

Mastering CVAA Compliance

[00:00:00.05] JENA WALLACE: Thank you so much for joining us for today's session on Mastering CVAA Compliance-- Practices for Navigating an Ambiguous Law. This presentation is presented by Hanna Wagner. Today's presentation will cover key topics such as getting started, building a robust compliance process, engaging with the disability community, and developing practical advocacy skills to drive positive change within your organization and industry.

[00:00:28.11] My name is Jena. I'm on the marketing team here at 3Play Media. And I'll be moderating today's session.

[00:00:33.81] Just a quick self-description. I am a white woman in my 30s with light brown hair. And I'm wearing a black sweater and green cat-eye glasses. And with that done, I'd like to introduce today's speaker, Hannah Wagner. I will pass it off to Hannah, who has a wonderful presentation for us today.

[00:00:55.53] HANNAH WAGNER: Thank you so much. Super glad to be here today. Again, I'm Hannah Wagner. My role at General Motors is working on our UX Design System. And I am the CVAA lead. So, essentially, as far as UX goes, that means the vehicle infotainment display system, just to give a little perspective.

[00:01:26.06] I am a white woman in my 30s. I have blonde hair and glasses. And I'm very petite.

[00:01:35.18] But let's get started here. I have an abbreviated agenda here. First, we'll talk very briefly and very high-level of what the CVAA is, in case somebody doesn't know. And then we can go through some best practices as far as getting started, building a process, outreach to the disability community, and advocating for change.

[00:02:06.48] I do want to disclaim, because this deals with the law, I am in no way providing legal advice. I'm not a lawyer. I feel like I have to say that. But these are just some personal insights that I have accumulated during my work on the CVAA.

[00:02:25.12] So what is the CVAA? The CVAA stands for the 21st Century Communications and Video Accessibility Act. It's a mouthful, so that's why we generally just say CVAA. It was enacted in 2010 during the Obama administration. And it requires that communication technologies, televised video, and emergency broadcasts are accessible to people with disabilities.

[00:02:55.95] So let's break that down a little bit. When we say communication technologies, we're really talking about two-way real-time communication. So that would include using your phone to make calls, texting, video conferencing, webinars, in the case that if we're actually talking with each other, not just one way, chat. So even if you're playing your Xbox Live and you're chatting with your teammates on a game, then that counts, too.

[00:03:41.12] And then for the other two parts, video, we're really talking about televised video. Right now, it's not really enforced for online-only video but still, obviously, encouraged. And then emergency broadcasts, so my best example is if you have a tornado in the area and there's an emergency broadcast on your TV or the like, that also needs to be accessible, as well. So those are the three main buckets.

[00:04:15.53] And this law is unique in that it requires outreach to disabled communities. So when you're providing your documentation, you also need to provide documentation that you have outreached to the community. And all of that documentation has to be done annually.

[00:04:40.04] So this is not a one-and-done, did I do it, yes or no? It's something you have to look at every year throughout the year. So, yeah, that's the overview.

[00:04:54.31] When I first got started on the CVAA, my leadership knew that I was really passionate about accessibility. And so they basically gave me this. And I wasn't very excited at first because it wasn't my bread and butter of empathy. It was like, regulations, ugh. [LAUGHS]

[00:05:17.56] So I came into this unsure of what this would be like. And really, the first thing that leadership had said to me was, OK, we want you to go in to talk to our legal group. And we want a definitive checklist of what we need to do to be accessible or to comply.

[00:05:43.67] And it did not work that way. Unlike other accessibility standards, like specifically WCAG-- most of us are familiar with that-- the CVAA doesn't really provide specific instructions on how exactly to achieve that compliance. The standards in WCAG were made so that they are measurable and so that you can go through QA and validate it. The only thing, I think, that's very concretely measurable in this law is providing closed captions in videos. Otherwise, it's very ambiguous.

[00:06:24.47] And what's more, there's a lot of vague wording that really muddies the waters. So one of the things that they talk about in this law is that you must comply if it's achievable. And achievable is defined as "with reasonable effort or expense."

[00:06:48.17] What does that mean? That's very subjective. So this is why talking to a lawyer is so very important for this. But, yeah, it was definitely written in a different way than other laws or standards like WCAG.

