

# Voluntary Product Accessibility Templates: Who Watches the Watchmen?

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## ABSTRACT

Academic libraries rely heavily on third-party electronic resource vendors to deliver databases, discovery platforms, and research tools essential to teaching and scholarship. Accessibility standards in academia continue to rise through legislation, institutional policy, and a growing commitment to inclusive design. Libraries increasingly use Voluntary Product Accessibility Templates (VPATs) to evaluate whether vendor products conform to established accessibility standards. Although VPATs are intended to provide transparency, the authors argue that their current unregulated implementation pose substantial human-factors challenges for librarians responsible for content development and purchasing. Because VPATs often rely on self-reported information, the accuracy of the template depends entirely on the vendor's commitment to accessibility. The authors explore these issues through a human-centered lens, drawing on interviews with academic librarians, accessibility specialists, and procurement officers. Findings highlight a perception that VPATs, although useful, function more as marketing tools than rigorous accessibility documentation. The authors also identify best-practice strategies and propose human-factors informed recommendations to improve VPAT usefulness in librarians' database selection decisions, such as, clearer structure and standardized language, integrating third-party validation, encouraging vendors to adopt transparent testing methodologies, and developing library focused training materials.

**Keywords:** Content standards, Accessibility reporting, Oversight

## INTRODUCTION

In the evolving landscape of accessibility in higher education, ensuring that educational and research materials meet accessibility standards is a shared institutional responsibility. When the Roman poet Juvenal wrote in his *Satires* the Latin phrase “*Quis custodiet ipsos custodes,*” translated in various ways, including “who watches the watchmen,” he highlighted a problem in human systems of all kinds; universities, corporations, governments, etc. If the powerful are our only source for access, who assures that they provide it? While legislative oversight of electronic resource accessibility continues to increase, the acquisition of research resources is shaped by the actions of multiple entities, including university faculty, librarians, and third-party vendors, each of whom shapes the information landscape.

With the updated Title II of the Americans with Disabilities Act (ADA), all public universities in the US must follow Web Content Accessibility Guidelines (WCAG) in compliance with WCAG 2.1 Level AA by April 24,

2026 for all digital content<sup>1</sup>. Similar legislation, the European Accessibility Act (EAA) was enacted in the EU in June 2025. Electronic resources librarians acquire, license, and manage access to critical digital research and instructional content such as research databases, eBooks, electronic journals, and streaming media from third-party vendors. As accessibility regulations in higher education become more rigorous, librarians must communicate these enhanced requirements to vendors and address any shortcomings. In essence, we have become the watchmen over a host of products which we do not have direct control. It has become critical that librarians find ways to communicate to vendors the need to adhere to accessibility standards. Voluntary Product Accessibility Templates (VPAT) play a critical role in tracking accessibility performance of digital products. In this article, we explore the ways in which VPATs support electronic resources librarians in serving as informed and effective watchmen over accessibility performance.

### **Voluntary Product Accessibility Template (VPAT)**

Developed by the Information Technology Industry Council, a VPAT is a “free template that translates accessibility requirements and standards (e.g., in Section 508 [of the Rehabilitation Act of 1973] and other legal frameworks) into actionable testing criteria for products and services” (VPAT, no date). The most current version of the form is VPAT version 2.5, released on April 24, 2025. There are four editions of the template: three based on Section 508, WCAG, and European Union standards, respectively, and a fourth that incorporates the three standards into one form. According to the Digital Accessibility Handbook for Librarians, the WCAG edition is likely the most beneficial for libraries in the United States (Spina, 2025).

The VPAT template is formatted as a table that lists accessibility criteria, conformance level (supports, partially supports, does not support, not applicable, and not evaluated), and additional comments. According to Falloon, sections of particular value for libraries include 1194.31 (functional performance), 1194.21 (local software), 1194.22 (web content) and 1194.41c (vendor technical support) (Falloon, 2017). Vendors may complete the templates in-house or hire third parties to conduct the evaluations. However, to complete a VPAT with requisite accuracy, an expert with a significant knowledge of accessibility standards must be involved (Willis and O’Reilly, 2020; Sturgill and Gould, 2023; Spina, 2025).

