Voluntary Product Accessibility Template® (VPAT®)

Revised Section 508 Edition

Version 2.4Rev

About This Document

The VPAT is provided in four editions based on the standards/guidelines being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International, which includes all of the standards.

This is the Revised Section 508 edition of the VPAT. It includes the following standards/guidelines:

- [Web Content Accessibility Guidelines 2.0](#)

- [Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018](#)

If you need a different combination of standards/guidelines, use the appropriate alternate edition of the VPAT found on the [ITI Accessibility web page](#).

This document is broken into two main sections:

- Essential Requirements and Best Practices for using the VPAT® to complete an Accessibility Conformance Report (the instructions)

- The VPAT

Please carefully review the Essential Requirements and Best Practices sections before using the VPAT to create an Accessibility Conformance Report.

The purpose of these instructions is to promote accurate and consistent reporting of product accessibility information.

The VPAT is a template used to document a product's conformance with accessibility standards and guidelines. The purpose of the Accessibility Conformance Report is to assist customers and buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology," also referred to as "Information and Communication Technology" (ICT) products and services with features that support accessibility.

The Information Technology Industry Council (ITI) provides the VPAT. Use of the template and service mark does not require membership in ITI.

Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors

This section provides guidance for reporting product conformance for major accessibility standards and guidelines using the VPAT® to produce the Accessibility Conformance Report. Deviating from these guidelines precludes vendors from referencing the template by name and/or the VPAT acronym.

Getting Started

1. Before creating a report, read all of the materials provided in this document.

2. Determine which accessibility standards/guidelines will be included in the Accessibility Conformance Report and use the appropriate VPAT file.

3. It is the vendor's responsibility to maintain the integrity of the data in the report.

Essential Requirements for Authors

The following are the minimum requirements to produce an Accessibility Conformance Report based on the VPAT®.

1. The VPAT name and template are registered service marks of ITI. Use of the VPAT template and name requires the inclusion of the registered service mark (i.e., "VPAT®"). Users of the VPAT agree not to deviate from the Essential Requirements for Authors.

2. The template file can be used as is or replicated in a different delivery format, for example as HTML or PDF. The final conformance report must be accessible.

3. A report must contain the following content at a minimum:

   - **Report Title** – In the heading format of "[Company Name] Accessibility Conformance Report"

   - **VPAT Heading Information** – Template version

   - **Name of Product/Version** – Name of Product being reported, including product version identifier if necessary

- **Report Date** – Date of report publication. At a minimum, provide the month and year of the report publication. For example, "May 2016". If date is included, ensure it is clear "4 May 2016" or "May 4, 2016".

- **Product Description** – A brief description of the product

- **Contact Information** – Contact Information for follow-up questions. Listing an email is sufficient.

- **Notes** – Any details or further explanation about the product or the report. This section may be left blank.

- **Evaluation Methods Used** – Include a description of evaluation methods used to complete the VPAT for the product under test.

- **Applicable Standards/Guidelines** – A clear indication of which Standards/Guidelines this Conformance Report covers.
  - The list must include only the Standards/Guidelines used to evaluate the product.
  - The applicable Standards/Guidelines that are included in this VPAT edition are:
    - [Web Content Accessibility Guidelines 2.0](#) or WCAG 2.0 (ISO/IEC 40500)
    - [Revised Section 508 standards](#) – the U.S. Federal accessibility standard for ICT Products, published by the U.S. Access Board in the Federal Register on January 18, 2017 and corrected on January 22, 2018
  - If other Standards/Guidelines are reported, then use the appropriate VPAT edition.
  - This information can be in a table format at the top of the report with the table heading 'Standards/Guidelines' and the reported Standards/Guidelines identified. This information can alternatively be supplied in the introductory text of the report. In the VPAT we have used a table as an example and listed "(yes / no)" for each standard/guideline. To indicate what the report covers leave the appropriate yes or no on each standard/guideline.
  - If multiple Standards or Guideline tables are included, each table must identify the Standard or Guideline that the criteria in that table represent.

- **Terms** – The report must list the definition of the terms used in the Conformance Level column. ITI recommends the following terms. If a vendor deviates from the ITI definitions, the vendor shall reference this change in the

heading Notes section. If a term is not used it can be removed from the list. The ITI definitions are: This can only be used in WCAG 2.x Level AAA

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.

- **Partially Supports**: Some functionality of the product does not meet the criterion.

- **Does Not Support**: The majority of product functionality does not meet the criterion.

- **Not Applicable**: The criterion is not relevant to the product.

Note: When filling in the WCAG tables, a response may use 'Supports' where one might otherwise be inclined to use 'Not Applicable'. This is in keeping with [WCAG 2.0 Understanding Conformance](): This means that if there is no content to which a success criterion applies, the success criterion is satisfied.

- **Not Evaluated**: The product has not been evaluated against the criterion. This can only be used in WCAG 2.x Level AAA.

- **Tables for Each Standard or Guideline** – Tables showing the responses to the criteria.

4. WCAG Conformance Information – The answers in the WCAG success criteria are based on the level of conformance being reported (Level A, AA or AAA).

- These tables are used to answer:

  - Revised Section 508:

    - Chapter 5 Software
    - Chapter 6 Support Documentation

  - The selected levels of WCAG 2.0 Guidelines.

- If using a summary table, due to answers applying to multiple criteria, when answering for the Revised Section 508, the answers need to be clear about which individual criteria the answer applies to. It is possible to either use a summary, selecting the worst case for the criteria, or to have separate answers or even tables for software, support documentation, authoring tools, etc., so long as the methodology used is made clear.

5. Remarks and Explanations – Detailed remarks should be provided in the Remarks and Explanations column to justify your answer in the Conformance Level column.

- When the conformance level is 'Partially Supports' or 'Does Not Support', the remarks should identify:

1. The functions or features with issues

2. How they do not fully support

- If the criterion does not apply, explain why.

- If an accessible alternative is used, describe it.

6. In the Section 508 tables, when subsections of criteria do not apply to the product, the section may be summarized or removed as long as an explanation is provided explaining why a criterion does not apply. Another alternative is to leave the table and add a summary why the section does not apply. For example, in Chapter 5 the criteria in 502 and 503 will not apply to a web only application, thus those sections can be removed with a summary in the notes for the chapter, or a row in the table.

