

Voluntary Product Accessibility Template® (VPAT®)

Revised Section 508 Edition

Version 2.3 (Revised) - April 2019

About This Document.....	1
Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors	3
Getting Started	3
Essential Requirements for Authors	3
Best Practices for Authors	6
Posting the Final Document.....	8
Table Information for VPAT® Readers	9
[Company] Accessibility Conformance Report.....	10

About This Document

The VPAT is provided in four editions based on the guidelines/standards being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International that includes all of the standards.

This is the Revised Section 508 edition of the VPAT. It includes the following standards/guidelines:

- [Web Content Accessibility Guidelines 2.0](#)
- [Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018](#)

If you need a different combination of standards/guidelines then use the appropriate alternate edition of the VPAT found on the [ITI Accessibility web page](#).

This document is broken into two main sections:

- Essential Requirements and Best Practices for using the VPAT® to complete an Accessibility Conformance Report
- The VPAT Template

Please carefully review the Essential Requirements and Best Practices sections before using the VPAT to create an Accessibility Conformance Report.

“Voluntary Product Accessibility Template” and “VPAT,” including the template format, are Federally Registered Service Marks of the Information Technology Industry Council (ITI). VPAT users agree not to deviate materially from the template format provided by ITI, and to use the service mark (“®”) where appropriate.

Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors

This section provides guidance for reporting product conformance for two major accessibility standards and guidelines using the VPAT® to produce the Accessibility Conformance Report. Deviating from these guidelines precludes vendors from referencing the template by name and/or the VPAT acronym. The purpose of these essential requirements and best practices are to promote accurate and consistent reporting of product accessibility information.

The VPAT is a template used to document a product's conformance with accessibility standards and guidelines. The purpose of the VPAT is to assist customers and buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology," also referred to as "Information and Communication Technology" (ICT) products and services with features that support accessibility.

Getting Started

1. Before creating a report, read all of the materials provided in this document.
2. The Information Technology Industry Council (ITI) provides the VPAT. Use of the template and service mark does not require membership in ITI.
3. Determine which accessibility standards/guidelines will be included in the product conformance report and use the appropriate VPAT file.
4. It is the vendor's responsibility to maintain the integrity of the data in the report.

Essential Requirements for Authors

The following are the minimum requirements to be a VPAT®.

1. The VPAT name and template are registered service marks of ITI. Use of the VPAT template and name requires the inclusion of the registered service mark (i.e., "VPAT®"). Users of the VPAT agree not to deviate from the Essential Requirements for Authors.
2. The template file can be used as is or replicated in a different delivery format, for example as HTML or PDF. The only requirement is that the final conformance report must be accessible.
3. A report must contain the following content at a minimum:

- **Report Title** – In the heading format of “[Company Name] Accessibility Conformance Report”
- **VPAT Heading Information** – Template version
- **Name of Product/Version** – Name of Product being reported, including version of the product
- **Product Description** – A brief description of the product
- **Report Date** – Date of report publication. At a minimum, provide the month and year of the report publication. For example, “May 2016”. If date is included ensure it is clear “4 May 2016” or “May 4, 2016”.
- **Contact Information** – Contact Information for follow-up questions. Listing an email is sufficient.
- **Notes** – Any details or further explanation about the product or the report. This section may be left blank.
- **Evaluation Methods Used** – Include a description of what evaluation methods were used to complete the VPAT for the product under test.
- **Applicable Standards/Guidelines** – A clear indication of which Standards/Guidelines this Conformance Report covers.
 - The list must include only the Standards/Guidelines that were used to develop the product.
 - A report must contain a minimum of one Standard/Guideline or any combination of the three Standards.
 - The applicable Standards/Guidelines that may be included are:
 - [Revised Section 508 standards](#) – the U.S. Federal accessibility standard, published by the U.S. Access Board in the Federal Register on January 18, 2017 and corrected on January 22, 2018
 - [Web Content Accessibility Guidelines 2.0](#) or WCAG 2.0 (ISO/IEC 40500)
 - This information can be in a table format at the top of the report with the table heading ‘Standards/Guidelines’ and the reported Standards/Guidelines identified.
 - Alternatively, the Standard/Guideline being reported can be clearly identified in the introductory text of the report. If multiple Standards or Guideline tables are included, each table should also be clearly identified as to the Standard or Guideline the criteria that table represents.