### **Literature Review**

A review of the literature reveals that Voluntary Product Accessibility Templates (VPATs) serve as a key communication tool between libraries and vendors of electronic resources. However, researchers note that VPATs are frequently outdated, incomplete, inaccurate, or tend to address only known issues (Spina, 2025). Despite significant staff time required, researchers stress the importance of user testing to independently validate vendors’ VPAT claims about compliance to accessibility standards (Falloon, 2017; Willis and O’Reilly, 2018; Sturgill and Gould, 2023).

A primary concern across the literature is the limited public availability of product VPATs. Willis and O’Reilly’s study, *Enhancing Visibility of*

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<sup>1</sup>After we conducted our interviews, the Department of Justice unexpectedly extended the compliance deadlines to April 26, 2027.

Vendor Accessibility Documentation (2018), assessed how vendors provide accessibility documentation and identified opportunities to improve public access to this information. Their findings indicate that only 15% of vendors made VPATs publicly available on their websites, with 16% able to provide VPATs upon email requests. On the other hand, 11% of vendors reported having no VPAT or accessibility data to provide; 18% provided no response (Willis and O'Reilly, 2018). More recent research suggests incremental improvement, with Sturgill and Gould (2023, p. 5) reporting that "VPATs created between 2019 and 2022 were downloadable from vendor websites more than 50% of the time."

Beyond availability, the literature also explores the reliability of VPAT content. Willis and O'Reilly (2020) conducted manual accessibility testing to assess the accuracy of vendor's self-reported VPAT claims. Their analysis revealed that only 10% of VPATs accurately matched claims on the VPAT when manually tested, the majority (61%) exhibited discrepancies categorized as "partial matches." These inaccuracies most frequently involved skip navigation failures, missing alternative text, insufficient OCR in downloadable files, and keyboard traps (Willis and O'Reilly, 2020). The literature suggests that the utility of VPATs is contingent upon the accessibility expertise of those completing them, whether internal staff or third-party consultants. Commonly documented limitations include vendors' failure to update VPATs following platform updates (Willis and O'Reilly, 2020; Spina, 2025) and the use of obsolete VPAT versions (Falloon and O'Reilly, 2020; Sturgill and Gould, 2023).

## Methods

In order to analyze the efficacy of and inherent problems with VPATs, we surveyed 15 total VPATs from vendors in 3 categories: major academic publishers, society publishers, and aggregators. Most vendors have multiple platforms on which they host content and therefore multiple VPATs; for this exercise, only one from each vendor was selected. The five major academic publishers produce large amounts of content, often have multiple platforms, and have robust website maintenance infrastructure and are able to put significant resources into things like accessibility. Aggregators, unlike publishers, host content they are licensed to display but do not own. They also generally have robust maintenance infrastructure and resources but may struggle to make content accessible because it is supplied by third parties and not the provider themselves. Society publishers are smaller and more specialized. They may aim their journal content at practitioners in their field as well as libraries. We examined the tools being used; whether the auditor was internal or external; and the date of the VPAT being examined. An analysis of the vendors' stated compliance to WCAG 2.2 standards, and of whether the stated compliance is consistent with tested values, is outside the scope of this paper but is a viable direction for future research. For graphs of select results, see Appendix A.

Our second method of analysis was a 30-minute, 6 question interview (see Appendix B for questions) with 4 different academic librarians whose work involves accessibility auditing. These librarians are from a range of geographic eras and work at institutions Carnegie classifies as Research

universities. Their interviews were transcribed with any references to geography or specific vendors were redacted.

Finally, a comparison of the quantitative and qualitative results was conducted to see if librarians' observations are in line with observable trends.

### **Quantitative Results**

The results of the quantitative analysis show that an increasing number of vendors have accessibility documentation. Of the 15 publishers and aggregators initially selected, all 15 had an available VPAT, and 13 were available freely on the vendor website. The other two had to be requested from the vendor via email, but were provided quickly. Of the VPATs analyzed, 67% were from 2025, 27% from 2024, and only 6% (one VPAT) from 2022. The oldest VPAT was from a society publisher, which reinforces the sentiments of our interviewees that society publishers tend to have fewer resources as compared to large academic publishers and aggregators. They also tend to serve a different purpose in the academic ecosystem, since they sell to professionals in their disciplines as well as libraries.