Best Practices for Authors

ITI suggests that authors adopt the following best practices when using the VPAT® to create an Accessibility Conformance Report.

- **Branding Header:** Company logo or branding information

- **Report Date Changes:** If a report is revised, change the report date and explain the revision in the Notes section. Alternately, create a new report and explain in the Notes section that it supersedes an earlier version of the report.

- **Notes:** Add any notes applicable to product or the report
    - Additional information about the product version that the document references
    - Any revisions to the document
    - Links to any related documents
    - Additional information describing the product
    - Additional information about what the document does or does not cover
    - Information suggested by the [WCAG 2.0 Conformance Claim](#)
    - Information needed to satisfy ISO/IEC 17050-1:2004, Supplier's Declaration of Conformity

- **Evaluation Methods Used –** Information to enter may include the following:
    - Testing is based on knowledge of general product functionality (Instructional note: this would mean the tester knows how to use the common uses and flows of the product in addition to accessibility)

- Similar to another evaluated product
- Testing with assistive technologies
- Published test method (provide name, publisher, URL link)
- Vendor proprietary test method
- Other test method

- **Remarks and Explanations:** This section may include:
  - Information regarding the testing of a given criteria.
  - Information on application dependencies to support accessibility (e.g. OS, app frameworks, browsers recommended).
  - How the customer can find more information about accessibility issues. One method can be to include the bug ID where customers can call the company's customer support to get additional information.
  - Known workarounds for accessibility issues.

- **Legal Disclaimer:** Area for any legal disclaimer text required by your organization.

- **Report Size:** To reduce the size of the report it is acceptable to remove sections. Individual criteria cannot be removed, only sections at a time. Section removal is acceptable in four situations:
  - When an entire section is not being reported on because it does not apply to the product, for example:
    - Chapter 4: Hardware. Information should be included in the notes for that section why it has been removed.
    - A card reader that doesn't have sound could remove the criteria in section 413 Closed Caption Processing Technologies and just note the why the criteria doesn't apply.
  - If the product is not being evaluated for a level of the criteria (for example Level AAA) then that table may be deleted.
  - If a requesting customer has identified that a section of the standard does not apply, information should be included in the notes that the section has been removed.

- **WCAG 2.0 Tables:** The WCAG 2.0 criteria are shown in three tables, Level A, Level AA, and Level AAA.
  - If desired, these tables can be combined into one table.
  - When reporting on a level (A, AA or AAA) all criteria for that level must be answered.

- **Language:** Translation to other languages is permitted.

- **Multiple Reports:** When using the VPAT to create an Accessibility Conformance Report for complex products it may be helpful to separate answers into multiple reports. For example, when a product is an Authoring Tool that also has web content and documentation. When multiple reports are used for a complex product, it is required to explain this and how to reach the other reports in the Notes section of each report.

- **Criteria Text:** To help conserve space in the ITI template only the criteria ID number and a short title have been included. Where possible, links have been included to the standard/guideline.

    - It is acceptable to add the full text of the criteria into the cell if desired to help with understanding.

    - The links to the standards/guidelines can be removed.

- **Ordering of Tables:** The order that the standard and guideline tables appear may be changed to facilitate reading. The current order is WCAG then Section 508. You can change this order to insert the WCAG criteria into the Section 508 tables.

- **Guideline Section Heading Rows in Tables:** The tables include heading rows to facilitate understanding the context of the criteria.

    - The cells in these rows do not require answers as indicated by "Heading cell – no response required."

    - It is optional to add a response if desired.

    - The shading of the row is also optional.

    - If removing the heading rows, edit the criteria titles so it's clear where they apply.

Posting the Final Document

- When publishing your Accessibility Conformance Report, be sure to remove the entire first 9 pages of this document, including the table of contents, introductory information and instructions.

- Check for each required item in the VPAT® document:

    - **[Company Name] Accessibility Conformance Report** (report title)

    - **(Based on VPAT® Version 2.4Rev)**

    - **Name of Product/Version**

    - **Report Date**

- **Product Description**

- **Contact Information**

- **Notes**

- **Evaluation Methods Used**

- **Applicable Standards/Guidelines**

- **Terms**

- **Tables for Each Standard or Guideline**

   - Check that there is a response for each criterion for 'Conformance Level' and 'Remarks and Explanations.'

- Verify that the final document is accessible.

- Post your final document on your company's web site, or make the document available to customers upon request.

Table Information for VPAT® Readers

For each of the standards, the criteria are listed by chapter in a table. The structures of the tables are: the first column contains the criteria being evaluated, the second column describes the level of conformance of the product regarding the criteria and the third column contains any additional remarks and explanations regarding the product.

- When sections of criteria do not apply, or are deemed by the customer as not applicable, the section is noted as such and the rest of that table may be removed for that section.

- When multiple standards are being recorded in this document, the duplicative sections are noted and responded to only one time. The duplicate entry will note the cross reference to the data.

HSAG Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT® Version 2.4Rev)

Name of Product/Version: Web Internet Information, Multimedia Video Products, Electronic Documents, Software, Functional Performance Criteria, and Support Documentation and Services

Report Date: 3/30/2022

Product Description: The purpose of this report is to assist you in making preliminary assessments regarding HSAG products and services with features that support accessibility. Specifically HSAG's websites, electronic documents, multimedia video products, software, functional performance criteria, and support documentation and services. There are three columns in each table. The first column contains the criteria being evaluated. The second column describes the level of support provided by the product. The third column describes how the requirement is implemented in the product and contains any additional remarks.

Contact Information: [Dave Kantrud](#)

Notes: This VPAT supersedes version 2.4 released February 2020 due to the latest VPAT version 2.4 (revised) released March 2022.

