ATTACHMENT A

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Updated July 31, 2007

Originally provided by the Social Security Administration Section 508 Program

HHS Guide to Completing the Section 508 Evaluation Template

Purpose:

This document provides Vendors with instructions on completing the Section 508 Evaluation Template for the US Department of Health and Human Services

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Background:

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the 508 Evaluation Template – a simple, web-based checklist that allows Vendors to document how their product **did** or **did not** meet the various Section 508 Requirements.

How the Section 508 Evaluation Template is organized:

This template is also known as the Voluntary Product Accessibility Template (VPAT)

The Section 508 Evaluation Template consists of a long series of tables. The ***Summary Table*** is used to provide a sense of your product's ***overall*** "level-of-conformance" with the Section 508 Standards. Subsequently, the ***Section 1194.xx Tables*** contain the detailed subparagraphs that a Section 508 Standard is composed of. It is within these ***Section 1194.xx Tables*** that you will define in detail how your product **did** or **did not** comply with a specific requirement.

Understanding the columns

Use the following to understand the use of the three columns in the Section 508 Evaluation Template's tables:

Summary Table	
Column Name	**Use**
Criteria:	Describes Subparts B, C, and D of the Section 508 Standards.
Supporting Features:	***Enter*** information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify ***Not Applicable***. **DO NOT ENTER REMARKS OR EXPLANATIONS IN THIS COLUMN.**
Remarks/Explanations:	***Enter*** general comments regarding a product's overall "level-of-conformance" with the ***Applicable*** Subpart.

Section 1194.xx Tables	
Column Name	**Use**
Criteria:	Describes a specific guideline that a Subpart is composed of.
Supporting Features:	***Enter*** information summarizing a product's "level-of-support" for a specific guideline.
Remarks/Explanations:	***Enter*** detailed information on how the product **did** or **did not** support a specific guideline.

What information do I enter in columns 2 and 3?

The *Supporting Features* and *Remarks/Explanations* columns are used to document exactly how a product **did** or **did not** meet the Section 508 Standards.

Supporting Features (second column on 508 Evaluation Template)	
Language	**What It Means…**
Supports	Product **FULLY meets** the letter and intent of the Criteria.
Supports with Exceptions	Product **does not ENTIRELY** meet the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Product provides *alternative* methods to **meet** the intent of the Criteria.
Does not Support	Product **does not** meet the letter or intent of the Criteria.
Not Applicable	The Criteria **does not** apply to the product.

Remarks & Explanations (third column on 508 Evaluation Template)	
If 2nd column states…	**Then…**
Supports	List exactly **what** features of the product **do** meet and describe **how** they are used to support the Criteria.
Supports with Exceptions	List exactly **what** features of the product **do** meet and describe **how** they are used to support the Criteria. **AND** List exactly **what** parts of the product **do not** meet and describe **how** they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly **what** *other* methods exist in the product and describe **how** they are used to support the Criteria.
Does not Support	Describe exactly **how** the product **does not** support the Criteria.
Not Applicable	Describe exactly **why** the criterion is not applicable to the product.

Typical Scenario for Completing a Section 508 Evaluation Template:

To complete the Section 508 Evaluation Template, enlist the services of your company's **technical specialist** for the product being sought for purchase. HHS requires a measure of technical detail in the responses. Once you have enlisted their assistance:

1) Determine which sections of the **Technical Standards (Subpart B-1194.21-26)** apply to your product.***** Keep in mind that you **always** must complete the **Functional Performance Criteria (Subpart C – 1194.31)** and **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the Section 508 Evaluation Template.

2) For each section that applies, determine if the product does or does not meet the specific Criteria elements.

3) Using the information found in the ***How the Section 508 Evaluation Template is organized*** section, document in the ***Section 1194.xx Tables*** exactly **how** your product **did** or **did not** meet the applicable standard.

    - If the product **supports** the standard, provide detailed examples of **what** accessibility features exist and **how** they are used to support the standard.

    - If the product **does not support** the standard, remember that Section 508 allows products to meet the Access Board Standards in innovative, non-traditional ways. The product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user without a disability.

    - If the product **does not** possess an ***innovative, non-traditional way*** of supporting the standard, provide detailed examples of exactly **how** the product **did not** meet the standard.

4) Once documented in the ***Section 1194.xx Tables*** exactly how the product **did** or **did not** meet, return to the ***Summary Table*** and document the product's overall "level-of-conformance" in each of the applicable sections.

5) Post the final Section 508 Evaluation Template on your company's web site or on the GSA Buy Accessible Wizard.

6) It is the Vendor's responsibility to maintain the integrity of the data on the Section 508 Evaluation Template. The information provided on the Section 508 Evaluation Template is considered a self-representation unless expressly affirmed otherwise. *Even so*, HHS uses this form to complete required Market Research associated with the agency complying with Section 508 and may use the form to eliminate this product compared to other **more accessible** products that meet the HHS business needs.

    * **Please Note:** Any **WEB** application being purchased by HHS also **requires** the Vendor to complete ***Section 1194.21*** of the Section 508 Evaluation Template in addition to ***Sections 1194.22***, ***1194.31***, and ***1194.41***.