When it comes to the party who compiled the VPAT, vendors were not always specific, but of the 9 who named their auditor, 7 analyzed their accessibility internally, 2 used outside firms, and 1 used an outside firm for initial compilation followed by an internal confirmation. This demonstrates a vulnerability of VPATs: they are often compiled by the people who have the greatest interest in presenting a platform in a favorable light. Third party testing by libraries takes on greater importance as a result. There were also significant differences in source specification between different vendor types. All but one of the "Big 5" academic publishers had specified the source of their testing, and several had dedicated accessibility departments within their companies, while one outsourced. An analysis of 5 large aggregators yielded similar results. On the other hand, only two of the society publishers specified the compiler of their VPAT. The existence of vendor departments specifically intended to do accessibility auditing and remediation suggests a commitment to accuracy.

The range and purpose of tools used by vendors to do this work, as stated in their VPATs is also encouraging. Almost every vendor named at least one piece of software used to do testing, and many were the same tools our interviewees used to audit their platforms. These included screen readers like NVIDIA and JAWS; and color contrast analyzers. In fact, in many cases, vendors listed paid tools that the librarians we interviewed don't have access to.

### **Interview Results**

Interviews with library professionals reveal that their work with electronic resources has increasingly necessitated creating avenues of communication with vendors about accessibility standards. Each interviewee expressed that accessibility was not their primary role in their institution but increasingly found themselves needing more time to adequately access that the electronic resources are compliant with accessibility standards. One interviewee described this increasing pressure: "At this point, accessibility has kind of eaten my job. It's a struggle to get all of my normal things done while trying

to also, in a rush, do assessments for 100 or so providers.” Interviewees emphasized that the impending April compliance deadlines for the updated Title II ADA regulations had intensified pressure, particularly as many vendors appeared unaware of or unprepared for the revised requirements.

Participants reported relying on freely accessibility assessment tools, expressing varying degrees of comfort with their own expertise in accessibility standards. Across interviews, each noted the need for additional training on accessibility assessment for electronic resources librarians. “Accessibility really is a specialty, and I don’t feel like I’m properly trained in this regard. I’ve sat through numerous webinars. I’ve read professional journal articles on the topic, and I feel woefully underprepared.” Interviewees noted that some universities have centralized accessibility testing, either through their IT departments or devoted accessibility staff. However, only one of the participants had centralized accessibility testing through their IT department, and they felt the level of testing was insufficient.

When asked about the role VPATs play in assessing accessibility and the extent to which these documents are perceived as trustworthy, one participant remarked: “VPATs are a step in the right direction.” Another participant with over a decade of experience in electronic resources accessibility assessment noted measurable improvement in VPAT accuracy over time, but emphasized that VPATs “should not be taken at face value,” stressing that it remains the responsibility of librarians to conduct due diligence by reviewing documentation and independently assessing vendor claims. Another participant reflected on shifting practice: “Obtaining a VPAT from vendor has been a longstanding practice, but now we are making sure that they’re following through on that promise of sending a VPAT and that we’re actually looking at it and testing that VPAT.”

Interview data indicated substantial variability in vendor practices regarding the maintenance and update of VPAT documentation: “It really runs the gamut. We question the vendors: how frequently do you update your VPAT? I’ve had some vendors tell me that it’s in their strategic plan and update VPATs annually. I have other vendors that hand us a VPAT that’s 5 or 6 years old.” Participants identified common patterns in vendor accessibility practices. Vendors serving European markets were described as more likely to demonstrate advanced accessibility awareness, while small society publishers, particularly those for whom “libraries are not their target audience,” were often perceived as unaware of accessibility requirements.

When asked about working directly with vendors to fix issues, interviewees reported varied responses. One cited the Library Accessibility Alliance as a motivator for change: “we noted that they’d been tested on the Library Academic... the Accessibility Alliance page, and they said, we’ve got a new VPAT coming forth soon, so we waited on that, and then we compared that to the new VPAT to the spaces where things weren’t working, and we did see improvement.” In fact, almost every respondent, when asked about internal and external improvements that could make accessibility auditing easier, cited the work of the LAA and the possibility of a body that could create a shared vocabulary and set of standards for filling out VPATs. While the WCAG 2.2 standards are a start, there is still wide variation in how the vendors interpret and describe their adherence to these standards. Greater standardization would help in that regard. Beyond making librarians’

auditing work easier, having collective standards also makes it easier to hold vendors accountable for not meeting them, allowing libraries to present a united front. As demonstrated by existing tools such as the Scholarly Publishing and Academic Resources Coalition's (SPARC) Contracts Library, libraries' bargaining power is enhanced when we facilitate shared knowledge and expectations.