Evaluation Methods Used: HSAG conforms to the United States Access Board Section 508 Information and Communication Technology (ICT) accessibility standards and guidelines (https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule). HSAG used manual testing to confirm standards/guidelines were met. HSAG also used the JAWS screen reader (v.19), CommonLook PDF and Word software, Adobe Accessibility Checker, and the WAVE Web Accessibility Evaluation Tool.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports**: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- **Not Applicable**: The criterion is not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Every non-text element has a text equivalent via alt description or other text alternative. The alt descriptions succinctly describe the purpose of the objects, without being too verbose or too vague. Electronic Docs: Every non-text element has a text equivalent via alt description or other text alternative. The alt descriptions succinctly describe the purpose of the objects, without being too verbose or too vague. Software: Every non-text element has a text equivalent via alt description or other text alternative. The alt descriptions succinctly describe the purpose of the objects, without being too verbose or too vague. Authoring Tool: HSAG does not produce authoring tools with non-text content or elements that require alt descriptions or other text alternatives.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: HSAG has prerecorded audio and video alternatives for time-based media. HSAG also uses transcripts and closed captioning for web-based audio and text, or audio descriptions for web-based, video-only products. Electronic Docs: HSAG produces transcripts in the form of electronic documents that contain alternatives for time-based media, web-based audio and text, or video-only products. Software: Alternative descriptions can be provided when programming the questionnaire. Authoring Tool: HSAG does not produce authoring tools that require alternatives for time-based media, web-based audio and text, or video-only products.
1.2.2 Captions (Prerecorded) (Level A)	Web: Supports	Web: HSAG has captions for prerecorded audio content

Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	in synchronized media. All training and informational video and multimedia productions that contain speech or other audio information necessary for the comprehension of the content contains closed captioning. Electronic Docs: HSAG produces transcripts in the form of electronic documents that align with captions for prerecorded audio content in synchronized media or video and multimedia productions. Software: Questionnaire must be built accordingly. Questionnaire designer should use HTML5 tags <video> and <track> to provide closed captions. Authoring Tool: HSAG does not produce authoring tools that require captions for prerecorded audio content in synchronized media or video and multimedia productions.
[1.2.3 Audio Description or Media Alternative (Prerecorded)](#) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: HSAG provides alternatives for time-based media or audio descriptions of prerecorded video content for synchronized media. All training and informational video and multimedia productions that contain visual information necessary for the comprehension of the content is audio described. Electronic Docs: HSAG provides all of the information in synchronized media (both visual and auditory) in text form to serve as an alternative for time-based media, audio descriptions of prerecorded video content for synchronized media, or video and multimedia productions. Software: Questionnaire must be built accordingly. Questionnaire designer should use HTML5 tags <video> and <track> to provide closed captions. Authoring Tool: HSAG does not produce authoring tools that require alternatives for time-based media, audio descriptions of prerecorded video content for

Criteria	Conformance Level	Remarks and Explanations
		synchronized media, or video and multimedia productions.
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: If information and relationships are implied by visual or auditory formatting, HSAG ensures that this formatting is preserved when format changes (read by screen reader, author style sheets, auditory cues). Electronic Docs: If information and relationships are implied by visual or auditory formatting, HSAG ensures that this formatting is preserved when format changes (read by screen reader, author style sheets, auditory cues). Software: If information and relationships are implied by visual or auditory formatting, HSAG ensures that this formatting is preserved when format changes (read by screen reader, author style sheets, auditory cues). Authoring Tool: HSAG does not produce authoring tools that require formatting to be preserved when format changes (read by screen reader, author style sheets, auditory cues).
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: The reading and navigation order (determined by code order) is logical, intuitive, and is preserved in alternative presentations of the content to maintain understanding of the meaning. Electronic Docs: The reading and navigation order (determined by code order) is logical, intuitive, and is preserved in alternative presentations of the content to maintain understanding of the meaning. Software: The reading and navigation order (determined by code order) is logical, intuitive, and is preserved in alternative presentations of the content to maintain understanding of the meaning. Authoring Tool: HSAG does not produce authoring tools where a correct reading sequence can be programmatically determined, or where meaningful

Criteria	Conformance Level	Remarks and Explanations
		sequence is required.
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Instructions for content do not rely only on shape, size, or visual location and additional information is provided to clarify content dependent on this kind of information. Electronic Docs: Instructions for content do not rely only on shape, size, or visual location and additional information is provided to clarify content dependent on this kind of information. Software: Instructions for content do not rely only on shape, size, or visual location and additional information is provided to clarify content dependent on this kind of information. Authoring Tool: HSAG does not produce authoring tools where instructions rely only on shape, size, or visual location.
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: When color is used to enhance the visibility of important information, an alternative indicator is used or other visual means are used to perceive the information. Electronic Docs: When color is used to enhance the visibility of important information, an alternative indicator is used or other visual means are used to perceive the information. Software: When color is used to enhance the visibility of important information, an alternative indicator or other visual means are used to convey the information. All buttons enhanced with color have text content representing their function and use. Authoring Tool: HSAG does not produce authoring tools where an alternative indicator is used for color or where other visual means are used to perceive the information.

Criteria	Conformance Level	Remarks and Explanations
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: If audio were to be included in web content, sound would be started by an action initiated by the user and not include elements of audio that play automatically for more than three seconds when a user lands on a page. Electronic Docs: If audio were to be included in electronic documents, sound would be started by an action initiated by the user and not include elements that play automatically for more than three seconds. Software: A Timer question can be used to control the playback after a period of time. Authoring Tool: HSAG does not produce authoring tools with elements that play automatically for more than three seconds. If audio were to be included, sound would be started by an action initiated by the user.
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: All page functionality and content are available using the keyboard or keyboard interface, and do not require specific timings for keystrokes. No input is dependent on user movement. Electronic Docs: All page functionality and content are available using the keyboard or keyboard interface, and do not require specific timings for keystrokes. No input is dependent on user movement. Software: All page functionality and content are available using the keyboard or keyboard interface, and do not require specific timings for keystrokes. No input is dependent on user movement. Authoring Tool: HSAG does not produce authoring tools that require content functionality to be operable through a keyboard or keyboard interface.
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not	Web: Keyboard or keyboard interface focus is never locked or trapped at one particular page element or subsection ensuring the user can navigate to and away from all navigable page elements using a keyboard only.

