

Accessibility Evaluation of Pearson REVEL Platform VPAT Document

Presented to: Pearson

July 23, 2015

Document Version 1.0
Prepared By:
Tech For All, Inc.
www.TFAConsulting.com

August 13, 2015

Document Version 1.1

Pearson additions:
Scope, Status & Legal
Pearson modifications:
Changed "Supports" to "Does not
Support" for item 1194.22 (j)
Updated contact information

Scope

This VPAT applies to the student view of REVEL 3.0.1.

This VPAT is for elements of REVEL products that are shared across all REVEL products. We call this the REVEL platform. A full REVEL product is made up of the platform, widget types, and topic-specific content. For a 100% accessible experience, each of these elements needs to be accessible. As such, this document gives part of the accessibility picture for a REVEL course.

Status

The REVEL platform was designed with accessibility in mind and can be used by students with disabilities, but there are outstanding bugs that prevent full standards compliance and an optimal experience.

Legal Info

THE INFORMATION AND MATERIALS PROVIDED IN THIS DOCUMENT ARE "AS IS" WITHOUT WARRANTIES OF ANY KIND INCLUDING WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR NON-INFRINGEMENT OF INTELLECTUAL PROPERTY. Accuracy and completeness of the information or materials on this document is not warranted. The information shall not be construed as product specifications for purposes of any warranty of compliance with product specifications in a given contract or order. Changes may be made to the information on this document or to the products described in them, at any time without notice. The information and materials on this document may be out of date, and no commitment is made to update the information and materials. Pearson specifically disclaims any liability with respect to this document and no contractual obligations are formed either directly or indirectly.

Table of Contents

1. Executive Summary	4
2. Voluntary Product Accessibility Template (VPAT)	5
Summary of Applicable Criteria	5
Section 1194.22 Web-based Internet information and communications	6
Section 1194.31 Functional Performance Criteria	8
Section 1194.41 Information, Documentation and Support	9
Appendix A: VPAT Background	9

1. Executive Summary

Tech For All, Inc. (*TFA*, <u>www.TFAConsulting.com</u>) conducted an independent Accessibility Evaluation of the *REVEL Platform* to test, analyze, and identify accessibility barriers encountered when using the platform by people with disabilities. The evaluation generated sufficient information to be able to assess the degree to which the web application conforms to the Section 508 Accessibility Standards. TFA concludes that overall the REVEL Platform supports Section 508 standards with exceptions. Conformance details are identified in the Voluntary Product Accessibility Template (VPAT) below.

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing VPAT documents that has been designed to create simplicity and uniformity/consistency in VPATs presented by a variety of suppliers. In preparing the VPAT, TFA has used the ITIC-recommended *VPAT Summary Description and Suggested Language for Completing VPAT* that can be found in *Appendix A*.

Based on this evaluation and on information published on the ITIC website (http://www.itic.org), TFA presents the following VPAT document for the REVEL Platform as laid out in the following tables: Table 1: Summary of Applicable Criteria, Table 2: Section 1194.22 Web-based Internet Information and Applications, Table 3: Section 1194.31 Functional Performance Criteria, and Table 4: Section 1194.41 Information, Documentation, and Support. In Table 4, Criterion 2 & 3 should be verified and completed by Pearson.

2. Voluntary Product Accessibility Template (VPAT)

REVEL Platform: https://console.pearson.com/signin

Table 1: Summary of Applicable Criteria

Criteria	Supporting Feature	Remarks and Explanations
Section 1194.21 Software	Not applicable	Section not applicable to this
Applications and Operating Systems		product
Section 1194.22 Web-based Internet	Supports with Exceptions	Please refer to the VPAT Details
information and applications		
Section 1194.23	Not applicable	Section not applicable to this
Telecommunications Products		product
Section 1194.24 Video and Multi-	Not applicable	Section not applicable to this
media Products		product
Section 1194.25 Self-Contained,	Not applicable	Section not applicable to this
Closed Products		product
Section 1194.26 Desktop and	Not applicable	Section not applicable to this
Portable Computers		product
Section 1194.31 Functional	Supports with Exceptions	Please refer to the VPAT Details
Performance Criteria		
Section 1194.41 Information,	Supports	Please refer to the VPAT Details
Documentation and Support		

