

Voluntary Product Accessibility Template (VPAT)

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| Project Name: | Skillsoft Government Leadership Advantage (SGLA) and Skillsoft Leadership Advantage (SLA) 2.0 applications |
| Last Revision Date: | Dec 16, 2018 |
| Revision: | 0.0.3 |

Product Details

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| Date Created: | This product has been available for several years |
| Product Name: | SGLA and SLA 2.0 |
| Version: | Skillport 8/8i – Patch 61 |
| Contact for more Information: | Contact your account team for more information. |

Supporting Features (second column on VPAT)

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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"). |

Summary Table - Voluntary Product Accessibility Template

Notes:

These are legacy Skillsoft Products, and accessibility features are more limited. Rather than update these products with more accessibility features, Skillsoft has rebuilt some of these products as learning programs directly into Skillport. These legacy portals are not expected to be further remediated for accessibility.

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.

In cases where a provision is not fully supported, remarks outline specific components of the product that do not support the provision. If such delineation is not provided, the comments apply to the system as a whole.

*Content items of the following types contained in or launched by the SGLA Portal do not support the standards:

- Case Studies
- Activities
- Business Impacts
- Business Challenges

| Criteria | Supporting Features | Remarks and explanations |
|---|--|----------------------------------|
| Section 1194.21 Software Applications and Operating Systems | Does not support/Supports with exceptions *Content items listed above do not support this section | See Section 1194.21 for details. |
| Section 1194.22 Web-based internet information and applications | Does not support/Supports with exceptions *Content items listed above do not support this section | See details in Section 1194.22. |
| 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 | |

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| Section 1194.26 Desktop and Portable Computers | Not Applicable | |
| Section 1194.31 Functional Performance Criteria | Supports with Exceptions | See details in Section 1194.31 |
| Section 1194.41 Information, documentation, and support. | Supports | See details in Section 1194.41 |

Section 1194.21 Software Applications and Operating Systems - Detail Voluntary Product Accessibility Template

| Criteria | Supporting Features | Remarks and explanations |
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| <p>(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.</p> | <p>Does not support</p> | <p>The application includes interactive controls with absent or non-standard keyboard behaviors:</p> <ul style="list-style-type: none"> • Flash banner/carousel not keyboard accessible • Featured Speakers / Book Summaries carousels difficult to navigate using the keyboard • Star ratings in form are not keyboard accessible • Change in carousel not triggered by keyboard focus, only mouse • Tab order doesn't follow visual order • Focus isn't set to the dialog when it opens. This causes the user to be unable to tab through the dialog content |
| <p>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.</p> | <p>Does not support</p> | <p>Many instances of interactive content being obscured in Windows High Contrast mode; these include:</p> <ul style="list-style-type: none"> • The background/outline of the inGenius notifications pop-up dialog • The outline of the search field (which becomes invisible when it gains focus and the placeholder text disappears) • The Submit Search button • The visual focus indicator (change of background color) on the track menu • The Flash carousel • The Featured Speakers / Book Summaries carousels controls |

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| | | <ul style="list-style-type: none"> • The color coding of certain entries in the Live Events section • The Featured Expert Insight pop-up dialog (making it impossible to close) • Buttons that also act as navigation do not indicate the currently selected page • Comment cancel / create buttons do not have sufficient contrast as they do not inherit High Contrast mode colors • Word documents may have tables containing shading which obscures the text in High Contrast mode • The SGLA logo does not have a text alternative, and does not appear correctly in High Contrast mode |
| <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>Supports with exceptions</p> | <p>The indication of focus on controls and links in content is not always well defined or is absent:</p> <ul style="list-style-type: none"> • The default dotted outline focus indication is insufficiently clear/visible • All focusable elements in the lower toolbar rely on color alone to indicate focus |
| <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>Does not Support</p> | <p>The content includes:</p> <ul style="list-style-type: none"> • Empty image links following regular links throughout the application • inGenius notifications trigger does not expose any role to assistive technologies and cannot be activated • Links used as buttons: <ul style="list-style-type: none"> ○ Submit Search control marked up as link instead of button ○ Featured Expert Insight video play button |

