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Section 508

Product Assessment

<Projects/Products Applicable to FNS Portfolio Management Division>

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Instructions for Completing the

Section 508 Product Assessment

# Purpose:

The purpose of the Section 508 Product Assessment is to assist contracting officials and other buyers of the United States Department of Agriculture (USDA) in making preliminary assessments regarding the availability of Electronic and Information Technology (EIT) products and services with features that support accessibility.

# Background:

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the Section 508 Voluntary Product Accessibility Template (VPAT) – a simple, Web-based checklist that allows manufacturers, developers, or vendors to document how their product **does** or **does not** meet the various Section 508 Requirements. CMS has adopted the VPAT for use in assessing Section 508 compliance of EIT products being acquired by or developed for the Agency, hence referred to by the Agency as the Section 508 Product Assessment.

# Who should complete the Section 508 Product Assessment?

USDA requires a measure of technical detail in the responses submitted in a Section 508 Product Assessment in order to effectively determine compliance of the identified EIT product. Therefore, a technical specialist for the manufacturer, developer, or vendor of the EIT product should complete the Section 508 Product Assessment.

It is the responsibility of the manufacturer, developer, or vendor of the EIT product to maintain the integrity of the data provided in the Section 508 Product Assessment. The information provided in the completed Section 508 Product Assessment for an EIT product is considered to be a self-representation unless expressly affirmed otherwise.

# Procedure for Completing the Section 508 Product Assessment:

**Step 1:** Utilizing the information provided in the following table, determine which sections of the **Technical Standards (Subpart B - 1194.21 through 1194.26)** apply to the EIT product**.** Note that the **Functional Performance Criteria (Subpart C – 1194.31)** and the **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the USDA Section 508 Product Assessment must be completed for every EIT product.

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| **Product** | **Applicable Sections** |
| Software | 1194.21 Software Applications and Operating Systems  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |
| Web | 1194.22 Web-Based Internet Information and Applications  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |

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| Web Application | 1194.21 Software Applications and Operating Systems  1194.22 Web-Based Internet Information and Applications  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |
| Telecommunications | 1194.23Telecommunications Products  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |
| Video/Multimedia | 1194.24 Video and Multimedia Products  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |
| Self-Contained | 1194.25 Self-Contained, Closed Products  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |
| Personal Computers | 1194.26 Desktop and Portable Computers  1194.31 Functional Performance Criteria  1194.41 Information, Documentation, and Support |

**Step 2:** Determine if the EIT product **does** or **does not** meet the individual Criteria elements listed in the 1st column of each applicable section of the Section 508 Product Assessment. Utilizing the guidance provided in the following table, provide the appropriate responses in the ***Supporting Features*** column (2nd column) of the Section 508 Product Assessment document for each Criteria element.

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| **Response** | **Means…** |
| **Supports** | Product **fully** **meets** the letter and intent of the Criteria. |
| **Supports with Exceptions** | Product **does not** **entirely** **meet** the letter and intent of the Criteria, but does provide some level of access. |
| **Supports through Equivalent Facilitation** | Product **provides alternative methods to meet** the intent of the Criteria. |
| **Does Not Support** | Product **does not** **meet** the letter or intent of the Criteria. |
| **Not Applicable** | The Criteria **does not** **apply** to the product. |

If the EIT product **Does Not Support** the Criteria, remember that Section 508 allows for products to meet the Access Board Standards in innovative, non-traditional ways. The EIT product can meet the standard (i.e., **Supports through Equivalent Facilitation**) by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user.

**Step 3:** Utilizing the guidance provided in the following table, document in the ***Remarks & Explanations*** column (3rd column) for each Criteria listed in the 1st column of the applicable sections of the Section 508 Product Assessment document, exactly **how** the EIT product **does** or **does not** meet the Criteria.