- **Terms** – Conformance level terms description section
 - **Tables for Each Standard or Guideline** – Tables showing the responses to the criteria.
5. WCAG Conformance Information – The answers in the WCAG success criteria are based on the level of conformance being reported (Level A, AA or AAA).
- These tables are used to answer:
 - Revised Section 508:
 - Chapter 5 Software
 - Chapter 6 Support Documentation
 - The selected levels of WCAG 2.0 Guidelines.
 - If using a summary table, due to answers applying to multiple criteria, when answering for the Revised Section 508, the answers need to be clear in what individual criteria the answer applies to. It is possible to either use a summary, selecting the worst case for the criteria, or to have separate answers or even tables for software, support documentation, authoring tools, etc., so long as the methodology used is made clear.
6. Conformance Levels – The report must list the definition of the terms used in the Conformance Level column. ITI recommends the following terms. If a vendor deviates from the ITI definitions, the vendor shall reference this change in the heading Notes section. If a term is not used it can be removed from the list. The ITI definitions are:
- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
 - **Partially Supports:** Some functionality of the product does not meet the criterion.
 - **Does Not Support:** The majority of product functionality does not meet the criterion.
 - **Not Applicable:** The criterion is not relevant to the product.
 - **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG 2.0 Level AAA.

Note: When filling in the WCAG tables, a response may use 'Supports' where one might otherwise be inclined to use 'Not Applicable'. This is in keeping with [WCAG 2.0 Understanding Conformance](#): 'This means that if there is no content to which a success criterion applies, the success criterion is satisfied.'

7. Remarks and Explanations – Detailed remarks should be provided in the Remarks and Explanations column to justify your answer in the Conformance Level column.
 - When the conformance level is ‘partially supports’ or ‘does not support’, the remarks should identify:
 1. The functions or features with issues
 2. How they do not fully support
 - If the criterion does not apply, explain why.
 - If an accessible alternative is used, describe it.
8. In the Section 508 tables, when subsections of criteria do not apply to the product, the section may be summarized or removed as long as an explanation is provided explaining why a criterion does not apply. Another alternative is to leave the table and add a summary why the section doesn’t apply. For example, in Chapter 5 the criteria in 502 and 503 will not apply to a web only application, thus those sections can be removed with a summary in the notes for the chapter, or a row in the table.

Best Practices for Authors

ITI suggests that authors adopt the following best practices when using the VPAT® to create an Accessibility Conformance Report.

- **Branding Header:** Company logo or branding information
- **Date Changes:** If a report is revised, change the report date and explain the revision in the Notes section. Alternately, create a new report and explain in the Notes section that it supersedes an earlier version of the report.
- **Notes:** Add any notes applicable to product or the report
 - Additional information about the product version that the document references
 - Any revisions to the document
 - Links to any related documents
 - Additional information describing the product
 - Additional information about what the document does or does not cover
 - Information suggested by the [WCAG 2.0 Conformance Claim](#)
 - Information needed to satisfy ISO/IEC 17050-1:2004, Supplier’s Declaration of Conformity

- **Evaluation Methods Used** – Information to enter may include the following:
 - Testing is based on general product knowledge
 - Similar to another evaluated product
 - Testing with assistive technologies
 - Published test method (provide name, publisher, URL link)
 - Vendor proprietary test method
 - Other test method
- **Remarks and Explanations:** This section may include:
 - Information regarding the testing of a given criteria.
 - Information on application dependencies to support accessibility (e.g. OS, app frameworks, browsers recommended).
 - How the customer can find more information about accessibility issues. One method can be to include the bug ID where customers can call the company's customer support to get additional information.
 - Known workarounds for accessibility issues.
- **Legal Disclaimer:** Area for any legal disclaimer text required by your organization.
- **Saving Space:** To reduce the size of the report it is acceptable to remove sections. Individual criteria cannot be removed, only sections at a time. Section removal is acceptable in four situations:
 - When an entire section is not being reported on because it doesn't apply to the product, for example:
 - Chapter 4: Hardware. Information should be included in the notes for that section why it has been removed.
 - A card reader that doesn't have sound could remove the criteria in section 413 Closed Caption Processing Technologies and just note the why the criteria doesn't apply.
 - If the product is not being evaluated for a level of the criteria (for example Level AAA) then that table may be deleted.
 - If a requesting customer has identified that a section of the standard does not apply, information should be included in the notes that the section has been removed.
- **WCAG 2.0 Tables:** The WCAG 2.0 criteria are shown in three tables, Level A, Level AA, and Level AAA.
 - If desired, these tables can be combined into one table.

