

David Berman Communications Accessibility Conformance Report (WCAG 2.1) for Absorb LMS (a product of Absorb LMS)

(Based on latest VPAT[®] Version 2.4Rev International Edition, published March 2022)

by [David Berman Communications](#)

This document conforms with all applicable EN 301 549, WCAG 2.0, WCAG 2.1, and WCAG 2.2 Level A and Level AA guidelines for accessible digital documents. For alternative formats, please contact David Berman Communications at info@davidberman.com or 1-613-728-6777.

Name of Product/Version: Absorb LMS, version 5.119.2.1.13, with Admin Refresh enabled

Report Date: September 30, 2024

Product Description: The admin and learner interfaces of a Web-based learning management system, including Admin, Learner, Manager, and Reviewer interface modules.

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Notes: The product conforms to WCAG 2.1 Level A and AA and EN 301 549, except for 5 success criteria which “Support With Exceptions” rather than full support, as detailed below.

Accessibility conformance testing was limited, at client request, to the Chrome browser experience, with and without JAWS enabled, of the Admin, Learner, Reviewer and Manager roles, and not including the Analyze and Create Application features. Also, the admin version called Admin Refresh was the admin module in scope of the product version tested.

We worked extensively with Absorb on remediation, coaching, and cyclical reauditing prior to authoring this ACR (VPAT) for their Absorb LMS. Their enthusiasm and dedication to making their product accessible is authentic: we identified several issues where they chose to go beyond the minimum in the techniques that they chose to embrace in our discussions together, and I am confident that they intend to go even further with future features and releases.

Designations of “Supports” are based upon the deeper commentary on each matter documented within the Accessibility Remediation Report (ARR) document that we developed and shared directly with the development team as their agenda for working through any conformance issues.

Evaluation Methods Used: Testing (and all tools used in our analysis) followed W3C’s WCAG-EM evaluation methodology, supported by pertinent PDF/UA testing according to the Matterhorn Protocol.

Tools: Auditing accomplished using the following tools (and methods):

- Automated testing tools for browsers: WebAim WAVE, Colour Contrast Analyser, Deque axe

- Automated testing tools for documents: Office Accessibility Checker (latest version), PAC (latest version), Adobe Acrobat Pro Accessibility Checker (latest version)
- Manual testing tools we use, as required:
 - Screen readers (NVDA)
 - Zimmerman Low Vision Simulation Kit
 - ZoomText

Functional Methods: The audit included comprehensive human (manual) review of each success criterion, including (but not limited to) these functional methods:

- using the keyboard only (or keyboard-only equivalents)
- muting sound controls
- screen magnification (using each operating system’s control set, using the user agent’s overall zoom function, using the user agent’s “zoom text only” functionality)
- navigation following top tasks as per discussion with client, as well as the overall framework.
- examination of:

- typeface treatments, sizing, and horizontal and vertical spacing
- hue usage and contrast (with and without high contrast display)
- content layouts, flow, and structure
- semantic layout and structure
- predictability
- content flow and navigability via non-keyboard input
- interactive patterns for comprehension and readability
- error situations and recovery
- responsive design scenarios (including desktop breakpoints)
- built-in accessibility features of each targeted operating system
- application of the principles of Universal Design for Learning
- observations via spot testing by users with lived experience

Accessibility Test Coordinator: David Berman, CPWA ADS

Web Accessibility Testers Team Lead: Ben Armitage, David Berman, Michael Cooper

Document Accessibility Testers Team: David Berman, CPWA ADS; Michael Cooper, WAS; Khadija Mogri, ADS

Applicable Standards/Guidelines

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

Standard/Guideline	Included in Report
Web Content Accessibility Guidelines 2.0	Level A: Yes Level AA: Yes Level AAA: No
Web Content Accessibility Guidelines 2.1	Level A: Yes Level AA: Yes Level AAA: No
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	Yes
EN 301 549 Accessibility requirements for ICT products and services - V3.1.1 (2019-11) AND EN 301 549 Accessibility requirements for ICT products and services - V3.2.1 (2021-03)	Yes

Terms

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

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

WCAG 2.x Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Sections 10.1-10.4 of Chapter 10 - Non-Web Documents, and Sections 11.1-11.4 and 11.8.2 of Chapter 11 - Non-Web Software (open and closed functionality), and Sections 12.1.2 and 12.2.4 of Chapter 12 – Documentation
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Notes: None