[00:07:06.44] So let's go through some best practices for getting started with the CVAA if you're new to it. I want to assure you through a quote by Dr. Martin Luther King, Jr. "You don't have to see the whole staircase, just take the first step."

[00:07:23.85] So it may feel really overwhelming, where you're like, I don't know anything about law. Where do I even start? That's OK. Don't get too hung up on that. Just get started. And on top of that, you want to start immediately. So don't wait until the end of the year to assess your compliance. That can get you into trouble.

[00:07:52.49] You can get to a point where you retroactively find out, oh, I didn't do this thing to make it accessible or the company didn't. And then you're going to have to pull it and not actually put it into production because it's not accessible and you're not compliant. So we don't want that to happen. You don't want to wait till the end of the year.

[00:08:20.73] As I said earlier, it's not a last-minute checkbox. The law was intended to incorporate these CVAA considerations throughout the design process. So that means from research, designing your product, all the way through implementation and validation, you need to be documenting throughout that entire process so that you can show you're considering it throughout. Not just, oh, wait, did we do it, yes or no?

[00:08:54.33] And even if it is late in the year when you're getting started, this is a great time for you to understand the law, talk to your lawyers, audit what features and products you have to see what does or does not apply, and building your process. Secondly, you're really going to want to be a sponge. So when I first started, as I said, in working on the CVAA, I knew a lot about accessibility, but I did not know anything about the CVAA. That was one law that had totally escaped my purview.

[00:09:32.98] So the first thing you should do is actually read the law. I know it's daunting and not exciting and, yeah, not fun. I think it's 27 or 28 pages. But it will help you identify where it does apply or does not apply in your products.

[00:09:57.88] And then it will also help you identify what technical questions you need to ask your lawyers because your lawyers don't know the technical ins and outs of what you're creating. So being able to speak both the legalese and the design, it's a very interesting position to be in.

[00:10:23.21] Or maybe you aren't the representative from the design department. Maybe you're in validation or a business associate that's a part of this. But either way, you should read the law and then study or research industry interpretations of the law from reputable sources.

[00:10:44.84] So, obviously, don't just ask anybody. But it's really helpful to understand what other companies that are similar to you are doing. So if you have digital products, maybe go online and try to understand what other digital companies are doing.

[00:11:01.92] And one of the-- [LAUGHS] funny enough, one of the groups that I used was 3Play Media. I promise, this is not a plug for them. It's the honest truth. I found that they were very-- their articles were very helpful in me really understanding what really does this law mean outside of legalese.

[00:11:25.97] Then you're going to want to talk to your legal counsel. You're going to want to really align yourself to what their perspective is because, often, their perspective is going to probably be different than how you read it. That's, unfortunately, part of just the legal life, is that they are looking at this from a defense standpoint. So it is going to be very different than how you see it if you are a person that's passionate about accessibility. And that's OK. I'll go into a little bit later about why the differing perspectives are actually good.

[00:12:13.85] And then, lastly, you're really going to want to take all of these and understand them in and out. Learn it so you can teach it because, I guarantee, if you're working on the CVAA, nobody else around you is going to have any idea what you're talking about. So you're going to have to teach over and over, what is the CVAA? How does this apply to what we're working on right now? Being well-versed in that is going to really help because-- I mean, even I, who was so interested in accessibility, didn't really know what the CVAA was until I started working on it.

[00:12:57.19] OK, and then, lastly, I think for this grouping, it's really important to compartmentalize. And by that, I mean understand the varying dynamics and perspectives of the CVAA. They are not all one and the same. So Congress's initial intention of the law is going to be different than your company's legal interpretation. And that's going to be different than maybe the business case that you want to bring forward. And that might be different than your personal ethics.

[00:13:31.15] All of these things really need to be understood and bucketed, if possible, so that you can use each of those buckets appropriately. So there is a place for all of these things. You just have to tactically know when to use them. I'll hopefully help with that a little bit later on, when to use which one.

[00:13:57.59] Oh, yes, and then when you're starting out, you're really going to want to find your Goldilocks. Often, very similarly to when I first got asked to do this, my bosses were like, give me a checklist. [LAUGHS] And it's very common, I think, for leaders to think that legal will just be able to give them a checklist. Not just for this law, but a lot of different things.