- When reporting on a level (A, AA or AAA) all criteria for that level must be answered.
- **Language:** Use text appropriate for your audience.
- **Multiple Reports:** When using the VPAT to create an Accessibility Conformance Report for complex products it may be helpful to separate answers into multiple reports. For example, when a product is an Authoring Tool that also has web content and documentation. When multiple reports are used for a complex product, it is required to explain this and how to reach the other reports in the Notes section of each report.
- **Criteria Text:** To help conserve space in the ITI template only the criteria ID number and a short title have been included. Where possible, links have been included to the standard/guideline.
 - It is acceptable to add the full text of the criteria into the cell if desired to help with understanding.
 - The links to the standards/guidelines can be removed.
- **Ordering of Tables:** The order that the standards/guideline tables appear may be changed to facilitate reading. For example, if the Accessibility Conformance Report is for Section 508 only, the WCAG tables may be moved to follow the numbering scheme used in the Section 508 criteria.
- **Guideline Section Heading Rows in Tables:** The tables include heading rows to facilitate understanding the context of the criteria.
 - The cells in these rows do not require answers as indicated by “Heading cell – no response required.”
 - It is optional to add a response if desired.
 - The shading of the row is also optional.
 - If removing the heading rows, edit the criteria titles so it’s clear where they apply.

Posting the Final Document

- Remove the *Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors* section from the template when publishing your Accessibility Conformance Report in final form. A link on page one in the template footnotes contains a hyperlink to this document on the Information Technology Industry Council (ITI) website at: <http://www.itic.org>.
- Check for each required item in the VPAT® document:

- The report title **[Company Name] Accessibility Conformance Report**
- The **“VPAT® Version 2.3 (Revised)”** heading
- **Name of Product/Version**
- **Product Description**
- **Report Date**
- **Contact Information**
- **Notes**
- **Evaluation methods used**
- **Applicable Standards/Guidelines**
- **Terms**
- **Report Information**
 - Check that there is a response for each criterion for ‘Conformance Level’ and ‘Remarks and Explanations.’
- Post your final document on your company’s web site, or make the document available to customers upon request.
- Your final document should be accessible.

Table Information for VPAT® Readers

For each of the standards, the criteria are listed by chapter in a table. The structures of the tables are: the first column contains the criteria being evaluated, the second column describes the level of conformance of the product regarding the criteria and the third column contains any additional remarks and explanations regarding the product.

- When sections of criteria do not apply, or deemed by the customer as not applicable, the section is noted as such and the rest of that table may be removed for that section.
- When multiple standards are being recorded in this document, the duplicative sections are noted and responded to only one time. The duplicate entry will note the cross reference to the data.

Turning Technologies Accessibility Conformance Report

Revised Section 508 Edition

VPAT® Version 2.3 (Revised) – April 2019

Name of Product/Version: TurningPoint app

Product Description: TurningPoint app is a mobile solution can be used with any web enabled device and allows students to view and respond to interactive questions from anywhere. Whether using a smart phone, tablet or computer, mobile responding offers the same experience for all learners.

Report Date: April 23, 2019

Contact Information: support@turningtechnologies.com

Notes:

Evaluation Methods Used: A functional review was based on general product knowledge and manual testing using assistive technologies and website accessibility tools. Below are some of the key evaluation tools and testing methods used to inform this VPAT®.

