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MEET THE CORPORATE PARTNER WEBINAR – PROCURE ACCESS BUILDING BLOCKS FIRESIDE CHAT SERIES: DEFINE REQUIREMENTS FOR NEW AND RENEWED PURCHASES & LICENSES

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>> MONICA ACKERMAN: So, that's the presentation portion of this. And now I would like to welcome Gautam Rao from Ernst & Young. And we are going to hear from him, a leader, how he has implemented this building block and other building blocks in his organizations.

>> OPERATOR: Recording in progress.

>> MONICA ACKERMAN: Welcome.

>> GAUTAM RAO: Happy to be here, nice to see you, Monica.

>> MONICA ACKERMAN: First, tell us about Ernst & Young and your roll there.

>> GAUTAM RAO: Sure, Ernst & Young is a very large professional organization. So I'm the head of accessibility, I'm responsible for accessibility center of excellence. And, you know, I provide services for both internal clients as well as external engagements. And we have been on this accessibility journey for about 7 to 8 years. And on the procurement accessibility journey for about 5 to 6 years. And the set of slides you showed were great. I wish I had them when I started the journey, but, you know, I'm happy to share how the idea of information translates into the real‑world scenario because there are some ways you need to tailor certain things according to how your company runs.

>> MONICA ACKERMAN: Absolutely. So around that, before specifically talking about accessible procurement, I find it helpful to set the context for how procurement is managed in your organization generally.   
 So how is software procurement done there? Is it centralized? Does each line of business do their own procurement?

>> GAUTAM RAO: So it is a combination. So we have 400,000 people. And our procurement function itself is close to a thousand people. So there's a global procurement function which, you know, procures for all 150 member firms, and then there's local procurement teams as well. So they do just for that country. So it's a combination. So we obviously tackle the larger piece which is the global procurement function. And, again, so if you look at it from progression point of view, we first tackle the largest volume products and then kind of progressively brought our thresholds down so we cover more and more now. So I think it's important to recognize you have to start somewhere and obviously you look at the sweet spots which gives the highest value.

>> MONICA ACKERMAN: That's an enormous organization, that's a lot of procurement that you're trying to influence to make sure it's accessible. And so how do you define requirements? Based on a standard or regulation or both?

>> GAUTAM RAO: Correct. So in our global Digital Accessibility Policy we mandate it as WCAG 2.1 AA now that 2.2 is out. So it specifies the type of functions that need to kind of leverage that into their process. So policy is fairly simple but then we have these supporting documentation based on audience. So in our policy we do procurement, we do web development, we do call out other digital and content teams. It applies to all of you. To help figure out how to include that in your process we provide supporting documentation. We have supporting documentation for procurement teams on what they need to do. Like you mentioned in your slide, sometimes it's an RFP, statements it's a product selection process, sometimes it's a single source, you know what you're going to buy. So depending on these different things, you need to ask different questions, collect different information, and assess it and track it uniformly.  
 So we have all that documented separated and we kind of deliver training on an ongoing basis to procurement teams, as well.

>> MONICA ACKERMAN: And these requirements, so you've mentioned you've got separate documentation depending on the type of procurement or the procurement team that's working.  
 Are these also embedded in some sort of a procurement workflow tool? How do you spread the word and ensure that it gets out to everybody?

>> GAUTAM RAO: Yeah, that's interesting. So yes, we just implemented a procurement tool which will make it easier for everybody to, you know, make it's part of the process. In fact they cannot skip it.   
 But so far the first several years we did do it in a manual basis and we picked the highest, you know, dollar value and the highest user base procurement teams to kind of train them and get it started. So we actually started with a very high threshold. Anything more than $5 million, anything more than 25,000 user base is all we are going to look at how much even that was pretty big for large company. Then progressively brought it down 2.5 million and 10,000 users. And then now once the new system rolls out it will be universal so everything will go to the process and it's a questionnaire. Unless they answer those questions or have the vendor answer the questions on accessibility it doesn't go further in the process so that's going to make a difference.

>> MONICA ACKERMAN: It's a gated process. Who manages the gates? It's easy ‑‑ it's not easy but it's easy enough to put in a requirement but it's the governance with where the real thought and work takes place.

