



Voluntary Product Accessibility (VPAT) WCAG 2.1 & Revised Section 508 Edition

VPAT® Version 2.3 April 2019

for
FreeWill Co.
Public and Login web application

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Executive Summary

Vendor Contact Information

Application Name & Version: FreeWill public facing web application

Vendor Company Name: FreeWill Co.

Vendor Contact Name: Jiin Myung

Vendor Contact Email: jiin@freewill.com

Scope of Evaluation

URL(s) Tested: <https://www.freewill.com/>

Applicable Guidelines: WCAG 2.1 Levels A & AA and Revised Section 508

Supported Browsers: Chrome, Edge, Safari & Firefox

Accessibility testing conducted by 5 auditors including people with visual and mobility disabilities and 1 application developer.

Assistive Technologies used:

- JAWS® 2023 Professional Screen Reading Software
- NVDA 2023.1 Screen Reading Software
- ZoomText 2022
- Chrome Accessibility Developer Tools and extension tools
- Windows High Contrast Mode
- HTML5 Validator
- a11y Tools
- Keyboard-Only Accessibility Testing
- SortSite 2023 (v. 6.49) Website Accessibility Testing Software

Note: Criterion auditor's may utilize specialized tools and software not included in the list above to either provide more accessible options for our auditors with disabilities or to provide better screen capture examples of WCAG issues documented in an auditor's JIRA tickets. Criterion does not make any assurances regarding either the accuracy or security of any products listed above.

Conformance Levels

The terms used in the Conformance Level columns 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.
- **Supports with Exceptions:** 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.x Level AAA).

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, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/ Web Content Accessibility Guidelines 2.1 at https://www.w3.org/TR/WCAG21/	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017 Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on January 22, 2018	(Yes)

WCAG 2.1 Report

Tables 1 and 2 also document conformance with:

- 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 2.1 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.1 Conformance Requirements](#).

Conclusion

This website/application **Supports** applicable Revised Section 508 and WCAG 2.1 A & AA guidelines as of January 8, 2024. See tables starting on page 6 for details.

Sincerely,

Anna Bradley M.S., Ed.S.

President

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Table 1: Success Criteria, Level A

Notes:

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	All non-text content that is presented to the user has a text alternative that serves the equivalent purpose. Images on site all have adequate text descriptions.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	An alternative for time-based media is provided which presents equivalent information. There is no prerecorded audio-only or video-only content present on the site.
1.2.2 Captions (Prerecorded) (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such. There are no videos on site.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. No audio descriptions or media alternatives (prerecorded) were identified on site. There are no videos on site.
1.3.1 Info and Relationships (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
1.3.2 Meaningful Sequence (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.
1.3.3 Sensory Characteristics (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound.
1.4.1 Use of Color (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. If color is used to convey information to users, another method besides color is used to convey the information.
1.4.2 Audio Control (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. No audio lasting more than 3 seconds is used on site.
2.1.1 Keyboard (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints. All content is keyboard accessible.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
2.1.2 No Keyboard Trap (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away. Keyboard focus is not trapped within subsections of content on page.
2.1.4 Character Key Shortcuts (Level A 2.1 only) •	Web: Not Applicable	If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true: Turn off A mechanism is available to turn the shortcut off; Remap A mechanism is available to remap the shortcut to use one or more non-printable keyboard characters (e.g. Ctrl, Alt, etc); Active only on focus The keyboard shortcut for a user interface component is only active when that component has focus. No keyboard shortcuts are used on site.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
2.2.1 Timing Adjustable (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	For each time limit that is set by the content, at least one of the following is true: Turn off: The user is allowed to turn off the time limit before encountering it; or Adjust: The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or Extend: The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or Real-time Exception: The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or Essential Exception: The time limit is essential and extending it would invalidate the activity; or 20 Hour Exception: The time limit is longer than 20 hours. User is allowed to adjust/extend any time limit within the site.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
2.2.2 Pause, Stop, Hide (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	For moving, blinking, scrolling, or auto-updating information, all the following are true: Moving, blinking, scrolling: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and Auto-updating: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential. All moving, blinking, scrolling or auto-updating content on site has a mechanism for the user to pause , stop, or hide it.
2.3.1 Three Flashes or Below Threshold (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.
2.4.1 Bypass Blocks (Level A) 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	A mechanism is available to bypass blocks of content that are repeated on multiple Web pages.
2.4.2 Page Titled (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Web pages have titles that describe topic or purpose.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
2.4.3 Focus Order (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability.
2.4.4 Link Purpose (In Context) (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general.
2.5.1 Pointer Gestures (Level A 2.1 only)	Web: Not Applicable	All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential. No functionality uses pointer gestures.
2.5.2 Pointer Cancellation (Level A 2.1 only)	Web: Not Applicable	For functionality that can be operated using a single pointer, at least one of the following is true: No Down-Event The down-event of the pointer is not used to execute any part of the function; Abort or Undo Completion of the function is on the up-event, and a mechanism is available to abort the function before completion or to undo the function after completion; Up Reversal The up-event reverses any outcome of the preceding down-event; Essential Completing the function on the down-event is essential. No functionality uses pointer gestures therefore no cancellation is needed.
2.5.3 Label in Name (Level A 2.1 only)	Web: Supports	For user interface components with labels that include text or images of text, the name contains the text that is presented visually. All components on site have correct labels.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
2.5.4 Motion Actuation (Level A 2.1 only)	Web: Not Applicable	Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when: Supported Interface The motion is used to operate functionality through an accessibility supported interface; Essential The motion is essential for the function and doing so would invalidate the activity. No functions on site are operated by motion.
3.1.1 Language of Page (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	The default human language of each Web page can be programmatically determined. Correct language code is used to identify correct language on the web application.
3.2.1 On Focus (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	When any component receives focus, it does not initiate a change of context. All components receives focus and none initiate a change of context.
3.2.2 On Input (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.
3.3.1 Error Identification (Level A) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text.