Criteria	Conformance Level	Remarks and Explanations
<p>1.1.1 Non-text Content (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-Web Document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.1 (Web) • 10.1.2.1 (Non-Web Document) • 11.1.2.1.1 (Open Functionality Software) • 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.2 (Web) • 10.1.2.2 (Non-Web Document) • 11.1.2.2 (Open Functionality Software) • 11.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.3 (Web) • 10.1.2.3 (Non-Web Document) • 11.1.2.3.1 (Open Functionality Software) • 11.1.2.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	This product does not contain any multimedia.
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.1 (Web) • 10.1.3.1 (Non-Web Document) • 11.1.3.1.1 (Open Functionality Software) • 11.1.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	The cart payment view contains credit card expiration fields that lack programmatically associated labels.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.2 (Web) • 10.1.3.2 (Non-Web Document) • 11.1.3.2.1 (Open Functionality Software) • 11.1.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.3 (Web) • 10.1.3.3 (Non-Web Document) • 11.1.3.3 (Open Functionality Software) • 11.1.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.1 Use of Color</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.1 (Web) • 10.1.4.1 (Non-Web Document) • 11.1.4.1 (Open Functionality Software) • 11.1.4.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>1.4.2 Audio Control</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.2 (Web) • 10.1.4.2 (Non-Web Document) • 11.1.4.2 (Open Functionality Software) • 11.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.1 Keyboard</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.1 (Web) • 10.2.1.1 (Non-Web Document) • 11.2.1.1.1 (Open Functionality Software) • 11.2.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.2 (Web) • 10.2.1.2 (Non-Web Document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.4 Character Key Shortcuts</u> (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.4 (Web) • 10.2.1.4 (Non-Web Document) • 11.2.1.4.1 (Open Functionality Software) • 11.2.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>2.2.1 Timing Adjustable</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.1 (Web) • 10.2.2.1 (Non-Web Document) • 11.2.2.1 (Open Functionality Software) • 11.2.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.2.2 Pause, Stop, Hide</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.2 (Web) • 10.2.2.2 (Non-Web Document) • 11.2.2.2 (Open Functionality Software) • 11.2.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>2.3.1 Three Flashes or Below Threshold</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.3.1 (Web) • 10.2.3.1 (Non-Web Document) • 11.2.3.1 (Open Functionality Software) • 11.2.3.1(Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.1 Bypass Blocks</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.1 (Web) • 10.2.4.1 (Non-Web Document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply • 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 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 	Supports	None
<p><u>2.4.2 Page Titled</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.2 (Web) • 10.2.4.2 (Non-Web Document) • 11.2.4.2 (Open Functionality Software) - Does not apply • 11.2.4.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.3 Focus Order</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.3 (Web) • 10.2.4.3 (Non-Web Document) • 11.2.4.3 (Open Functionality Software) • 11.2.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	The product fully supports this success criterion for 34 of the 36 languages supported. However, for the two right-to-left languages (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.4 (Web) • 10.2.4.4 (Non-Web Document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.1 Pointer Gestures</u> (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.1 (Web) • 10.2.5.1 (Non-Web Document) • 11.2.5.1 (Open Functionality Software) • 11.2.5.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>2.5.2 Pointer Cancellation</u> (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.2 (Web) • 10.2.5.2 (Non-Web Document) • 11.2.5.2 (Open Functionality Software) • 11.2.5.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.3 Label in Name</u> (Level A 2.1 only) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.3 (Web) • 10.2.5.3 (Non-Web Document) • 11.2.5.3 (Open Functionality Software) • 11.2.5.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>2.5.4 Motion Actuation</u> (Level A 2.1 only) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.4 (Web) • 10.2.5.4 (Non-Web Document) • 11.2.5.4 (Open Functionality Software) • 11.2.5.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.1 Language of Page</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.1 (Web) • 10.3.1.1 (Non-Web Document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>3.2.1 On Focus</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.1 (Web) • 10.3.2.1 (Non-Web Document) • 11.3.2.1 (Open Functionality Software) • 11.3.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.2 On Input</u> (Level A) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.2 (Web) • 10.3.2.2 (Non-Web Document) • 11.3.2.2 (Open Functionality Software) • 11.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None
<p><u>3.3.1 Error Identification</u> (Level A) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.1 (Web) • 10.3.3.1 (Non-Web Document) • 11.3.3.1.1 (Open Functionality Software) • 11.3.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports with Exceptions	The cart payment view fails to announce form errors to screen reader users.

