

Accessibility Analysis

VPAT Section 508
Web Application Analysis

Books24x7
www.books24x7.com

Updated: April 2012, amended 18 Jan 2018

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Note:

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.

The following sections provide a detailed response on an item-by-item basis for the relevant Section 508 requirements.

Section 508 1194.21 Analysis

The following table provides a list of the Section 508 1194.21 (a-l) requirements, identifies the overall status of Books24x7’s compliance:

Section 1194.21: Software Applications and Operating Systems		
508 Requirement	Current Status	Comments
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

developer.		
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input checked="" type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	<p>Site does not support user selected or preconfigured color and contrast settings.</p> <p>Additionally, not allow users to change or adjust contrast, fonts and color selection.</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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

	exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

Section 508 1194.22 Analysis

The following table provides a list of the Section 508 1194.22 (a-p) requirements, identifies the overall status of Books24x7's level of accessibility.

Section 1194.22: Web-based Intranet and Internet Information and Applications		
508 Requirement	Current Status	Comments
(a) A text requirement for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with	

content).	compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with presentation.	<input type="checkbox"/> Supports <input checked="" type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	The Books24x7 On Demand Platform itself fully supports this requirement. Our text based content collections also support this requirement. We have Closed Captioning for all our Flash video based content collections, as well as downloadable transcripts,
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example context or markup.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(e) Redundant text links shall be provided for each active region of a server-side image map.	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

<p>(g) Row and column headers shall be identified for data tables.</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
<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.</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
<p>(i) Frames shall be titled with text that facilitates frame identification and navigation.</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
<p>(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	<p>No known issues with screen flicker.</p>
<p>(k) A text-only page, with equivalent information or functionality, shall be provided to make a application 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.</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	<p>A text-only site is available for users who want a site optimized for screen readers. This text-only site delivers content that is identical to the main site.</p>
<p>(l) When pages utilize scripting languages to display content, or to create interface elements, the</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation	

information provided by the script shall be identified with functional text that can be read by assistive technology.	<input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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).	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(o) A method shall be provided that permits users to skip repetitive navigation links.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

Section 508 1194.24 Analysis

The following table provides a list of the Section 508 1194.24 (a-e) requirements, identifies the overall status of Books24x7's compliance:

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Section 1194.24: Video and Multimedia Products

508 Requirement	Current Status	Comments
<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>	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
<p>(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p>	<input type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
<p>(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that</p>	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support	

contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	<input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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 comprehension of the content, shall be audio described.	<input type="checkbox"/> Supports <input checked="" type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	Visual information is always explained for comprehension, but may not be described in detail.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	

Section 508 1194.31 Analysis

The following table provides a list of the Section 508 1194.31 (a-e) requirements, identifies the overall status of Books24x7's compliance:

Section 1194.31: Functional Performance Criteria		
508 Requirement	Current Status	Comments
(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.	<input type="checkbox"/> Supports <input checked="" type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	The Books24x7 On Demand Platform itself fully supports this requirement. Our text based content collections also support this requirement. In addition, estimated 90% of the entire Flash video based content library supports this requirement.
(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	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable	.

support for Assistive Technology used by people who are visually impaired shall be provided.	<input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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	<input type="checkbox"/> Supports <input checked="" type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	The Books24x7 On Demand Platform itself fully supports this requirement. Our text based content collections also support this requirement. We have Closed Captioning for all our Flash video based content collections, as well as downloadable transcripts,
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	
(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.	<input checked="" type="checkbox"/> Supports <input type="checkbox"/> Supports with exceptions <input type="checkbox"/> Supports through equivalent facilitation <input type="checkbox"/> Supports when combined with compatible AT <input type="checkbox"/> Does not support <input type="checkbox"/> Not applicable <input type="checkbox"/> Not applicable – fundamental alteration exception applies	