WCAG 2.1 Criteria	Conformance Level	Remarks and Explanations
3.3.2 Labels or Instructions (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Labels or instructions are provided when content requires user input. All user input content has correct labels or instructions provided on site.
4.1.1 Parsing (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.
4.1.2 Name, Role, Value (Level A) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	Captions are provided for all live audio content in synchronized media. Site has no live audio content.

Criteria	Conformance Level	Remarks and Explanations
1.2.5 Audio Description (Prerecorded) (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Audio description is provided for all prerecorded video content in synchronized media. Site does not have any video content or synchronized media.
1.3.4 Orientation (Level AA 2.1 only)	Web: Supports	Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential. Content on site remains viewable and operational when orientation is changed.
1.3.5 Identify Input Purpose (Level AA 2.1 only)	Web: Supports	The purpose of each input field collecting information about the user can be programmatically determined when: - The input field serves a purpose identified in the Input Purposes for User Interface Components section; and - The content is implemented using technologies with support for identifying the expected meaning for form input data. All fields on site identify their expected meaning to users.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following: Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1; Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement. Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality. All text on site can be resized without loss of content or functionality.
1.4.5 Images of Text (Level AA) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports	If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: Customizable: The image of text can be visually customized to the user's requirements; Essential: A presentation of text is essential to the information being conveyed. Text is used on visual presentations within the site.
1.4.10 Reflow (Level AA 2.1 only)	Web: Supports	Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for: • Vertical scrolling content at a width equivalent to 320 CSS pixels; • Horizontal scrolling content at a height equivalent to 256 CSS pixels. Except for parts of the content which require two-dimensional layout for usage or meaning. All content on site presents without loss of information or functionality.

Criteria	Conformance Level	Remarks and Explanations
1.4.11 Non-text Contrast (Level AA 2.1 only)	Web: Supports	The visual presentation of the following has a contrast ratio of at least 3:1 against adjacent color(s): User Interface Components Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author; Graphical Objects Parts of graphics required to understand the content, except when a presentation of graphics is essential to the information being conveyed. Non-text content on site meets the required contrast levels.
1.4.12 Text Spacing (Level AA 2.1 only)	Web: Supports	In content implemented using markup languages that support the following text style properties, no loss of content or functionality occurs by setting all of the following and by changing no other style property: • Line height (line spacing) to at least 1.5 times the font size; • Spacing following paragraphs to at least 2 times the font size; • Letter spacing (tracking) to at least 0.12 times the font size; • Word spacing to at least 0.16 times the font size. Except: Human languages and scripts that do not make use of one or more of these text style properties in written text can conform using only the properties that exist for that combination of language and script. No content or functionality is lost on the site when user changes styles.

