Data Accessibility, Raw Data Transfers, VPATs, and Dashboards

Guidance for Institutional Researchers

SBCTC Research and Performance Management (RPM)

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This document is intended to support internal policy development and discussion, not to substitute for agency counsel or the agency accessibility/ADA coordinator. Legal and statewide policy citations should be rechecked before formal adoption because accessibility standards and implementation guidance can change.

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1. Background and Issue Presented

The issue arose from a concern that raw data shared by the State Board with colleges must meet digital accessibility requirements before being transmitted, and that failure to do so could place colleges at risk with the U.S. Department of Education Office for Civil Rights or other federal agencies.

The relevant RPM workflows include, for example, transfers of raw data files from datalink queries, CSV files(such as exports from Qualtrics surveys); and datasets extracted, processed, or generated using SQL, Python, or R and then shared with college institutional research (IR) departments for analysis, among others.

Initial question

> *When a state agency shares raw data files — typically tables created using SQL — and sends them to another state agency or to college IR offices, are those files subject to VPAT evaluations, and what accessibility obligations apply?*

2. Working Conclusions from the Legal/Policy Review

- A raw dataset does not ordinarily require its own VPAT evaluation merely because it is electronic or transferred between public entities. VPATs/Accessibility Conformance Reports are principally mechanisms for documenting the accessibility conformance of ICT products and services, especially in procurement.
- A raw machine-readable data file and a human-readable report are not the same product. The intended function and use of the file matter.
- A CSV, SQL extract, database dump, R/Python-generated dataset, or similar analytical file is commonly intended for ingestion, computation, statistical analysis, or further transformation rather than direct visual consumption.
- Washington accessibility policy is broader than the federal DOJ web rule, so it is not advisable to state categorically that raw data are 'exempt.' A safer and more accurate position is that machine-readable data require a different accessibility analysis from human-facing documents and interfaces.
- Human-readable reports, formatted Excel workbooks, Word/PDF reports, presentations, dashboards, web pages, survey interfaces, and data applications raise conventional accessibility requirements because ***the product itself is how a person receives or interacts with the information***.
- Supporting documentation such as data dictionaries and codebooks is human-readable content and should be made accessible in the format in which it is distributed.
- If an analyst with a disability experiences an actual barrier in a raw-data workflow, the agency should identify and address the barrier. The appropriate remedy may involve the analytical software, metadata/documentation, delivery format, or an individualized accommodation rather than remediation of the dataset.
- An accessibility statement and alternative-format contact pathway on a dashboard page is useful, but it should function as a backstop while direct dashboard accessibility is improved, not as a general substitute for making the dashboard itself accessible.

A useful compliance formulation

> *The distinction is not between 'accessible' and 'not accessible' information. It is between different forms of technology and information that create different kinds of accessibility issues and therefore may require different compliance approaches.*

3. Key Definitions and Distinctions

Term	Working definition
Machine-readable analytical data	Structured data whose principal purpose is ingestion, computation, statistical analysis, transformation, or transfer between systems rather than direct presentation to a human reader. Examples include CSV, delimited text, Oracle/SQL extracts, database tables, API output, JSON/XML, R/Python/SAS/SPSS/Stata datasets, and Qualtrics response exports.
Supporting documentation	Human-readable material needed to understand or use a dataset, such as data dictionaries, codebooks, file layouts, methodology notes, variable lists, read-me files, and instructions.
Human-readable analytical product	A digital product primarily intended to communicate information directly to a person, such as a formatted Excel report, Word/PDF report, PowerPoint presentation, statistical brief, formatted table, chart, infographic, or research summary.
Interactive application/dashboard	A user interface through which people filter, query, navigate, visualize, or otherwise interact with data. Examples include dashboards, web applications, survey interfaces, data portals, and interactive visualizations.
VPAT / Accessibility Conformance Report	A structured mechanism used to document the accessibility conformance of an ICT product or service. It is commonly requested in procurement and vendor review. It is not ordinarily created for each raw dataset exported from a system.

Why CSV is not the same as an Excel report

A CSV is a plain-text serialization of tabular data. It can be opened in Excel, but Excel is only one possible program used to read or import it. Opening a CSV in Excel does not transform the source dataset into a designed Excel workbook.

