

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: 1/1/2013

Name of Product: VFRRedact

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The information contained within this Accessibility Review Document is the result of a high-level audit performed by a third party. The high-level audit tested the compliance of VFRRedact application with the requirements of Section 508 of the Rehabilitation Act of 1973 as Amended (1998). The scope of testing included a representative sample of VFRRedact screens and features, and task-driven testing techniques by users who are blind or have low-vision with the leading assistive technologies.

VFRRedact is not fully compliant with the Section 508 standards and cannot effectively be accessed by users who are blind and users with limited or no mobility. A variety of accessibility issues were found in VFRRedact. The most significant issues that affect users with disabilities are: a lack of keyboard access to the document canvas area, a lack of support for multiple labels for form fields and other controls, a lack of meaningful labels for form fields and a lack of support for correct role and state attributes for many controls.

Summary Table

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Voluntary Product Accessibility Template®		
Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Does Not Support	
Section 1194.22 Web-based Internet Information and Applications	Not Applicable	None Supplied
Section 1194.23 Telecommunications Products	Not Applicable	None Supplied
Section 1194.24 Video and Multi-media Products	Not Applicable	None Supplied
Section 1194.25 Self-Contained, Closed Products	Not Applicable	None Supplied
Section 1194.26 Desktop and Portable Computers	Not Applicable	None Supplied
Section 1194.31 Functional Performance Criteria	Does Not Support	
Section 1194.41 Information, Documentation and Support	Not Tested	

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Section 1194.21 Software Applications and Operating Systems – Detail VPAT™ Voluntary Product Accessibility Template®		
Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the	Does Not Support	VFRRedact provides limited support for access to the application from the keyboard. Functionality within toolbars and tabs are accessible

<p>result of performing a function can be discerned textually.</p>	<p>from the keyboard through the use of the <code>Tab</code> key and documented keyboard shortcuts. The document canvas area, however, is not keyboard accessible. Though the canvas area permits focus with keyboard shortcuts <code>F6</code> or <code>Ctrl+1</code>, keyboard-only users are unable to perform any functions such as dragging, dropping, selecting and measuring objects on the canvas. These functions are completely mouse-driven. Keyboard users are not able to perform certain annotation on the objects or redact text from any documents. Keyboard-only users are not able to select, copy/cut and paste text via the keyboard on the canvas area nor are they able to access the context menu on the canvas or on the object. In the “Takeoff” and “Markup Open for Review” dialogs, keyboard focus cannot be set to the column headers to change the sort state. In the “Print” dialog, the page tabs (General, Scale) cannot be toggled with the standard keystroke <code>Ctrl+Tab</code>. However, the left and right arrow keys can be used to activate these tabs. Within the “Print Watermarks/Banner” dialog, the edit fields (<code>role=editable text</code>) within the tree-view when activated via the keyboard appear as outline items. Keyboard users cannot edit an editable field via the keyboard. Most of the controls (button) within the Brava! Application have tooltips associated with them; however, when</p>
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		<p>keyboard users navigate through a control via the keyboard, the tooltip does not appear for the control.</p> <p>In the “Compare” toolbar, when the text compare button is activated, mouse users can select any of the files for a better view on the canvas area; however, keyboard users cannot select a file.</p> <p>In multiple modules, JAWS screen reader users cannot use the standard keystrokes <code>Alt+Down</code> arrow to open the dropdown for page navigation and the dropdown for editable combo boxes that appear on the “Status Bar”. However, other keystrokes such as <code>F4</code> or <code>Alt+Up</code> arrow keys can be used.</p> <p>Both the "Viewed" progress bar (<code>role=progress bar</code>) that displays the percentage of the redacted items and the page number next to it are not accessible to keyboard users.</p> <p>In the “Enter Phone Number to Exclude” dialog, when users enter data into an edit field, focus shifts to the next edit field without users' interaction.</p> <p>Dynamic text in multiple modules is not accessible to screen reader users, including the various printer settings information within the “Print” dialog, the mark-up type information that appears above a selected mark-up in the “Takeoff” tab and dynamic text that appears below the “Verify” combo box when “Image Area” is selected from the combo box.</p> <p>Shortcut key combinations in multiple modules are not functional from anywhere in the application; they are functional only when the</p>
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		<p>document canvas area is in focus.</p> <p>In “Expiration Date (Calendar)”, keyboard users cannot navigate to the year, next (“>”) and previous (“<”) buttons for navigating to next and previous months. However, users can use Page Up/Down keystrokes for navigating through months.</p> <p>Within multiple modules, many tools within the toolbar(s) are missing shortcuts/accelerators or are not duplicated in the menu structure.</p>
<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 with Exceptions</p>	<p>VFRRedact</p> <p>provides support for system level accessibility preference within the application toolbars. A level of “Supports with Exceptions” is given due to the nature of the following exception:</p> <p>If a (accessible) tagged PDF is opened within Brava! Enterprise Server and published with annotations and redaction settings, the accessibility tags that were saved in the source PDF document are removed.</p> <p>When ZoomText users search for a text on the document canvas area, a text highlighting indicates the focus rectangle for the searched text; however, the focus does not scroll into the view.</p> <p>Various controls in multiple modules within the Brava! Enterprise Server do not support Windows "High Contrast Color #1" settings, including the background for the page navigation combo box in the “Viewing and Page control” toolbar, the “Use exceptions list” hyperlink in</p>