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| **If Supporting Features (2nd column) response is…** | **Then Remarks & Explanations (3rd column) response should be…** |
| **Supports** | List exactly **what** features of the product **do** meet the Criteria and describe **how** the features are used to support the standard. |
| **Supports with Exceptions** | List exactly **what** features of the product **do** meet the Criteria and describe **how** the features are used to support the standard.  **AND**  List exactly **what** aspects of the product **do not** meet the Criteria and describe **how** they fail to support the Criteria. |
| **Supports through Equivalent Facilitation** | List exactly **what** *alternative* methods exist in the product and describe **how** they are used to support the Criteria. |
| **Does Not Support** | Describe exactly **how** the product **does not** support the Criteria. |
| **Not Applicable** | Describe exactly **why** the Criteria are not applicable to the product. |

**Step 4:** Provide the completed Section 508 Product Assessment to the USDA Requestor.

# Section 508 Product Assessment

**USDA Requestor:** **Date:**

**Product Name:** **Version:**

**Vendor:** **Vendor Contact:**

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| Section 1194.21 Software Applications and Operating Systems ***Refer to*** [***http://www.access-board.gov/sec508/guide/1194.21.htm***](http://www.access-board.gov/sec508/guide/1194.21.htm) ***for details on the criteria listed below.*** | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| 1. When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.   **(a.1) Can you navigate all aspects of the application using only the keyboard**  **(a.2) Is every feature of the application available using the keyboard** |  |  |
| 1. Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.   **(b.1) Does the application avoid disrupting or disabling activated features of other products that are identified as accessibility features (where those features are developed and documented according to industry standards?**  **(b.2) Does the application avoid disrupting or disabling activated features of any operating system that are identified as accessibility features (where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer)?**  **(b.3) Are all of the operating system accessibility options that were previously set still available?**  **(b.4) Are all the features of the software product accessibility options that were previously set still available?** |  |  |
| 1. A well-defined onscreen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.   **(c.1) is a well-defined on-screen indication of the current focus (e.g., cursor) provided that moves among interactive interface elements as the input focus changes?**  **(c.2) Is the focus programmatically exposed so that AT can track focus and focus changes?**  **(c.3) Is there no evident change in on-screen focus as you navigate through one or more components of an application?** |  |  |
| 1. Sufficient information about a user interface element including the identity, operation, and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.   **(d.1) Can the screen reader distinguish and read all controls such as prompts for edit fields, text, radio buttons, checkboxes, menus and toolbars to the user?**  **(d.2) When an image represents a program element is the information conveyed by the image available in text?** |  |  |
| 1. When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application’s performance.   **(e.1) Do individual icons used to identify controls, status indicators or other programmatic elements mean the same thing through out the application?**  **(e.2) When an image represents a program element is the information conveyed by the image available in text?** |  |  |
| 1. Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.   **(f.1) Is all text presented in the application readable by assistive technologies? (Minimum information that shall be made available is text content, text input caret location, and text attributes).** |  |  |
| 1. Applications shall not override user-selected contrast and color selections and other individual display attributes.   **(g.1) Does the application avoid overriding user-selected contrast and color selections and other individual display attributes?**  **(g.2) If a product uses its own color and contrast settings, does it comply with 1194.21 (j)?** |  |  |
| 1. When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.   **If animated objects are present, is the information conveyed by the animated object displayable in at least one non-animated presentation mode at the option of the user( i.e. , audio or captions?** |  |  |
| 1. Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.   **If color is the sole means used to prompt a response, indicate an action, distinguish a visual element or convey information, is the information displayed in another mode? Example: If the color red indicate negative numbers, are those numbers also represented with a negative sign (-)?** |  |  |
| 1. When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.   **(j.1) If users can adjust color and contrast setting, is a variety of color and contrast settings available to choose from?**  **Note: If the product does not feature adjustable color or contrast settings, the standard does not apply.** |  |  |
| 1. Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2Hz and lower than 55Hz.   **(k.1) Are screen items which flash, blink or flicker set at a rate of less than twice a second or more than 55 times a second?**  **(Hertz (Hz) is a cycle per second)**  **(k.2) Does the page avoid using effects that cause the screen to “flicker” as pages are loaded?** |  |  |
| 1. When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.   **(l.1) Can you navigate and follow links and forms with the keyboard?**  **(l.2) Can the electronic forms be used with assistive technologies?**  **(l.3) Can a screen reading program read all prompts, directions, explanations, or instructions on the form and understand the purpose of each field and the functionality required for completion and submission of the form?** |  |  |