Table 2: Section 1194.22 Web-based Internet information and communications

(a) A text equivalent for every non- text element shall be provided (e.g., via "alt," "longdesc," or in element content). (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	Criteria	Supporting Feature	Remarks and Explanations
text element shall be provided (e.g., via "alt," "longdesc," or in element content). (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided for each active region of a server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells or data tables that have two or more logical levels of row or column headers. (l) Frames shall be dittled with text that facilitates frame identification and navigation. (g) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with experiment of the text-only page, with excomplished in any other way. The content of the text-only page shall be updated			Remarks and Explanations
via "alt," "longdesc," or in element content). (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps. (g) Row and column headers shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with enroying an any other way. The content of the text-only page shall be updated	_ · · ·	Supports	
content). (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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			
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with expressions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated	_		
multimedia presentation shall be synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided in stead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	•	D	G 1 '1 '
synchronized with the presentation. (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data calls and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	1 1 1 2	Does not Support	
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be updated			captions and transcripts.
that all information conveyed with color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image maps. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (j) Fames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	•		
color is also available without color, for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image maps shall be provided instead of server-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Supports with Exceptions Supports with Exceptions Bupports with Exceptions Supports with Exceptions Bupports Buppor		Supports	
for example from context or markup. (d) Documents shall be organized so they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image maps. (f) Client-side image maps. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports The application is readable without styles. Supports Supports Headers missing from one performance page. Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.			•
Markup. Supports Supports The application is readable without requiring an associated style sheet.	,		the pages.
they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	•		
they are readable without requiring an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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	•	_	
an associated style sheet. (e) Redundant text links shall be provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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		Supports	
(e) Redundant text links shall be provided for each active region of a server-side image maps. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Supports with Exceptions Headers missing from one performance page. Headers missing from one performance page. Bupports Supports with Exceptions Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.			styles.
provided for each active region of a server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Bupports with Exceptions Headers missing from one performance page. Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Headers missing from one performance page. Does not Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.			
server-side image map. (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Headers missing from one performance page. Headers missing from one performance page. Supports Headers missing from one performance page. Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.		Supports	
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page.			
provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page. Supports Headers missing from one performance page. Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. Fleaders missing from one performance page. Does not Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.			
image maps except where the regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page. Headers missing from one performance page. Supports with Exceptions Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.		Supports	
regions cannot be defined with an available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page.			
available geometric shape. (g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page.	image maps except where the		
(g) Row and column headers shall be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provised to make a website 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 Supports with Exceptions Headers missing from one performance page. Fleaders missing from one performance page.	regions cannot be defined with an		
be identified for data tables. (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports with Exceptions Headers missing from one performance page. Supports with Exceptions Headers missing from one performance page. For all pages and peaders missing from one performance page. Headers missing from one performance page. For all pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	available geometric shape.		
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports With Exceptions Headers missing from one performance page. Headers missing from one performance page. Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	(g) Row and column headers shall	Supports with Exceptions	Headers missing from one
associate data cells and header cells for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Supports Pages may present some flash-like effects during loading, depending on the user's environment. Text-only page is not available.	be identified for data tables.		performance page.
for data tables that have two or more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	(h) Markup shall be used to	Supports with Exceptions	Headers missing from one
more logical levels of row or column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Does not Support Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	associate data cells and header cells		performance page.
column headers. (i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	for data tables that have two or		
(i) Frames shall be titled with text that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Supports Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	more logical levels of row or		
that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Does not Support Pages may present some flash-like effects during loading, depending on the user's environment. Text-only page is not available.	column headers.		
that facilitates frame identification and navigation. (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Does not Support Pages may present some flash-like effects during loading, depending on the user's environment. N/A Text-only page is not available.	(i) Frames shall be titled with text	Supports	
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 Does not Support effects during loading, depending on the user's environment. Text-only page is not available.	that facilitates frame identification	••	
causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 effects during loading, depending on the user's environment. Text-only page is not available.	and navigation.		
causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 effects during loading, depending on the user's environment. Text-only page is not available.		Does not Support	Pages may present some flash-like
frequency greater than 2 Hz and lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 On the user's environment. Text-only page is not available.		**	
lower than 55 Hz. (k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 N/A Text-only page is not available.			
(k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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 N/A Text-only page is not available.			
equivalent information or functionality, shall be provided to make a website 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		N/A	Text-only page is not available.
functionality, shall be provided to make a website 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	1		71 8
make a website 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	•		
provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated	· -		
compliance cannot be accomplished in any other way. The content of the text-only page shall be updated			
in any other way. The content of the text-only page shall be updated			
text-only page shall be updated			
	The state of the s		
···	whenever the primary page changes.		