It will be more important than ever to have robust communication with our vendors, because the updated ADA legislation will require a more proactive approach to accessibility remediation. For many years, library patrons would report accessibility issues to their librarian and receive an accessible copy of the item they were trying to access at that point. For example, a professor might report a lack of CCs on a streaming video. The library would then report that issue to the vendor, who would add captions. Or a student with low vision might report a PDF that isn't screen reader accessible, which is a problem the librarian might be able to fix internally or might have to contact the vendor about. With the advent of new Title II guidelines, websites are expected to be accessible at the time of access. As one interviewee pointed out, "[in the past] as long as you could remediate [an inaccessible resource], it was fine, but now it's more of a proactive stance where you have to be... designing...on the front end."

Several librarians also mentioned the need for a more proactive approach to interface design on the vendor side. As one pointed out, "it's really expensive for us to go in and redo a product. We just build it right on the first time, on the front end." Another said "it's their product, right? And they're selling it to us, so as a consumer, I think we do have a responsibility to say, hey, you can make this better...they're always migrating platforms and adding new features and doing all this stuff. Why aren't they designing it?" The constant updating of standards and platforms makes it impossible to completely eliminate remediation work. However, designing products to be up to current accessibility standards would greatly reduce the amount of remediation that is necessary, saving work for both librarians and vendors.

## Conclusion

The interviewees noted that a significant part of the struggle was developing adequate workflows. One participant explained that during the early stages of establishing their workflow, this work consumed nearly 80% of their time for several months. Each participant expressed a desire to have an industry-wide set of best practices and uniform standards. "The reality is, libraries across the country are all, at the exact time, reinventing the wheel. We are all doing the exact same thing." Another librarian stressed that "it really feels like everybody is left to their own devices."

While there was a strong consensus that VPATs are useful tools for communicating accessibility profiles of electronic resources, participants emphasized that because VPATs are self-reported by vendors, their claims must be independently tested. However, each participant noted that it was not best practice for individual libraries to duplicate testing for the same product. The library profession is deeply rooted in collaborative models that distribute workload and minimize redundant effort, exemplified by shared services like OCLC. This type of collective action is beneficial not only in

easing the labor associated with accessibility testing, but also in supporting institutions that lack in-house expertise in accessibility requirements. “The reality is lots of libraries don’t have depth of expertise around accessibility, and if we would band together, that would make it a lot easier. And it creates a larger counterpart to motivate publishers and societies.”

While several participants expressed the pressure of being the “watchmen” to assure their institutions were investing in accessible products, all participants clearly embraced the mission of providing robust research materials to all users. One participant noted that being in a technical services role often feels behind the scenes. However, advocating for accessible resources was one part of their job that has a direct impact on the quality of people’s university experience. “I don’t always see the impact of the work that I do. That is until I really started working on accessibility. It was a problem that I helped to solve not only for students, but faculty. And that is an important piece of accessibility, because you’re not just doing it to comply with a mandate; you’re doing it to help individuals. We’re service professionals and what we do helps people.”