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| Section 1194.22 Web-Based Internet Information and Applications ***Refer to*** [***http://www.access-board.gov/sec508/guide/1194.22.htm***](http://www.access-board.gov/sec508/guide/1194.22.htm) ***for details on the criteria listed below.*** | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| 1. A text equivalent for every non-text element shall be provided (for example, via “alt,” “longdesc,” or in element content).   **(a.1) Are ALT tags provided for every image?**  **(a.2) Are ALT tags provided for every hotspot on an image map and the map as a whole?**  **(a.3) Are ALT tags provided for every animated image?**  **(a.4) Are ALT tags provided for every applet?**  **(a.5) Are ALT tags provided for Programmatic objects?**  **(a.6) Are null (alt = “”) ALT tags provided for images used as list bullets?**  **(a.7) Are null ALT tags provided for image used as spacers?**  **(a.8) Are ALT tags provided for every image-type button in forms?**  **(a.9) Do audio files have transcripts?**  **(a.10) Do video files have synchronized captions?**  **(a.11) If flash is used does each user selectable element have an alternate tag?** |  |  |
| 1. Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.   **(b.1) If there is a video presentation on your web page does the auditory, text equivalent (captioning) or other alternatives synchronize with the video?**  **(b.2) Is the auditory or text equivalent descriptions accurate and adequate?**  **(b.3) Is a link to any player or plug-in that is required to render multimedia provided?** |  |  |
| 1. Web pages shall be designed so that all information conveyed with color is also available without color, for example, from context or markup.   **(c.1) Does the page avoid using color to convey information (e.g. click on the red link to proceed)?**  **(c.2) Do I mages with text in them use contrasting colors so that the text is easily readable?** |  |  |
| 1. Documents shall be organized so they are readable without requiring an associated style sheet.   **(d.1) Can the page content be viewed without style sheets (e.g. dos the content still appear)?**  **(d.2) Does the reading order of the page still make sense without style sheets?**  **To test: Display style sheets in your browser’s preferences, and see if all the information is still available and in logical order** |  |  |
| 1. Redundant text links shall be provided for each active region of a server-side image map.   **(e.1) If possible, has the server-side image map been converted to a client-side image map?**  **(e.2) If a server-side image map is used, are redundant text links provided for every active region on the server-side image map?** |  |  |
| 1. Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.   **(f.1) Are client-side image maps being used instead of server-side except where the regions(s) can not be defined with an available geometric shape?**  **(f.1) Is appropriate alternative text provided for images as well as each map hot spots?** |  |  |
| 1. Row and column headers shall be identified for data tables.   **(g.1) Are all column and row headers identified using the <th> instead of the “td” tag in data tables?**  **(g.2) Is unique id attribute associated with each “th” element and its corresponding “td” cells?**  **(g.3) Is the scope or the headers and id attributes used for row and column header cells?**  **(g.4) Does the text in the summary attribute accurately describe the related table data?**  **(g.5) Is the “th” tag not used to achieve formatting (i.e., to bold text)?**    **(g.6) Is the <pre> tag not used to create a tabular layout of text?**    **(g.7) Are table header not used in decorative or layout tables?** |  |  |
| 1. Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.   **(h.1) Are data cells and header cells associated for data tables that have two or more logical levels or row or column headers?**  **(h.2) Are all column and row headers identified using the <th> instead of the “td” tag in data tables?**  **(h.3) Is a unique id attribute associated with each “th” element cell?**  **(h.4) Is the scope or the headers and id attributes used for row and column header cells?**  **(h.5) Does the text in the summary attribute accurately describe the related table data?**  **(h.6) Is the “th” tag not used to achieve formatting (i.e. to bold text)?**  **(h.7) Is the <pre> tag not used to create a tabular layout of text?**    **(h.8) Are table header not used in decorative or layout tables?** |  |  |
| 1. Frames shall be titled with text that facilitates frame identification and navigation.   **Note: Frames are not allowed on the ihs.gov domain ( HIS & HHS requirements)** |  |  |
| 1. Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2Hz and lower than 55Hz.   **(j.1) Does the page avoid using blinking text and /or images?**  **(j.2) Does the page avoid using effects that cause the screen to “flicker” as pages are loaded?**  **(j.3) Are screen items which flash, blink or flicker set at a rate of less than twice a second or more than 55 times a second? (Hertz (Hz) is a cycle per second)** |  |  |
| 1. A text-only page, with equivalent information or functionality, shall be provided to make a Web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.   **(k.1) Are all pages accessible?**  **(k.2) Document file name does not contain spaces or special characters and is no more than 20 characters?**  **(k.3) Document properties for Author, title, Company, Keywords and Language properly filled out?**  **(k.4) Document has been formatted using style elements (proper headers, bullets, etc.)?**  **(k.5) All edits have been accepted, comments removed, and track changes and formatting marks turned off?**  **(k.6) Color is not used to convey important information, e.g., “See red text below.”?**  **(k.7) All images have alternative text descriptions (Images used only for decorations have null alt tags:**  **alt= “”?**  **(k.8) All charts and graphs have either an alternative text description or provide a description in the text immediately below the chart or graph?**  **(k.9) All hyperlinks are active and use the full Web address, e.g., http://cms.hhs.gov?**  **(k.10) Document has been reviewed in Print Preview for a final visual check?**  **This would be a good time to use the Section 508 Checklist for Word Document, PDF , Multimedia and HTML** |  |  |
| 1. When pages utilize scripting languages to display content or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.   **(l.1) Is information provided by the script with functional text readable by assistive technology when pages utilize scripting languages to display content or to create interface elements?**  **(l.2) Are accessible alternatives provided for scripts and applets that are inaccessible with assistive technologies (e.g. <non-script> tags)?** |  |  |
| (m) When a Web page requires that an applet, plug-in, or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).  **(m.1) If a page uses plug-ins, applets, etc. is a link to that plug-in or applet provided to interpret the page content?**  **(m.2) Does the plug-in applets comply with the Section 508 standards listed in 1194.21 (a) through (l)?** |  |  |
| 1. When electronic forms are designed to be completed online, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.   **(n.1)** **For all form controls implicitly associated with labels, are the labels properly positioned?**  **(n.2) Can you navigate and follow links and forms with the keyboard?**  **(n.3)** **Can the form be used with assistive technology?** |  |  |
| 1. A method shall be provided that permits users to skip repetitive navigation links.   **A method shall be provided that permits users to skip repetitive navigation links.**  **Is there a way to skip over a group of links (e.g., the header page navigation and footer?** |  |  |
| 1. When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.   **(p.1) Is the user alerted when a timed response is required and given sufficient time to indicate more time is required?**  **(p.2) Does the page avoid automatic redirects and automatic refreshing, etc?** |  |  |

