

# How to Prepare a Well-Written RFP for Document Remediation

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PAPER**



# With So Many New Vendors Bidding on Remediation Projects, How Do You Ensure You Are Giving Bids to the Right Vendor?

Here at CommonLook, we respond to a large number of RFP requests each year for document remediation work. One of the most frustrating things we encounter is that many of these RFPs are not clearly defining what is required to deliver a quality product to the client.

Let's face it; these government RFPs are written to help the government get the best pricing, which we can understand. But the reason agencies request the work is because accessible and standards-compliant documents are critical. If the project is 100% based solely on price and the result is files that are poorly tagged and not accessible and standards-compliant, then the project wastes time and money. Furthermore, the agencies are still liable for any legal issues resulting in non-accessible documents.

One problem lies in the various standards and the definition of

standards compliance. When the RFP emphasizes the lowest bid and does not include precise definitions for the quality of the delivery, the result is almost guaranteed to fail.

We have worked with large agency projects where the work was distributed among multiple organizations, based solely on pricing. In the QA process, many files were identified as sub-standard, resulting in re-work requests.

In one particular case, we received thousands of files sent to us for last-minute remediation work to "fix" what had been done by other vendors, which just adds to the total cost of the project and makes meeting the client deadlines that much more difficult.

## Clear Bid Pricing

If an agency selects the lowest qualified bidder, there needs to be a way to ensure that each bid is valid,

The eight primary issues that RFPs fail to address:

- 1. Clear bid pricing**
- 2. Multiple document formats**
- 3. Document complexity**
- 4. Compliance testing**
- 5. Reference checks and software tools**
- 6. Fillable forms**
- 7. Sample documents**
- 8. Vetting vendors**

accurate and meets all the required criteria.

Most agencies have a fixed budget for these projects that cannot exceed the total cost of the project. For that reason, bid forms and other pricing sheets must clearly define how the agency would like to see the pricing.

There should be an accurate page count for the project. Estimated page counts will lead to someone bidding low to secure the business.

Pricing out the cost per page various content types (simple PDF, complex PDF, fillable forms, Office files) is necessary to define the project cost.

But without looking at samples, it is difficult to provide accurate bids on unknown quantities for each type of file.

The most precise way to establish pricing is to provide access to the content during the bid process, so the entire scope of the project is priced accordingly.





This method does not work for RFPs whose goal is to find a vendor for ad hoc work. In that scenario, using pricing based on content type is more appropriate.

## Multiple Document Format Support

We see RFPs all the time that outline strict specifications for the PDF and Office documents requiring strict adherence to standards such as WCAG 2.0 or WCAG 2.1. Many times, they will list requirements such as tagging, structuring of tagging, alternative text, tables and lists, metadata, color/contrast, fillable form fields and tooltips, to name a few. Often, they require that all files pass the Adobe Acrobat Accessibility Checker, but PDF and Office documents are very different.

While PDF documents have supported WCAG 2.0, WCAG 2.1, HHS and PDF/

UA accessibility via the tag structure, Office documents vary and sometimes they cannot be fully WCAG 2.0 compliant. The Office Accessibility Checker tool will help find the most obvious issues. Still, Office documents, by their very nature, can have inaccessible content and the result may not fully meet WCAG 2.0 or WCAG 2.1 standards.

We recommend that agencies convert Office files to PDF format for publication so that the files can all be remediated to meet the standards and avoid the issues of Office accessibility.



## Complexity of Documents

Documents can have a variety of complex elements that can affect the cost of remediation. Simple documents that consist of text paragraphs can be remediated and tested for compliance with lower labor costs than complex documents with many large tables and lists. Also, these documents may have images requiring alternative text descriptions, especially if the graphics are technical and require subject matter expertise.

Form documents, specifically fillable forms, demand specialized handling to allow for navigation using a screen reader, an accessibility tool used by many vision-impaired people.

The disabled should be able to fill out the form online in the same manner as anyone else.

What does this have to do with the RFP process?

Well, the cost to remediate 5,000 pages of simple documents is much less than 5,000 pages of fillable forms.

### **What about using automated tools?**

Automated tools have their place in PDF remediation. They can provide the “first pass” of a document to add the tags and attempt to identify and correctly place the tags in the right order.

But document remediation needs to be manually remediated to ensure at the very least that items such as reading order, alternative text descriptions, heading levels and other content are correctly used. Manual remediation can then certify the document as standards-compliant.