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool) • 602.3 (Support Docs)	applicable	Electronic Docs: Keyboard or keyboard interface focus is never locked or trapped at one particular page element or subsection ensuring the user can navigate to and away from all navigable page elements using a keyboard only. Software: Keyboard or keyboard interface focus is never locked or trapped at one particular page element or subsection ensuring the user can navigate to and away from all navigable page elements using a keyboard only. Authoring Tool: HSAG does not produce authoring tools where a keyboard or keyboard interface locks or traps at a particular element or subsection.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Should requirements dictate functions that are time-dependent or where timed responses are required, the user will be alerted with compliant mechanisms with sufficient time to respond that additional time may be needed and that the time limit can be turned off, adjusted, or extended. Electronic Docs: Should requirements dictate functions that are time-dependent or where timed responses are required, the user will be alerted with compliant mechanisms with sufficient time to respond that additional time may be needed and that the time limit can be turned off, adjusted, or extended. Software: In general, HSAG does not design functions that are time-dependent or where timed responses are required. However, should requirements dictate, the user will be alerted with compliant mechanisms with sufficient time to respond that additional time may be needed and that the time limit can be turned off, adjusted, or extended. Authoring Tool: HSAG does not produce authoring tools that require timed responses.
2.2.2 Pause, Stop, Hide (Level A)	Web: Supports	Web: For moving, blinking, scrolling, or auto updating

Criteria	Conformance Level	Remarks and Explanations

Also applies to:
Revised Section 508
   • 501 (Web)(Software)
   • 504.2 (Authoring Tool)
   • 602.3 (Support Docs)
	Electronic Docs: Supports
	Software: Supports
	Authoring Tool: Not applicable
		information that starts automatically, lasts more than five seconds, and presents in parallel with other content, users can pause, stop, hide the content, or control the frequency for nonessential activities, when applicable but is not default functionality.
		Electronic Docs: For electronic documents where moving, blinking, scrolling, or auto updating information that starts automatically, lasts more than five seconds, or presents in parallel with other content is embedded, users can pause, stop, hide the content, or control the frequency for nonessential activities, when applicable but is not default functionality.
		Software: For moving, blinking, scrolling, or auto updating information that starts automatically, lasts more than five seconds, and presents in parallel with other content, users can pause, stop, hide the content, or control the frequency for nonessential activities.
		Authoring Tool: HSAG does not produce authoring tools with moving, blinking, scrolling, or auto updating information that starts automatically, lasts more than five seconds, or presents in parallel with other content.

[2.3.1 Three Flashes or Below Threshold](#) (Level A)
Also applies to:
Revised Section 508
   • 501 (Web)(Software)
   • 504.2 (Authoring Tool)
   • 602.3 (Support Docs)
	Web: Supports
	Electronic Docs: Supports
	Software: Supports
	Authoring Tool: Not applicable
		Web: No elements on the page flash more than three times per second and fall above general flash and red flash thresholds, thus reducing the risk of optically induced seizures.
		Electronic Docs: For electronic documents, no embedded content contains elements that flash more than three times per second and fall above general flash and red flash thresholds.
		Software: No elements on the page flash more than three times per second and fall above general flash and red flash thresholds, thus reducing the risk of optically induced seizures.
		Authoring Tool: HSAG does not produce authoring tools

Criteria	Conformance Level	Remarks and Explanations
		with elements that flash more than three times per second and fall above general flash and red flash thresholds.
2.4.1 Bypass Blocks (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Electronic Docs: Supports Authoring Tool: Not applicable	Web: A skip-to-content link is provided on each web page to bypass blocks of content. Electronic Docs: Heading elements are identified at each section of content. Headings are marked as heading tags in PDFs. Authoring Tool: HSAG does not produce authoring tools with the ability to bypass blocks of content on multiple pages.
2.4.2 Page Titled (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: HSAG web pages have descriptive and informative page titles that indicate topic or purpose. Electronic Docs: HSAG documents have descriptive and informative page titles that indicate topic or purpose. Software: HSAG software has descriptive and informative page titles that indicate topic or purpose. Authoring Tool: HSAG does not produce authoring tools that require descriptive and informative page titles.
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: The sequential navigation of content provides information in an order consistent with content meaning and can be operated using a keyboard. The navigation order of links, form elements, etc., is logical and intuitive. Electronic Docs: The sequential navigation of content provides information in an order consistent with content meaning and can be operated using a keyboard. The navigation order of links, form elements, etc., is logical and intuitive. Software: The sequential navigation of content provides information in an order consistent with content meaning and can be operated using a keyboard. The navigation order of links, form elements, etc., is logical and intuitive.

Criteria	Conformance Level	Remarks and Explanations
		Authoring Tool: HSAG does not produce authoring tools that require content to have a logical navigation order or to be operated by a keyboard.
2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Link text alone contains enough information to determine the purpose of each link. Link text and its content (surrounding paragraph, table headers) also contains enough information to determine purpose. Electronic Docs: Link text alone contains enough information to determine the purpose of each link. Link text and its content (surrounding paragraph, table headers) also contains enough information to determine purpose. Software: Link text alone contains enough information to determine the purpose of each link. Link text and its content (surrounding paragraph, table headers) also contains enough information to determine purpose. Authoring Tool: HSAG does not produce authoring tools that require informative link text/surrounding content.
3.1.1 Language of Page (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: The language on pages is identified using the <html lang=en> attribute to present text and other linguistic content correctly. Electronic Docs: The language on pages is identified. Software: The language on pages is identified using the <html lang=en> attribute to present text and other linguistic content correctly. Authoring Tool: HSAG does not produce authoring tools that require programmatically determined language.
3.2.1 On Focus (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: When a page element receives focus, it does not result in a change of context, a substantial change on the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user. Electronic Docs: When a page element receives focus, it does not result in a change of context, a substantial

Criteria	Conformance Level	Remarks and Explanations
		change on the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user. Software: When a page element receives focus, it does not result in a change of context, a substantial change on the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user. Authoring Tool: HSAG does not produce authoring tools with elements that receive focus resulting in a change of context.
3.2.2 On Input (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Setting changes made in the user interface do not cause an automatic change of the context unless the change is predicted, or the user is notified prior to the change. Users are notified in advance when context is changed after selecting a checkbox, entering text into a text field, or changing an option in a list control. Electronic Docs: All form controls in a document have text labels adjacent to them. All PDF forms have accessibility tag elements and field help text. Form elements have labels associated with them. Users are notified in advance when context is changed after selecting a checkbox, entering text into a text field, or changing an option in a list control. Software: Setting changes made in the user interface do not cause an automatic change of the context unless the change is predicted, or the user is notified prior to the change. Users are notified in advance when context is changed after selecting a checkbox, entering text into a text field, or changing an option in a list control. Authoring Tool: HSAG does not produce authoring tools where changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the