>> GAUTAM RAO: So it is my team, the accessibility center of excellence team. The new system is being rolled out and we have to see how that goes and we may to have do some tweaks. In the past it was my team that would actually collect, you know, the collection is done by the procurement team of the VPAT so then we would assess it and give it a score. And during a product selection process we typically give a score of 100 for A, B, and C. So of hundred total points possible, give of those points were given to accessibility. We have to be pragmatic and realize that we can just say no to a product because it's inaccessible. We still want to fact that into the process but that's not the only decision because product functionality, information security, what business needs are, user requirement, all that kind of stuff, needs to factor in.  
 So 5% of the score is accessibility. Everything else being equal, the more accessible product will be purchased. So that assessments based on VPAT was done. And for very large products we would do the testing but in most cases we would actually take what was given in the VPAT and use that to give a score from 0 to 5. And I completely agree sometimes when you see VPATs is suspicious and the comments column is blank so yes we do some follow‑ups there. And in addition to VPATs we also collect some of the metrics. So we ask them questions, how have you integrated accessibility in your process? And give at least a one paragraph response on how you hope to achieve 2.1 AA. And also for some vendors which are not too keen we also have wording ready where it says that, you know, looks like you're not, you know, considering accessibility seriously, you know. We have it in our policy. And, you know, we will look at alternate products. And if we find something that is more accessible, we will move to that. So that's clearly also available as a written statement to send to the vendor if they kind of don't respond.

>> MONICA ACKERMAN: The volume is still pretty high. So our automating part of the work. I'm super interested, so you said your accessibility COE, you review them. What does that look like? What kind of volume hits you and how do you manage that?

>> GAUTAM RAO: Correct. So, you know, this past year ‑‑ so I think we were at the cusp of something really big. But the last year or so the volumes would have been, you know, 100, 200. Of the thousands that we procure. Because that's the threshold.  
 Now it's going to be a new world so we will see how that goes but we may have to start training some of the procurement people to do some initial assessment or ‑‑ yeah. And then come back to us if they have questions.  
 And we probably audit their work to see if what they answered was correct or not.

>> MONICA ACKERMAN: That's great. So you started small, iterated, took your lessons, your learning. Sounds like you're still taking that approach as you're scaling out your procurement program.

>> GAUTAM RAO: Correct. Absolutely. I mean, I think some of these larger companies order products and we all know them and we can't give any names. We do testing even after we bought them. So if you onboarded them because feature‑wise we do need them but then we continuously test them for all their different modules and submit, you know, changes, bugs, based on a priority basis to them. And we also try to maintain relationships with their heads of accessibility because it's a small community and trying to get that elevated. Then they can go to their stakeholders saying these companies are coming to us with their bugs and we fix it so we kind of help each other out.

>> MONICA ACKERMAN: That's amazing. It's one of the connector pieces that Disability:IN can provide, too. Many big companies, we are small groups of people and we are trying to advance that change.   
 Do you ever hear from vendors: But nobody else has asked for this?

>> GAUTAM RAO: Yeah, correct.

>> MONICA ACKERMAN: We hear that, too. Our partnerships here in Canada, our banks, will sometimes get together and say, well this vendor has come forward and said nobody else is asking for accessibility requirements and it's how we come together as a community and really that power of community, the power of larger groups coming forward and saying: Well, actually many of us are looking forward. And if you want to be competitive, then come and meet our needs.  
 As you're going through this process, another thing that strikes me is how do you articulate risk to your business partners? Part of it is procurement but business as you mentioned, 5% is accessibility, the other 95% are functional requirements of security.   
 How do you have those conversations with your business partners on the importance of accessibility and the decision you're asking them to make?

>> GAUTAM RAO: Correct. Yeah. So for us being a professional service first formed there are actually two angles to it. So one is using these products in house for employees. And then second is using these products to deliver services to our clients.   
 So yeah, I mean, you know, if a product is already purchased and we have the VPATs and stuff, we know how good or bad it is and we are trying to have the vendor improve it.   
 But yeah. So to our business stakeholders we make it clear, so this is where they are and, you know, and we try to simplify to them and give them a score of 0 to 100. So this is probably a fail or this is okay or, you know, this is 60%. But then when we deliver services to our clients, at that time we take the VPAT that the provider or vendor has and then submit it to the client. And our client would have to kind of decide whether they want to go with it or not. So, for example, we provide services to many banks. And the bank will have a requirement: You must meet WCAG. But we say we are using this product and this product has this thing so then it's up to the client if they don't want to go ahead with us and another company has a better offering with more accessible products, it's their call.  
 But we try to be transparent and be up front and say this is our policy, we want to get there but this is what we have.

>> MONICA ACKERMAN: Great.