		<p>the “Redact Privacy Info” dialog, the text for the days of the week in the “Expiration Date (Calendar)” dialog, the background for radio buttons and combo boxes within the “Verify Redactions” tab that remains the same, the background for the combo box that does not turn into black until the “fit to radio” button is checked within the “CSF Publishing Options” dialog and many controls within "Verify Entire Document".</p>
<p>(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.</p>	<p>Supports with Exceptions</p>	<p>VFRRedact</p> <p>supports programmatic focus tracking and visual identification of the currently focused element for the taskbar and panel areas. A level of “Does Not Support” is given due to the nature of the following exceptions:</p> <p>In multiple modules, navigating through the thumbnails, bookmarks and color choices, users can navigate through the individual item and a highlighted rectangle appears; however, the programmatic focus does not trigger the</p> <p>action and the accessible name for the highlighted item does not get exposed through the MSAA window. Screen readers, such as JAWS, track the name of the individual item via the <code>OBJECT_NAMECHANGE</code> event handler associated with each item.</p> <p>Within the “Verify Redactions” tab for the “With color” radio button, when ZoomText is running and users activate the color drop down menu, the focus shifts to the beginning of the application. ZoomText users are not able to select a color from the menu until the</p>

		<p>focused control is scrolled into view via the Tab key.</p> <p>For many controls within "Verify Entire Document", the focus rectangle is not clear in "High Contrast Color #1".</p> <p>Without a clear indication of a focus rectangle, users who have low vision or are color blind cannot identify a focused control.</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>Supports with Exceptions</p>	<p>VFRRedact</p> <p>provides information about a sub-set of user interface components via the MSAA API.</p> <p>Brava! Enterprise Server does not currently export information from the main document viewer (canvas) via the relevant API functionality. The state, identity and operation of text boxes, annotations and redactions are not presented as an accessible name through the MSAA API.</p> <p>The canvas displays and manipulates non-textual background content, such as images and drawings, for which accessibility cannot be currently applied without fundamentally altering the application.</p> <p>When the document canvas area (<code>role=document</code>) gains focus, JAWS reads "hidden from frame" instead of reading "Document Drawing View area", the accessible name of the document canvas area.</p> <p>Document content presented in the</p> <p>canvas is provided an MSAA role of <code>ROLE_SYSTEM_DOCUMENT</code>. The <code>PROPID_ACC_VALUE</code> property is set to the text within the canvas and is supported by the NVDA</p>