Criteria	Conformance Level	Remarks and Explanations
		behavior before using the component.
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Form fields requiring a specific format, value, or length indicate so within the element's label or title. Error identification and description are displayed and described as plain text and error fields are highlighted. Electronic Docs: Form fields requiring a specific format, value, or length indicate so within the element's label or title. Error identification and description are displayed and described as plain text. Software: Form fields requiring a specific format, value, or length indicate so within the element's label or title. Error identification and description are displayed and described as plain text and error fields are highlighted. Authoring Tool: HSAG does not produce authoring tools that require form fields to indicate a specific format, value, or length and does not require error identification or description.
3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: All form controls have text labels adjacent to them when content requires user input. All PDF forms have accessibility tag elements and field help text. Form elements have labels associated with them. Users can navigate through the form with their keyboard or Assistive Technology and access the functionality and help required to complete and submit the form. Electronic Docs: All form controls have text labels adjacent to them when content requires user input. All PDF forms have accessibility tag elements and field help text. Form elements have labels associated with them. Users can navigate through the form with their keyboard or Assistive Technology and access the functionality and help required to complete and submit the form. Software: All form controls have text labels adjacent to them when content requires user input. Form elements

Criteria	Conformance Level	Remarks and Explanations
		have labels associated with them. Users can navigate through the form with their keyboard or Assistive Technology and access the functionality and help required to complete and submit the form. Authoring Tool: HSAG does not produce authoring tools that require form controls to have text labels adjacent to them when content requires user input.
4.1.1 Parsing (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Elements have complete start and end tags, and elements are nested according to their specifications so assistive technologies can parse content accurately. Electronic Docs: For electronic documents with embedded content, elements contain start and end tags and are nested according to their specifications. Software: Elements have complete start and end tags, and where possible elements are nested according to their specifications so assistive technologies can parse content accurately. Authoring Tool: HSAG does not produce authoring tools with elements containing start and end tags and are nested according to their specifications.
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: User interface components can be programmatically determined for standard HTML components and are used according to specification. Electronic Docs: Electronic documents will be embedded with user interface components can be programmatically determined for standard HTML components. Software: User interface components can be programmatically determined for standard HTML components and are used according to specification. Authoring Tool: HSAG does not produce authoring tools with user interface components that can be programmatically determined for standard HTML components.

Table 2: Success Criteria, Level AA

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not applicable Software: Supports Authoring Tool: Not applicable	Web: Captions are created for all live audio content in synchronized media that include dialogue and identify speakers. Electronic Docs: HSAG does not produce electronic documents with captions for live audio content in synchronized media. Software: Questionnaire must be built accordingly. Questionnaire designer should use HTML5 tags <video> and <track> to provide closed captions. Authoring Tool: HSAG does not produce authoring tools with captions for live audio content in synchronized media.
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: HSAG provides audio descriptions for prerecorded video content in synchronized media when the video portion is not available (e.g., during long pauses in dialogue). Electronic Docs: For electronic documents with embedded content, this content will provide audio descriptions for prerecorded video content in synchronized media. Software: Questionnaire must be built accordingly. Questionnaire designer should use HTML5 tags <video> and <track> to provide closed captions. Authoring Tool: HSAG does not produce authoring tools with audio descriptions for prerecorded video content in synchronized media.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not	Web: All text has a contrast ratio of 4.5:1, and a contrast ratio of 3:1 is applied to large text. Incidental text or images and logotype text do not have contrast requirements.

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool) • 602.3 (Support Docs)	applicable	Electronic Docs: All text has a contrast ratio of 4.5:1, and a contrast ratio of 3:1 is applied to large text. Incidental text or images and logotype text do not have contrast requirements. Software: All text has a contrast ratio of 4.5:1, and a contrast ratio of 3:1 is applied to large text. Incidental text or images and logotype text do not have contrast requirements. Authoring Tool: HSAG does not produce authoring tools with visual presentation of text and images of text that require a contrast ratio of 4.5:1, or a contrast ratio of 3:1 for large text.
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Text can be resized without assistive technology up to 200 percent without loss of content or functionality, so it can be read directly by people with mild visual disabilities. Electronic Docs: Content is readable when text size is doubled. Software: Text can be resized without assistive technology up to 200 percent without loss of content or functionality, so it can be read directly by people with mild visual disabilities. Authoring Tool: HSAG does not produce authoring tools that require content to be readable when text size is doubled.
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: When the same visual presentation can be made using text only, an image is not used to present that text, for example, through the use of styled headings and navigation items using a cascading style sheet (CSS). Electronic Docs: When the same visual presentation can be made using text only, an image is not used to present that text, for example, through the use of styled headings and navigation items using a cascading style sheet (CSS).

Criteria	Conformance Level	Remarks and Explanations
		Software: When the same visual presentation can be made using text only, an image is not used to present that text, for example, through the use of styled headings and navigation items using a cascading style sheet (CSS). Authoring Tool: HSAG does not produce authoring tools where text is used to convey information rather than images of text.
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Electronic Docs: Supports Authoring Tool: Not applicable	Web: Multiple ways are available to find other web pages, including a site map and site search functionality. Electronic Docs: Multiple ways are available to find other pages in a document, including a table of contents and bookmarks. Authoring Tool: HSAG does not produce authoring tools that require multiple ways to find other pages, within a set of pages.
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Page headings, labels, and interactive controls are informative and describe topic or purpose to assist in finding information easily. Electronic Docs: Page headings, labels, and interactive controls are informative and describe topic or purpose to assist in finding information easily. Software: Page headings, labels, and interactive controls are informative and describe topic or purpose to assist in finding information easily. Authoring Tool: HSAG does not produce authoring tools that require page headings, labels, and interactive controls to be informative.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Page elements are visually apparent when using the keyboard. When users tab through a page, users can see where they are on the page and which element has the keyboard focus. Electronic Docs: Page elements are visually apparent when using the keyboard. When users tab through a