[00:14:29.74] And, unfortunately, law is very subjective. And it's very rare you get just a plain checklist of things you need to do or not do. WCAG is special like that. So you can't rely on legal to define how you're going to implement those solutions.

[00:14:49.84] And low legal risk doesn't mean you can just rest on your laurels. I've seen situations where a feature has been created, and it complies at the time. And because legal doesn't have a certain amount of insight into the culture of the disability community and technology, it's easy for them to look every year at it and say, oh, yeah, this complies. We're still doing it. We're good.

[00:15:26.98] But technology changes over time. And this law is intended to also change with technology. So you can run into situations where what once worked years ago may not be a solution that's viable today. So you can't just rest on your laurels, as I said. You need to continually really look at what you have and try to improve.

[00:15:57.37] On the total flip-side, I think a lot of people feel like they need to hit a perfect 100% to be compliant. This is not a zero-sum game. It's not a yes or a no exactly. Really, what we're searching for here or what this law is intended to do is continually put us in a mental model of improvement. We want to be showing our work to say, hey, we're incorporating CVAA in our guidelines throughout the whole process so that we can improve year to year.

[00:16:38.11] OK, so now that we've gone through some best practices for getting started, let's talk about building your process. One really important thing is just identifying what applies. So if you're just starting, first, do an audit of your products and features. If you're not just starting, then it's still good to do a yearly audit of your products and features.

[00:17:04.54] Build CVAA checkpoints early into your portfolio process. So if you have a lot of features coming in or a lot of products coming in, make sure that-- let's say if there's a kickoff meeting, make sure that that's a part of that first kickoff meeting so that everybody who's there who is working on that project knows that it's a consideration that needs to be a part of that entire process. If you start early, you're going to be miles ahead.

[00:17:35.20] And you also are going to have to teach everyone to be able to identify and understand the basics of CVAA. If I were expected-- and I think I kind of was at the beginning-- expected to be able to decipher through all of GM's products and features to say, yes, this applies; no, this doesn't; and just be cognizant of everything that's happening, that's not feasible. So the more we can teach everyone to be able to identify at least and maybe have a basic understanding, then people can come to me and be like, hey, I think this might apply. What do you think?

[00:18:20.09] And, really, designers can't incorporate inclusive design practices without knowing about it in the first place. So if you're just validating, you're not including the design or the research in your process. And it really takes a village, as I said, to make sure that you don't let anything slip through the cracks. And at the end of the day, accessibility is everyone's responsibility.

[00:18:52.35] So when we're building a task force, it's not a one-person job, as I had said. There's way too many pieces to this. There's different departments trying to work together. So quite often, it's point persons from each department working together to ensure that this is all accomplished by the end of the year.

[00:19:22.91] You don't necessarily have to have a whole full-time team dedicated to this. I know I work on it currently only part-time. So that is one way of doing it.

[00:19:41.76] But if you do give these part-time work on this, make sure that those individuals have scoped time to work on this. If you just pile it on of all of their other responsibilities without scoping for it, you're going to drift over into the bare minimum bucket. And that's not your Goldilocks. So you want to make sure that there's ample scoping for this.

[00:20:17.35] And then if you can, when you're picking people for each department, if you're a people leader, if you can pick passionate people, that, again, will prevent you from drifting over into that bare minimum bucket. You want to make sure that people who really care about this are going to push it forward, if possible. Sometimes it's not always possible.

[00:20:47.43] And then you're going to need to meet cross-functionally throughout the year. For us, it fluctuates a lot. We might meet a lot in the beginning of the year and then maybe in the fall a lot.

[00:21:01.95] And to go off of that, I have a timeline here that I will describe, how our group does it. It's very flexible. So this is not by any means precise, but it gives you an idea of how I've blocked this out for my department.

[00:21:25.15] So Q1 for us, we do prepping documentation for last year's certification. Usually, I think, certification is due in March for the previous year. So that gives you a little bit of time to get your ducks in order and make sure you have everything set. During that Q1 time, I also like to try to do some education with teammates. Refresh people's memories, this is something we need to look for in our features next year.

