

VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date: November 10, 2010

Name of Product: Red Hat Enterprise Linux (version 6) product family including Red Hat Enterprise Linux for Servers, Red Hat Enterprise Linux for HPC Head Node, Red Hat Enterprise Linux for HPC Compute Node, Red Hat Enterprise Linux for Desktop, Red Hat Enterprise Linux for Workstation.

Contact for more information (name/phone/email):
Section 508 Coordinator <section508@redhat.com>

Summary Table

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<i>Criteria</i>	<i>Supporting Features</i>	<i>Remarks and explanations</i>
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Section 1194.21 Software Applications and Operating Systems	See below	This template is for Red Hat Enterprise Linux 6 in command line mode.
Section 1194.21 Software Applications and Operating Systems	See below	This template is for Red Hat Enterprise Linux 6 in GUI (GNOME desktop) mode.
Section 1194.31 Functional Performance Criteria	See below	
Section 1194.41 Information, Documentation and Support	See below	

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Section 1194.21 Software Applications and Operating Systems – Detail

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Red Hat Enterprise Linux 6 - Command Line Mode

Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supported	All command line mode tasks are executed from a keyboard.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry	Supported	No known application disrupts or disables accessibility features.

<p>standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.</p>		
<p>(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.</p>	<p>Not Applicable</p>	<p>Command line mode does not contain user interface objects.</p>
<p>(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.</p>	<p>Not Applicable</p>	<p>Command line mode does not contain user interface objects.</p>
<p>(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.</p>	<p>Not Applicable</p>	<p>Command line mode does not contain images.</p>
<p>(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.</p>	<p>Supported</p>	<p>In command line mode all text is available via the controlling terminal. The current cursor position is available via industry standard terminal command codes. Accessibility technology can utilize pseudo-terminals to interpret industry standard terminal</p>

		control sequences and provide users with the content, cursor position, and text attributes. Alternatively, accessibility technology can access text attributes on virtual terminals in console mode via the /dev/vsca interface.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supported	No known application overrides user selected contrast and color selections.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Not Applicable	Command line mode does not offer animation.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	Applications which utilize color to convey information have equivalent facilities that do not require color coding. For example, by default the "ls" command assigns colors to certain types of files when it lists directories. This information can be displayed in a non-color coded format by using the "file" command.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable	Partially Supported	Command line mode does not permit the user to

of producing a range of contrast levels shall be provided.		adjust color and contrast settings.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supported	Any flashing or blinking does so at a frequency within the recommended range.
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Not Applicable	

Section 1194.21 Software Applications and Operating Systems – Detail

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Red Hat Enterprise Linux 6 – GUI Mode (GNOME Desktop)

Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supported	Program functions can be accessed via menu accelerators and MouseKeys. The GTK2 2.x GUI toolkit used by GNOME 2.x provides the ability to control functions by

		pressing keyboard accelerator keys. Access to product functions without accelerator keys can be achieved using the MouseKeys feature of AccessX. Blind users who can not use MouseKeys will be unable to access features which do not have accelerator keys.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supported	No known application disrupts or disables accessibility features.
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supported	The GTK2 2.x GUI toolkit exposes focus programmatically via the ATK (Accessibility Tool Kit).
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an	Supported	Some user interface information is available to Assistive

<p>image represents a program element, the information conveyed by the image must also be available in text.</p>		<p>Technology. GTK2 2.x includes the ability to attach text descriptions to images, and provides a programmatic interface for many elements.</p>
<p>(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.</p>	<p>Supported</p>	<p>The GNOME Desktop implements a set of stock icons that all applications use to ensure consistent usage of images.</p>
<p>(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.</p>	<p>Supported</p>	<p>Text input and output objects in GTK2 2.x supply content, cursor position, and attributes. GTK2 2.0 implements a generic interface for Assistive Technology via ATK (Accessibility Tool Kit).</p>
<p>(g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>	<p>Supported</p>	<p>The tested applications do not override the user selected contrast and color selections. The GNOME Accessibility Project is working to ensure application compliance.</p>
<p>(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.</p>	<p>Partially Supported</p>	<p>In the rare occurrences of animations in GNOME, non-animated information is</p>

		displayed with the animation.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	The applications tested did not use color as the only means of conveying information.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Supported	GNOME provides numerous color selection options.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supported	Any flashing or blinking does so at a frequency within the recommended range.
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Not Supported	Electronic forms are not implemented in GNOME.