		<p>screen reader.</p> <p>The incorrect role (list) is used for the main canvas area within the “Verify Entire Document” window. Without a correct role (e.g. <code>role=document</code>) set, assistive technologies may not be able to interact with a control correctly.</p> <p>The entire “Color” dropdown is not identified to users of assistive technologies. In addition to missing a name, its <code>role (window)</code> is not correctly exposed via MSAA.</p> <p>In multiple modules, when selecting the individual items in the “Color” dropdown, “Thumbnails” and “Bookmarks” tabs, the accessible name for these selected items does not get exposed via the MSAA API. JAWS screen readers use the <code>OBJECT_NAMECHANGE</code> event handler associated with each selection to announce the name of these selected items.</p> <p>Various controls within Brava! Enterprise need accessible names assigned to them including the following:</p> <p>The object containing the tree-view items in the “Print Watermarks/Banner” dialog is missing an accessible name.</p> <p>In multiple modules, the containers for containing list items are missing accessible names.</p> <p>An accessible name does not appear for the color menu items within the dropdown menus for the “Rater Background” in the “Background and Color Setting” dialog and for “Text Background” in the “Status Bar”. When this item gains focus, nothing is announced</p>
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		<p>by the screen readers.</p> <p>The column headers (role=column header) for the markups such as</p> <p>Category and visibility are missing accessible names within the "Takeoff" tab. Without this information, column headers cannot be associated with individual markup.</p> <p>Within the "Takeoff" tab, the individual markup (role=list item) is missing an accessible name. The type information of the item is exposed through a mouse over tooltip, but the "Description" property of the individual category does not include type (length, area and count) and visibility information.</p> <p>Within the "Takeoff" tab, the light bulb icon next to a measurement list toggles visibility on or off upon pressing the spacebar. This information is not announced to screen reader users.</p> <p>The main canvas area (role=list) within "Verify Entire Document" is missing an accessible name.</p> <p>In "Verify Entire document", the slider (role=slider) for "Focus Size" is missing an accessible name.</p> <p>Within "Verify Entire document", both the "Viewed" progress bar (role=progress bar) that displays the percentage of the redacted items and the page number next to it are not identified by screen readers. The progress bar value is not accessible to sighted keyboard users.</p> <p>Within "Verify Entire Document", the accessible name "scroll down" or "scroll</p>
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		<p>up" for the buttons for navigating to the first and last page is not meaningful or unique.</p> <p>Within "Viewing Tools & Page Control" and "Verify Entire Document", even though users of assistive technologies such as JAWS are able to read the current slider value (or % value) that is included in the accessible name, there is no textual equivalent for sighted keyboard users.</p> <p>In multiple modules, many form fields are missing form field constraints such as a required field indicator, email or number format, including all edit fields within the "Enter Phone Number to Exclude" dialog, the edit field "Pages designated for output" within the TIFF and CSF publishing dialogs and the edit fields "Password" and "Confirm" in the CSF and PDF publishing dialogs. In multiple modules, form fields are not labeled explicitly; these include: all of the edit fields for entering a phone number within "Enter Phone numbers to Exclude" dialog, the checkboxes that appear next to "Name", "Email Address" and "Phone Number" within the "Redact Privacy Info" dialog, all the edit fields in the tree-view within the "Print watermarks/Banner" dialog and the editable text area (role=editable text) within the "Changemarks Reply" dialog. Within the "Print Watermarks/Banner" dialog, the edit fields (role=editable text) within the tree view are not correctly exposed to</p>
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		<p>assistive technology users. Keyboard users cannot identify these fields as editable text. When navigating to an item and pressing the Enter key, the role attribute does not indicate editable text.</p> <p>Within the "Publish Options" dialog, the "Save to file" and "Email as attachment" radio buttons are not grouped properly. Pressing the arrow keys should cycle through the group of radio buttons only and not any other controls that are not in the group.</p> <p>The nested grouping, "Set Scale", appears within the "Page Scale" grouping in the "Measurement Setting" dialog. Screen readers skip the "Set Scale" group name and instead read the "Page Scale" group name.</p> <p>In many modules, multiple on-screen labels appear for form fields that are not associated with a form field, including the "'(ft)" and "(in)" on-screen labels next to</p> <div><p>the "Enter length selected points" edit field, the "days" on-screen text that is not associated with the "In" input edit field within the "CSF Publishing Options", the "=" onscreen text that is not associated with the input edit field within the "Calibration" dialog and "Unit to" and "actual size" are not associated with any form fields within the "Print" dialog. In multiple modules, the accessible name for form fields are not meaningful, including "Search Target" for the "Verify" combo box within the "Verify Redactions" tab,</p></div>
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		<p>"Double click, Ctrl+C to Copy" for Total Length (Area or Count) within the Takeoff tab, "<blank>" for tree-items within the "Print Watermarks/Banner" dialog, "^" and "..." that appear on the "Changemarks" dialog and "-" for the edit field that appears next to "(ft)" within the "Calibration" dialog.</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.	Supports	All bitmap images used in Brava! Enterprise Server are utilized in a consistent fashion throughout the application.
(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.	Supports with Exceptions	<p>VFRRedact provides partial information about a subset of user interface components via the MSAA Accessibility API. PDF content presented in the canvas is provided an MSAA role of <code>ROLE_SYSTEM_DOCUMENT</code>. The <code>PROPID_ACC_VALUE</code> property is set to the text within the canvas and is supported by the NVDA screen reader.</p>
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports with Exceptions	<p>VFRRedact Server provides support for system level contrast and color settings within the application toolbars. There are options to adjust the contrast and color settings of the documents as well. However, a "Support with Exceptions" is given due to the following exceptions:</p> <p>Various controls in multiple</p>