[00:21:57.99] And then for Q2, we tend to do design auditing. So that's where we really see if there's any big differences between last year and this year. Are there any big features that are coming in? This is when we'll do that and review with legal to make sure that we're covering everything.

[00:22:22.95] So, obviously, there's going to be design features that happen not just in Q2. It's a whole throughout-the-year process. That's fine. And we can add, as needed. But it's really great to have that first main chunk done by Q3 because that allows us to hand off our design documentation to validation or any other departments that need it.

[00:23:00.51] The other thing in Q2 is we start outreach planning. So that's something that we have to do. It tends to take more time to get organized for outreach. So we start a little early.

[00:23:15.92] And then Q3 and Q4, we do our outreach. Q3, we collect and hand off our-- well, the design documentation over to validation and the other departments. And then Q4, we're collecting our validation documentation and basically getting things prepared so that we can get our certification in the spring. And then it all starts over again.

[00:23:45.54] So let's move to some best practices for outreach. I know I skipped over what outreach is, so I want to take a little bit of time to define what that is a little bit more. So outreach is your best opportunity to determine how you can comply.

[00:24:03.00] So remember I said legal can't really tell you how you need to comply. Outreach is really going to tell you how. So it's crucial. Not only just required, but crucial. And records must be maintained of your efforts to consult with individuals with disabilities in the design process.

[00:24:28.14] So possible methods of outreach can include conferences that deal with the CVAA, user research, talking to consultancies, talking to other companies in your industry to see, what are their standards? What are they doing? All of these things are different ways we can achieve that outreach requirement.

[00:24:59.62] So this is really important. Compliance does not mean it's a good or accessible product. So you can have legal say, yep, you're providing this feature, so it's compliant. But you may do some outreach, let's say some user testing, and you may find that people with disabilities can't actually use your product because you needed to put that into your entire design process.

That's a part of making a product viable, is that QA, user testing, and validation to ensure that it actually works for the people you need to create it for. [LAUGHS]

[00:25:50.72] And I do want to note that it is possible to be frugal and effective. You don't necessarily have to pay tons of money to do this. You can be resourceful. But I do want to specify that if you really aren't learning anything in your outreach, it's not effective.

[00:26:14.72] You're better spending your time and money doing some other form of outreach. And by that, I mean, like, let's say you are going to conferences, and you're talking to some industry, similar other companies, and you aren't really learning much. You aren't really figuring out how to improve your products. That's a good sign that you need to re-evaluate what you're doing.

[00:26:46.46] And then if you do do user testing, I always feel like I have to mention this, but make sure you're reimbursing people with disabilities for their time and effort. It's just like any other kind of user testing. We want to make sure we're equitable.

[00:27:05.63] And then, lastly, when you're doing outreach, no matter what kind, you're going to want to make sure the designers and decision-makers and really anybody who's involved with the CVAA, make sure that they understand what you have learned. Otherwise, they can't improve their products. And that defeats the whole purpose. So we really need to make sure that we're voicing what we've learned throughout the company so that we can get better.

[00:27:38.00] All right, so our last group is best practices for advocating for change. I get questions on this a lot. I'm going to-- there. And it can be really difficult to advocate for change.

[00:27:55.14] One of the most effective ways I think that I have come across-- and this is still something that I'm learning. I think it's a skill. So it's something that I'm still learning, but I will share with you today.

[00:28:13.65] Remember when I mentioned you need to compartmentalize all those different perspectives? For this purpose, I'm going to call them logic strategies. So when you're trying to advocate for change, you're going to want to use those buckets at the right time. So I created a little list of good opportunities to use each of those buckets that I've talked about today.

[00:28:44.80] So, for example, outreach results can be super effective when you're trying to communicate to leadership what the barrier is that your customers are facing and how it impacts disabled users. Also, it really makes accessibility relatable, relevant, and human to decision-makers.

[00:29:09.55] I think it's very easy to get sucked into numbers and think there's not many people with disabilities. It's an edge case. We don't need to focus on this. It's not a priority. If you make it really relatable, relevant, and human, then it's harder to do that. So your outreach can be a super valuable tool.