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Section 1194.31 Functional Performance Criteria
– Detail
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Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and	Supported	Support for Assistive Technology is provided via the

<p>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.</p>		<p>Controlling Terminal interface.</p>
<p>(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.</p>	<p>Supported</p>	<p>Support for Assistive Technology is provided via the Controlling Terminal interface.</p>
<p>(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided</p>	<p>Supported</p>	<p>Support for Assistive Technology is provided via the Controlling Terminal interface.</p>
<p>(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.</p>	<p>Supported</p>	<p>Support for Assistive Technology is provided via the Controlling Terminal interface.</p>

(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Supported	Support for Assistive Technology is provided via the Controlling Terminal interface.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supported	Command line mode requires text input via the Controlling Terminal. Normally this requires fine motor control or simultaneous actions on a keyboard. Assistive Technology can be used by people with disabilities in command line mode to access program functions.

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Section 1194.41 Information, Documentation and Support – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supported	Red Hat documentation is available in electronic form and can be downloaded from here: www.redhat.com/docs/ . Most of our manuals are available in HTML and PDF forms.
(b) End-users shall have access to a description of	Supported	Online help describing accessibility features can be

<p>the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.</p>		<p>found using System->Help and selecting the Accessibility hyperlink. This information can be viewed online. It is also available in XML format.</p>
<p>(c) Support services for products shall accommodate the communication needs of end-users with disabilities.</p>	<p>Supported</p>	<p>Customer support services can be contacted using phone, web interface or e-mail. Customer support personnel is familiar with product's accessibility features and can advise end users regarding customization necessary to enable these features. Additional information can be found here: www.redhat.com/solutions/government/accessibility/</p>

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May 16, 2012

Mike Harvey, Manager,
Red Hat, Inc.
JBoss QE

RE: Section 508 Compliance Audit VPAT of JBOSS EAP 6.0

Mr. Harvey:

Thank you for retaining Criterion 508 Solutions, Inc. to perform an independent third-party audit of the JBOSS EAP 6.0 web application. Our findings are summarized in the following Voluntary Product Accessibility Template (VPAT).

Assistive technologies used to evaluate Red Hat's JBOSS EAP 6.0 application includes keyboard only navigation, JAWS, Dragon Naturally Speaking and ZoomText.

Please contact me at your convenience if you or your clients have any questions about the following VPAT and Criterion's test results.

Sincerely,

Anna Bradley

CEO

Criterion 508 Solutions, Inc.

Tel: 888-508-3973

Email: ABradley@Criterion508.com



Voluntary Product Accessibility Template

Date: May 16, 2012

Product Name: Red Hat JBOSS EAP 6.0 Web Application

Vendor Company Name: Red Hat

Vendor Contact Name: Michael Harvey

Summary Table Voluntary Product Accessibility Template		
Criteria	Level of Support & Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Not Applicable	This is not a Software application.
Section 1194.22 Web-based Internet Information and Applications	Supports with Exceptions	Refer to Section 1194.22 in VPAT Details section below
Section 1194.23 Telecommunications Products	Not Applicable	This is not a telecommunications product.
Section 1194.24 Video and Multi-media Products	Not Applicable	This is not a video or multi-media product.
Section 1194.25 Self-Contained, Closed Products	Not Applicable	This is not a self-contained or closed product.
Section 1194.26 Desktop and Portable Computers	Not Applicable	This is not a desktop or portable computer.
Section 1194.31 Functional Performance Criteria	Supports with Exceptions	Refer to Section 1194.31 in VPAT Details section below
Section 1194.41 Information, Documentation and Support	Supports	