Criteria	Conformance Level	Remarks and Explanations
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Web: Supports	Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true: Dismissable A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content; Hoverable If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing; Persistent The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid. Except: The visual presentation of the additional content is controlled by the user agent and is not modified by the author. Hover focus and keyboard focus is correctly coded to become visible and then hidden when required.
2.4.5 Multiple Ways (Level AA) 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	More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process. Site contains two ways to locate web pages.
2.4.6 Headings and Labels (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	All headings and labels on the site describe topic or purpose.

Criteria	Conformance Level	Remarks and Explanations
<u>2.4.7 Focus Visible</u> (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports	Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. Focus is visible when users navigate the site.
<u>3.1.2 Language of Parts</u> (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text. There is no other language on the site other than English.
<u>3.2.3 Consistent Navigation</u> (Level AA) 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	Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user. Repeated
<u>3.2.4 Consistent Identification</u> (Level AA) 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	Components that have the same functionality within a set of Web pages are identified consistently. Site uses consistent forms of identification on components.
<u>3.3.3 Error Suggestion</u> (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. Input errors are not detected within the site.

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Not Applicable	For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: Reversible: Submissions are reversible. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. No Financial transactions or legal commitments occur within the site.
4.1.3 Status Messages (Level AA 2.1 only)	Web: Supports	In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus. Status messages throughout the site have correct roles or properties.

Table 3: Success Criteria, Level AAA

Notes: Not Evaluated

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated

Criteria	Conformance Level	Remarks and Explanations
1.2.8 Media Alternative (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.2.9 Audio-only (Live) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.3.6 Identify Purpose (Level AAA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.4.6 Contrast Enhanced (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.4.7 Low or No Background Audio (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.4.8 Visual Presentation (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
1.4.9 Images of Text (No Exception) Control (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.1.3 Keyboard (No Exception) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.2.3 No Timing (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.2.4 Interruptions (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.2.5 Re-authenticating (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated

Criteria	Conformance Level	Remarks and Explanations
2.2.6 Timeouts (Level AAA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.3.2 Three Flashes (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.3.3 Animation from Interactions (Level AAA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.4.8 Location (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.4.9 Link Purpose (Link Only) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.4.10 Section Headings (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
2.5.5 Target Size (Level AAA 2.1 only)	Web: Not Evaluated	Web: Not Evaluated
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.1.3 Unusual Words (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.1.4 Abbreviations (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.1.5 Reading Level (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated

Criteria	Conformance Level	Remarks and Explanations
3.1.6 Pronunciation (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.2.5 Change on Request (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.3.5 Help (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated
3.3.6 Error Prevention (All) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Evaluated	Web: Not Evaluated

Revised Section 508 Report

Notes: None

Chapter 3: Functional Performance Criteria (FPC)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.
302.2 With Limited Vision	Supports	Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.
302.3 Without Perception of Color	Supports	Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.

Criteria	Conformance Level	Remarks and Explanations
302.4 Without Hearing	Supports	Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.
302.5 With Limited Hearing	Supports	Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.
302.6 Without Speech	Not Applicable	Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.
302.7 With Limited Manipulation	Supports	Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.
302.8 With Limited Reach and Strength	Not Applicable	Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.

Chapter 4: Hardware

Notes: Not Applicable – Hardware out of scope.