[00:29:33.54] The legal perspectives can be useful when you're trying to determine those Goldilocks objectives. Your legal team will help you define, OK, what's the bare minimum, and what may be going beyond what we're capable of doing or beyond what is necessary? So you can find that middle ground of improvement. It can also help temper high or low expectations that you may get from leadership or anybody, really. It's a really good tool to find that middle ground.

[00:30:17.34] Business cases are great for when legal may determine a solution isn't a must to comply, but you still know it's the right thing to do or it's profitable to do, or a million other reasons. That's the point where you build a business case. It may still be a great thing to do, but legal won't necessarily be able to push for it at that point.

[00:30:51.62] I often think that people don't think the personal ethics are very important because it's feelings and morals and that kind of wishy-washy area. So often, I think people shy away from that area or that bucket. But personal ethics can be particularly useful when you're trying to create an inclusive culture at work and spreading your passion to others.

[00:31:27.09] So if you're passionate and you're excited about something, more likely, others are going to be interested, too. So you really can use your personal ethics. You just have to use it in the right way and the right situation.

[00:31:41.63] And then, lastly, we have Congress's intention. So when they created that law originally, they intended for the technology, as it changes through time, to continue to be accessible through those changes. So it's not just if we're expanding what communication between two people means digitally, that should be included. That's the intention, anyway.

[00:32:17.04] So this will really help you envision the future of your products. You'll get to assess, like, are we headed in the right direction? Are we considering all of these things into our work as we move to the future?

[00:32:34.42] And then, also, it'll ensure what you're doing right now or what you've done in the past is on the right track. So are you implementing considerations throughout your entire design process? If not, OK, you can identify some areas maybe you want to improve.

[00:32:55.27] And then, I think this is lastly, changing stubborn biases. I also get asked about this a lot. Certainly within the vehicle or automotive industry, there definitely are some biases that I have faced and others have faced. But you may find that you have pushback from your industry, from your company, from individuals within the company.

[00:33:25.51] And my best suggestions would be to figure out what motivates that person or group. So if they're data-driven, maybe you want to go with something like the data side of outreach. Or if they're more of an emotional person, you might want to ensure that you're infusing your personal ethics in there.

[00:33:50.35] There's an unlimited combination of different ways you can use those tools. And no matter what tools you're using, you're going to want to make sure you have some concrete data and some humanization. That's my secret sauce, at least.

[00:34:12.77] As much as I think a lot of us who are passionate about accessibility, we want to just fight for what's right. And it's a difficult thing, but we need to know what hills to die on. Sometimes it behooves us to let something go. And perhaps in the future, we'll have that opportunity to tackle it. Maybe it's not a now thing.

[00:34:45.81] It's a very difficult skill, but it's a necessary one. Otherwise, we will get burnt out. And we can't have that happen. We need all of us. All right, I think that's it. I am super excited that you guys spent time with me today. And I would love to answer some questions.

[00:35:08.55] JENA WALLACE: Yeah, thanks so much, Hannah. That was a great presentation. We do have quite a few questions popping up. So we'll just go ahead and dive in and get started.

[00:35:18.73] So up first, we have a comment from someone. One of the biggest issues we've run into is getting feedback from the disabled community. Any tips on that would be great.

[00:35:30.18] HANNAH WAGNER: Yeah, it is a tough one. It depends on your business. If you have, let's say, user testing that you're able to do, it's a hard road. I've had to fight for that a lot. And sometimes, it's useful to slowly and painstakingly build a community of people that you can use as panel participants.

[00:36:06.61] Often, if you reach out to organizations that work with people with disabilities, there's a lot of information you can get from them. And sometimes they're willing to work with you, as far as user testing. One thing I will say, the disability community is so ready to give them your-- give you their opinion. So I think once you can break that first barrier, if you will, you'll find that there are people who are interested in doing this. And, yeah, definitely talk with organizations.

[00:36:49.34] And then talk with whoever you're doing user testing with. So let's say you use [usertesting.com](https://www.usertesting.com). You work with them. Some of these groups already have-- they're already building pools. So talk to them. See if they have a pool already.