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.2 Labels or Instructions</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.2 (Web) • 10.3.3.2 (Non-Web Document) • 11.3.3.2 (Open Functionality Software) • 11.3.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None
<p><u>4.1.1 Parsing</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.1 (Web) • 10.4.1.1 (Non-Web Document) • 11.4.1.1.1 (Open Functionality Software) • 11.4.1.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p>4.1.2 Name, Role, Value (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.2 (Web) • 10.4.1.2 (Non-Web Document) • 11.4.1.2.1 (Open Functionality Software) • 11.4.1.2.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None

Table 2: Success Criteria, Level AA

Notes: None

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.4 Captions (Live) (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.4 (Web) • 10.1.2.4 (Non-Web Document) • 11.1.2.4 (Open Functionality Software) • 11.1.2.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	This product does not contain any live multimedia.
<p>1.2.5 Audio Description (Prerecorded) (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.5 (Web) • 10.1.2.5 (Non-Web Document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.4 Orientation</u> (Level AA 2.1 only) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.4 (Web) • 10.1.3.4 (Non-Web Document) • 11.1.3.4 (Open Functionality Software) • 11.1.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>1.3.5 Identify Input Purpose</u> (Level AA 2.1 only) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.5 (Web) • 10.1.3.5 (Non-Web Document) • 11.1.3.5 (Open Functionality Software) • 11.1.3.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports With Exceptions	User account creation fields include mandatory field that fail to provide autocomplete labeling.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.3 (Web) • 10.1.4.3 (Non-Web Document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>1.4.4 Resize text</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.4 (Web) • 10.1.4.4 (Non-Web Document) • 11.1.4.4.1 (Open Functionality Software) • 11.1.4.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.5 Images of Text</u> (Level AA) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.5 (Web) • 10.1.4.5 (Non-Web Document) • 11.1.4.5.1 (Open Functionality Software) • 11.1.4.5.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>1.4.10 Reflow</u> (Level AA 2.1 only) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.10 (Web) • 10.1.4.10 (Non-Web Document) • 11.1.4.10.1 (Open Functionality Software) • 11.1.4.10.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports with Exceptions	The Admin Experience fails to provide a responsive layout.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.11 Non-text Contrast</u> (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.11 (Web) • 10.1.4.11 (Non-Web Document) • 11.1.4.11 (Open Functionality Software) • 11.1.4.11 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>1.4.12 Text Spacing</u> (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.12 (Web) • 10.1.4.12 (Non-Web Document) • 11.1.4.12 (Open Functionality Software) • 11.1.4.12 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.13 Content on Hover or Focus</u> (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.13 (Web) • 10.1.4.13 (Non-Web Document) • 11.1.4.13 (Open Functionality Software) • 11.1.4.13 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) • Revised Section 508 – Does not apply 	Supports	None
<p><u>2.4.5 Multiple Ways</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.5 (Web) • 10.2.4.5 (Non-Web Document) – Does not apply • 11.2.4.5 (Open Functionality Software) – Does not apply • 11.2.4.5 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 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 	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.6 (Web) • 10.2.4.6 (Non-Web Document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	None
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.7 (Web) • 10.2.4.7 (Non-Web Document) • 11.2.4.7 (Open Functionality Software) • 11.2.4.7 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.2 (Web) • 10.3.1.2 (Non-Web Document) • 11.3.1.2 (Open Functionality Software) – Does not apply • 11.3.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.3 (Web) • 10.3.2.3 (Non-Web Document) – Does not apply • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) <p>602.3 (Support Docs) – Does not apply to non-web docs</p>	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.4 Consistent Identification</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.4 (Web) • 10.3.2.4 (Non-Web Document) – Does not apply • 11.3.2.4 (Open Functionality Software) – Does not apply • 11.3.2.4 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) <p>602.3 (Support Docs) – Does not apply to non-web docs</p>	Supports	None
<p><u>3.3.3 Error Suggestion</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.3 (Web) • 10.3.3.3 (Non-Web Document) • 11.3.3.3 (Open Functionality Software) • 11.3.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.4 Error Prevention (Legal, Financial, Data)</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.4 (Web) • 10.3.3.4 (Non-Web Document) • 11.3.3.4 (Open Functionality Software) • 11.3.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	None
<p><u>4.1.3 Status Messages</u> (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.3 (Web) • 10.4.1.3 (Non-Web Document) – Does not apply • 11.4.1.3 (Open Functionality Software) – Does not apply • 11.4.1.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	None

