Ten Rules for Accessibility Success in Projects

1. Find out if the ITD Accessibility Standards Apply to your Project.

Determine if your project is subject to the ITD Enterprise Accessibility Standards AND/or the ITD Web Accessibility Standards. Those standards, and their applicability language, are available at http://www.mass.gov/accessibility

2. Build Accessibility into the Procurement.

If your project is subject to these standards, build accessibility into the RFR or RFQ, and the resulting contract by using the contract language available by selecting “Accessibility for IT Solutions Contract Language” at http://www.mass.gov/itd/legaltemplates

Require vendors to submit VPATs (Voluntary Product Accessibility Template®) or other accessibility assessment materials if they have them, (but don’t score vendors for having them or not or you will exclude companies that may have fine products).

3. Find out if a Waiver is needed; if so, Apply to ITD for a Waiver.

Identify the apparent successful bidder for your procurement. If the apparent successful bidder presents COTS software that they acknowledge in their bid is not fully accessible, or that you determine is not fully accessible based on their submission, apply to ITD for a waiver, following the published requirements for waivers in connection with ITS33 projects (even if yours is not an ITS33 project.). A waiver application will not result in accessibility requirements being “waived” but in ITD’s approval of a realistic plan for eliminating accessibility problems where possible and, where it is not possible to correct those problems, mitigating them. Waiver requests must include, among other things, your plans for remediation or mitigation. For a full description of the waiver requirements, go to http://www.mass.gov/accessibility and select “IT Acquisition Accessibility Compliance Program”, then “Waivers from ITD Accessibility Requirements”. On rare occasions, ITD may, in consultation with MOD, determine that it cannot grant a waiver, and your agency cannot use the products of the vendor referenced in the waiver. Make a final award of the contract only when you have received a waiver approval from ITD.


Hire a third party accessibility contractor to perform the Commonwealth’s review of vendor deliverables or COTS against the ITD Accessibility Standards and the AT/IT Environment List. Use ITD’s Third Party Accessibility Tester Contract, ITS34DESIGNATEDITD, and ITD’s RFQ template for such engagements, available at www.mass.gov/itd; click on the “ITD Template Resource Center”.

5. Build Accessibility into the Project Plan and all Phases of the Project.

Once the waiver (if applied for) is issued and the contract is executed, meet with the vendor and agree how to build accessibility testing (including both vendor and agency-hired third party tester testing), remediation, and training into the project plan; document your agreement this agreement in the project plan. Remember that the vendor must test their deliverables or COTS (unless they already have VPATs for their COTS) and you must test their deliverables or COTS (through a third party tester), prior to your acceptance of deliverables or COTS. Testing that first occurs at the user acceptance phase is too late. Testing should not only focus on code but also on documentation. Review the AT/IT Environment List and the required mitigations set forth in the waiver granted by ITD.

The AT/IT Environment list can be found by selecting “IT Acquisition Accessibility Compliance Program”, then “Generic Assistive Technology and Information Technology (AT/IT) Environment List” from http://www.mass.gov/accessibility

Develop a toolkit for initial and future deployments of the system to users with disabilities, including specific instructions for installations involving users of assistive technology, addressing particular server, browser and software configurations; special scripts, and work arounds; and any other special hardware, software or instructions the installer may need to complete roll out to users of assistive technology.
6. For Large Projects, Create an Accessibility Advisory Committee.

If your project is a large one (over $10,000,000 or affecting all or most Commonwealth employees or residents), set up an Accessibility Advisory Committee including at a minimum representation from MOD and ITD. You should also invite MRC, MCB, MCDHH, DDS and DMH to participate (with the understanding that, given their limited resources, they may not be able to participate). Your project team should meet with your advisory committee regularly during the course of the project to ensure that accessibility needs are being addressed. Project management must take the advice of this Board into account in managing the project.

7. Estimate the Number of Users of Assistive Technologies, and Determine the type of Technologies they use.

For applications that will only be used within the Executive Department, working with MOD, the ADA coordinators, HRD, and the CIOs, identify the number, location and identity of users who use or may use assistive technology. For applications that will be used by the public assume a broad range of disabilities among users and their use of the broad range of operating systems, third party technology and desktops referenced in the AT/IT Environment list. This information gathering process may enable you to tailor the parts of the AT/IT environment list applicable to your project, and will enable effective outreach and communication to the disability community for purposes of planning training.


Using a third party accessibility vendor from the ITD contract, review the vendor’s accessibility testing results and Voluntary Product Accessibility Templates (“VPAT”); conduct testing of code and documentation; identify mitigations; and work with the vendor on mitigation.


Involve assistive technology users in user acceptance testing of the mitigated system and documentation.


Make arrangements for assistive technology users to have training before or during training for other users. Ensure that the Commonwealth meets their training needs. Training should be accessible in both format and delivery. Training and user documentation, as well as training location for assistive technology users, must be accessible. For example, instructions given verbally by trainers need to take into account, through the use of an interpreter or a CART reporter, the need of deaf users to access spoken instructions. Similarly, training and user documentation must take into account the needs of those who cannot use a mouse to enter equivalent keyboard commands. Consult the disability handbook for Executive Branch Entities for additional details on conducting accessible training, available as a Word document at: http://mass.gov/EOaf/docs/mod/ExecutiveBranchDisabilityHandbookfinal2007.doc or in PDF at http://mass.gov/EOaf/docs/mod/ExecutiveBranchDisabilityHandbookfinal2007.pdf

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