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	Not Applicable	Not Applicable
402.2.2 Transactional Outputs	Not Applicable	Not Applicable
402.2.3 Speech Delivery Type and Coordination	Not Applicable	Not Applicable
402.2.4 User Control	Not Applicable	Not Applicable
402.2.5 Braille Instructions	Not Applicable	Not Applicable

Criteria	Conformance Level	Remarks and Explanations
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Not Applicable	Not Applicable
402.3.2 Non-private Listening	Not Applicable	Not Applicable
402.4 Characters on Display Screens	Not Applicable	Not Applicable
402.5 Characters on Variable Message Signs	Not Applicable	Not Applicable
403 Biometrics	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	Not Applicable
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required
404.1 General	Not Applicable	Not Applicable
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	Not Applicable
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	Not Applicable
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	Not Applicable
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	Not Applicable
407.3.2 Alphabetic Keys	Not Applicable	Not Applicable
407.3.3 Numeric Keys	Not Applicable	Not Applicable
407.4 Key Repeat	Not Applicable	Not Applicable
407.5 Timed Response	Not Applicable	Not Applicable
407.6 Operation	Not Applicable	Not Applicable
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	Not Applicable
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	Not Applicable
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	Not Applicable
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	Not Applicable
407.8.2 Side Reach	Not Applicable	Not Applicable
407.8.2.1 Unobstructed Side Reach	Not Applicable	Not Applicable
407.8.2.2 Obstructed Side Reach	Not Applicable	Not Applicable
407.8.3 Forward Reach	Not Applicable	Not Applicable
407.8.3.1 Unobstructed Forward Reach	Not Applicable	Not Applicable

Criteria	Conformance Level	Remarks and Explanations
407.8.3.2 Obstructed Forward Reach	Not Applicable	Not Applicable
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	Not Applicable
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	Not Applicable
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	Not Applicable
408.3 Flashing	Not Applicable	Not Applicable
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	Not Applicable
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	Not Applicable
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	Not Applicable
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
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	Not Applicable
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	Not Applicable
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	Not Applicable	Not Applicable
412.4 Digital Encoding of Speech	Not Applicable	Not Applicable
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Not Applicable	Not Applicable
412.7 Video Communication	Not Applicable	Not Applicable
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Not Applicable	Not Applicable
412.8.2 Voice and Hearing Carry Over	Not Applicable	Not Applicable
412.8.3 Signal Compatibility	Not Applicable	Not Applicable
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	Not Applicable
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	Not Applicable
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	Not Applicable

Criteria	Conformance Level	Remarks and Explanations
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	Not Applicable
414.1.2 Other ICT	Not Applicable	Not Applicable
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not Applicable	Not Applicable
415.1.2 Audio Description Controls	Not Applicable	Not Applicable

Chapter 5: Software

Notes: N/A

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.1 AA	See WCAG 2.1 section	See information in WCAG 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	Platform software shall provide user control over platform features that are defined in the platform documentation as accessibility features.
502.2.2 No Disruption of Accessibility Features	Not Applicable	Software shall not disrupt platform features that are defined in the platform documentation as accessibility features.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Not Applicable	The object role, state(s), properties, boundary, name, and description shall be programmatically determinable.
502.3.2 Modification of Object Information	Not Applicable	States and properties that can be set by the user shall be capable of being set programmatically, including through assistive technology.
502.3.3 Row, Column, and Headers	Not Applicable	If an object is in a data table, the occupied rows and columns, and any headers associated with those rows or columns, shall be programmatically determinable.

Criteria	Conformance Level	Remarks and Explanations
502.3.4 Values	Not Applicable	Any current value(s), and any set or range of allowable values associated with an object, shall be programmatically determinable.
502.3.5 Modification of Values	Not Applicable	Values that can be set by the user shall be capable of being set programmatically, including through assistive technology.
502.3.6 Label Relationships	Not Applicable	Any relationship that a component has as a label for another component, or of being labeled by another component, shall be programmatically determinable.
502.3.7 Hierarchical Relationships	Not Applicable	Any hierarchical (parent-child) relationship that a component has as a container for, or being contained by, another component shall be programmatically determinable.
502.3.8 Text	Not Applicable	The content of text objects, text attributes, and the boundary of text rendered to the screen, shall be programmatically determinable.
502.3.9 Modification of Text	Not Applicable	Text that can be set by the user shall be capable of being set programmatically, including through assistive technology. Text that can be set by the user shall be capable of being set programmatically, including through assistive technology.
502.3.10 List of Actions	Not Applicable	A list of all actions that can be executed on an object shall be programmatically determinable.
502.3.11 Actions on Objects	Not Applicable	Applications shall allow assistive technology to programmatically execute available actions on objects.
502.3.12 Focus Cursor	Not Applicable	Applications shall expose information and mechanisms necessary to track focus, text insertion point, and selection attributes of user interface components.
502.3.13 Modification of Focus Cursor	Not Applicable	Focus, text insertion point, and selection attributes that can be set by the user shall be capable of being set programmatically, including using assistive technology.

