

No further alterations of any kind are planned. This VPAT will apply, and the 508 Refresh VPAT format and standards will not apply, for all prior or future sales of this Legacy ICT. That is as provided by 508 Refresh standard E.202.2:

Legacy ICT. Any component or portion of existing ICT that complies with an earlier standard issued pursuant to Section 508 of the Rehabilitation Act of 1973, as amended (as republished in Appendix D), and that has not been altered on or after January 18, 2018, shall not be required to be modified to conform to the Revised 508 Standards.

Explanation of Supp	porting Features
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	



Standard	Reference	Supporting Features	Remarks
Software Applications and Operating Systems			
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.	1194.21(a)	Supports	All functionality is accessible via the keyboard.
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.	1194.21(b)	Supports with Exceptions	The software does not disrupt or disable activated accessibility features with the exception of user-selected color or contrast settings. (See 1194.21(g))
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.	1194.21(c)	Supports	On-screen focus is well defined for the sighted user and is programmatically exposed for Assistive Technology.
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	1194.21(d)	Supports	



represents a program element, the information conveyed by the image must also be available in text.			
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.	1194.21(e)	Supports	Meanings assigned to bitmaps are used consistently throughout.
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.	1194.21(f)	Supports	
Applications shall not override user selected contrast and color selections and other individual display attributes	1194.21(g)	Does not Support	The application does not inherit user's color or contrast settings
When animation is displayed, the information shall be displayable in at least one non- animated presentation mode at the option of the user.	1194.21(h)	Not Applicable	
Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	1194.21(i)	Supports	Color is not used as the only means of conveying information.
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.	1194.21(j)	Not Applicable	User-adjustment of color and contrast is not permitted.
Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than	1194.21(k)	Supports	Blinking and flashing are not used.



2 Hz and lower than 55 Hz.			
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.	1194.21(l)	Not Applicable	Electronic forms are not used.



Standard	Reference	Supporting Features	Remarks
Web-based Intranet and Internet Information and Applications			
A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	1194.22(a)	Supports	Alternative Text is provided for graphics and images to ensure any additional instructional value that is derived from these non- text elements is available to all users.
Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	1194.22(b)	Supports through Equivalent Facilitation	In lieu of captioning, a transcript version of the video presentation is provided, including all text from any narration and the full dialog between participants in the videos, including descriptions of facial expressions, body language and tone of the conversation.
Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	1194.22(c)	Not Applicable	Color is not used as the only means of conveying information.
Documents shall be organized so they are readable without requiring an associated style sheet	1194.22(d)	Supports	
Redundant text links shall be provided for each active region of a server-side image map	1194.22(e)	Not Applicable	Server side image maps are not used.
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.	1194.22(f)	Not Applicable	Client side image maps are not used.
Row and column headers shall be identified for data tables.	1194.22(g)	Supports	Row and column headers are correctly identified and navigable.
Markup shall be used to associate data cells and header cells for data tables that	1194.22(h)	Not Applicable	Complex tables are not used.



have two or more logical levels of row or column headers.]
Frames shall be titled with text that facilitates frame identification and navigation.	1194.22(i)	Supports	
Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	1194.22(j)	Supports	
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.	1194.22(k)	Supports	A text-only transcript page is provided that includes all text from any narration, and the full dialog between participants in the videos, including descriptions of facial expressions, body language and tone of the conversation.
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.	1194.22(l)	Supports	
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 (I).	1194.22(m)	Not Applicable	Plug-ins are not required.
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.	1194.22(n)	Not Applicable	The courseware does not contain electronic forms to be completed online.



A method shall be provided that permits users to skip repetitive navigation links.	1194.22(o)	Does not Support	Navigation of the content pages follows a defined order. However, areas of focus on each content page is limited to the navigation buttons, as there are no interactive components within the instructional videos.
When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	1194.22(p)	Not Applicable	Timed responses are not required in the application.



Standard	Reference	Supporting Features	Remarks
Functional Performance Criteria			
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.	1194.31(a)	Supports when combined with Compatible AT	When the Assistive Technology is detected, a text-only transcript page is presented to the AT that includes all text from any narration, and the full dialog between participants in the videos, including descriptions of facial expressions, body language and tone of the conversation.
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.	1194.31(b)	Supports when combined with Compatible AT	See 1194.31(a) above.
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.	1194.31(c)	Supports with Equivalent Facilitation	For hearing-impaired users, a text-only transcript page is available that includes all text from any narration, and the full dialog between participants in the videos, including descriptions of facial expressions, body language and tone of the conversations.
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.	1194.31(d)	Supports with Equivalent Facilitation	For hearing-impaired users, a text-only transcript page is available that includes all text from any narration, and the full dialog between participants in the videos, including descriptions of facial expressions, body language and tone of the conversations.
At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive technology used	1194.31(e)	Not Applicable	User speech is not required.



by people with disabilities shall be provided.			
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.	1194.31(f)	Supports	Multiple input methods are supported including full keyboard functionality (in lieu of a mouse), pointing devices, and voice activation software.



Standard	Reference	Supporting Features	Remarks
nformation, Documentation and Support			
Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	1194.41(a)	Supports	
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.	1194.41(b)	Supports	
Support services for products shall accommodate the communication needs of end- users with disabilities.	1194.41(c)	Supports	