[00:37:10.52] That's hopefully a good way to get started. I'm very partial to user testing, of course, as a designer. But there's many other ways to do it, as well.

[00:37:22.04] JENA WALLACE: Kind of piggybacking off of that-- and I know there's a lot of people adding some really helpful comments about finding people with disabilities to test-- is there any places or resources you would recommend for actually finding those testers, assuming that you are going through with paid testing and whatnot?

[00:37:43.93] HANNAH WAGNER: I mean, I feel like my answer is going to be similar or the same. Talk to organizations that have to do with the disabilities you're trying to work with. So

what is it? The National Federation of the Blind might be a good one, or, let's see, The Council-- oh, I forget what it is. [LAUGHS]

[00:38:16.35] There's many of them out there. There's some that are specific to states, as well. So if you need people to come in and actually be present in your user testing, maybe look at more local organizations. And then if you're doing more quantitative research and it's remote, then you can go to those big organizations, national organizations.

[00:38:45.10] JENA WALLACE: Cool, thank you. So our next question, someone notes that as a person with a physical disability themselves, any idea why the CVAA was written without those specific instructions?

[00:39:03.70] HANNAH WAGNER: That's a very good question. I really hesitate to try to speak for what Congress is thinking. But I think my best guess would be that if you're working on two-way conversation, I think it tends to be-- it's not exclusively, but tends to be more often about blindness or deafness or those sorts of sensory disabilities. Again, that's not totally true across the board. But that's my guess as why they might have gone that route.

[00:39:55.88] JENA WALLACE: Yeah, definitely hard to speak for the lawmakers. Especially since the CVAA was-- I believe 2010 is when it went into effect, so it's been a while. A lot of things have changed since then. But I think you answered that very well with the limited information you have into lawmakers' brains.

[00:40:19.25] HANNAH WAGNER: Thank you.

[00:40:20.33] JENA WALLACE: Our next question, in regards to documenting your company's outreach to the disabled community, is there a best practice on the type of documentation to use and storage? For example, can we simply use a Google Doc that explains what we did at a specific date or time?

[00:40:42.18] HANNAH WAGNER: So I think this is where we start to get into the territory of you probably want to consult your lawyer. They will tell you probably what the best thing to do is. I think it's probably-- again, I am not a lawyer.

[00:41:00.52] I want to make sure that people understand you can't just take my word for it. But I think having a document where you list what you've done and when is probably enough. Yeah, it's kind of murky waters there.

[00:41:22.84] JENA WALLACE: Yeah, unfortunately, I think, as the title of this presentation is, this is an ambiguous law. So some of the answers are kind of ambiguous. But we do the best we can. Our next question, have there been any significant lawsuits that are a direct result of the CVAA and can be useful for pushing that legal argument for compliance?

[00:41:49.91] HANNAH WAGNER: Yes, absolutely. And, in fact, if you just do a google search, you will find at least five, I think. So I think one of the-- the problem is, is that I start to

have WCAG and CVAA flow in together when it comes to lawsuits because often it has to do with-- lately, it's been online lawsuits.

[00:42:20.73] So forgive me if I'm speaking about any WCAG ones instead of CVAA. But, yeah, there's definitely some websites that have gotten into trouble. Let me think. I know Domino's has gotten into trouble here in Michigan.

[00:42:42.99] And, hmm, I'm trying to think if there's any other really obvious examples I can give. I think Target had some lawsuits recently, as well. But, yeah, this should be-- that kind of information should be pretty available on the internet.

[00:43:09.77] JENA WALLACE: Well, thank you. We're just getting questions in as you're speaking. So give me just a moment here.

[00:43:15.68] HANNAH WAGNER: Yeah, no worries.

[00:43:16.85] JENA WALLACE: What type of automotive products and features are impacted by this law?

[00:43:22.40] HANNAH WAGNER: That's a great question.

[00:43:24.20] JENA WALLACE: Yeah, they mentioned drivers must pass an eye exam. Are we talking about just the entertainment systems? What are we talking about here with automotive?