- Tool-Based Testing: SiteImprove; tota11y; Lighthouse; Web Accessibility Toolbar (WAT); Web Accessibility Evaluation Tool (WAVE) by WebAIM

- Color Contrast Test: WebAIM Color Contrast Checker; Chrome Developer Tools
- Screen Reader Tests: JAWS (IE 11, Edge, Firefox, Chrome); NVDA (Chrome, Firefox); Voiceover (Safari)
- Manual Accessibility Testing: Keyboard testing with visual focus; logical order; Images and videos

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes: The following criteria were tested on the TurningPoint mobile and web applications.

Criteria	Conformance Level	Remarks and Explanations
<u>1.1.1 Non-text Content</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Supports Software: Partially Supports	Images and figures are appropriately labeled with descriptive text or are marked as decorative.
<u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No audio and/or video is required for the use of ResponseWare.
<u>1.2.2 Captions (Prerecorded)</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No audio and/or video is required for the use of ResponseWare.
<u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No audio and/or video is required for the use of ResponseWare.
<u>1.3.1 Info and Relationships</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) 	Partially Supports	Semantic markup is used appropriately, however further audits are being conducted to identify and ensure all elements have appropriate labels and text.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		TurningPoint is currently in the process of remediating instances to fully meet this criteria.
<u>1.3.2 Meaningful Sequence</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	The reading and navigation order are logical and intuitive (moves left to right and top to bottom of the page), however some components are not focusable or should not be focusable.
<u>1.3.3 Sensory Characteristics</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Instructions do not rely upon shape, size, or visual location or sensory characteristics.
<u>1.4.1 Use of Color</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Color is not used as the only visual means of conveying information.
<u>1.4.2 Audio Control</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	Audio is not used within the application.
<u>2.1.1 Keyboard</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	The web application can be executed through a keyboard only interface. However, not all content is easily accessible without the use of a screen reader.

Criteria	Conformance Level	Remarks and Explanations
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Users can tab or use the escape key to move focus out of components. There are areas within the application which the user cannot interact with using a keyboard but the user can always navigate to another element.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Timing settings are controlled by the administrator (instructor) of the poll, and can be adjusted or extended to meet the specific needs of the population using the application.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: <ul style="list-style-type: none"> Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	
2.4.1 Bypass Blocks (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Partially Supports	Headings and aria labels are used to assist users, however additional evaluation is needed to ensure consisting of heading and label use throughout the application. Some portions of the application do not have appropriate headings or labels preventing users from accessing information or using the application correctly.

Criteria	Conformance Level	Remarks and Explanations
<u>2.4.2 Page Titled</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Web pages have titles but further description could be used to provide further support for users.
<u>2.4.3 Focus Order</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	The navigation order of links, form elements, on main login page are logical and intuitive, (move left to right, top to bottom of the page,) however the focus order does not continue to polling sessions preventing assistive software users from interacting with the poll.
<u>2.4.4 Link Purpose (In Context)</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Purpose of links with portions of the application can be determined from link text, however there are areas that additional description would be required for assistive software users including polling answer buttons.
<u>3.1.1 Language of Page</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Pages have a specified language embedded (English by default).
<u>3.2.1 On Focus</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	When any user interface component receives focus, it does not initiate a change of context.
<u>3.2.2 On Input</u> (Level A) Also applies to: Revised Section 508	Supports	Submission buttons are used to initiate a change of context, or description is provided to the user before action is taken.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		
<u>3.3.1 Error Identification</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Does Not Support	The user currently is not notified of all errors detected when using the application. The WAI-ARIA role alert can be used to directly communicate error messages to users using assistive technologies.
<u>3.3.2 Labels or Instructions</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Input fields and select menus have visible labels and or descriptions programmatically available for screen readers.
<u>4.1.1 Parsing</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	HTML parsing errors are not found within the web application.
<u>4.1.2 Name, Role, Value</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Does Not Support	Additional audits required to ensure all elements requiring user input are properly labeled, and proper ARIA labels are used. Currently there are links, and form elements where ARIA labels are not used preventing assistive software users from accessing that portion of the application.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<u>1.2.4 Captions (Live)</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	
<u>1.2.5 Audio Description (Prerecorded)</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	
<u>1.4.3 Contrast (Minimum)</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	A majority of the ResponseWare application meets minimum contrast requirements. There are a few minor elements in greyscale that do need to be adjusted, as well as light blue shades used for polling answers.
<u>1.4.4 Resize text</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Text can be resized within the browser or through the user's operating system without loss of content or functionality.
<u>1.4.5 Images of Text</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Text images are not used or have an alternative description that can be programmatically conveyed by assistive technology.
<u>2.4.5 Multiple Ways</u> (Level AA) Also applies to: Revised Section 508	Supports	Content not part of a sequenced process can be accessed from another area of the website.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 		
<u>2.4.6 Headings and Labels</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Appropriate headings and labels are used in a majority of the application, however additional description is needed to provide further support to assistive software users.
<u>2.4.7 Focus Visible</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	A visible indicator in the form of a focus ring or CSS effect is present when the focus is given to a focusable element.
<u>3.1.2 Language of Parts</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	All parts have a specified language embedded (English by default).
<u>3.2.3 Consistent Navigation</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Navigation links remain consistent throughout the application.
<u>3.2.4 Consistent Identification</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 	Supports	Components with the same functionality are labeled and identified consistently throughout the application.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) – Does not apply to non-web docs 		
<p>3.3.3 Error Suggestion (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Does Not Support	The user currently is not notified of all errors detected when using the application. The WAI-ARIA role alert can be used to directly communicate error messages to users using assistive technologies.
<p>3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	