		<p>modules within the Brava! Enterprise Server do not support Windows "High Contrast Color #1" settings. These include: the</p> <p>background for the page navigation combo box in the "Viewing and Page control" toolbar, the "Use exceptions list" hyperlink in the "Redact Privacy Info" dialog, the text for the days of the week in the "Expiration Date (Calendar)" dialog, the background for radio buttons and combo boxes within the "Verify Redactions" tab that remains the same, the background for the combo box that does not turn into black until the "fit to radio" button is checked within the "CSF Publishing Options" dialog and many controls within the "Verify Entire Document".</p>
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Not Applicable	
(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>VFRRedact</p> <p>provides for the selection and redaction of text within documents. Selected and redacted text is displayed using an inline document highlight – information which is not provided in an alternative fashion. However, a "Support with Exceptions" is given because of the following exceptions:</p> <p>In the Brava! Functions toolbar and in the Thumbnail tab, the red exclamatory sign indicating the existence of an error in a document is only visual. The color that appears as</p>

		<p>menu items within dropdown menus on the "Rater Background" in the "Background and Color Setting" and on the "Text Background" in the "Status Bar" is only visual. There is no text equivalent that exists for this color menu item.</p> <p>Within the "Expiration Date (calendar)", when the calendar opens, the current date is highlighted in light gray; however, no textual equivalent appears that indicates the current date.</p> <p>In the "Compare" toolbar, when the "compare text" button is activated for comparing two files side by side, various colors (green, red and yellow) are used to indicate the type of changes on the document or the location on the document where a change is made. There is no textual indication of these colors available for screen reader users.</p>
(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.	Supports	VFRRedact provides the ability for users to select a variety of color and contrast settings.
(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	VFRRedact does not utilize blinking or flashing elements.
(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	Supports with Exceptions	<p>VFRRedact provides for the labeling of most, but not all form elements used within the application.</p> <p>In multiple modules, form fields are not labeled explicitly. These include: all of the edit fields for entering</p>