Table 3: Success Criteria, Level AAA

Notes: None

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.6 Sign Language (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.2.7 Extended Audio Description (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.2.8 Media Alternative (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.2.9 Audio-only (Live) (Level AAA) EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.3.6 Identify Purpose (Level AAA 2.1 only) EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.4.6 Contrast Enhanced (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.4.7 Low or No Background Audio (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None

Criteria	Conformance Level	Remarks and Explanations
<p>1.4.8 Visual Presentation (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>1.4.9 Images of Text (No Exception) Control (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.1.3 Keyboard (No Exception) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.2.3 No Timing (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.2.4 Interruptions (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.2.5 Re-authenticating (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.2.6 Timeouts (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p>2.3.2 Three Flashes (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.3.3 Animation from Interactions</u> (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>2.4.8 Location</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>2.4.9 Link Purpose (Link Only)</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>2.4.10 Section Headings</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>2.5.5 Target Size</u> (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>2.5.6 Concurrent Input Mechanisms</u> (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.1.3 Unusual Words</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.1.4 Abbreviations</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.5 Reading Level</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.1.6 Pronunciation</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.2.5 Change on Request</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.3.5 Help</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None
<p><u>3.3.6 Error Prevention (All)</u> (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Evaluated	None

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 with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The cart payment view contains credit card expiration fields that lack programmatically associated labels.</p> <p>User account creation fields fail to provide autocomplete labeling.</p> <p>The cart payment view fails to announce form errors to screen reader users.</p>

Criteria	Conformance Level	Remarks and Explanations
302.2 With Limited Vision	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The Admin Experience fails to provide a responsive layout.</p>
302.3 Without Perception of Color	Supports	None
302.4 Without Hearing	Supports	None
302.5 With Limited Hearing	Supports	None
302.6 Without Speech	Supports	None
302.7 With Limited Manipulation	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p>
302.8 With Limited Reach and Strength	Supports	None

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The cart payment view fails to announce form errors to screen reader users.</p> <p>The cart payment view contains credit card expiration fields that lack programmatically associated labels.</p>

EN 301 549 Report

Notes: None

Chapter [4: Functional Performance Statements \(FPS\)](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The cart payment view contains credit card expiration fields that lack programmatically associated labels.</p> <p>User account creation fields fail to provide autocomplete labeling.</p> <p>The cart payment view fails to announce form errors to screen reader users.</p>

Criteria	Conformance Level	Remarks and Explanations
4.2.2 Usage with limited vision	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The Admin Experience fails to provide a responsive layout.</p>
4.2.3 Usage without perception of colour	Supports	None
4.2.4 Usage without hearing	Supports	None
4.2.5 Usage with limited hearing	Supports	None
4.2.6 Usage without vocal capability	Supports	None
4.2.7 Usage with limited manipulation or strength	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p>
4.2.8 Usage with limited reach	Supports	None

Criteria	Conformance Level	Remarks and Explanations
4.2.9 Minimize photosensitive seizure triggers	Supports	None
4.2.10 Usage with limited cognition	Supports with Exceptions	<p>The product supports 36 natural languages. However, for the two right-to-left languages amongst these (i.e., the Arabic and Hebrew pages), the product has limited accessibility due to following a left-to-right focus order rather than a right-to-left focus order for those languages as well.</p> <p>The cart payment view fails to announce form errors to screen reader users.</p> <p>The cart payment view contains credit card expiration fields that lack programmatically associated labels.</p>
4.2.11 Privacy	Supports	None