A typical raw CSV might contain:

```
college_code,respondent_id,q1,q2,q3,student_group
030,100234,4,5,3,2
030,100235,2,4,5,1
```

A file like this ordinarily has no fonts, colors, merged cells, graphics, alt text, heading hierarchy, keyboard focus, interactive controls, or visual reading order. Many WCAG criteria therefore have no meaningful direct application to the serialized file itself. The receiving analyst typically interacts with the data through R, Python, SAS, SPSS, Stata, Excel, Tableau, Power BI, a database, or another analytical environment.

What should be requested when a raw-data accessibility complaint is made

1. The legal or policy authority relied upon, including the applicable provision of USER-01, USER-01-01-S, Section 504, Title II, OCR guidance, or another requirement.
2. The exact file or product at issue: machine-readable CSV, formatted Excel report, PDF, data dictionary, dashboard, survey interface, or another product.
3. The accessibility requirement allegedly not met, including the WCAG success criterion or other technical requirement if one has been identified.
4. The actual access barrier created by the file in its intended use.
5. The expected remediation and how that remediation applies to the particular file type.

6. Whether a person with a disability has experienced an access barrier and, if so, the environment in which the barrier occurred.

4. RPM Data Accessibility Standard and Guidance

Department: Research and Performance Management (RPM)

Applies to: Data, research, reporting, survey, visualization, and analytical products created, maintained, shared, or published by the department

Effective date: December 1, 2026

Owner: RPM

Review cycle: Annual, or when statewide/federal accessibility requirements materially change

1. Purpose

Research and Performance Management (RPM) creates and distributes many different forms of digital information, including raw datasets, statistical extracts, data dictionaries, research reports, spreadsheets, dashboards, visualizations, survey materials, and web content.

These products do not all function in the same way and do not create the same accessibility risks.

The purpose of this standard is to establish a consistent framework for determining accessibility requirements for RPM products; distinguish machine-readable analytical data from human-readable reports and interfaces; ensure that accessibility effort is directed toward actual barriers experienced by users; support compliance with applicable Washington State and federal accessibility requirements; ensure accessibility is considered during design and development rather than only after publication; provide practical guidance to analysts, researchers, developers, and managers; and maintain the integrity and usefulness of machine-readable data-sharing processes.

This standard is intended to complement, not replace, agency-wide accessibility policy, ADA/Section 504 obligations, reasonable-accommodation procedures, records requirements, privacy requirements, data-governance standards, or information-security requirements.

2. Governing principles

2.1 Accessibility is based on function and use. Accessibility requirements should be evaluated according to what the product is; how it is intended to be used; who is expected to use it; whether a person interacts directly with it; whether the product presents information to a human user or primarily transmits structured information between systems; and whether an actual accessibility barrier exists. File extension alone does not determine accessibility requirements.

2.2 Machine-readable data and human-readable information are different products. RPM distinguishes among machine-readable analytical data; supporting documentation; human-readable analytical products; interactive applications and dashboards; and public web content.

2.3 Accessibility should be addressed where the barrier occurs. RPM will not assume every underlying data file must be visually reformatted to address accessibility. Accessibility review should identify the person or user group affected, the task they are attempting, the technology through which they perform it, the specific barrier, the applicable requirement, and the most effective means of eliminating the barrier.

2.4 Accessibility is an ongoing responsibility. Accessibility should be incorporated into project planning, procurement, survey design, report production, dashboard development, documentation, web publication, quality assurance, and maintenance.

3. Applicable standards

RPM products are subject to applicable agency, Washington State, and federal accessibility requirements.

Washington Technology Solutions' Digital Accessibility Standard USER-01-01-S establishes the statewide minimum accessibility standard for covered technology. RPM should use WCAG 2.2 AA as its primary technical accessibility reference where WCAG criteria meaningfully apply.

Federal Title II requirements separately establish accessibility obligations for state and local government web content and mobile applications. RPM should not assume that satisfying one standard automatically satisfies every state or federal obligation.

Where uncertainty exists, RPM should consult the agency accessibility director, information technology accessibility staff, and/or legal counsel as appropriate.

4. Category A — Machine-readable analytical data

Definition: Structured data whose principal purpose is ingestion, computation, statistical analysis, transformation, or transfer between systems rather than direct presentation of information to a human reader.