<p>all directions and cues.</p>	<p>a phone number within the “Enter Phone Numbers to Exclude” dialog, the checkboxes that appear next to “Name”, “Email Address” and “Phone Number” within the “Redact Privacy Info” dialog, all edit fields in the tree-view within the “Print Watermarks/Banner” dialog and the editable text area (role=editable text) within the “Changemarks Reply” dialog. Within the “Print Watermarks/Banner” dialog, the edit fields (role=editable text) within the tree view are not correctly exposed to assistive technology users. Keyboard users cannot identify these fields as editable text. When navigating to an item and pressing the Enter key, the role attribute does not indicate editable text.</p> <p>Within the “Publish Options” dialog, the “Save to file” and “Email as attachment” radio buttons are not grouped properly. Pressing arrow keys should cycle though the group of radio buttons only and not any other controls that are not in the group.</p> <p>The nested grouping, “Set Scale”, appears within the “Page Scale” grouping in the “Measurement Setting” dialog and screen readers skip the “Set Scale” group name and instead read the “Page Scale” group name. In many modules, multiple on-screen labels appear for form fields that are not associated with a form field, including the “(ft)” and “(in)” on-screen labels next to the “Enter length selected points” edit field, the “days”</p>
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		<p>on-screen text that is not associated with the "In" input edit field within "CSF Publishing Options", the "=" onscreen text that is not associated with the input edit field within the "Calibration" dialog and "Unit to" and "actual size" are not associated with any form fields within the "Print" dialog.</p> <p>In multiple modules, accessible names for the form fields are not meaningful, including "Search Target" for the "Verify" combo box within the "Verify Redactions" tab, "Double click, Ctrl+C to Copy" for Total Length (Area or Count) within the Takeoff tab, "<blank>" for tree-items within the "Print Watermarks/Banner" dialog, "^" and "..." that appear on the "Changemarks" dialog and "-" for the edit field that appears next to "(ft)" within the "Calibration" dialog.</p>
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Section 1194.22 Web-based Internet information and applications – Detail

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<i>Criteria</i>	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).		
(b) Equivalent alternatives for any		

multimedia presentation shall be synchronized with the presentation.		
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.		
(d) Documents shall be organized so they are readable without requiring an associated style sheet.		
(e) Redundant text links shall be provided for each active region of a server-side image map.		
(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.		
(g) Row and column headers shall be identified for data tables.		
(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.		
(i) Frames shall be titled with text that facilitates frame identification and navigation		
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		
(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.		

(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.		
(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).		
(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.		
(o) A method shall be provided that permits users to skip repetitive navigation links.		
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		

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

displays.		
(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.		
(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.		
(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.		
(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.		
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.		

(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.		
(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.		
(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.		
(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.		

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Section 1194.24 Video and Multi-media

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 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</p>		

audio program playback circuitry.		
(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.		
(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.		
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.		

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<p align="center">Section 1194.25 Self-Contained, Closed Products – Detail</p> <p align="center">VPAT™</p> <p align="center">Voluntary Product Accessibility Template®</p>		
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 the user to possess particular biological characteristics, shall also be provided.		
(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.		
(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.		
(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.		
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.		
(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>(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 reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.</p>		
<p>(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</p>		

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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<p align="center">Section 1194.26 Desktop and Portable Computers – Detail VPAT™ Voluntary Product Accessibility Template®</p>		
Criteria	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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<p>Section 1194.31 Functional Performance</p> <p>Criteria – Detail</p> <p>VPAT™</p> <p>Voluntary Product Accessibility Template®</p>		
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.	Does Not Support/ Fundamental Alteration Exception Applies	VFRRedact provides information about a sub-set of user interface components via the Microsoft Active Accessibility (MSAA) API. However, the canvas area and functions within the canvas area do not support a mode of operation for people who are blind or visually impaired. Brava! Enterprise Server does not currently export information from the main document viewer (canvas) via the relevant API functionality. The state, identity