Chapter 5: [Generic Requirements](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
5.1 Closed functionality	Heading cell – no response required	Heading cell – no response required
5.1.2 General	Heading cell – no response required	Heading cell – no response required
5.1.2.1 Closed functionality	See 5.2 through 13	See information in 5.2 through 13
5.1.2.2 Assistive technology	See 5.1.3 through 5.1.6	See information in 5.1.3 through 5.1.6
5.1.3 Non-visual access	Heading cell – no response required	Heading cell – no response required
5.1.3.1 Audio output of visual information	Not applicable	All 5.1 criteria within this section are not applicable because the product does not have closed functionality.
5.1.3.2 Auditory output delivery including speech	Not applicable	None
5.1.3.3 Auditory output correlation	Not applicable	None
5.1.3.4 Speech output user control	Not applicable	None
5.1.3.5 Speech output automatic interruption	Not applicable	None
5.1.3.6 Speech output for non-text content	Not applicable	None
5.1.3.7 Speech output for video information	Not applicable	None
5.1.3.8 Masked entry	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
5.1.3.9 Private access to personal data	Not applicable	None
5.1.3.10 Non-interfering audio output	Not applicable	None
5.1.3.11 Private listening volume	Not applicable	None
5.1.3.12 Speaker volume	Not applicable	None
5.1.3.13 Volume reset	Not applicable	None
5.1.3.14 Spoken languages	Not applicable	None
5.1.3.15 Non-visual error identification	Not applicable	None
5.1.3.16 Receipts, tickets, and transactional outputs	Not applicable	None
5.1.4 Functionality closed to text enlargement	Not applicable	None
5.1.5 Visual output for auditory information	Not applicable	None
5.1.6 Operation without keyboard interface	Heading cell – no response required	Heading cell – no response required
5.1.6.1 Closed functionality	See 5.1.3.1 through 5.1.3.16	See information in 5.1.3.1 through 5.1.3.16
5.1.6.2 Input focus	Not applicable	None
5.1.7 Access without speech	Not applicable	None
5.2 Activation of accessibility features	Supports	None

Criteria	Conformance Level	Remarks and Explanations
5.3 Biometrics	Not applicable	None
5.4 Preservation of accessibility information during conversion	Supports	None
5.5 Operable parts	Heading cell – no response required	Heading cell – no response required
5.5.1 Means of operation	Not applicable	None
5.5.2 Operable parts discernibility	Not applicable	None
5.6 Locking or toggle controls	Heading cell – no response required	Heading cell – no response required
5.6.1 Tactile or auditory status	Not applicable	None
5.6.2 Visual status	Not applicable	None
5.7 Key repeat	Not applicable	None
5.8 Double-strike key acceptance	Not applicable	None
5.9 Simultaneous user actions	Not applicable	None

Chapter 6: [ICT with Two-Way Voice Communication](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
6.1 Audio bandwidth for speech	Not applicable	All criteria within this section are not applicable because the product does not include two-way voice communication.
6.2 Real-time text (RTT) functionality	Heading cell – no response required	Heading cell – no response required
6.2.1.1 RTT communication	Not applicable	None
6.2.1.2 Concurrent voice and text	Not applicable	None
6.2.2.1 Visually distinguishable display	Not applicable	None
6.2.2.2 Programmatically determinable send and receive direction	Not applicable	None
6.2.2.3 Speaker identification	Not applicable	None
6.2.2.4 Visual indicator of Audio with RTT	Not applicable	None
6.2.3 Interoperability	Not applicable	None
6.2.4 RTT responsiveness	Not applicable	None
6.3 Caller ID	Not applicable	None
6.4 Alternatives to voice-based services	Not applicable	None
6.5 Video communication	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
6.5.1 General (informative)	Heading cell – no response required	Heading cell – no response required
6.5.2 Resolution	Not applicable	None
6.5.3 Frame rate	Not applicable	None
6.5.4 Synchronization between audio and video	Not applicable	None
6.5.5 Visual indicator of audio with video	Not applicable	None
6.5.6 Speaker identification with video (sign language) communication	Not applicable	None
6.6 Alternatives to video-based services (advisory only)	Advisory – no response required	Advisory – no response required