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| | | <ul style="list-style-type: none"> • Controls with missing accessible labels and control group labels not programmatically associated • Controls are exposed without role and state information or incorrect role and state information • Structural HTML markup is not used correctly to convey user interface semantics • No programmatic grouping of related content (e.g. the related tools / activities, and the activities and associated attachments) • Presentation names and titles in PowerPoint slides are not read by screen readers, even though they are text elements |
| (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. | Supports | |
| (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. | Supports with exceptions | <p>Background images exist containing text with no textual equivalents.</p> <p>On some HTML pages, graphics of tables are used, instead of a text table with correct formatting.</p> |
| (g) Applications shall not override user selected contrast and color selections and other individual display attributes. | Supports with exceptions | Refer to 1194.21 (b) |
| (h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user. | Supports | |

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| <p>(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.</p> | <p>Supports with exceptions</p> | <p>Color coding used as the only means to visually identify hyperlinks, in many instances.</p> |
| <p>(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.</p> | <p>Supports</p> | |
| <p>(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.</p> | <p>Supports</p> | |
| <p>(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.</p> | <p>Does not Support</p> | <ul style="list-style-type: none"> • Required fields not programmatically indicated and definition located after form • Error messages are not conveyed to screen readers • Forms control not programmatically associated with labels • Radio buttons in the test pages don't function as standard radio buttons • Also; Refer to 1194.21(d) |

Section 1194.22 Web-based Internet information and applications – Detail

| Criteria | Supporting Features | Remarks and explanations |
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| (a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content). | Supports with exceptions | <p>Images have incorrect, insufficient or missing text alternatives, examples include:</p> <ul style="list-style-type: none"> • Some CSS based images lack alternative/hidden HTML text • No text alternative to Flash banner/carousel • No text alternative on Featured Expert Insight video play button • Star rating icons have no alternative text • Recommendations indicator has insufficient alternative text • Images used for checkboxes and radio buttons don't have an alt attributes • The SGLA logo does not have a text alternative, and does not appear correctly in High Contrast Mode • Some images in PowerPoint slides have associated alt text which says "Non-instructional graphic". The alt text should be left blank in these cases |
| (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation. | Supports | |
| (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 with exceptions | Refer to 1194.21(i) |
| (d) Documents shall be organized so they are readable without requiring an associated style sheet. | Does not support | <ul style="list-style-type: none"> • A lot of hidden content is visible when CSS is disabled, this makes the page very cluttered |

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| | | <ul style="list-style-type: none"> • Tab order doesn't follow visual order (e.g. disclosure widget control in first section appears before the section but are after it in the tab order) • Inability to scroll some pages makes it impossible access all content • Styles not applied correctly to all Word documents |
| (e) Redundant text links shall be provided for each active region of a server-side image map. | Not Applicable | Image maps are not used. |
| (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 | Image maps are not used. |
| (g) Row and column headers shall be identified for data tables. | Supports with exceptions | <p>A number of data tables do not have column headers identified.</p> <p>Some Word documents have table header rows which are not marked up correctly.</p> <p>The header rows in HTML pages are treated as normal rows, so headers are not announced for each cell.</p> |
| (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. | Not applicable | |
| (i) Frames shall be titled with text that facilitates frame identification and navigation | Supports with exceptions | Some frames do not have titles. |
| (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 | The product does not have any content that flickers. |
| (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply | Not applicable | |

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| 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. | | |
| (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). | Not Applicable | |
| (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. | Does not Support | Refer to 1194.21(l) |
| (o) A method shall be provided that permits users to skip repetitive navigation links. | Supports with exceptions | <ul style="list-style-type: none"> • Skip link shifts the viewport but not focus • Skip links are available, but are not visible and therefore not usable by sighted keyboard users |
| (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required. | Does not support | On those pages that have a session limit: User is logged out without an option to extend their session. |