**Section 1194.22 Web-based Internet information and applications - Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports	
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Not Applicable	
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	
(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.	Not Applicable	
(g) Row and column headers shall be identified for data tables.	Support with Exceptions	Tables are missing a summary attribute used to describe the table's purpose and contents.
(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.	Supports	
(i) Frames shall be titled with text that facilitates frame identification and navigation	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.	Not Applicable	
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Not Applicable	

<p>(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.</p>	<p>Supports</p>	
<p>(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).</p>	<p>Not Applicable</p>	
<p>(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.</p>	<p>Supports</p>	
<p>(o) A method shall be provided that permits users to skip repetitive navigation links.</p>	<p>Supports</p>	
<p>(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.</p>	<p>Not Applicable</p>	<p>Timed Responses are not present in the application.</p>

**Section 1194.31 Functional Performance Criteria – Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supports	Successfully tested with JAWS screen reader.
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Supports with Exception	ZoomText's program echo (speech while navigating via the keyboard) does not read some control titles and control tab text.
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Not Applicable	Product does not require user hearing.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Not Applicable	Audio information is not important for use of the product.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Not Applicable	Product does not require user speech.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supports with Exceptions	Unable to utilize keyboard only navigation to activate some links on the site. Dragon Naturally Speaking "Tab" command does not work consistently throughout application.

**Section 1194.41 Information, Documentation and Support – Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	Product support documentation available in accessible HTML.
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supports	
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	

APPENDIX A

Suggested Language for Filling out the VPAT

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITIC (Information Technology Industry Council) has developed suggested language for use when filling out a VPAT. You may choose to employ all or some of the language below. Once you determine what language you intend to use, we recommend that use is consistent throughout all of your VPATs.

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 AT

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").



Voluntary Product Accessibility Template

Date: September 16, 2013

Product Name: Red Hat JBoss Portal V6.1 Web Application

Vendor Company Name: Red Hat, Inc.

Vendor Contact Name: Michael Harvey (Email: mharvey@redhat.com)

**Summary Table
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Supports and Not Applicable	Keyboard only navigation is supported.
Section 1194.22 Web-based Internet Information and Applications	Supports	<p>The JBoss Portal V6.1 Web Application has been optimized for accessibility using the following assistive technologies and browsers:</p> <ul style="list-style-type: none"> • JAWS® v. 14 • Dragon Naturally Speaking® v. 11 • ZoomText® v. 10 • Keyboard Only Navigation • HTML Validators • Internet Explorer® 9.0 and FireFox® 21.0
Section 1194.23 Telecommunications Products	Not Applicable	

Section 1194.24 Video and Multi-media Products	Not Applicable	
Section 1194.25 Self-Contained, Closed Products	Not Applicable	
Section 1194.26 Desktop and Portable Computers	Not Applicable	
Section 1194.31 Functional Performance Criteria	Supports	
Section 1194.41 Information, Documentation and Support	Supports	

**Section 1194.22 Web-based Internet information and applications - Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports	
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports	
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	
(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.	Supports	
(g) Row and column headers shall be identified for data tables.	Supports	
(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.	Supports	

(i) Frames shall be titled with text that facilitates frame identification and navigation	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.	Supports	
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Not Applicable	
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Supports	
(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	
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supports	
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	

**Section 1194.31 Functional Performance Criteria – Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supports	
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Supports	
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Not Applicable	
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Not Applicable	
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Not Applicable	
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supports	

**Section 1194.41 Information, Documentation and Support – Detail
Voluntary Product Accessibility Template**

Criteria	Level of Support & Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supports	See “Accessibility Statement” for detailed accessibility features of this web application.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	

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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 AT

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").