Criteria	Conformance Level	Remarks and Explanations
• 602.3 (Support Docs)		document, users can see where they are on the page and which element has the keyboard focus. Software: Page elements are visually apparent when using the keyboard. When users tab through a page, users can see where they are on the page and which element has the keyboard focus. Authoring Tool: HSAG does not produce authoring tools where a keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: Page content language that is in a different language is identified so that speech synthesizers that support multiple languages will be able to speak the text in the appropriate accent with proper pronunciation. Electronic Docs: Page content language that is in a different language is identified so that speech synthesizers that support multiple languages will be able to speak the text in the appropriate accent with proper pronunciation. Software: Page language is overridden by Web Browser settings. Page language is always consistent and does not change due to content; all content is in English only. Authoring Tool: HSAG does not produce authoring tools where the human language of each passage or phrase in the content can be programmatically determined.
3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Electronic Docs: Supports Authoring Tool: Not applicable	Web: Repeated navigation links on web pages do not change order when navigating through the site. They consistently appear in the same relative order/location. Electronic Docs: HSAG documents contain consistent headers, footers, and page numbers. Authoring Tool: HSAG does not produce authoring tools with repeated navigation links that change order during navigation.
3.2.4 Consistent Identification (Level AA) Also applies to:	Web: Supports Electronic Docs: Not	Web: Elements and text alternatives with the same functionality are consistently identified across a set of

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	applicable Authoring Tool: Not applicable	web pages. Electronic Docs: HSAG does not produce electronic documents that have elements with the same functionality that are consistently identified across pages. Authoring Tool: HSAG does not produce authoring tools that have elements with the same functionality that are consistently identified across pages.
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports with exceptions Electronic Docs: Supports Software: Supports Authoring Tool: Not applicable	Web: When input errors are detected, information and suggestions for correction are provided to users as to how to successfully correct input errors. Electronic Docs: HSAG 's electronic documents detect input errors that provide information as to how to fix the error to allow users to successfully fill out forms. Software: When input errors are detected, information and suggestions for correction are provided to users as to how to successfully correct input errors. Authoring Tool: HSAG does not produce authoring tools with detected input errors that provide information as to how to fix the error to allow users to successfully fill out forms.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Not applicable Electronic Docs: Not applicable. Software: Supports Authoring Tool: Not applicable	Web: HSAG does not use its website to allow individuals to complete legal commitments or financial transactions. Electronic Docs: HSAG does not produce electronic documents to allow individuals to complete legal commitments or financial transactions. Software: Software allows individuals to complete legal commitments or financial transactions. Authoring Tool: HSAG does not produce authoring tools to allow individuals to complete legal commitments or financial transactions.

Table 3: Success Criteria, Level AAA

Notes: HSAG does not evaluate WCAG Level AAA.

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.2.8 Media Alternative (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.2.9 Audio-only (Live) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.4.6 Contrast (Enhanced) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.4.7 Low or No Background Audio (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.4.8 Visual Presentation (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
1.4.9 Images of Text (No Exception) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.1.3 Keyboard (No Exception) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.2.3 No Timing (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.2.4 Interruptions (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.2.5 Re-authenticating (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.3.2 Three Flashes (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.4.8 Location (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated

Criteria	Conformance Level	Remarks and Explanations
2.4.9 Link Purpose (Link Only) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
2.4.10 Section Headings (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.1.3 Unusual Words (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.1.4 Abbreviations (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.1.5 Reading Level (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.1.6 Pronunciation (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.2.5 Change on Request (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.3.5 Help (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated
3.3.6 Error Prevention (All) (Level AAA) Revised Section 508 – Does not apply	Web: Not evaluated	Web: Not evaluated

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Notes: All remarks and explanations are included in the table below.

Chapter 3: Functional Performance Criteria (FPC)

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	All information provided by the website, in documents, software, or multimedia is either text, labeled markup, or closed captioned. Support for screen readers is provided (e.g., through transcripts). All training and informational video and multimedia productions that contain visual information necessary for the comprehension of the content is audio described.
302.2 With Limited Vision	Supports	Functionality is provided by the web browser as well as by the font size button/magnification functionality of the website/electronic documents/software. Support for screen readers is provided (e.g., through transcripts). Color contrast requirements are also met. All training and informational video and multimedia productions that contain visual information necessary for the comprehension of the content is audio described.
302.3 Without Perception of Color	Supports	When color is used to enhance the visibility of important information or a

Criteria	Conformance Level	Remarks and Explanations
		visual mode of operation, an alternative indicator is used that does not require color perception (usually text).
302.4 Without Hearing	Supports	Operation of the website and use of documents does not require user hearing. All multimedia with audio produced by HSAG are closed captioned.
302.5 With Limited Hearing	Supports	Operation of the website, software, and use of documents does not require user hearing. Keyboards are used as a mode of operation to enhance and control volume. All videos are closed captioned.
302.6 Without Speech	Supports	Operation of the website, documents, software, and multimedia products does not require speech. Keyboards are used as a mode of operation to enhance and control volume.
302.7 With Limited Manipulation	Supports	The website, software, and documents can be navigated with simple keystrokes (e.g., tab, space, alpha keys, ALT) and does not require fine motor controls or simultaneous actions.
302.8 With Limited Reach and Strength	Supports	The website, software, and documents can be navigated with simple keystrokes (e.g., tab, space, alpha keys, ALT) and does not require fine motor controls or simultaneous actions.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	HSAG provides technical support for all of its products through email, voice (telephone), fax, documentation, and on-site training. Additionally, a description of the accessibility and compatibility features in alternate formats will be provided on

Criteria	Conformance Level	Remarks and Explanations
		request, at no additional charge. Support documentation is available on the website in both HTML and PDF formats at no additional charge. Key documents are translated and available at no additional charge.