		<p>and operation of text boxes, annotations and redactions are not presented as an accessible name through the MSAA API. The canvas displays and manipulates non-textual content such as images and drawings for which accessibility cannot be currently applied without fundamentally altering the application.</p> <p>Keyboard access can be applied to the document canvas for scrolling only. PDF content is not rendered as text through the canvas view and PDF text cannot be copied, pasted or redacted from the keyboard. If a (accessible) tagged PDF is opened within Brava! Enterprise Server and published with annotations and redaction settings, the accessibility tags that were saved in the source PDF document are removed. Users of screen readers rely on a tagged PDF document for logical reading order, textual alternatives, as well as state, identity and operation of interactive controls.</p> <p>When an annotated PDF is published and imported in a PDF viewer, the annotation information appears as a comment on the PDF. This comment is only accessible with the mouse. Users of screen readers can read the information on the comment, but sighted keyboard-only users cannot access the commented information via the keyboard.</p> <p>PDF content presented in the canvas is provided an MSAA role of <code>ROLE_SYSTEM_DOCUMENT</code>. The <code>PROPID_ACC_VALUE</code> property is set to the text within the canvas and is supported by the NVDA screen reader. The NVDA screen reader identifies the MSAA role attribute for various controls more accurately than the JAWS</p>
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		<p>screen reader. NVDA announces the role information of the Ancestor for the first control within the toolbar or the pane. For example, navigating through the “Brava! Functions Toolbar”, NVDA announces “Task Bar dialog”; for the Markup button, NVDA announces the role of “button”. The existence of markup in a document is only indicated via a red exclamatory icon (!). Users with visual impairments may not be aware of the existence of markup in the document.</p> <p>Most of the accessibility issues that directly impair the use of the Brava! Enterprise Server by users who are blind or visually impaired have been discussed in the technical paragraphs above; For details, please refer primarily to §1194.21 paragraphs (a), (d), (f), (i) and (l)</p>
<p>(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.</p>	<p>Supports with Exceptions</p>	<p>VFRRedact</p> <p>provides limited operation for people who have low vision within the zoom and magnification buttons on the toolbar that expand the object in the document canvas area. The toolbars themselves have to be adjusted using an Assistive Technology such as ZoomText, though the tooltips for each item adjust with the operating system zoom settings.</p> <p>When an option is activated that opens a new toolbar or tab, the programmatic focus remains on the menu or button that has been invoked. The focus does not shift to the top of the newly opened panel. Users of screen magnification may not become aware of the newly displayed panel elsewhere on the screen.</p> <p>When ZoomText users search for text on the document canvas area, a text highlighting indicates the focus rectangle for</p>

		<p>the searched text; however, the focus does not scroll into view. Brava! Enterprise Server provides the ability for users to select a variety of color and contrast settings. In multiple modules, when selecting the individual items in the "Color" dropdown, "Thumbnails" and "Bookmarks" tabs, the accessible name for these selected items does not get exposed via the MSAA API, which thereby impedes screen magnification focus tracking. Within the "Verify Redactions" tab for the "With color" radio button, when ZoomText is running and users activate the color drop down menu, the focus shifts to the beginning of the application. ZoomText users are not able to select a color from the menu until the focused control is scrolled into view via the Tab key.</p> <p>The existence of markup in a document is only indicated via a red exclamatory icon (!). Users with low-vision may not be aware of the existence of markup in the document.</p>
(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	Does not use sound in any way.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices	Supports	Does not use sound in any way.

shall be provided.		
(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.	Supports	Does not use require speech for use.
(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.	Does Not Support	<p>VFRRedact</p> <p>does not provide a mode of use for users without fine motor control.</p> <p>The canvas area and functions within the canvas area do not support keyboard access as a mode of operation for people who have limited mobility. Placing annotations onto the canvas and selecting text for redactions can only be accomplished using the mouse. Voice recognition software such as Dragon NaturallySpeaking can be used within the document canvas area, but only with simulated mouse actions and navigation with the mouse grid functionality. This form of navigation, however, is extremely tedious and is mentioned here as a means to facilitate users who may use this software.</p> <p>Most of these issues have been discussed in the technical paragraphs above; for details, please refer primarily to §1194.21 (a), (d) and (l).</p>

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Section 1194.41 Information, Documentation and Support – Detail

VPAT™ Voluntary Product Accessibility Template®		
Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supported	Will be provided as required
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supported	Will be provided as required
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Not Applicable	No end-user support provided by vendor.

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