[00:43:32.09] HANNAH WAGNER: Yeah, so for the automotive industry, it tends to be-- again, a lot of this really has to do with communication. So for GM, we have OnStar. That involves two-way real-time communication. So we have to make sure that that complies. Any time, for any vehicle, whether it's GM or not, you have, let's say, texting or voice calls, things like that, that counts. So we have to ensure that we have ways to make it more accessible for everybody.

[00:44:15.19] JENA WALLACE: Cool. So moving right along, so earlier on in the presentation, you mentioned that just getting started when it comes to accessibility is the most important part. And how do you prioritize what part of the CVAA to start with when you're just getting started? I know you could just start anywhere. But I guess, in your shoes, where would you start?

[00:44:44.39] HANNAH WAGNER: So, let's see, where did I start? [LAUGHS] After learning what it even was, I did an audit of all of our department's features and products to understand, OK, what even applies here? And then it's really about prioritizing. OK, is there anything that's new or maybe not going to be compliant anymore because things have changed?

[00:45:16.21] Those are the things you want to start with immediately because you only have a year to comply. So, yeah, I mean, really doing that audit will help you figure out where you prioritize-- or where your priorities lie.

[00:45:36.42] JENA WALLACE: Agreed. Moving right along. Next question.

[00:45:41.83] HANNAH WAGNER: So many questions. I love it.

[00:45:43.38] JENA WALLACE: I know, this is a very, very lively chat. And they're really great questions.

[00:45:47.37] HANNAH WAGNER: Oh, good.

[00:45:49.41] JENA WALLACE: I have read through much CVAA documentation. I always get confused, and if there's an official form or such we must fill out and provide the FCC? If so, can we share that link?

[00:46:04.74] HANNAH WAGNER: It's funny that this-- I'm laughing because this is a question that we are always asking, as well. [LAUGHS] You're going to have to ask your lawyer for certain. But from what I understand, I believe there's-- somebody high up needs to sign off and say, like, we have done all these things, attest that we are compliant.

[00:46:33.97] And I think that's what you put in, along with your documentation, as your certification. But, again, don't quote me on that part. That's our legal department's area. But I believe that's what you're supposed to do. [LAUGHS]

[00:46:58.52] JENA WALLACE: I'll just quickly share a comment that just came in from Julia in the chat. It's comforting that you're laughing because it shows we're not the only one confused.

[00:47:06.56] [LAUGHTER]

[00:47:09.08] HANNAH WAGNER: Yeah, I mean, that's the main thing that I wanted to put out here, is this is ambiguous. And even GM is still trying to constantly make sure that we're doing the right thing. It's not an exact science.

[00:47:26.72] JENA WALLACE: Yeah, for sure. Our next question we have, do you have any recommendations to help organizations get away from thinking of accessibility as a legal requirement and, instead, something that's valuable and important to the brand?

[00:47:45.57] HANNAH WAGNER: Man, especially in this climate right now, it's really difficult because I know a lot of companies are pulling back on extra things that they're doing. So it can be really tough, especially now.

[00:48:03.77] I think that is where the business case mindset really is helpful. So if you can pull data saying like, hey, our users really want these accessibility features. Or let's say you have an app, and you pull research that says it's like 50% of phone users use accessibility features. So it's not just people with disabilities that are using these features. It's a lot of people.

[00:48:42.39] So if you can communicate that these edge-case solutions really help everybody, then I think that can sometimes get through. You have to know who you're talking to. But I would definitely say pull together a business case.

[00:49:03.10] Try to get some-- if it's like trying to get stakeholders interested, often what they're really interested in is, how do we further our business? So that business case bucket might be particularly helpful.

[00:49:25.82] JENA WALLACE: So kind of on this legal topic, let's see, when it comes to working with your organization's legal team, how do you foster a collaborative working relationship that's prioritizing your authentic commitment to accessibility while meeting their compliance and risk concerns and all of the boxes that they're trying to check?

[00:49:54.90] HANNAH WAGNER: Yeah, this is an excellent question. I will be a little bit vulnerable right now and say, I went in talking to the lawyers ready to make a difference. And I thought it would be-- I had read the law, so I had my own interpretation in my head of what it meant.

[00:50:17.02] So I thought we were going to really go hard at accessibility. And I was met with resistance from the legal team, obviously, for good reason. They're looking at it from a different perspective.