Examples include CSV files; delimited text files; Oracle extracts; SQL query results; fixed-width data files; R data objects; Python-generated datasets; SAS, SPSS, or Stata data files; database tables; API output; JSON or XML data; survey-response exports from Qualtrics; and files produced for import into statistical, business-intelligence, or database software.

A machine-readable file may be opened in Excel or another spreadsheet application without becoming a human-readable report.

Standard: Machine-readable analytical data does not require visual-document remediation solely because it is transmitted electronically.

RPM does not require a raw dataset to be reformatted as a conventional accessible spreadsheet before sharing it with an authorized recipient unless the file is actually intended to function as a human-readable report; an identified user with a disability cannot obtain equivalent access through the intended analytical environment; an applicable law, statewide standard, contract, or agency policy specifically requires a different approach; or the file contains presentation or interface features that independently create accessibility requirements.

RPM should preserve machine-readability and analytical integrity.

Good practice: use clear and stable variable names; consistent data types; avoid undocumented embedded formatting; avoid merged cells; avoid blank rows/columns used solely for visual layout; represent missing values consistently; provide accessible supporting documentation explaining variables, codes, suppression rules, and file structure; provide sufficient metadata; and use a commonly usable format appropriate to the analytical purpose.

5. Category B — Supporting documentation

Definition: Materials intended for people to read in order to understand or use a dataset.

Examples include data dictionaries, codebooks, file-layout documents, methodology notes, survey instruments, read-me files, user instructions, variable lists, technical documentation, and data-quality notes.

Standard: Supporting documentation should meet applicable accessibility requirements for its format. Word documents should use appropriate headings, readable tables, meaningful link text, and other accessible-document practices. PDFs should be properly tagged and have logical reading order. HTML documentation should meet applicable WCAG requirements. Spreadsheet-based codebooks should be structured so tables and headers can be interpreted by assistive technology.

Whenever RPM provides a complex machine-readable dataset to another organization, accessible supporting documentation should be provided when necessary for meaningful use.

6. Category C — Human-readable analytical products

Definition: A digital product primarily intended to communicate information directly to a human reader.

Examples include formatted Excel reports, Word reports, PDFs, PowerPoint presentations, statistical briefs, formatted tables, charts, infographics, research summaries, and downloadable reports attached to webpages.

Standard: Human-readable analytical products must be designed with accessibility in mind and should meet the applicable accessibility criteria for their format.

At minimum, headings should be programmatically identified where supported; tables should have identifiable headers; reading order should be logical; charts and images should have meaningful text alternatives or equivalent textual explanation; information should not depend on color alone; color combinations should meet applicable contrast requirements; links should have descriptive text; document titles and language should be identified where supported; keyboard and assistive-technology access should be tested where relevant; and complex statistical information should be explained in text where graphical presentation alone would exclude users.

7. Excel and spreadsheet guidance

Because spreadsheets are used for both analytical transfer and human-readable reporting, the intended function of the file must be determined before applying accessibility requirements.

Raw analytical spreadsheet: An Excel workbook containing hundreds of thousands of record-level rows supplied to an IR office for analysis can be treated as Category A when its primary purpose is data transfer/analysis and formatting is incidental.

Human-readable Excel report: A workbook containing formatted tables, colors, trend charts, explanatory text, and summarized results is Category C and should be designed and tested as an accessible spreadsheet.

Mixed-use workbook: If a workbook contains both raw data and human-readable report tabs, components may be treated separately. For example, Read Me = Category B; Summary and Charts = Category C; Raw Data = Category A.

8. Dashboards and interactive data visualizations

Dashboards present one of RPM's most difficult accessibility challenges because visual exploration, filtering, hover behavior, maps, complex charts, and dense statistical displays can create barriers for people who use screen readers, magnification, voice control, keyboard navigation, or other assistive technologies.

RPM recognizes that an accessibility notice or alternative-format contact mechanism is important, but it is not a substitute for continuing to improve accessibility of the dashboard itself.

Dashboard standard: RPM will make reasonable and sustained efforts to make dashboards and interactive visualizations directly accessible.