Section 1194.23 Telecommunications Products - Detail

Voluntary Product Accessibility Template

| Criteria | Supporting Features | Remarks and explanations |
|---|---------------------|--------------------------|
| <p>(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.</p> | Not Applicable | |
| <p>(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.</p> | Not Applicable | |
| <p>(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.</p> | Not Applicable | |
| <p>(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.</p> | Not Applicable | |
| <p>(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.</p> | Not Applicable | |

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| <p>(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.</p> | <p>Not Applicable</p> | |
| <p>(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.</p> | <p>Not Applicable</p> | |
| <p>(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.</p> | <p>Not Applicable</p> | |
| <p>(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.</p> | <p>Not Applicable</p> | |
| <p>(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.</p> | <p>Not Applicable</p> | |

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| <p>(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.</p> | <p>Not Applicable</p> | |
| <p>(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.</p> | <p>Not Applicable</p> | |
| <p>(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.</p> | <p>Not Applicable</p> | |
| <p>(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.</p> | <p>Not Applicable</p> | |

Section 1194.24 Video and Multimedia Products - Detail

Voluntary Product Accessibility Template

| Criteria | Supporting Features | Remarks and explanations |
|---|---------------------|--------------------------|
| <p>(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.</p> | Not Applicable | |
| <p>(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p> | Not Applicable | |
| <p>(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.</p> | Supports | |
| <p>(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the</p> | Not Applicable | |

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| comprehension of the content, shall be audio described. | | |
| (e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent. | Not Applicable | |

Section 1194.25 Self contained, closed products - Detail Voluntary Product Accessibility Template

| Criteria | Supporting Features | Remarks and explanations |
|---|---------------------|--------------------------|
| (a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach assistive technology to the product. Personal headsets for private listening are not assistive technology. | Not Applicable | |
| (b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required | Not Applicable | |
| (c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4). | Not Applicable | |
| (d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided. | Not Applicable | |
| (e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime. | Not Applicable | |
| (f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the | Not Applicable | |

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| volume to the default level after every use. | | |
| (g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. | Not Applicable | |
| (h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided. | Not Applicable | |
| (i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. | Not Applicable | |
| <p>(j) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following:</p> <p>(1) The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length (see Figure 1 of this part).</p> <p>(2) Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.</p> <p>(3) Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.</p> <p>(4) Operable controls shall not be more than 24 inches behind the reference plane (see Figure 2 of this part).</p> | Not Applicable | |

Section 1194.26 Desktop and Portable Computers - Detail Voluntary Product Accessibility Template

(This applies to equipment we would buy for this effort)

| Criteria | Supporting Features | Remarks and explanations |
|---|---------------------|--------------------------|
| (a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4). | Not Applicable | |
| (b) If a product utilizes touch screens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4). | Not Applicable | |
| (c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided. | Not Applicable | |
| (d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards | Not Applicable | |

Section 1194.31 Functional Performance Criteria Voluntary Product Accessibility Template

| Criteria | 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. | Does not support | See comments in 1194.21(a), (d) and (l), 1194.22(a) |
| (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. | Does not support | See comments in 1194.21(b) |
| (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 | Supports | |
| (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. | Supports | |
| (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 | The product does not require 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 | The product does not require fine motor control or simultaneous actions. |

Section 1194.41 Information, Documentation and Support

Voluntary Product Accessibility Template

| 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 | Supports | Alternative forms of access to product support documentation in alternative formats are available upon request by contacting Skillsoft support. |
| (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 | Alternative forms of access to descriptions of the accessibility and compatibility features in alternative formats are available upon request at no additional charge to the end user by contacting Skillsoft support. |
| (c) Support services for products shall accommodate the communication needs of end-users with disabilities. | Supports | Support via Telephone and E-mail. |