>> GAUTAM RAO: Correct. And we also have ‑‑ we are very clear about this accommodation piece. So in some cases if it's not feasible to completely do this stuff, we have accommodation, we know it's not an ideal solution, but it addresses the immediate gap. Somebody is the client, can't do this task and we can call this person or this number and we will help through a screen share session help. It's not always ideal but it's something. And we have it internally, as well.

>> MONICA ACKERMAN: But it does speak to having a broader accessibility program.   
 So from your COE perhaps could you share a little bit about your role in creating these enterprise programs and policies and kind of end to end it sounds like you start a procurement, work at testing, follow through to the end and accommodate.

>> GAUTAM RAO: Correct. And as of now we are just still talking about SaaS products which we bought from a vendor but actually the bigger portion of our software or web development happens in house. So and we actually either build it ourselves with our employees or we have vendors build it for us. So that's a different ball game. In some ways it's simpler because in our contract template we put in a line saying to the vendor that whatever you build for us must meet 2.1 AA and if they don't then we can take legal recourse. We can have them redo it for us or there's punitive damage, that kind of stuff. Sometimes we procure resources or people from these vendors and have them build stuff for us. There's a clear statement that says you will provide us people trained in accessibility, expert developer or tester. And if they're not trained enough, skilled enough, then we will ask for a replacement.  
 So all that is clearly worded.  
 But in terms of an overall program, we have a big training component so we have training for internal developers, designers, testers. And we say this is the training we use. If you want, you can train them using that or you can use some other thing. But then you must be experts in WCAG. And in our own methodology we have changed how we, you know, do sprints and put accessibility in criteria.  
 So through every sprint it's built correctly so it comes out accessible. That's the methodological piece, procurement piece. And yeah. So we try to embed it in as many ways as possible and keep trying to educate.

>> MONICA ACKERMAN: And it's really interesting that you're expecting your vendors to train their own staff.

>> GAUTAM RAO: M‑hmm.

>> MONICA ACKERMAN: That's a really important piece is to skill accessibility out is that understanding.  
 I'm also interested in a little bit more about the governance. You do mention that you track and you follow. What does that look like? Is it on a quarterly basis? Ad hoc?

>> GAUTAM RAO: So that depends. Correct. So, again, so we have about maybe five ‑‑ yeah, maybe 5,000 assets which may behalf are bought and half you are built by us. We are embedded, my center of excellence team is embedded so it's concept design built accessible. We are already at AA for that. In some cases the teams are knowledgeable enough that sometimes we have ‑‑ we can roll off because they know what to do.  
 So at high level there's a P one, P two, P three priority kind of products. The P‑1s are embedded. ‑‑ priority two are baseline audits, we can give them a high‑level roadmap. And we try to do it every, you know, quarter or at least once in six months go back to them and say, hey, did you make progress or not? And for the last one the P‑3 we have a lot of them smaller ones so we do something called an accessibility basic check and we say, you know, here is the bare minimum, you have to get this done immediately. And get to AA in a reasonable time frame.  
 And then so that is a different approach there. So those are the three kind of approaches we have.

>> MONICA ACKERMAN: And that's with what you're building and also with what you're procuring?

>> GAUTAM RAO: Most of it with rebuilding. With procuring ‑‑ yeah. I think P 1, 2 and 3 concept is there in what we procure, yeah, I guess so, yeah.

>> MONICA ACKERMAN: Everyone is on a journey, everybody is learning on the way. So we learn ‑‑ so far we are hearing about what worked. What about what didn't work? Is there any advice you would have to somebody that is starting or midway for what you learned?

>> GAUTAM RAO: Yeah, I mean, I think the more support you get, the better. And it is not just, you know, again, all companies are different, but the more functions you get involved, the better.   
 So if you get legal compliance involved and make them aware that ADA in the U.S. and Canada is here or in Europe, every country actually has anti‑disability laws. So you can get into legal trouble. So getting them on board and then getting the, you know, brand and marketing people on board saying this could hurt your brand. You may be able to settle with $25,000 but the hit to the brand is bigger so that can get attention.  
 And then from an HR perspective, do you really want to be the firm where employees can't do their best? From a talent and HR perspective that angle is there. The biggest lift to our organization is IT. So luckily we have chief information officer and chief technology officer who are completely on board. When I presented my roadmap they said can you get there faster. I think getting that C suite level of support is useful. Keep, you know, telling them how important it is.   
 And also to make it clear that to get started is not that difficult. You can pick some high‑value targets, high numbers, get started and then create a play book. I think that's one thing that everybody can do.