Every RFP should define page counts and provide sample documents for







While the Adobe  
Checker addresses  
most of the  
common issues, it  
is not all-inclusive  
and does not certify  
a document meets  
any accessibility  
standards.

each type so that potential vendors  
can accurately quote pricing.

## Testing for Compliance

Compliance testing is a big deal  
because a universally accepted report  
that ensures compliance with any of  
the recognized accessibility standards  
does not exist. Accessibility standards  
include WCAG 2.0, WCAG 2.1, HHS and  
PDF/UA.

Unfortunately, because testing  
requires the tester to understand  
what they are testing for and to  
verify compliance, the results can be  
incorrect if the tester lacks document  
accessibility experience. For example,  
alternative text verification can be  
marked as passed because there  
is a description listed, but if the



description is just the name of the image file, that does not meet the WCAG requirements. Many agencies specify Adobe Accessibility Checker as the only accessibility checker requirement. While the Adobe Checker addresses the most common issues, it is not all-inclusive and does not certify a document meets any accessibility standards. Besides, many RFPs require that the files are checked using a screen reader. Both requirements, while being a good first step, can still result in files that have accessibility issues and do not meet the standards, thus putting your agency in legal jeopardy. Unless you are blind, you may not know how to use a screen-reader properly. If that is the case, you may pass files that still have issues. Because of the lack of an industry-standard PDF accessibility

compliance testing tool, CommonLook created the free PDF Validator tool to provide organizations with a way to test and verify compliance with any of the standards.

## **Reference Checks and Software Tools**

Most RFPs call for reference checks on all vendors. Many will also require proof of having done work similar to the current project within a specific time.

As more organizations seek to ensure PDF compliance, a flood of new vendors who claim they can do the work, has entered the market.

Document accessibility remediation work calls for a specialized skill set and requires detailed knowledge

of accessibility and PDF document structure. We have seen these vendors claim they have done document accessibility remediation for other agencies, but there is no record or proof they have done the job. Many times, the reference is for other work that may relate to document archiving, scanning or similar functions.

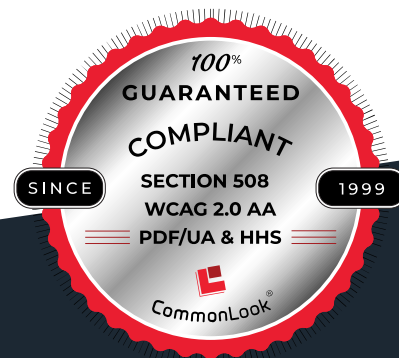
The vendor may include WCAG or Section 508 compliance to make it look like their contract was for document remediation, but that is not the case. Insist on relevant references and double-check their references. Talk to the agencies they list as clients and ask them if the vendor performed the work specified in the RFP. Same for software tools.

The W3C - the organization that developed the WCAG standards -

lists only lists only two tools for PDF accessibility remediation work, Adobe Acrobat and CommonLook PDF.

A few new tools out on the market claim similar functions, especially some of the proposed automation solutions. Make sure to find out who is using these tools and how accurate the results are.

Most of these so-called “auto tagger” tools are only 60% accurate and will require extensive manual remediation work to ensure compliance with the standards. In one recent RFP, the vendor claimed to have a tool in continuous development since 2005 that was specifically designed to use AI and algorithms to analyze









documents, implying that their solution was a remediation tool. If you read closer, their account described the typical attributes of what you need to work on for PDF accessibility, stating that their product would review, analyze and learn. Still, it never explicitly stated that the solution tagged PDFs and certified them for accessibility compliance. Upon further review, we found no reference to this tool on the internet, in government purchasing procurements or at the US Trademark office, where this particular tool claims to have a trademark for the name.

Document accessibility is a small industry and there are a few key players that are well known in the industry. If you cannot find any mentions of their company, tools or products on the internet or if you can't verify their references, do not choose that vendor.

## **Fillable Forms**

Fillable forms are different from print forms and other PDF documents.

The unique documents are designed to allow fields to be filled out online and thus have special accessibility requirements. These forms require that there are fillable form fields with the appropriate tooltips. Sometimes there are radio buttons or content that need java scripting or other work to work correctly with a screen reader.

We have seen vendors quote fillable form services at absurd pricing, like \$3 per page. A vendor that quotes pricing that is not commensurate to the complexity of the project should lose the bid. Why? Because fillable forms are the most labor-intensive PDF accessibility work and can take several hours per page to complete correctly and test with a screen reader.