Chapter 4: Hardware

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen	Supports	HSAG's web applications support third-party accessibility tools that convert text to audio.
402.2.2 Transactional Outputs	Supports	HSAG's web applications provide confirmation text when transactions are completed that can be converted from text to audio by third-party accessibility tools.
402.2.3 Speech Delivery Type and Coordination	Supports	HSAG's web applications support third-party accessibility tools that convert text to speech in a digitized format and coordinated with information displayed on the screen.
402.2.4 User Control	Supports	HSAG's web applications support third-party accessibility tools that convert text to speech and can be interrupted, repeated, and paused.
402.2.5 Braille Instructions	Supports	Key documents and instructions for initiating the operation of speech mode

Criteria	Conformance Level	Remarks and Explanations
		are available at no additional charge. HSAG's contracted translation vendor provides Braille translations.
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Supports	HSAG's web applications support third-party accessibility tools including audio hardware that provide volume controls.
402.3.2 Non-private Listening	Supports	HSAG's web applications support third-party accessibility tools including audio hardware that can amplify volume up to at least 65dB and automatically reset the volume to a default level after every use.
402.4 Characters on Display Screens	Supports	HSAG's Cisco 8800 telephone handsets support characters displayed on the screen in a sans serif font and provides screen enlargement. Characters contrast with their background with either light characters on a dark background or dark characters on a light background.
402.5 Characters on Variable Message Signs	Supports	Characters on variable message signs shall conform to section 703.7 Variable Message Signs of ICC A117.1-2009 (incorporated by reference, see 702.6.1).
403 Biometrics	Heading cell – no response required	Heading cell – no response required
403.1 General	Supports	HSAG does not use biometrics as the only means for user identification or control access.
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required
404.1 General	Supports	HSAG's Cisco phone system supports the Baudot tones used by U.S. standard TTY's and are transmitted and received reliably by the Cisco 8800 series telephone handsets.

Criteria	Conformance Level	Remarks and Explanations
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General	Supports	HSAG's Cisco 8800 telephone handsets provide the same degree of privacy of input and output to all individuals. When speech output required by 402.2 is enabled, the screen does not blank automatically.
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General	Supports	HSAG's Cisco 8800 telephone handsets are equipped with standard connectors including RJ-45, USB, and Bluetooth.
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Supports	HSAG's Cisco 8800 telephone handsets have keys and controls that contrast visually from the background.
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Supports	HSAG's Cisco 8800 telephone handsets are arranged in a standard layout with a raised nib on the 5-key, thereby making tactile navigation easier for visually impaired users.
407.3.2 Alphabetic Keys	Supports	Alphabetic keys are arranged in a QWERTY-based layout and the "F" and "J" keys are distinct from other keys.
407.3.3 Numeric Keys	Supports	IT Numeric keys are arranged in a 12-key ascending/descending layout. The number 5 key is tactilely distinct from other numeric keys.
407.4 Key Repeat	Supports	HSAG's web applications support operating system's accessibility keyboard settings including key repeat that can be adjusted to a 2 second minimum.
407.5 Timed Response	Supports	If a timed response is implemented, the

Criteria	Conformance Level	Remarks and Explanations
		user shall be alerted visually, as well as by touch or sound, and shall be given the opportunity to indicate that more time is needed.
407.6 Operation	Supports	At least one mode of operation requires no grasping, pinching, or twisting of the wrist.
407.7 Tickets, Fare Cards, and Keycards	Supports	Keycards have an orientation that is tactilely discernible.
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Supports	The device position is determined during installation at the discretion of the end user.
407.8.1.1 Vertical Plane for Side Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.1.2 Vertical Plane for Forward Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.2 Side Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.2.1 Unobstructed Side Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.2.2 Obstructed Side Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.3 Forward Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.3.1 Unobstructed Forward Reach	Supports	The device position is determined during installation at the discretion of the end

Criteria	Conformance Level	Remarks and Explanations
		user.
407.8.3.2 Obstructed Forward Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Supports	The device position is determined during installation at the discretion of the end user.
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Supports	The device position is determined during installation at the discretion of the end user.
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Supports	Display screens are visible from a point located 40 inches above the floor space.
408.3 Flashing	Supports	HSAG's Cisco 8800 telephone handsets do not flash more than three times in any one-second and fall above general flash and red flash thresholds.
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General	Supports	Where provided, indicators for status are discernible visually and by touch or sound.
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General	Supports	When color is used to enhance the visibility of conveying important information or action, an alternative indicator or other visual means are used to perceive the information.
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	Audible signals or cues are not the only means of conveying information, actions, or prompts.
412 ICT with Two-Way Voice Communication	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
412.2.1 Volume Gain for Wireline Telephones	Supports	HSAG's Cisco 8800 telephone handsets support volume gain conforming to 47 CFR 68.317.
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	HSAG does not have a non-wireline ICT.
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	Not applicable
412.3.2 Wireline Handsets	Supports	HSAG's Cisco 8800 telephone handsets conform to TIA-1083-B.
412.4 Digital Encoding of Speech	Supports	HSAG's Cisco 8800 telephone handsets can transmit and receive speech that is digitally encoded in the manner specified by ITU-T Recommendation G.7222.2 and IETF RFC 6716.
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Supports	HSAG's Cisco 8800 telephone handsets have caller identification and similar telecommunications functions are visible and audible.
412.7 Video Communication	Supports	Real-time video quality is sufficient to support communication using sign language.
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Supports	HSAG's Cisco phone system supports electronic, non-acoustic connections using an RJ-11 analog telephone line through a Cisco ATA-186 FXS port.
412.8.2 Voice and Hearing Carry Over	Supports	HSAG's Cisco 8800 telephone handsets provide microphone capability of turning on and off that would allow the user to intermix speech with a TTY.
412.8.3 Signal Compatibility	Supports	HSAG's Cisco phone system supports Baudot tones used by U.S. standard TTY's using the G.711 codec.

Criteria	Conformance Level	Remarks and Explanations
412.8.4 Voice Mail and Other Messaging Systems	Supports	HSAG's voice mail, auto-attendant, interactive voice response, and caller identification systems are compatible with TTY.
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Supports	Hardware supports display of captions.
413.1.2 Pass-Through of Closed Caption Data	Supports	Hardware cabling and equipment passes through caption data (renders for end user).
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	HSAG does not use digital television tuners.
414.1.2 Other ICT	Not Applicable	HSAG does not use audio description processing technologies for other ICT.
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Supports	Operable parts for caption control are available.
415.1.2 Audio Description Controls	Supports	Operable parts for audio description are available.

