. There is a very good research problem out there to research what people currently do and therefore find a gap in information. Is it just I’ll try the website and just muddle through, or I’ll just give us when I find a certain type of accessibility problem present? Are you trying to describe a research project that gathers information from disabled web users about how they assess and predict the likely accessibility of sites they use and that would help us understand the possible role of accreditation schemes.

There is also the project involving social response from IBM Japan where users report when they find problems. This would help us to know if a page was accessible to a certain population and more would a more reliable method than whether it had an external accreditation. *Collaborative web accessibility improvement: challenges and possibilities:* [*http://doi.acm.org/10.1145/1639642.1639677*](http://doi.acm.org/10.1145/1639642.1639677)*.* That project was conducted by Hiro Takagi and Chieko Asakawa from IBM Japan in Social Accessibility.

### Limitations and Benefits

### Discussion

Does the user receives any benefit from using a website that has been accredited? Are people actually seeing people receive a benefit from using an accredited website?

There has been considerable work done on the quality of websites and accredited websites. One participant stated accredited websites or websites that meet an accessibility standard tend to be better built and they tend to have the better infrastructure because they have been built by better developer who understand the ins and outs of accessibility as well as other aspects of the technology. The benefits are probably not always going to be particularly noticeable, but can have things like better response times for downloads for example. The websites actually run better. It’s difficult for users to actually say that this is a superior site, but the reality is that they are often better created.

There are benefits from accreditation that are not direct benefits, but are side effects which assume that accreditation is a reflection of the actual accessibility of the website. Potentially you can warn users ahead of time whether a website is accessible or not. So if a website is not accessible, the user can skip the trauma of traversing a very painful website and if the user knows beforehand whether a website is accessible perhaps he will lean towards navigating it. It’s a side benefit.

We should also be looking at the trustworthiness of accreditation schemes and also the question of who is accrediting the website. Do they have the expertise, and the trust factor? Do people believe what they say? We see that in accessibility pages such as a statement of WCAG 2.0 AAA and then you see that they would not pass single A let alone AAA. Self-certification of this type does not always seem to be realistic. However one would hope that if you had paid someone to do an expert evaluation that the result should be better.

That opens the question of defining the most appropriate third-party. There were discussions about ‘Fix the Web’ where the approach involved people with disabilities who would report problems they have with accessing the website and then a volunteer would fix the problem and report that problem to the site owner. The question was raised whether it should be the person experiencing the problem who should report directly because it was their problem, rather than having someone triage it and turn it into a technical description. While there is merit in providing the technical description, it makes you think about whether the best accreditation that someone with a screen reader could have would be to know that someone else with a similar screen reader and could successfully use the website. It’s another area of discussion in the role of how the website is accredited, can you use it successfully or not. It brings up the challenge of the many different levels of skill and assistive technology and the set-ups for those are different – what the technology can and cannot support.

Trustworthiness is critical as it often has an impact on the underlying standard as well. Very often not only will the scheme be trusted or less trusted but also for us with WCAG for example, it could be seen as not reliable. There might be a site that claims to be WCAG complaint but the particular can’t use it, reflecting on accessibility as a whole. When we talk about accessibility or accreditation schemes, there is the risk, if it’s not done properly of undoing the work we’ve done over a lot of years in accessibility.

Once again, the reputation of the people who are saying that the website is accessible is very critical and the question about whether a third-party should say something or the user should say themselves comes back to the IBM model. This bring us back to the point of who is going to say whether the website is accessible and whether they have the right to be able to say it is.

That leads us into the last section about future practice considerations. Who should be able to say that a website is accessible? The discussion mentioned Giorgio Brajnik’s paper on the expertise effect, and Jonathan Hassel’s article both of which are provided in the reference list below.

## Future practice considerations

### Discussion

Johnathan Hassel has written about suppliers of accreditation services (see the reference at the end of the notes). Suzette Keith examined EU organisations that had self-certified websites and compared what level they said they met and what they actually met. Jonathan’s Hassel’s paper deals with what you should receive from an accreditation scheme and addresses the issues of trust, and choosing an accreditation scheme or provider. The article examines whether people should be examining the qualifications of accreditation providers. Leonie Watson mentioned a discussion with the International Association of Accessibility Professionals which looks at qualifications. Discussions centre on how you choose an evaluator and the importance of examining their qualifications.

The question was raised about W3C’s role into this field. Do they have an opinion about third-party accreditors? Due to time constrains, this questions was not able to be discussed further.

According to W3C, process is important and paramount. From their perspective they are open and not closed to particular groups. Who can make a claim and say they can? The idea is W3C think there is a place for self-declaration. There are organisations that have the expertise, skills, and the will to make their own claims and they say they have a quality assurance process in place. Others need help such technical, external evaluation etc. They believe both can and should co-exist and that the issue of skills is something very important, and needs to be worked on with training and other materials. W3C stress they need to be and remain open so that anyone can become such a qualified person or not.

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