Remember, you get what you pay for. If you select a vendor based on price alone and the pricing is much less than the other bids, you can safely assume that the forms are not fillable forms or the vendor is not aware of what is required to ensure fillable forms are accessible.

## Sample Documents

Providing sample documents is a good idea so that the bidders have an idea of the complexity of the documents covered in the RFP. It is also an excellent way to get sample pricing by using these documents as examples, especially for large projects, where you need a total cost for the project. If you provide a sample of each of the documents to be remediated, it is much easier for vendors to understand the scope of the projects. Vendors can base their bids on total pages, the complexity of the documents and other factors that impact how much each vendor will quote the total cost to do the work.

Request a sample document be remediated by each vendor that bids on the project and require them to not only provide the remediated sample document but the matching accessibility report so you can get an idea of the quality of their work.

## Vetting Vendors

As we discussed earlier, due to the increased interest in document

accessibility as a part of large website accessibility projects, many new vendors are trying to compete in this space. Only a few companies with decades of experience provide these services, like CommonLook. We have focused on PDF Accessibility for over 20 years.

While new vendors may provide attractive pricing in an attempt to “buy the business,” you do need to check references carefully and assure they are qualified to do the work properly. If they claim to be using new software tools, how long have they been on the market? Are they being used by other agencies in your state or the Federal space? Are standards organizations such as the W3C listing these tools as solutions available to organizations to ensure compliance?

Fancy brochures and claims of powerful AI-powered software may seem impressive, but if you cannot find any references to these tools in use by other clients, then you should be careful in your selection process.





## Recommendations:

- ▶ **Provide simplified bid forms** for RFPs with a cost for the entire project based on a total RFP page count. For ad hoc bids, get prices for various estimated types of content.



- ▶ **Convert Office documents to PDF format** to ensure that the documents can be made fully accessible and standards-compliant. For documents that cannot be saved as PDF, consider removing them from the website or defining what criteria to test the files. It is difficult for any vendor to certify compliance for Office documents. Any vendor that claims any Office file can be 100% compliant is not a vendor you want to be doing business with from a liability standpoint.
- ▶ List the **total number of files and page counts** for each type of document type so you will get an accurate bid on the overall scope of the project. It is an excellent idea to provide sample documents to

the vendors before the bidding to ensure all bidders understand the true project scope.

- ▶ In addition to passing the Adobe Acrobat Checker and testing with a screen reader, consider requiring vendors to **provide a full compliance report** showing compliance with WCAG 2.0 AA, WCAG 2.1 AA, HHS or PDF/UA. Tools such as PAC3 and CommonLook PDF Validator are free and available to provide compliance reports that are much more comprehensive than the Adobe Acrobat Checker.
- ▶ **Check references carefully** to ensure that the work that the vendor has done is of the same scope, scale and deliverables as



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your RFP. Double-check any software tools they claim to use and certify the results.

- ▶ Fillable forms are expensive to remediate for accessibility, as it is a time-consuming process to remediate them properly. Ensure that the RFP **requires fillable forms** and that all bids reflect the requirements that the forms be fully accessible with all the correct requirements, such as tooltips.
- ▶ **Provide sample documents** as much as possible, or better yet, provide access to all the materials included in the RFP to get the most accurate total fixed cost for the project from all vendors bidding on the project. Ask for a sample remediated file and accessibility compliance report as a way to test the quality of their work.
- ▶ Ensure you **vet the vendors bidding on the project** to ensure they are legitimately qualified to do the work prescribed in the RFP. Check with other agencies to see if they have used them and if they were happy with the work.

## The Bottom Line

Write an RFP for document accessibility remediation that will allow any vendor to give you the information you need to select the most qualified vendor with the lowest cost to do the work properly.

## About CommonLook

Since 1999, CommonLook® has been a world-leading provider of software products and professional services enabling government agencies and corporations to meet their obligations for electronic document accessibility to achieve compliance with accessibility standards.

CommonLook's product family offers significant time and cost savings throughout the document production cycle from authoring to verification, correction and management of PDF documents and document collections.

Customers include U.S. and Canadian government agencies and leading global corporations.

CommonLook is a leader in setting US and international standards for PDF accessibility through contributions from its key executives to standards-setting entities.



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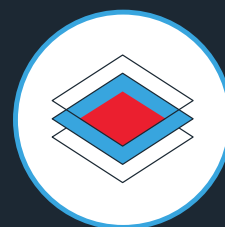
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