6

Criteria	Supporting Feature	Remarks and Explanations
(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.	Supports with Exceptions	Some custom controls weren't fully accessible and lack name, role, and value attributes that can be identified by assistive technology.
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with 1194.21(a) through (l).	Supports	No applets or plug-ins are required.
(n) 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.	Supports	Form field elements are labeled.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	Headings are available as a tool to skip repetitive content.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	No timed responses are present.

Table 3: Section 1194.31 Functional Performance Criteria

Cuitouio	Commonting Footons	Damanka and Ermlanations
Criteria	Supporting Feature	Remarks and Explanations
(a) At least one mode of operation	Support with Exceptions	Assistive technology users are able
and information retrieval that does		to complete all of the basic
not require user vision shall be		functions of the platform with few
provided, or support for Assistive		exceptions. Accessing sliders quiz
Technology used by people who are		drawer, assignment list drawer and
blind or visually impaired shall be		other tools were found to be
provided.		inaccessible.
(b) At least one mode of operation	Supports with Exceptions	Use of the application is available
and information retrieval that does		with resizing of the screen to
not require visual acuity greater		200% as well as magnification
than 20/70 shall be provided in		software. Assistive technology
audio and enlarged print output		users are able to complete all of
working together or independently,		the basic functions of the platform
or support for Assistive Technology		with few exceptions. Accessing
used by people who are visually		sliders quiz drawer, assignment list
impaired shall be provided.		drawer and other tools were found
		to be inaccessible.
(c) At least one mode of operation	Does not Support	Console page video lacks captions
and information retrieval that does	2 ots not support	and transcripts.
not require user hearing shall be		und unistripis.
provided, or support for Assistive		
Technology used by people who are		
deaf or hard of hearing shall be		
provided.		
(d) Where audio information is	Supports	Users can use their own
important for the use of a product,	Supports	technology and computer to
at least one mode of operation and		enhance the audio.
information retrieval shall be		cimanee the audio.
provided in an enhanced auditory		
-		
fashion, or support for assistive		
hearing devices shall be provided.	S	No serve serve la constant
(e) At least one mode of operation	Supports	No pages require speech.
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.		
(f) At least one mode of operation	Support with Exceptions	Although aspects of the
and information retrieval that does		application support the use of
not require fine motor control or		assistive technology, keyboard
simultaneous actions and that is		only users are unable to access all
operable with limited reach and		page functionality such as the
strength shall be provided.		slider, quiz drawer, and
		assignment list drawer on the
		Content Player Page.