Revised Section 508 Report

Notes:

Chapter 3: [Functional Performance Criteria \(FPC\)](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	The majority of the elements on the TurningPoint app (mobile/web) is accessible with compatible assistive technologies.
302.2 With Limited Vision	Partially Supports	Supports when combined with Compatible Assistive Technology. Product functionalities perform well at 200% zoom level without loss of content. Majority of text have a sufficient color contrast ratio with the background.
302.3 Without Perception of Color	Supports	Color alone is not used to convey information.
302.4 Without Hearing	Not Applicable	No auditory alerts are used.
302.5 With Limited Hearing	Not Applicable	No auditory alerts are used.
302.6 Without Speech	Not Applicable	Speech input is not required.
302.7 With Limited Manipulation	Partially Supports	Users with limited manipulation can use the TurningPoint mobile or web when combined with Compatible Assistive Technology. Users can navigate and use majority of the application using a keyboard-only interface.
302.8 With Limited Reach and Strength	Supports	

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	<p>Simple language is used for text content.</p> <p>Interface navigation is made simple through clear headings and visual illustrations.</p> <p>Documentation for TurningPoint app is provided in digital format on Turning Technologies' website (www.turingtechnologies.com).</p>

Chapter 4: [Hardware](#)

Notes: This application is not a hardware related product.

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen	Not Applicable	
402.2.2 Transactional Outputs	Not Applicable	
402.2.3 Speech Delivery Type and Coordination	Not Applicable	
402.2.4 User Control	Not Applicable	
402.2.5 Braille Instructions	Not Applicable	
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Not Applicable	
402.3.2 Non-private Listening	Not Applicable	
402.4 Characters on Display Screens	Not Applicable	
402.5 Characters on Variable Message Signs	Not Applicable	
403 Biometrics	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
404.1 General	Not Applicable	
<u>405 Privacy</u>	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	
<u>406 Standard Connections</u>	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	
<u>407 Operable Parts</u>	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	
<u>407.3 Input Controls</u>	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	
407.3.2 Alphabetic Keys	Not Applicable	
407.3.3 Numeric Keys	Not Applicable	
407.4 Key Repeat	Not Applicable	
407.5 Timed Response	Not Applicable	
407.6 Operation	Not Applicable	
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	
<u>407.8 Reach Height and Depth</u>	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	
407.8.2 Side Reach	Not Applicable	
407.8.2.1 Unobstructed Side Reach	Not Applicable	
407.8.2.2 Obstructed Side Reach	Not Applicable	
407.8.3 Forward Reach	Not Applicable	
407.8.3.1 Unobstructed Forward Reach	Not Applicable	
407.8.3.2 Obstructed Forward Reach	Not Applicable	
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	
<u>408 Display Screens</u>	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
408.3 Flashing	Not Applicable	
<u>409 Status Indicators</u>	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	
<u>410 Color Coding</u>	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	
<u>411 Audible Signals</u>	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	
<u>412 ICT with Two-Way Voice Communication</u>	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	
412.3.2 Wireline Handsets	Not Applicable	
412.4 Digital Encoding of Speech	Not Applicable	
412.5 Real-Time Text Functionality	Not Applicable	
412.6 Caller ID	Not Applicable	
412.7 Video Communication	Not Applicable	
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Not Applicable	
412.8.2 Voice and Hearing Carry Over	Not Applicable	
412.8.3 Signal Compatibility	Not Applicable	
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	
<u>413 Closed Caption Processing Technologies</u>	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	
<u>414 Audio Description Processing Technologies</u>	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	
414.1.2 Other ICT	Not Applicable	
<u>415 User Controls for Captions and Audio Descriptions</u>	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
415.1.2 Audio Description Controls	Not Applicable	

