

VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date: 02/21/2017

Name of Product: Echo360

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Definition of Terms Used in VPAT Column “Supporting Features”

- **Supports** - the product fully meets the criteria.
- **Offers Some Support** - The product largely does not meet the criteria, except for in a few instances.
- **Partially Supports** - The product has many instances of meeting the criteria, and many others of not meeting it.
- **Supports with Exceptions**- The product largely meets the criteria, except for a few instances where it does not.
- **Not Applicable (N/A)** - The criteria does not apply to this product.
- **Not Supported** - The product does not meet the criteria.

Summary Table

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Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Supports with exceptions	Refer to details below.
Section 1194.22 Web-based Internet Information and Applications	Supports with exceptions	Refer to details below.
Section 1194.23 Telecommunications Products	Not Applicable	
Section 1194.24 Video and Multimedia Products	Supports with exceptions	Refer to details below.
Section 1194.25 Self-Contained, Closed Products	Not Applicable	
Section 1194.26 Desktop and Portable Computers	Not Applicable	
Section 1194.31 Functional Performance Criteria	Supports with exceptions	Refer to details below.
Section 1194.41 Information, Documentation and Support	Supports with exceptions	Refer to details below.

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Section 1194.21 Software Applications and Operating Systems – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
<p>(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.</p>	<p>Supports with exceptions</p>	<p>Most of the functionality of the product is available through the keyboard. Exceptions include:</p> <ul style="list-style-type: none"> ● It is not possible to fully scroll the index topics with the keyboard on the support page. ● On the class info page, the video and slides links are not usable by keyboard users. ● Due to improper markup the bookmark link on the Study Guide is unusable to keyboard users. ● Questions in the discussion pane cannot be opened by keyboard users. ● The controls on the class list pane are not accessible via keyboard. ● The options menu for the slides and video in “My Content” in the Instructor Library are not accessible via keyboard. ● Table sorting options on the Instructors tab

		<p>and the Students tab of the settings page are not accessible to keyboard users.</p> <ul style="list-style-type: none"> • The capture submenus on the Admin Dashboard are not accessible to keyboard users. • Filtering options in the date submenu on the Captures page are not keyboard accessible. • Content inside the table of the Capture page is not accessible to keyboard users. • Using any functionality in the Admin Course List table is impossible for keyboard users. • Checkboxes on the Administrators tab of the Admin - Institution Settings are inaccessible for keyboard users.
<p>(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.</p>	<p>Supports</p>	
<p>(c) A well-defined on-screen indication of the current focus shall</p>	<p>Supports with exceptions</p>	<p>The position of the focus indicator is not</p>

<p>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.</p>		<p>always clear on the support pages.</p>
<p>(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.</p>	<p>Offers some support</p>	<p>Nearly every page on the site has at least one or more controls that are not properly identified to assistive technology. In addition, the images in the Support section of the site lack alt attributes, along with the watermark image on the Branding tab which has an inaccurate alt attribute, and the magnifying glass icons on search fields are not labeled.</p>
<p>(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.</p>	<p>Supports</p>	
<p>(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location and text attributes.</p>	<p>Supports</p>	
<p>(g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>	<p>Supports</p>	<p>Insofar as the user's browser supports contrast changes, the app is supported.</p>
<p>(h) When animation is displayed, the</p>	<p>Supports</p>	

information shall be displayable in at least one non-animated presentation mode at the option of the user.		
(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.	Supports with exceptions	<p>Currently active element is indicated visually only and is not communicated to screen reader users on the following pages:</p> <ul style="list-style-type: none"> • Student Class Info - Course subpages • Table of Contents for Help • Legal page for the section sidebar • Instructor Class Info - Course subpages • My Content and Shared with me pages in Instructor Library • Instructor Settings subpages • Configurations submenu
(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.	N/A	This functionality is not offered by this product
(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.	Supports	
(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.	Offers some support	Most form fields in the application are not properly labeled. In addition, the application makes heavy use of custom dropdown menus which are not accessible to screen reader users.