- HHS reserves the right to reject a PAT and corresponding proposal/offering if the answers do not address the standards. HHS needs the PAT to address the standards in order to evaluate it for conformance.

- Please answer honestly and be prepared to work with HHS to improve accessibility for your product if it is purchased.

- **Submission of this documentation constitutes a warrant on behalf of the vendor of the conformance of their product. Remediation of a product or service to the specified conformance shall be the responsibility of the vendor.**

HHS Section 508 Evaluation Template

Date: 09/30/15
Name of Product: Instructor Led Training (ILT), Virtual Instructor Led Training (VILT), Web-based Training (WBT)
Contact for more Information: Ericka Sanders, Director, Learning Solutions, FPMI Solutions, Inc. Main Office: (888) 644-3764 (Toll-free in the U.S.)

** Denotes Required

Summary Table		
Criteria	**Supporting Features**	**Remarks and explanations**
Section 1194.21 Software Applications and Operating Systems		
Section 1194.22 Web-based internet information and applications		
Section 1194.23 Telecommunications Products		
Section 1194.24 Video and Multi-media Products		
Section 1194.25 Self-Contained, Closed Products		
Section 1194.26 Desktop and Portable Computers		
** Section 1194.31 Functional Performance Criteria		
** Section 1194.41 Information, documentation, and support.		

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Section 1194.21 Software Applications and Operating Systems		
Refer to (http://www.access-board.gov/sec508/guide/1194.21.htm) for details on the guidelines listed below.		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supports	All actions that can be identified or labeled with text are required to be executable from a keyboard and assistive technology can read the text output.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supports	Accessibility features are provided for persons with disabilities. Software programs are design to keep from disabling accessibility features when they have been activated. These features include but are not limited to: • Narrated Text • Closed Captioning • Color Contrast • Screen Reader Accessibility • Key Board Accessibility • Visual Prompts when an error tone is

		sounded (to assist persons who are deaf or hard of hearing) • Alt Tag, Long descriptions • Descriptive Audio • Braille Conversion • Text Labels
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supported with Exceptions	An on-screen indication of the current focus is provided and defined throughout interactive elements as the focus changes in our template designed interactions and allows a person using assistive technology to discern the focus point. All elements are keyboard accessible. (Text hyperlinks, flash interactions, on-screen elements) AND When using Captivate, there are some design weaknesses that limit the ability to provide a well-defined on-screen indication of the current focus in some development instances. (Setting the focus for an interaction that is not a "Play" or "Pause" the focus is not automatically set, nor does it provide the capability to manually set this feature.)
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.	Supported	Information about a user interface element including the identity, operation and state of the element is available to assistive technology. User interface elements have text labels. All images are available by either Alt Tags or Long Description. (All selectable interface items)
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Not Applicable	Bitmap images are not used. Instead of animated images we use a series of images to simulate the change. Each of the images will have their own identifier. (Alt Tag or Long Description)
(f) Textual information shall be provided through operating system functions for displaying text. The	Supported with Exceptions	For the major operating systems for developer solutions

minimum information that shall be made available is text content, text input caret location, and text attributes.		software (including Windows, Apple, Android) Sufficient information about a user interface element including the identity, operation and state of the element is available to assistive technology. AND Exceptions are operating systems that are minor open source systems that do not support these features that make full accessibility available to the end user.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports through Equivalent Facilitation	All on-screen elements are color contrast checked IAW W3C standards and 508 requirements and is keyboard accessible.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supported	All animations are created with either descriptive audio, a long description or appropriate alt text.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	Color coding is used but is not the only means of conveying information. Uses of literal change such as a check mark, an "X" or some other meaningful "not there" and after selection "there" change is always given to the user with updated labels and screen reader information.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Supported with Exceptions	Color variations are provided however user preferences, monitor color calibration and desktop settings will always override default and chosen options.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supported	Use of any blinking text is never provided.
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supported	Fields and forms provided are tab indexed and screen reader accessible.

Section 1194.22 Web-based Internet information and applications

* Refer to (http://www.access-board.gov/sec508/guide/1194.22.htm) for details on the guidelines listed below.		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supported	Elements are always written with a text description thru alt text, long description, labels, titles and accessible via visual text, screen reader or descriptive audio/narration.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supported	Text transcripts, closed captioning and narrated/descriptive audio are always provided with all multimedia presentations.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supported	Web pages and interations/multimedia presentations are designed in such a way that adequate contrast is taken into consideration and screen reader accessibility is available.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supported	Style sheets and documents are designed so that all information present is always available.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Image maps although rarely used are always provided with an alternate hyperlink and are always provided client-side.
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Supported	Image maps although rarely used are always provided with an alternate hyperlink and are always provided client-side.
(g) Row and column headers shall be identified for data tables.	Supported	Table row and column headers are identified with both labels and HTML standard tags.
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	Supported	Tables are divided into separate entities when more than one set of data logic levels exist within a topic or page of information.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Not Applicable	Frames are not used.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supported with Exceptions	All interactions and multimedia projects are created with a minimum of 24 frames per second. However, computer performance may impact the speed of delivery lowering the frequency of updating the screen which could create screen flicker.
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the	Supported	When needed a text-only page of content is automatically delivered or made available on demand when interactions or multimedia content is too complex for conventional

primary page changes.		accessibility standards to be applied.
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Not Applicable	All information provided is pre-rendered to the software application on demand.
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with 1194.21(a) through (l).	Supported	Although rarely used when applicable a plug-in or extra external software application link is always provided.
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supported	Fields and forms provided are tab indexed and screen reader accessible including all information contained within each element.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supported	A direct link to the main body of content is provided from the start of the content.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supported	Alerts are provided thru both visual and audio indication with focus being set to the active warning or screen reader direction.