Chapter 5: Software

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.x section	See information in WCAG 2.x section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Not Applicable	HSAG does not provide or alter platform software and delivers all software through a web browser that has its own accessibility features, which it does not override or alter. HTML markup conforms to WCAG standards for screen readers,

Criteria	Conformance Level	Remarks and Explanations
		custom style sheets and other readability aids.
502.2.2 No Disruption of Accessibility Features	Not Applicable	HSAG does not provide or alter platform software and delivers all software through a web browser that has its own accessibility features, which it does not override or alter. HTML markup conforms to WCAG standards for screen readers, custom style sheets and other readability aids.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Supports	The web browsing software used to access our software provides semantic information about the user interface objects to the assistive technology (AT) through application programming interfaces that expose information to the AT (e.g., name, role, state). Keyboard navigation of page elements is not defeated or altered.
502.3.2 Modification of Object Information	Supports	The web browsing software used to access our software provides semantic information about the user interface objects to the AT through application programming interfaces that expose information to the AT (e.g., name, role, state). Software allows for ATs to set attributes in the object information (e.g., setting the styling of text).
502.3.3 Row, Column, and Headers	Supports	Information represented as tables is displayed using standard organization and relationship information is available programmatically using AT (e.g., table

Criteria	Conformance Level	Remarks and Explanations
		headers are coded as headers). Keyboard navigation of page elements is not defeated or altered.
502.3.4 Values	Supports	Associated object current value(s) or allowable value ranges are programmatically determinable to AT by using native controls in the browser and mobile devices.
502.3.5 Modification of Values	Supports	Associated object current value(s) or allowable value ranges are programmatically determinable to AT by using native controls in the browser and mobile devices.
502.3.6 Label Relationships	Supports	Associated object current value(s) or allowable value ranges are programmatically determinable to AT by using native controls in the browser and mobile devices.
502.3.7 Hierarchical Relationships	Supports	Labels used to describe objects (e.g., buttons, edit fields) are programmatically associated with the object for AT to make them available to the user. Descriptions/instructions are programmatically determinable.
502.3.8 Text	Supports	Software provides semantic information about the user interface objects to the AT including parent-child relationship components allowing users to understand how to navigate and interact with interface controls. HTML standards (single header, hierarchal tagging, reducing excessive structure is enforced both by generative software and coding style

Criteria	Conformance Level	Remarks and Explanations
		guides.
502.3.9 Modification of Text	Supports	The functionality to create, interact with, and modify editable text is programmatically available to the AT; browser functionality to interact with text is not altered or overridden. Text fields have standard security features that do not unreasonably prevent free text entry within expected input parameters.
502.3.10 List of Actions	Not Applicable	Software does not alter, or override known and accepted actions (such as altering key bindings or changing clipboard behavior).
502.3.11 Actions on Objects	Not Applicable	Software does not alter, or override known and accepted actions (such as altering key bindings or changing clipboard behavior).
502.3.12 Focus Cursor	Supports	The focus location, selection state, and text insertion point information are programmatically available to AT to describe, magnify, or manipulate the focused object for the user, using browser native controls.
502.3.13 Modification of Focus Cursor	Supports	Focus location, selection state, and text insertion points that can be set by the user are programmatically available to AT, such as speech-recognition programs (entering spoken text into a document), using browser native controls.
502.3.14 Event Notification	Not Applicable	Software does not override or alter existing Web Browser functionality that would support AT notification of alerts or content changes.

Criteria	Conformance Level	Remarks and Explanations
502.4 Platform Accessibility Features	Not Applicable	HSAG does not provide a platform (computing hardware, operating system, web browser) and does not prevent the existing functionality of established Web platforms, operating systems, hardware, and 3rd party software from use with AT.
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	HSAG does not produce applications where preferences set by users on platform settings (e.g., color, contrast, font size, etc.) are carried over/permitted by applications, and not overridden or altered. Custom style sheet overrides are not prevented.
503.3 Alternative User Interfaces	Not Applicable	HSAG does not provide or prevent the use of AT including alternative user interfaces, high-contrast style sheets, screen magnifiers, and CSS style sheets.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Partially Supports	HSAG does not produce applications that use custom media players for audio or video playback. If the video playback application allows for caption controls, this option is not blocked or prevented.
503.4.2 Audio Description Controls	Partially Supports	HSAG does not produce applications that use custom media players for audio or video playback. Third-party tools that allow this functionality are not altered and pass through to the site via an iFrame.
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	See WCAG 2.x section	See information in WCAG 2.x section
504.2.1 Preservation of Information Provided for Accessibility in Format	Not Applicable	HSAG does not produce authoring tools

Criteria	Conformance Level	Remarks and Explanations
Conversion		that convert format of web sites to other formats or platforms.
504.2.2 PDF Export	Supports	PDF documents generated by HSAG applications support current format standards and pass PDF (1.7) and PDF/A (ISO-19005) validations. PDFs are authored to our communications standards for contrast, readability, and compatibility with standard PDF readers and browsers.
504.3 Prompts	Not Applicable	HSAG does not produce authoring tools that prompt/guide users to create accessible content (e.g., including ALT text field when inserting images).
504.4 Templates	Not Applicable	HSAG does not produce authoring tools that provide templates or accessible template options.

Chapter 6: Support Documentation and Services

Notes: All remarks and explanations are included in the table below.

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	A description of the accessibility and compatibility features in alternate formats will be provided on request, at no additional charge.
602.3 Electronic Support Documentation	See WCAG 2.x section	See information in WCAG 2.x section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	HSAG provides technical support for all of its products through email, voice (telephone), fax, documentation, and on-site training. Key documents are translated

Criteria	Conformance Level	Remarks and Explanations
		and available at no additional charge.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	A description of the accessibility and compatibility features in alternate formats will be provided on request, at no additional charge. HSAG provides technical support for all its products through email, voice (telephone), fax, documentation, and on-site training.
603.3 Accommodation of Communication Needs	Supports	HSAG provides technical support for all its products through email, voice (telephone), fax, documentation, and on-site training. Key documents are translated and available at no additional charge. Sign language interpreters, real-time captioning, and other alternative methods are available to meet the needs of individuals with disabilities.

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