[00:50:36.35] I think in this instance, again, it's really important to compartmentalize. So if you have those personal convictions and ethics that you really feel strongly about, maybe that's not what you use as a tactic in your legal discussions. So being able to decide when you're going to use which of those buckets is really important.

[00:51:03.57] So if you can put on your legal hat and then understand what the requirements are, then maybe then you'd be able to take your business case to leadership and say, hey, this is why I think we need to do this. This is what legal says. They say we can do this other thing, and it's fine. But this is what's going to make our company even better. So it's really about the fine-tuning of what arguments you use and where.

[00:51:38.42] JENA WALLACE: Yeah, definitely, I agree. It's a messaging thing. It's finding the best messaging that's going to work for your audience. So in terms of training and awareness programs, what approaches have you found most effective in educating diverse teams on the nuances of accessibility, considering all these different roles and responsibilities?

[00:52:07.13] HANNAH WAGNER: That's something I'm still actually working on. It's constantly evolving at this point. Luckily, my role in the CVAA is pretty focused.

[00:52:24.03] So just to be clear, I work on the outreach for GM. And then I also do the UX part, so the design part. And so, really, when I'm teaching others, it's often my team.

[00:52:44.08] So I know their language. I have done lunch and learns, and have had meetings about it, presentations. I've taken it under my own wing for now, but ideally, we would have actually structured classes you could go through. But as we all know, this is always-- there's always room for improvement and changes in accessibility.

[00:53:20.33] JENA WALLACE: Definitely. And I'll just point out, if you are an attendee and you haven't been keeping up with the chat, there's a lot of great information being presented in there and helping to back up everything that you're saying, Hannah.

[00:53:35.49] HANNAH WAGNER: I love it.

[00:53:35.60] JENA WALLACE: So I highly encourage everyone to read through and take a look at the resources being shared. They're really great. So our next question, specifically for larger organizations, what governance structures or frameworks have you found effective in ensuring sustained commitment to accessibility at all levels? And how do you adapt these to evolving organizational structures, particularly when there is an economic downturn and accessibility isn't being prioritized?

[00:54:11.99] HANNAH WAGNER: Let me voice this back to make sure I understand the question. So what structures within a company can you have to ensure that the processes are being met, especially during times when things are shaky? Is that where we're going?

[00:54:32.22] JENA WALLACE: Yes.

[00:54:32.49] HANNAH WAGNER: OK. This is something that I've also been working on, as well. A couple of years ago, I started on the CVAA, and so this has been a huge learning curve. And I think for us, it has been more of a grassroots effort as far as the government side because we have the technical knowledge, so we know what-- we know what needs to be documented, kind of. So we have been setting up these structures and figuring out what works and what doesn't work.

[00:55:29.28] I don't think it's really been as much of a top-down effort, other than top-down saying, hey, we need to comply to the CVAA. I think a lot of it has been trial and error on our part, working with legal to understand what the needs are, and then building our own processes to reflect that. I wish there was more support top down.

[00:55:58.50] Unfortunately, like you guys said, priorities change within a business. Sometimes it's like you get quite a bit of funding, and things are going really smoothly. And then there's other years where there's a big reorganization, or lots of people maybe get let go.

[00:56:18.77] And then you have a whole new bunch of representatives of the different departments working on CVAA. And you're like, nobody knows what's happening. There's so many different scenarios of what could be happening.

[00:56:31.95] But I really suggest, if you're trying to figure it out, I would say just get started and see what the needs are. If validation is feeling unsure about what even the needs are, OK, then maybe look at your documentation and design and see, are you clear enough? Hopefully that's a good answer. [LAUGHS]

[00:56:57.81] JENA WALLACE: I think that's great. And that's a great way to end because we are just at time. So I just want to thank you, Hannah, so much for today's presentation. I also

want to thank our ASL interpreter and to our very own 3Play captioner for making this session accessible today.

[00:57:15.78] And thank you, everyone, so much for joining us, asking great questions, sharing great resources. That's what we love to see in our webinars. And, yeah, that's it. Thanks again, everyone. I hope you have a great rest of your day. Thanks, Hannah.

[00:57:32.22] HANNAH WAGNER: Thank you.