Chapter 7: [ICT with Video Capabilities](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
7.1 Caption processing technology	Heading cell – no response required	Heading cell – no response required
7.1.1 Captioning playback	Not applicable	None
7.1.2 Captioning synchronization	Not applicable	None
7.1.3 Preservation of captioning	Not applicable	None
7.1.4 Captions characteristics	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
7.1.5 Spoken subtitles	Not applicable	None
7.2.1 Audio description playback	Not applicable	None
7.2.2 Audio description synchronization	Not applicable	None
7.2.3 Preservation of audio description	Not applicable	None
7.3 User controls for captions and audio description	Not applicable	None

Chapter 8: [Hardware](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
8.1.1 Generic requirements	Heading cell – no response required	Heading cell – no response required
8.1.2 Standard connections	Not applicable	None
8.1.3 Colour	Not applicable	None
8.2 Hardware products with speech output	Heading cell – no response required	Heading cell – no response required
8.2.1.1 Speech volume range	Not applicable	None
8.2.1.2 Incremental volume control	Not applicable	None
8.2.2.1 Fixed-line devices	Not applicable	None
8.2.2.2 Wireless communication devices	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
8.3 Stationary ICT	Heading cell – no response required	Heading cell – no response required
8.3.2.1 Unobstructed high forward reach	Not applicable	None
8.3.2.2 Unobstructed low forward reach	Not applicable	None
8.3.2.3.1 Clear space	Not applicable	None
8.3.2.3.2 Obstructed (< 510 mm) forward reach	Not applicable	None
8.3.2.3.3 Obstructed (< 635 mm) forward reach	Not applicable	None
8.3.2.4 Knee and toe clearance width	Not applicable	None
8.3.2.5 Toe clearance	Not applicable	None
8.3.2.6 Knee clearance	Not applicable	None
8.3.3.1 Unobstructed high side reach	Not applicable	None
8.3.3.2 Unobstructed low side reach	Not applicable	None
8.3.3.3.1 Obstructed (< 255 mm) side reach	Not applicable	None
8.3.3.3.2 Obstructed (< 610 mm) side reach	Not applicable	None
8.3.4.1 Change in level	Not applicable	None
8.3.4.2 Clear floor or ground space	Not applicable	None
8.3.4.3.2 Forward approach	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
8.3.4.3.3 Parallel approach	Not applicable	None
8.3.5 Visibility	Not applicable	None
8.3.6 Installation instructions	Not applicable	None
8.4 Mechanically Operable parts	Heading cell – no response required	Heading cell – no response required
8.4.1 Numeric keys	Not applicable	None
8.4.2.1 Means of operation of mechanical parts	Not applicable	None
8.4.2.2 Force of operation of mechanical parts	Not applicable	None
8.4.3 Keys, tickets and fare cards	Not applicable	None
8.5 Tactile indication of speech mode	Not applicable	None

Chapter 9: [Web](#) (see [WCAG 2.x section](#))

Notes: None

Chapter 10: [Non-Web Documents](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
10.0 General (informative)	Heading cell – no response required	Heading cell – no response required
10.1.1.1 through 10.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section

Criteria	Conformance Level	Remarks and Explanations
10.5 Caption positioning	Supports	None
10.6 Audio description timing	Supports	None

Chapter [11: Software](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
11.0 General (informative)	Heading cell – no response required	Heading cell – no response required
11.1.1.1 through 11.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section
11.5 Interoperability with assistive technology	Heading cell – no response required	Heading cell – no response required
11.5.1 Closed functionality	Heading cell – no response required	Heading cell – no response required
11.5.2 Accessibility services	Heading cell – no response required	Heading cell – no response required
11.5.2.1 Platform accessibility service support for software that provides a user interface	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.2 Platform accessibility service support for assistive technologies	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.3 Use of accessibility services	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.4 Assistive technology	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
11.5.2.5 Object information	Not applicable	None
11.5.2.6 Row, column, and headers	Not applicable	None
11.5.2.7 Values	Not applicable	None
11.5.2.8 Label relationships	Not applicable	None
11.5.2.9 Parent-child relationships	Not applicable	None
11.5.2.10 Text	Not applicable	None
11.5.2.11 List of available actions	Not applicable	None
11.5.2.12 Execution of available actions	Not applicable	None
11.5.2.13 Tracking of focus and selection attributes	Not applicable	None
11.5.2.14 Modification of focus and selection attributes	Not applicable	None
11.5.2.15 Change notification	Not applicable	None
11.5.2.16 Modifications of states and properties	Not applicable	None
11.5.2.17 Modifications of values and text	Not applicable	None
11.6 Documented accessibility usage	Heading cell – no response required	Heading cell – no response required
11.6.1 User control of accessibility features	Not applicable	None
11.6.2 No disruption of accessibility features	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
11.7 User preferences	Not applicable	None
11.8 Authoring tools	Heading cell – no response required	Heading cell – no response required
11.8.1 Content technology	Heading cell – no response required	Heading cell – no response required
11.8.2 Accessible content creation	See WCAG 2.x section	See information in WCAG 2.x section
11.8.3 Preservation of accessibility information in transformations	Not applicable	None
11.8.4 Repair assistance	Not applicable	None
11.8.5 Templates	Not applicable	None