Criteria	Conformance Level	Remarks and Explanations
502.3.14 Event Notification	Not Applicable	Notification of events relevant to user interactions, including but not limited to, changes in the component's state(s), value, name, description, or boundary, shall be available to assistive technology.
502.4 Platform Accessibility Features	Not Applicable	Platforms and platform software shall conform to the requirements in ANSI/HFES 200.2, Human Factors Engineering of Software User Interfaces — Part 2: Accessibility (2008) (incorporated by reference, see 702.4.1) listed below: • Section 9.3.3 • Section 9.3.4 • Section 9.3.5 • Section 10.6.7 • Section 10.6.8 • Section 10.6.9 • Section 10.7.1
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	Applications shall permit user preferences from platform settings for color, contrast, font type, font size, and focus cursor. Exception: Applications that are designed to be isolated from their underlying platform software, including Web applications, shall not be required to conform to 503.2.
503.3 Alternative User Interfaces	Not Applicable	Where an application provides an alternative user interface that functions as assistive technology, the application shall use platform and other industry standard accessibility services.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Not Applicable	Where user controls are provided for volume adjustment, ICT shall provide user controls for the selection of captions at the same menu level as the user controls for volume or program selection.

Criteria	Conformance Level	Remarks and Explanations
503.4.2 Audio Description Controls	Not Applicable	Where user controls are provided for program selection, ICT shall provide user controls for the selection of audio descriptions at the same menu level as the user controls for volume or program selection.
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 2.1 section	Authoring tools shall provide a mode of operation to create or edit content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.1 (incorporated by reference, see 702.10.1) for all supported features and, as applicable, to file formats supported by the authoring tool. Authoring tools shall permit authors the option of overriding information required for accessibility. EXCEPTION: Authoring tools shall not be required to conform to 504.2 when used to directly edit plain text source code. See WCAG 2.1 section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	Authoring tools shall, when converting content from one format to another or saving content in multiple formats, preserve the information required for accessibility to the extent that the information is supported by the destination format.
504.2.2 PDF Export	Not Applicable	Authoring tools capable of exporting PDF files that conform to ISO 32000-1:2008 (PDF 1.7) shall also be capable of exporting PDF files that conform to ANSI/AIIM/ISO 14289-1:2016 (PDF/UA-1) (incorporated by reference, see 702.3.1)
504.3 Prompts	Not Applicable	Authoring tools shall provide a mode of operation that prompts authors to create content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.1 (incorporated by reference, see 702.10.1) for supported features and, as applicable, to file formats supported by the authoring tool.

Criteria	Conformance Level	Remarks and Explanations
504.4 Templates	Not Applicable	Where templates are provided, templates allowing content creation that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.1 (incorporated by reference, see 702.10.1) shall be provided for a range of template uses for supported features and, as applicable, to file formats supported by the authoring tool.

Chapter 6: Support Documentation and Services

Notes: N/A

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	The technical requirements in Chapter 6 shall apply to ICT support documentation and services where required by 508 Chapter 2 (Scoping Req), 255 Chapter 2 (Scoping Requirements), and where otherwise referenced in any other chapter of the Revised 508 Standards or Revised 255 Guidelines.
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.1		Documentation that supports the use of ICT shall conform to 602.
602.2 Accessibility and Compatibility Features	Supports	Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5. Documentation shall include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology.

Criteria	Conformance Level	Remarks and Explanations
602.3 Electronic Support Documentation	See WCAG 2.1 section	Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.1 (incorporated by reference, see 702.10.1). See WCAG 2.1 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.
603 Support Services	Heading cell – no response required	ICT support services including, but not limited to, help desks, call centers, training services, and automated self-service technical support, shall conform to 603.
603.2 Information on Accessibility and Compatibility Features	Supports	ICT support services shall include information on the accessibility and compatibility features required by 602.2.
603.3 Accommodation of Communication Needs	Supports	Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.

END OF DOCUMENT