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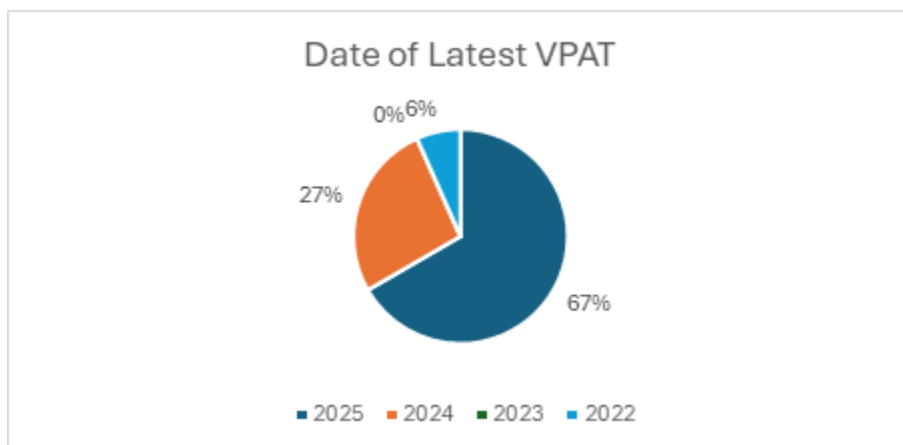
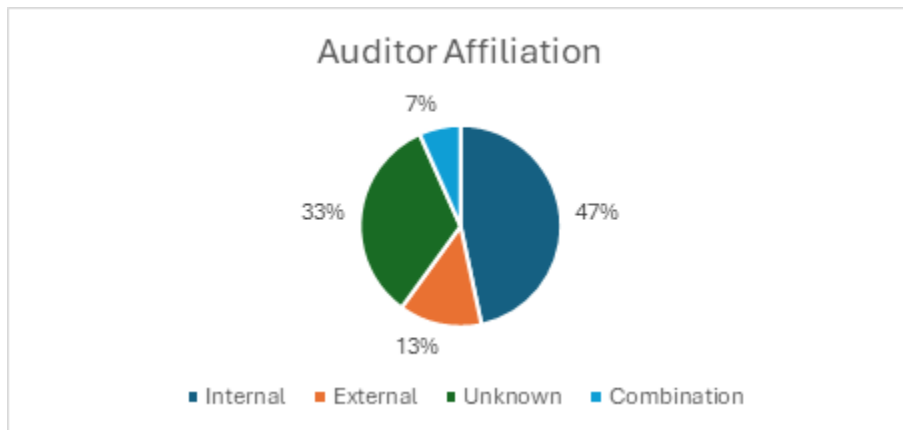
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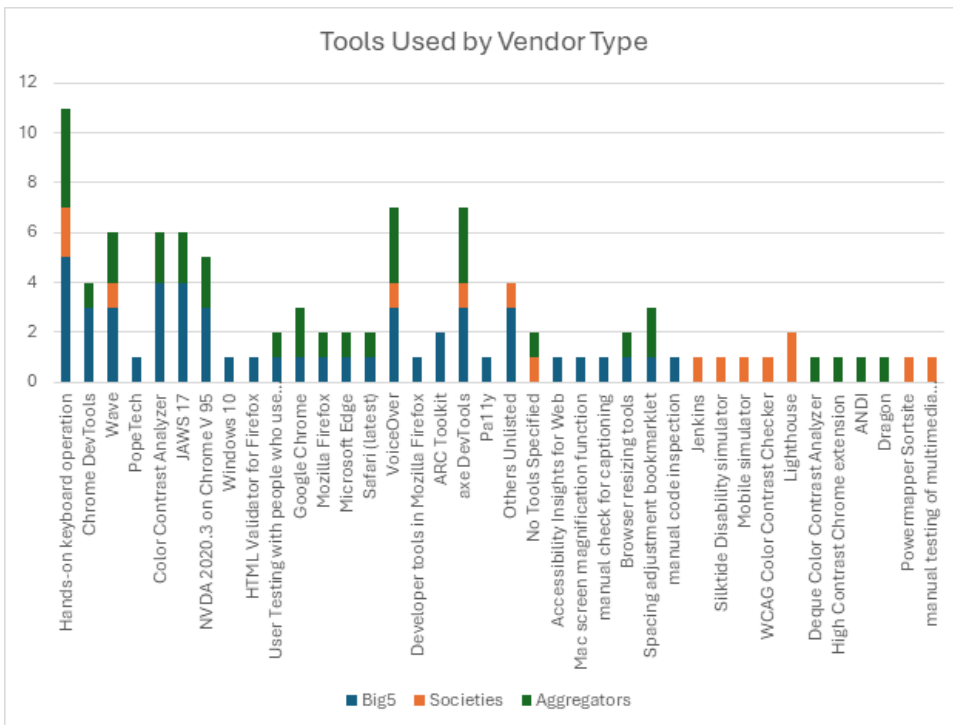
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## Appendix A: Quantitative Results





## Appendix B: Interview Questions

What is your role in supporting e-resources accessibility for your university? How long have you been doing this work? Is this your primary job? If not, how much time on average are you able to put in annually?

What tools do you have access to for the purposes of accessibility auditing? What does your process look like? Do any specific situations stick out to you?

How useful do you find VPATs/ACRs in auditing accessibility? Do you consider them to be a trustworthy source, and, if not, how do you confirm?

Have you found accessibility issues in your review process? How do you resolve those as they come up? What role do vendors have in resolving problems?

What internal or external changes could make the process of accessibility auditing easier?

What haven't we asked you about? Is there anything you would like to add to this discussion?