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**Section 1194.22 Web-based Internet information
and applications – Detail**

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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).	Supports with exceptions	The images in the Support section of the site lack alt attributes, along with the watermark image on the Branding tab which has an inaccurate alt attribute, and the magnifying glass icons on the search fields are not labeled.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports	The content creators have the option to add captions to videos. Content creators can also upload videos with audio descriptions.
(c) Web pages shall be designed so that all information conveyed with color is also available without color,	Supports	Currently active element is only indicated visually and is not

<p>for example from context or markup.</p>		<p>communicated to screen reader users on the following pages:</p> <ul style="list-style-type: none"> • Student Class Info - Course subpages • Table of Contents for Help • Legal page for the section sidebar • Instructor Class Info - Course subpages • My Content and Shared with me pages in Instructor Library • Instructor Settings subpages • Configurations submenu
<p>(d) Documents shall be organized so they are readable without requiring an associated style sheet.</p>	<p>Partially Supports</p>	<p>This is largely supported by the product with the exception of the video player. When CSS is disabled, the player controls disappear.</p>
<p>(e) Redundant text links shall be provided for each active region of a server-side image map.</p>	<p>N/A</p>	<p>This product does not use server side image maps.</p>

<p>(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.</p>	<p>N/A</p>	<p>This product does not use client side image maps.</p>
<p>(g) Row and column headers shall be identified for data tables.</p>	<p>Not Supported</p>	<p>Many tables on the site are not marked up as tables, and the tables that are marked up as tables lack scope attributes.</p>
<p>(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.</p>	<p>N/A</p>	
<p>(i) Frames shall be titled with text that facilitates frame identification and navigation.</p>	<p>Not Supported</p>	<p>All iframes on the site lack titles</p>
<p>(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<p>Supports</p>	
<p>(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 primary page changes.</p>	<p>N/A</p>	<p>No text only pages are required to accomplish compliance with this part.</p>
<p>(l) When pages utilize scripting languages to display content or to create interface elements, the information provided by the script</p>	<p>Supports</p>	

shall be identified with functional text that can be read by Assistive Technology.		
(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).	Supports	
(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.	Partially Supports	Most form fields in the application are not properly labeled. In addition, the application makes heavy use of custom dropdown menus which are not accessible to screen reader users.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	Each of the application pages provides a skip to main content link
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	N/A	

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

– Detail

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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.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.		
(c) Voice mail, auto-attendant and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.		
(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		

<p>provide sufficient time for the user to indicate more time is required.</p>		
<p>(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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</p>		

<p>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 access or shall restore it upon delivery.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		

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Section 1194.24 Video and Multimedia Products

– Detail

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Criteria	Supporting Features	Remarks and explanations
<p>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</p>	<p>N/A</p>	<p>This product provides no television display or receiver functionality.</p>

<p>decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape and DVD signals.</p>		
<p>(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p>	<p>N/A</p>	<p>This product provides no television tuner functionality.</p>
<p>(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.</p>	<p>Supports</p>	
<p>(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.</p>	<p>Not supported</p>	
<p>(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.</p>	<p>Supported</p>	

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Section 1194.25 Self-Contained, Closed Products – Detail

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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.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		
(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).		
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require		

<p>the user to possess particular biological characteristics, shall also be provided.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(h) When a product permits a user to adjust color and contrast</p>		

<p>settings, a range of color selections capable of producing a variety of contrast levels shall be provided.</p>		
<p>(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>		
<p>(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.</p>		
<p>(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</p>		

reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.		
(j)(3) 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 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.		
(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.		

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Section 1194.26 Desktop and Portable

Computers – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(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).		
(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.		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards.		

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Section 1194.31 Functional Performance

Criteria – Detail

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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.	Supports with exceptions	Parts of the application are usable with the screen reader, but other parts are difficult or impossible to use due to poor context, unlabeled links and form fields, improper mark up, etc.
(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.	Supports	The product supports using the web browser's native zoom functionality and enlarged font size option. The product also supports screen reader and zooming assistive technologies.
(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.	Supports	
(d) Where audio information is important for the use of a product,	N/A	The product does not interfere with the operating system and

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.		hardware's ability to provide this functionality.
(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.	N/A	The product does not require user speech.
(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.	Supports	

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Section 1194.41 Information, Documentation and Support – Detail

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<i>Criteria</i>	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.		
(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.		
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.		

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