Dashboard projects should consider keyboard navigation; logical focus order; meaningful control labels; screen-reader identification of filters and controls; visible keyboard focus; color contrast; use of more than color alone; text equivalents for key charts and findings; accessible table views where feasible; clear titles/instructions; avoidance of essential information available only on hover; zoom/text resizing; meaningful error messages; predictable filtering behavior; and compatibility with commonly used assistive technology to the extent supported by the platform.

Alternative access: Where a dashboard cannot yet provide fully equivalent direct access because of documented technical limitations, RPM should provide a meaningful alternative method for obtaining the information. This may include accessible downloadable tables, accessible HTML tables, an accessible CSV containing the data represented in the dashboard, an accessible summary report, written explanation of key findings, staff assistance in extracting requested information, or another format that provides equivalent information.

Recommended accessibility statement: “Accessibility: We are working to improve the accessibility of our interactive data visualizations. If you experience difficulty accessing information in this dashboard or need the information in an alternative format, please contact [name/unit] at [email/phone]. Please tell us which dashboard or data you need and, if possible, the format that would work best for you.”

Response to an alternative-format request: acknowledge promptly; determine what information or functionality the person is trying to access; avoid requiring unnecessary disability information; identify a format or method that provides effective access; provide it within a reasonable timeframe appropriate to the underlying program or service; and use recurring requests as evidence for future dashboard-accessibility priorities.

Before publishing a new dashboard, document whether keyboard-only navigation has been tested; whether major controls have usable accessible names; whether charts can be understood without relying solely on color; whether critical information is available in text or tabular form; whether an accessible data download is available; whether known platform limitations exist; whether an accessibility statement/contact method is present; who owns response to accessibility requests; and what improvements remain on the accessibility backlog.

9. Webpages containing data

A webpage should not rely solely on an embedded dashboard when essential information can reasonably also be conveyed through accessible content.

Where practicable, dashboard webpages should include a plain-language description of what the dashboard contains; major findings or context in HTML text; definitions; accessible links to underlying data; accessible downloadable tables; methodology; date of last update; source information; and an accessibility/contact statement.

10. Charts, maps, and statistical graphics

Visualizations should be designed so a user is not required to perceive the graphic visually in order to obtain essential information.

For a simple chart, provide concise alternative text describing what the chart measures, the relevant population/time period, and the principal conclusion.

For a complex chart, alt text alone may be insufficient. Provide a short alt-text description plus a nearby accessible table, data download, or detailed text description.

Maps are particularly challenging. Where a map conveys substantive data, RPM should provide the underlying geographically organized information in a non-map format where feasible.

11. Survey accessibility

RPM-sponsored surveys should be evaluated separately from the data exported from those surveys.

The survey interface is an interactive application and should be accessible to respondents.

The survey-response export is normally Category A machine-readable analytical data.

The survey instrument/codebook is Category B supporting documentation.

The survey findings report/dashboard is Category C or an interactive/dashboard category depending on format.

This distinction should be maintained throughout project planning and complaint review.

12. Data shared with colleges or other agencies

Before distributing a data product, RPM should determine its classification.

Raw analytical transfer: If Category A, no document-style accessibility remediation is required solely because the file is being transferred; provide accessible supporting documentation as appropriate; preserve machine readability; address known user-specific barriers; and document unusual accessibility issues if they exist.

Human-readable deliverable: If Category B or C, apply relevant accessibility requirements before routine distribution whenever practicable; correct known defects; and use accessible templates where available.

Interactive product: Accessibility should be included in development and testing; alternative access should be available where technical barriers remain; and known limitations should be documented and prioritized for improvement.

13. Determining whether an accessibility issue exists

An accessibility concern involving data should be evaluated by asking: What specific product is involved? Which classification applies? What is its intended use? Who needs to use it? What task is the user unable to perform? What is the actual barrier? Which accessibility requirement applies? What remediation would eliminate the barrier? Would the proposed remediation interfere with the product's analytical purpose? Can equivalent access be provided more effectively through another method?

Statements such as “the data are inaccessible” or “the file must meet WCAG” are not sufficient by themselves to identify a required remediation. The specific barrier and applicable requirement should be identified.

14. Accessibility requests and complaints

RPM should respond constructively to accessibility concerns.

A complaint should not be rejected solely because the product is classified as machine-readable data. Likewise, a complaint should not automatically result in applying document-remediation requirements to a raw dataset.