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| Section 1194.25 Self-Contained, Closed Products ***Refer to*** [***http://www.access-board.gov/sec508/guide/1194.25.htm***](http://www.access-board.gov/sec508/guide/1194.25.htm) ***for details on the criteria listed below.*** | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| 1. Self-contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.   **(a.1) does your product have embedded software?**  **(a.2) Does your self contained, closed products have built-in accessibility?**  **Note: self-contained products generally have embedded software and are commonly designed in such a fashion that a user cannot easily attach or install assistive technology**  **(example: copier machine, calculators, fax machines, information transaction machines, and information kiosks)** |  |  |
| 1. When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.   **(b.1) does your self-contained, closed system notified the user if a process is about to time-out and be given an opportunity to answer a prompt asking whether additional time is needed.** |  |  |
| 1. Where a product utilizes touch screens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k)(1) through (4).   **(k1) Controls and keys shall be tactilely discernible without activating the controls or keys.**  **(k2) Controls and keys shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2 N) maximum.**  **(k3) If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.**  **(k4) The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.** |  |  |
| 1. When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.   **(d.1) Does your application/product contain Biometric controls that are activated only if a particular biological feature (e.g., voiceprint) of the user exists and matches specific criteria? ( Other examples include retinal scans and fingerprint identification that may become a common practice for allowing an individual to gain access to personal data from an information transaction type of machine)**  **If so,** **when a system needs to be accessed by a person with a disability and that disability prohibits the use of a specific biometric feature, a non-biometric alternative should be provided that does not compromise security.** |  |  |
| 1. When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry-standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at any time.   **(e.1) This provision applies only to voice output. For example, it could apply to a device that is providing voice output for a person who is unable to see a visual display.**  **(e.2) A standard connector- People who regularly use information transaction kiosks may plan to carry a portable headset (or other listening coupler) with them. Examples of common plugs on headsets include those that fit 2.5 mm jacks (such as those in most cellular phones) and 3.5 mm plugs (such as those in most portable stereos). There have been problems in the past when manufacturers made proprietary plugs that were flat with multiple pins and were compatible only to their own products.** |  |  |
| 1. When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45dB, a volume gain of at least 20dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.   **(f.1) Is the audio outputs from the kiosk type product have a minimum level of 65 dB? (A feature has been required to automatically reset the volume to the default level after every use. This is consistent with a similar provision addressing telecommunications products.)**  **Note: People who are hard of hearing, generally speaking, require voice levels to be 20 dB above the ambient sound level to understand speech. This means that as long as the noise level in the surrounding environment is below 45 dB, the 65 dB output level would be sufficient. If the product is in an environment with a high noise level, the user must be able to raise the volume to a setting of 20 dB higher than the ambient noise level.** |  |  |
| 1. Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.   **(g.1) This provision does not prohibit the use of color to enhance identification of important features. It does, however, require that some other method of identification, such as text labels, be combined with the use of color.** |  |  |
| 1. When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.   **(h.1**) **This provision is applied to those products that already allow a user to adjust screen colors.**  **Note: This provision requires more than just providing color choices. The available choices must also allow for different levels of contrast. Many people experience a high degree of sensitivity to bright displays. People with this condition cannot focus on a bright screen for long because they will soon be unable to distinguish individual letters. An overly bright background causes a visual "white-out". To alleviate this problem, the user must be able to select a softer background and appropriate foreground colors. On the other hand, many people with low vision can work most efficiently when the screen is set with very sharp contrast settings. Because there is such a variance in individual needs it is necessary for a program to have a variety of color and contrast settings.** |  |  |
| 1. Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2Hz and lower than 55Hz.   **(i.1) This requirement is necessary because some individuals with photosensitive epilepsy can have a seizure triggered by displays that flicker or flash, particularly if the flash has a high intensity and is within certain frequency ranges. The 2 Hz limit was chosen to be consistent with proposed revisions to the ADA Accessibility Guidelines which, in turn, are being harmonized with the International Code Council (ICC)/ANSI A117 standard, "Accessible and Usable Buildings and Facilities", ICC/ANSI A117.1-1998 which references a 2 Hz limit. An upper limit was identified at 55 Hz.** |  |  |
| (j)(1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48- inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.  **(j.1) These provisions apply to the physical characteristics of large office equipment including reach ranges and the general physical accessibility of controls and features.**  **Examples of these products, include but are not limited to copiers, information kiosks, and free standing printers. These provisions are based on the** [**Americans with Disabilities Act Accessibility Guidelines**](http://www.access-board.gov/adaag/html/adaag.htm) **(ADAAG 4.2 Space Allowance and Reach Ranges).** |  |  |
| (j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.  **(j.2) These provisions apply to the physical characteristics of large office equipment including reach ranges and the general physical accessibility of controls and features.**  **Examples of these products, include but are not limited to copiers, information kiosks, and free standing printers. These provisions are based on the** [**Americans with Disabilities Act Accessibility Guidelines**](http://www.access-board.gov/adaag/html/adaag.htm) **(ADAAG 4.2 Space Allowance and Reach Ranges).** |  |  |
| (j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.  **(j.3)**  **These provisions apply to the physical characteristics of large office equipment including reach ranges and the general physical accessibility of controls and features.**  **Examples of these products, include but are not limited to copiers, information kiosks, and free standing printers. These provisions are based on the** [**Americans with Disabilities Act Accessibility Guidelines**](http://www.access-board.gov/adaag/html/adaag.htm) **(ADAAG 4.2 Space Allowance and Reach Ranges).** |  |  |
| (j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.  **(j.4) These provisions apply to the physical characteristics of large office equipment including reach ranges and the general physical accessibility of controls and features.**  **Examples of these products, include but are not limited to copiers, information kiosks, and free standing printers. These provisions are based on the** [**Americans with Disabilities Act Accessibility Guidelines**](http://www.access-board.gov/adaag/html/adaag.htm) **(ADAAG 4.2 Space Allowance and Reach Ranges).** |  |  |