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

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Section 1194.23 Telecommunications Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.23.htm) for details on the guidelines listed below.		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.	c	Supported with browser/OS supported software.
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for	Supports through Equivalent Facilitation	Supported with browser/OS supported software.

access or shall restore it upon delivery.		
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.	Supports through Equivalent Facilitation	Supported with browser/OS supported software.

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Section 1194.24 Video and Multi-media Products *Refer to (http://www.access-board.gov/sec508/guide/1194.24.htm) for details on the guidelines listed below.*		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.	Not Applicable	The Criteria **does not** apply to the product.
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not Applicable	The Criteria **does not** apply to the product.
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	Supported	All multimedia is created with descriptive audio, transcripts, and narrations.

(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.	Supported	All multimedia is created with descriptive audio, transcripts, and narrations.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Supported	All 508 related content regardless of disability is accessible to the disabled or non-disabled learner for their convenience.

Section 1194.25 Self-Contained, Closed Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.25.htm) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) Self-contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	Not applicable	The Criteria **does not** apply to the product.
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supported	Alerts are provided thru both visual and audio indication with focus being set to the active warning or screen reader direction.
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Supports	Products have mechanically operated controls or keys, that comply with the following: A) Controls and keys discernible without activating the controls or keys. B) Controls and keys are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. C) Key repeat is supported, the delay before repeat is adjustable to at least 2 seconds. Key repeat rate is adjustable to 2 seconds per character. D) The status of all locking or toggle controls or keys is visually discernible, and discernible either through touch or sound.
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not Applicable	The Criteria **does not** apply to the product.

(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	Supported	All multi-media products have full start, stop, pause, closed captioning, transcript, mute and volume level capabilities throughout the product.
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	Supported	All volume levels are automatically adjusted to the default level (45 dB) after every use. User are able to increase the volume from this level if required to accommodate their hearing requirements and needs.
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	Color coding is used but is not the only means of conveying information. Uses of literal change such as a check mark, an "X" or some other meaningful "not there" and after selection "there" change is always given to the user with updated labels and screen reader information.
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.	Supported with Exceptions	Color variations are provided however user preferences, monitor color calibration and desktop settings will always override default and chosen options.
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supported with Exceptions	All interactions and multimedia projects are created with a minimum of 24 frames per second. However, computer performance may impact the speed of delivery lowering the frequency of updating the screen which could create screen flicker.
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.	Not Applicable	The Criteria **does not** apply to the product.
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.	Not Applicable	The Criteria **does not** apply to the product.
(j)(3) Products which are freestanding, non-portable,	Not Applicable	The Criteria **does not** apply to the

and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		product.
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.	Not Applicable	The Criteria **does not** apply to the product.

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Section 1194.26 Desktop and Portable Computers
* *Refer to (http://www.access-board.gov/sec508/guide/1194.26.htm) for details on the guidelines listed below.*

Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Supported	Products have mechanically operated controls or keys, that comply with the following: **A)** Controls and keys discernible without activating the controls or keys. **B)** Controls and keys are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. **C)** Key repeat is supported, the delay before repeat is adjustable to at least 2 seconds. Key repeat rate is adjustable to 2 seconds per character. **D)** The status of all locking or toggle controls or keys is visually discernible, and discernible either through touch or sound.
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Supported	This provision supports either desktop and portable computers that use touchscreens or other controls which are controlled via a person's touch.
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not Applicable	The Criteria **does not** apply to the product.
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not Applicable	The Criteria **does not** apply to the product.

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Section 1194.31 Functional Performance Criteria

Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supported	Alt tags, descriptive audio, narration, transcripts, long descriptions and accessible screen reader textual content are available for people who are blind or visually impaired.

(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Supported	Alt tags, descriptive audio, narration, transcripts, long descriptions and accessible screen reader textual content are available for people who are blind or visually impaired.
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Supported	Closed Captioning and transcript are provided for people who are deaf or hard of hearing.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Supported	Closed Captioning and transcript are provided for people who are deaf or hard of hearing.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Supported	Chat rooms are provided and speech impaired users have the ability to utilize chat rooms to communicate via keyboard.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supported with Exceptions	Alt tags, descriptive audio, narration, transcripts, long descriptions, closed captioning, transcripts and accessible screen reader textual content are available to people who are blind or deaf.

Section 1194.41 Information, documentation, and support.		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supported	Documentation is available at no extra charge upon request, at no additional charge.
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supported	End users can access a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supported	Support services for products accommodate the communication needs of end-users with disabilities