>> MONICA ACKERMAN: So what is your play book?

>> GAUTAM RAO: (Chuckles). No, I mean, I think I've covered most of it. So yeah, get your support, educate people. You know, make sure your standards are clear to everybody embedded in the process so it doesn't fall through the cracks. We completely did our methodologies. Training is one thing they understand but they don't know where and when to use their training. And you need to give them some time to, you know, even start using an upskill so it becomes business as usual. I think there's no silver bullet. Just get started and let people do their thing.

>> MONICA ACKERMAN: Yeah, I love that. That's ‑‑ what is it, progress over perfection.

>> GAUTAM RAO: Correct. Exactly.

>> MONICA ACKERMAN: Learn along the way. I had another question about what you're hearing from companies. So we are talking mostly about the maturity of the procurement process within our organizations. What about the maturity of the companies that are wanting to sell to you? Are you seeing that people are understanding accessibility? Are they selling accessibility? Or do they still come to you that it's accessible 24 hours a day, seven days a week.

>> GAUTAM RAO: Yeah, I mean, I think accessibility as a term is often misused. So access, too, is confused with accessibility many times. And like you said, sometimes VPATs will be like yes we are accessible, they just give a yes/no answer. Yes we are accessible. So those tend to be the smaller vendors. And we have some niche products, you know, that we do need and yeah it's a difficult connotation to those vendors because they know it's a very specific product, specific thing it does, and we need it so we are going to buy it. But then some negotiation that, you know, the larger companies are clear, you know, with what they need to do. But the problem there is they tend to buy other companies which tend to be smaller and they brought them into the fold but they're not there yet.  
 So that's a different connotation. So they need to bring it in.  
 But yeah, I think the maturity overall is improving. With Europe now the disability Act coming so that's also going to help. We are seeing a lot of work from Canada for some reason, so maybe the ACA is taking affect or whatever. And in the U.S., ADA is being taken more seriously.

>> MONICA ACKERMAN: The regulations helped move that forward.

>> GAUTAM RAO: Yeah.

>> MONICA ACKERMAN: And create the attention. In Canada we have the accessible Canada Act. And while there are no standards yet around digital accessibility that have been published or the work is under way and the approach that the government has taken is on barrier identification and removal in the area of information and communication.  
 And so that's probably why you're starting to see more questions being asked from the federal government and also from federally‑regulated entities like banking, transportation, and telecommunications.

>> GAUTAM RAO: Yeah.

>> MONICA ACKERMAN: Anything else that you want to share about your procurement journey?

>> GAUTAM RAO: Yeah, I mean, I think it's easy to get frustrated or easy to kind of not know where to start. But I think that's information that you share in those slides are just right on the money. I really wish I had them to kind of get started. It's comprehensive, it has everything. And you may dropout or leave out certain things but there's definitely enough to get started. And just get everybody on the journey, you know, you have to make the business towards accessibility and even in procurement. And, yeah, learn and adapt, and, you know, constantly evolve. I think together we can ‑‑ and leverage relationships. There's a lot of companies who are further along the journey so the community is small. They're definitely willing to share so tap into that and leverage these large organizations. There's obviously Disability:IN and even some organizations in Europe that do similar work.

>> MONICA ACKERMAN: That's amazing. I know that we are on our journey, as well, at ScotiaBank. And even today I asked a lot of questions that actually were things that I personally would love to know more about as we are, you know, moving forward in the plan. So I hope that the conversation was as informative to everyone on the line as it was to me.  
 And so I think now we are going to open the call to questions.

>> OPERATOR: Recording stopped.

>> CELESTE KEANAAINA: Sounds great. Monica I liked that progress over perfection. That's definitely very true and I think that your conversation with Gautam is very encouraging for everyone. Just really encouraging to start on their journey so thank you both very much. Let me see if we have any questions in the chat. Yeah, for our audience, please feel free to submit any questions through the Q&A, if you have any at this time. And if not we can also end a little bit early, as well. I'll give it a couple minutes.  
 All right. I think our audience is a little shy today. Quite all right. But thank you, both, so much for joining. A lot of good nuggets to take away. Beautiful presentation, Monica. And yeah. I hope you have a wonderful day. And thank you to our ASL interpreter, Kelly, doing a beautiful job. And for Annamarie for captioning. Really appreciate you both. All right. Thank you, very much. Have a good one.

>> GAUTAM RAO: Thank you.

>> MONICA ACKERMAN: Bye.   
 (Webinar concluded)

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