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| Section 1194.31 Functional Performance Criteria **Note:** The performance requirements of this section are intended for overall product evaluation and for technologies or components for which there is no specific requirements under the technical standards in Subpart B. These criteria are designed to ensure that the individual accessible components work together to create an accessible product. They cover operation, including input and control functions, operation of mechanical mechanisms, and access to visual and audible information. These provisions are structured to allow people with sensory or physical disabilities to locate, identify, and operate input, control and mechanical functions and to access the information provided, including test, static or dynamic images, icons, labels sounds or incidental operating cues. | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| 1. At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.   **Is at least one mode of operation and information retrieval that does not require user vision provided, or is support for assistive technology used by people who are blind or visually impaired provided?** |  |  |
| 1. At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.   **Is at least one mode of operation and information retrieval that does not require visual perception greater than 20/70 provided in audio and enlarged print output working together or independently, or support for assistive technology used by people who are visually impaired provided?** |  |  |
| 1. At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided.   **Is at least one mode of operation and information retrieval that does not require user hearing provided, or support for assistive technology used by people who are deaf or hard of hearing provided?** |  |  |
| 1. Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.   **Where audio information is important for the use of a product, is at least one mode of operation and information retrieval provided in an enhanced auditory fashion, or support for assistive hearing devices provided?** |  |  |
| 1. At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.   **Where audio information is important for the use of a product, is at least one mode of operation and information retrieval provided in an enhanced auditory fashion, or support for assistive hearing devices provided?** |  |  |
| 1. At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.   **Is at least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength provided?** |  |  |