RPM should identify the product involved; identify the access need where known; distinguish the dataset from the software/document/interface through which it is used; investigate the claimed barrier; consult accessibility specialists where needed; remediate applicable issues; provide alternative access where necessary; and document the outcome.

Where a complaint asserts a legal or technical requirement that is unclear, RPM may appropriately request the applicable legal/policy provision, the WCAG criterion or other technical standard, the specific accessibility defect, and the expected remediation.

15. Procurement and third-party tools

Accessibility of an exported dataset is separate from accessibility of the software used to create, collect, analyze, or publish it.

Technologies that may require procurement accessibility review include survey platforms, dashboard platforms, business-intelligence tools, statistical applications, web applications, database front ends, visualization products, document-generation tools, and data portals.

Where required by agency or statewide procedures, RPM should obtain and evaluate appropriate accessibility-conformance documentation such as an Accessibility Conformance Report/VPAT and should not rely solely on a vendor's statement that a product is “ADA compliant.”

A VPAT is not ordinarily created for each dataset generated by a product.

16. Roles and responsibilities

Product owner: identify the product classification; consider accessibility during project planning; ensure applicable testing occurs; document known limitations; ensure an alternative-access pathway exists where needed; and maintain the product after publication.

Analyst/researcher: use accessible templates and practices for human-readable products; preserve usable machine-readable structure in analytical data; produce accessible supporting documentation; raise known limitations; and respond appropriately when an actual user barrier is identified.

Dashboard developer: use the most accessible functionality available within the chosen platform; test keyboard and screen-reader behavior where feasible; minimize dependence on visual-only interaction; provide data/table alternatives where feasible; and document platform limitations rather than assuming a product is accessible because the vendor provides a VPAT.

Accessibility specialist: assist with interpreting statewide requirements, complex testing, evaluating unusual products, prioritizing remediation, resolving complaints, and determining when equivalent access is appropriate.

17. Minimum standard for new work

Machine-readable data: structured, documented, analyzable, and accompanied by accessible documentation where needed.

Reports/documents: accessible by design.

Dashboards: accessibility considered from project initiation; direct accessibility maximized; known limitations documented; useful nonvisual access provided.

Webpages: applicable WCAG requirements incorporated before publication.

Third-party technology: accessibility evaluated during procurement and implementation, not only after purchase.

18. Continuous improvement

RPM recognizes that data visualization and interactive analytics are rapidly evolving and that some current dashboard platforms impose significant accessibility limitations.

RPM should maintain an inventory of significant public dashboards; identify known accessibility limitations; prioritize improvements based on user impact and frequency of use; incorporate accessibility into platform selection and future procurement; test new platform capabilities; use alternative-access requests to identify high-priority barriers; consult users of assistive technology where feasible; and periodically review this standard against changes in WaTech, WCAG, ADA, and Section 504 requirements.

The existence of technical limitations does not end RPM accessibility responsibility. It informs how RPM prioritizes remediation and provides equivalent access while more accessible solutions are developed.

19. Core decision rule

When deciding what accessibility work is required, RPM should ask:

"Is this product itself the means by which a person is expected to perceive, understand, navigate, or interact with the information, or is it primarily structured data intended to be processed by another system or analytical tool?"

If it is principally a human-facing product, direct accessibility requirements should generally be applied to the product.

If it is principally machine-readable analytical data, RPM should preserve its analytical structure, provide accessible supporting information, and address any actual access barriers in the complete user workflow.

This approach supports both meaningful digital accessibility and reliable data practice.

Accessibility review matrix

Product	Typical primary use	Default treatment
CSV/raw SQL extract	Machine analysis	Preserve structure; accessible documentation
R/Python/SAS/SPSS dataset	Statistical analysis	Preserve structure
JSON/API output	Machine/system consumption	Preserve machine-readable structure
Data dictionary	Human reference	Accessible document
Codebook	Human reference	Accessible document
Excel raw-data workbook	Analysis	Treat primarily as analytical data
Formatted Excel report	Direct reading	Accessible spreadsheet
Word report	Direct reading	Accessible document
PDF report	Direct reading	Accessible document
PowerPoint	Presentation	Accessible presentation
Static chart	Visual communication	Text alternative/equivalent data
Dashboard	Interactive analysis	Direct accessibility + alternative access
Webpage	Public information	WCAG-compliant web content
Qualtrics respondent survey	Data collection interface	Accessible interactive application
Qualtrics CSV export	Analysis	Machine-readable analytical data
Tableau/Power BI download	Depends on format	Classify according to actual output/use

Examples

Example 1 — Central Oracle extract

An analyst runs a SQL query against the central Oracle system and exports 250,000 student records to CSV for a college IR office. Classification: Category A. Preserve the analytical structure and supply an accessible data dictionary where necessary. No visual spreadsheet remediation is required simply because a college receives the file.