Chapter [12: Documentation and Support Services](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
12.1 Product documentation	Heading cell – no response required	Heading cell – no response required
12.1.1 Accessibility and compatibility features	Supports	None
12.1.2 Accessible documentation	See WCAG 2.x section	See information in WCAG section
12.2 Support Services	Heading cell – no response required	Heading cell – no response required
12.2.2 Information on accessibility and compatibility features	Supports	None
12.2.3 Effective communication	Supports	None
12.2.4 Accessible documentation	See WCAG 2.x section	See information in WCAG section

Chapter [13: ICT Providing Relay or Emergency Service Access](#)

Notes: None

Criteria	Conformance Level	Remarks and Explanations
13.1 Relay services requirements	Heading cell – no response required	Heading cell – no response required
13.1.2 Text relay services	Not applicable	None
13.1.3 Sign relay services	Not applicable	None
13.1.4 Lip-reading relay services	Not applicable	None

Criteria	Conformance Level	Remarks and Explanations
13.1.5 Captioned telephony services	Not applicable	None
13.1.6 Speech to speech relay services	Not applicable	None
13.2 Access to relay services	Not applicable	None
13.3 Access to emergency services	Not applicable	None

Expert certification

10/11/2024

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David Berman, CPWA, WAS, CPACC

Signed by: David Berman

David Berman, CPWA, WAS, CPACC, ADS

With over 30 years of experience in design and communications, David has worked extensively in accessible Web and software interface development. David is global chair of the IAAP (the International Association of Accessibility Professionals) and an Invited Expert to the W3C (the publishers of WCAG). David has taken all available courses of the U.S. Trusted Tester program, in support of *U.S. Revised Section 508*. David has advised the Government of Canada and a coalition of Canada's top accessibility organizations on the content of the *Accessible Canada Act* and its anticipated regulatory approach, including arguing for international harmonized adoption of *EN 301 549*.

David Berman is one of several hundred people in the world to hold CPWA, WAS, CPACC, and ADS certifications, the World's only globally recognized certifications for accessibility professionals. These certifications are issued by IAAP (the International Association of Accessibility Professionals). IAAP is a division of G3ICT, for which David is an International Advisor.

David is a member of the ISO committee for accessible PDF (PDF/UA) and for plain language. Our team status as an accessibility auditor has the highest bona fides available in the World. The U.S. Department of Education's Office of Civil Rights has reported to us that we have all the bona fides they require to deem us as acceptable for auditing Revised Section 508, Section 504, and ADA compliance.

David Berman successfully completed all certificate courses available from the Department of Homeland Security on the Revised Section 508, which are designed to qualify professionals to be able to author VPAT reports. In fact, he was asked to participate in the first cohort in order to help perfect the course material that was revised for latest Section 508 / VPAT requirements.

David was appointed by Ontario's Minister in charge of accessibility to serve on the standards review committee for Ontario's world-leading AODA accessibility regulations, which address WCAG 2 Level AA. He was contracted by Sir Tim Berners-Lee's World Wide Web Foundation to audit online accessibility in over 40 countries for the annual theWebIndex.org benchmark report. In 2015, he was named an Invited Expert to W3C, the authors of WCAG. The same year he was appointed International Universal Design Champion for the Government of Ireland. In 2009, David was appointed a high-level advisor to the United Nations on how accessible Web design can help fulfill the Millennium Development Goals.

Full biography and CV: <http://www.davidberman.com/about/biography>