8

Section 1194.41 Information, Documentation and Support

Criteria	Supporting Feature	Remarks and Explanations
(a) Product support documentation	Supports	Help and support is available
provided to end-users shall be		within the application.
made available in alternate		
formats upon request, at no		
additional charge		5
(b) End-users shall have access to	Supports	Pearson can provide access to the
a description of the accessibility		application's VPAT for customers
and compatibility features of		upon request.
products in alternate formats or		Pearson also maintains
alternate methods upon request, at		information on accessibility for
no additional charge.		students at:
		http://www.pearsonhighered.com/r
() G	g ,	evel/accessibility/
(c) Support services for products	Supports	Pearson Support is familiar with
shall accommodate the		such features as keyboard access
communication needs of end-users with disabilities.		and other options important to people with disabilities.
with disabilities.		Pearson is also familiar with using
		telephone relay services for
		customers who are deaf or hard of
		hearing. For assistance, email
		disability.support@pearson.com
		disability isupporter peurson.com

Appendix A: VPAT Background

To facilitate effective communication between producers of products and services and those who acquire them concerning the accessibility of specific products, an accessibility information template was created by a joint government and industry effort. The VPAT document was created by the Information Technology Industry Council (www.itic.org) based on Section 508 Standards established by the United States Access Board (www.access-board.gov) in 2001.

The use of the VPAT as an evaluation tool has enabled companies to self-document and formally attest to conformance and nonconformance with specific Section 508 requirements point by point. Its purpose is to assist federal and state contracting officials and other purchasers in making preliminary assessments regarding the availability of commercial Information and Communication Technologies (ICT) products and services with features that support accessibility. Vendors are frequently required to submit VPATs with their responses to RFPs and other government purchasing proposals.

For each ICT product category to which Section 508 applies, three different requirements need to be addressed. (Complete information regarding these requirements can be found at the www.section508.gov and www.itic.org websites):

1. Specific Requirements, corresponding to specific product groups:

Section 1194.21 Software Applications and Operating Systems

Section 1194.22 Web-based Internet Information and Applications

Section 1194.23 Telecommunications Products

Section 1194.24 Video and Multimedia Products

Section 1194.25 Self-Contained, Closed Products

Section 1194.26 Desktop and Portable Computers

- 2. Section 1194.31 Functional Performance Criteria, "Functional Performance Criteria," applying to all product groups
- 3. Section 1194.41 Information, Documentation, and Support: General Requirement, "Information, Documentation, and Support," applying to the information provided *accompanying* all ICT products. Thus FAQ's, Manuals and the like must all be accessible.

Considering that the VPAT carries important information for the procurement official, it is essential that a supplier/producer provide an accurately prepared VPAT that fairly and responsibly represents its product and/or service.

Suggested VPAT Language:

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITIC (www.itic.org) has developed suggested language for use when filling out a VPAT document. The following table provides the suggested language.

Column 1 - Supporting Features

Column 2 - Remarks and Explanations

Feedback from procurement officials and customers shows that providing further explanation regarding features and exceptions is especially helpful. Use this column to detail how the product addresses the standard or criteria by:

- Listing accessibility features or features that are accessible
- Detailing where in the product an exception occurs

Explaining equivalent methods of facilitation (definition of "equivalent facilitation" -see 36 CFR 1194.5.)

Supporting Features	Remarks and Explanations
Supports	Use this language when you determine the product fully meets the letter and intent of the Criteria.
Supports with Exceptions	Use this language when you determine the product does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria.
Supports through Equivalent Facilitation	Use this language when you have identified an alternate way to meet the intent of the Criteria or when the product does not fully meet the intent of the Criteria.
Supports when combined with Compatible Assistive Technology	Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible AT. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for people who are blind).
Does not Support	Use this language when you determine the product does not meet the letter or intent of the Criteria.
Not Applicable	Use this language when you determine that the Criteria do not apply to the specific product.
Not Applicable - Fundamental Alteration Exception Applies	Use this language when you determine a Fundamental Alteration of the product would be required to meet the Criteria (see the access board standards for the definition of "fundamental alteration").