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| Section 1194.41 Information, Documentation, and Support **Note:** The requirements in this section addresses access to all information, documentation, and support provided to end users (i.e., Federal Employees) of covered technologies. This includes user guides, installation guides for end-user installable devices, and customer support and technical support communications. Such information must be available in alternate formats upon request at no additional charge. Alternate formats or methods of communication can include Braille, large print, electronic text, TTY access, and captioning and audio description for video materials. | | |
| **Criteria** | **Supporting Features** | **Remarks and Explanations** |
| 1. Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.   **(a.1) Is product support documentation provided to end-users available in alternate formats (i.e., ASCII test or HTML) upon request for no additional charge?**  **(a.2) Are all manuals and documentation provided in electronic formats as well as text files, including text descriptions of any charts, graphs, pictures, or graphics of any nature?** |  |  |
| 1. End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.   **(b.1) Is a description of the product’s accessibility and compatibility features that are built into a product fully documented and available in alternate formats or alternate modes upon request at no additional charge?**  **(b.2) Are all keyboards navigation which does not follow documented**  **system conventions fully documented and available in alternate formats or alternate modes upon request at no additional charge?** |  |  |
| 1. Support services for products shall accommodate the communication needs of end-users with disabilities.   **Are help desks and other support services for products or services capable of accommodating the communication needs of persons with disabilities?** |  |  |