Example 2 — Campus climate survey

RPM exports respondent-level Qualtrics data to CSV and sends each college its records. The CSV is Category A. A Word codebook explaining survey variables is Category B and should be accessible. The raw CSV remains machine-readable analytical data.

Example 3 — Enrollment workbook

RPM produces an Excel workbook with enrollment trends, formatted tables, charts, color coding, and narrative commentary. Classification: Category C. The workbook should be designed and tested as an accessible spreadsheet.

Example 4 — Public dashboard

RPM publishes an interactive dashboard allowing users to select college, race/ethnicity, age, and year and displays multiple charts. RPM should work toward direct accessibility. Where platform limitations remain, the page should offer meaningful alternative access such as downloadable data, tabular results, or staff-assisted extraction, and identify how users can report accessibility problems or request another format.

Example 5 — Screen-reader user requests dashboard information

A user says they cannot use the dashboard with a screen reader and needs enrollment by college and race/ethnicity for 2022–2026. RPM should not merely send the user back to the dashboard. An appropriate response could be an accessible HTML or Excel table, CSV, or another format agreed upon with the user. The request should also inform dashboard-accessibility priorities.

Example 6 — Analyst cannot use raw dataset

A college IR analyst using assistive technology reports that variable names and code structure in a raw CSV make the file impossible to interpret. RPM should investigate. Possible solutions include improving the data dictionary, expanding abbreviated variable labels in documentation, supplying machine-readable metadata, modifying the delivery structure where this does not compromise analysis, or working with the analyst to identify an effective format.

5. Reference Links Used in the Discussion

- **Washington Technology Solutions — Digital Accessibility Policy:** https://watech.wa.gov/policies/digital-accessibility-policy
- **Washington Technology Solutions — Digital Accessibility Standard:** https://watech.wa.gov/policies/digital-accessibility-standard
- **Washington USER-01-01-S Digital Accessibility Standard (PDF location cited during discussion):** https://watech.wa.gov/sites/default/files/2025-01/USER-01-01-S%20Digital%20Accessibility%20Standard.pdf
- **Washington USER-01 Digital Accessibility Policy (PDF location cited during discussion):** https://watech.wa.gov/sites/default/files/2025-01/USER%20-01%20Digital%20Accessibility%20Policy.pdf
- **Washington DES — IT Accessibility Plan (cited during discussion):** https://des.wa.gov/sites/default/files/2025-07/DES-IT-accessibility-plan.pdf
- **Washington Data Portal — Accessibility on data.wa.gov:** https://data.wa.gov/stories/s/Accessibility-on-data-wa-gov/74gc-aacr/
- **U.S. DOJ — Title II Web and Mobile App Accessibility Rule:** https://www.ada.gov/resources/2024-03-08-web-rule/
- **U.S. DOJ — First Steps Toward Complying with the Web and Mobile App Accessibility Rule:** https://www.ada.gov/resources/web-rule-first-steps/
- **U.S. DOJ — Title II Regulations:** https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/
- **U.S. Department of Education OCR — Case Processing Manual:** https://www.ed.gov/laws-and-policy/civil-rights-laws/file-complaint/ocr-case-processing-manual-cpm
- **U.S. Department of Education OCR — How OCR Handles Complaints:** https://www.ed.gov/laws-and-policy/civil-rights-laws/file-complaint/how-the-office-for-civil-rights-handles-complaints
- **Section508.gov — How to Create an Accessibility Conformance Report using VPAT:** https://www.section508.gov/sell/how-to-create-acr-with-vpat/
- **Section508.gov — Request Accessibility Information:** https://www.section508.gov/buy/request-accessibility-information/
- **Information Technology Industry Council — VPAT:** https://www.itic.org/policy/accessibility/voluntary-product-accessibility-template