Chapter 5: [Software](#)

Notes: This product is not considered platform software as defined by Section 508.

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG 2.0 section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Supports	Accessibility features native to the mobile operating system can be used with the TurningPoint app.
502.2.2 No Disruption of Accessibility Features	Supports	TurningPoint app does not conflict with native accessibility features.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Not Applicable	
502.3.2 Modification of Object Information	Not Applicable	
502.3.3 Row, Column, and Headers	Not Applicable	
502.3.4 Values	Not Applicable	
502.3.5 Modification of Values	Not Applicable	
502.3.6 Label Relationships	Not Applicable	
502.3.7 Hierarchical Relationships	Not Applicable	
502.3.8 Text	Not Applicable	
502.3.9 Modification of Text	Not Applicable	
502.3.10 List of Actions	Not Applicable	
502.3.11 Actions on Objects	Not Applicable	
502.3.12 Focus Cursor	Not Applicable	
502.3.13 Modification of Focus Cursor	Not Applicable	
502.3.14 Event Notification	Not Applicable	
502.4 Platform Accessibility Features	Not Applicable	
503 Applications	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
503.2 User Preferences	Partially Supports	The TurningPoint mobile app currently does not allow user customization of interface features such as color, contrast and font size. Exception: The web based version is compatible with Browser, Native OS and assistive technologies to customize the users experience.
503.3 Alternative User Interfaces	Supports	The TurningPoint mobile app is also available as a web based and desktop application.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Not Applicable	
503.4.2 Audio Description Controls	Not Applicable	
<u>504 Authoring Tools</u>	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)	See WCAG 2.0 section	See information in WCAG 2.0 section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	
504.2.2 PDF Export	Not Applicable	PDF export not provided.
504.3 Prompts	Not Applicable	
504.4 Templates	Not Applicable	

Chapter 6: [Support Documentation and Services](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
<u>602 Support Documentation</u>	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
602.2 Accessibility and Compatibility Features	Does Not Support	Accessibility related documentation is currently not available to users.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	Documentation for TurningPoint app is provided in digital format on Turning Technologies' website (www.turningtechnologies.com) at no additional charge. A paper copy is available upon request for this product.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	
603.3 Accommodation of Communication Needs	Supports	Turning Technologies support can be reached via telephone (1-866-756-3015) or email (support@turningtechnologies.com) Monday through Friday 7:00am-9:00pm EST. (excluding holidays and other observed days which the office may be closed)

Turning Technologies Legal Disclaimer

This document is provided for information purposes only and the contents herein are subject to change without notice. Turning Technologies does not warrant that this document is error free, nor does it provide any other warranties, whether expressed orally or implied in law. The information contained in this document represents the current view of the TurningPoint app of the date of publication and Turning Technologies cannot guarantee the accuracy of any information presented herein after the date of the publication. Turning Technologies specifically disclaims any liability with respect to this document and no contractual obligations are formed either directly or indirectly by this document. Turning Technologies further makes no representation concerning the ability of assistive technologies or other products to interoperate with its websites or web products.