Accessibility Conformance Report

PowerDMS Public-Facing Documents

VPAT® Version 2.3 (Revised) – August 2020 Revised Section 508 Edition

This Accessibility Conformance Report, following the Voluntary Product Accessibility Template (VPAT) is a tool that helps officials and decision-makers to evaluate PowerDMS Public Facing Documents product conformance with the accessibility standards under Section 508 of the Rehabilitation Act.

The scope of this VPAT includes all the features of websites published via the **PowerDMS Public-Facing Documents** product.

Name of Product/Version: PowerDMS Public-Facing Documents

Product Description: This is an add-on product to the PowerDMS document

management web application which permits customers to publish content from their PowerDMS document management system to a

publicly accessible website.

Report Date: August 28, 2020

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Notes: None

Evaluation Methods Used: Conformance to the listed accessibility standards has been

evaluated by a third party audit firm using a combination of static analysis tools and manual testing with assistive technologies.

This document describes the extent to which the product conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 'A' and 'AA' levels as described at http://www.w3.org/TR/WCAG20/, and the applicable U.S. Section 508 standards, subject to PowerDMS's interpretation of those standards and the remarks in this document. If this product has dependencies on other products, they are stated at the end of this VPAT and they may or may not meet the WCAG 2.0 criteria. Please see the individual VPATs for details.

For more information regarding the accessibility of this product or other PowerDMS products, see our PowerDMS Public Documentation under *Compliance* > *Attestations* or contact: support@powerdms.com.

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.

Applicable Standards/Guidelines

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

Standard/Guidelines	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 criteria. This can be used only 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 <u>WCAG 2.0 Understanding Conformance</u>: This means that if there is no content to which a success criterion applies, the success criterion is satisfied.

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

Note: The product partially supports these standards.

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Time-Based media is not used in this application. CAPTCHAs are not used in this application. Decorative images and non-text characters are ignored by assistive technology. User-generated content may contain links or images, the content author has control over their context/behavior.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Supports	 No Pre-recorded audio-only or video-only content is being used. User-generated content may contain links, images, audio, or video, the content author has control over their context/behavior.

602.3 (Support Docs)		
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508	Supports	 No Pre-recorded video content is being used. User-generated content may contain links, or images, audio, or video, the content author has control over their context/behavior.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 No Pre-recorded audio or video content is being used. User-generated content may contain links, or images, audio, or video, the content author has control over their context/behavior.
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	User can navigate side menu and access documents.
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Product tested for screen reader. Presentation sequence matches the logical reading sequence.
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508	Supports	Instructions provided do not refer to things solely based on their sensory characteristics such as shape, size, visual location, orientation, color, or sound.

1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Information conveyed by color is available in alternative formats, such as icons, text labels, and context menus.
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	No automatically playing audio is used.
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508	Partially Supports	 Ability to perform most functions from the keyboard only. Logical movement of focus through the controls. Exception found: When navigating via keyboard, certain options such as page size, page number cannot be modified using keyboard alone.
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Movement of focus through each control only using the keyboard, with no "keyboard trap" that prevents focus from moving away from any control using ChromeVox.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508	Supports	No Time limits are used in general navigation and use of application. • User-generated content may contain time limits, the content author has control over this behavior.

2.2.2 Pause, Stop, Hide (Level A) Also applies to: Revised Section 508	Supports	No moving, blinking or scrolling content is used in the application.
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	No portion of the screen flickers or flashes with a frequency between 2 Hz and 55 Hz.
2.4.1 Bypass Blocks (Level A) Also applies to: Revised Section 508 • 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	Assistive Technologies can bypass blocks of content each time a new page is navigated.
2.4.2 Page Titled (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Page titles are used consistently and text facilitates frame identification in all parts.
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508	Supports	Logical movement through the focusable components using only the keyboard follows a meaningful sequence.

2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 The text of links and their surrounding paragraph, or list, is sufficient to describe their purpose. User-generated content may contain links, the content author has control over their context/behavior.
3.1.1 Language of Page (Level A) Also applies to: Revised Section 508	Supports	Application is in the locale/language of the underlying platform.
3.2.1 On Focus (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	All elements on page clearly display focus states.
3.2.2 On Input (Level A) Also applies to: Revised Section 508	Supports	Changes in the value of user interface components does not result in a substantial change to the user interface of the software, an additional change of keyboard focus, or the spawning of a new window.
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	When input errors are detected, they are described to the user in text, including identifying the item where the error occurred.
3.3.2 Labels or Instructions (Level A)	Partially Supports	No labels are used in the general application.

Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		Exception: The PDF viewer technology used to display the document is an embedded third-party product and may be missing labels for certain elements. This does not limit the user's ability to use the product and consume the document content.
4.1.1 Parsing (Level A) Also applies to: Revised Section 508	Supports	User-generated content may contain markup, the content author has control over these elements.
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	 Most user interface controls provide names, states, roles, and values. Exception: The PDF viewer technology used to display the document is an embedded third-party product and may be missing roles and values for certain elements. This does not limit the user's ability to use the product and consume the document content.

Table 2: Success Criteria, Level AA

Note: The product partially supports these standards.

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508	Supports	 No live audio content in video is being used. User-generated content may contain audio, the

 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		content author has control over publishing audio or video files in PowerDMS.
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 No pre-recorded video is being used. User-generated content may contain audio, the content author has control over publishing audio or video files in PowerDMS.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508	Partially Supports	Controls to skip links to Documents and Notes have specific color combinations that do not fully meet the success criteria.
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	All text is visible and pages can be navigated.
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Images of text are not used. User-generated content may contain audio, the content author has control over publishing audio or video files in PowerDMS.
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) - Does not apply to non-web software • 504.2 (Authoring Tool)	Supports	There exists multiple ways to navigate main and supplemental content.

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602.3 (Support Docs) Does not apply to non-web docs		
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508	Supports	Headers describe the topic or purpose of the content below them.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Visual indication of the focused component when used with ChromeVox. Visual indication of the position of the cursor in editable text fields. Current focus location and position of the caret in text is programmatically exposed.
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Application is in the locale/language of the underlying platform. Exception found: When the language of the application is set to something other than English, a guided screen reader will read specific web elements not defined in English.
3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508	Supports	Navigational mechanisms that are repeated on multiple Web pages within a set of web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.

 602.3 (Support Docs) Does not apply to non-web docs 		
3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 • 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	Components that have the same functionality within the product are identified consistently.
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508	Supports	Some errors are automatically detected and provide suggestions to the user.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Data is checked for input errors with an opportunity for the user to correct them. Data can be reviewed, corrected, and confirmed by the user before they are finalized.

Table 3: Success Criteria, Level AAA

Notes: The product is not being evaluated for this level of the criteria.

The table for Table 3: Success Criteria, Level AAA has been omitted from this VPAT.

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Notes: According to the <u>Text of the Standard and Guidelines</u> for the IT Final Rule as it related with Section

508. https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#302-functional-performance-criteria

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	The core functionality of PowerDMS is accessible to assistive technology users.
302.2 With Limited Vision	Partially Supports	 The core functionality is accessible to assistive technology users. Product supports browser built-in zoom capabilities. Product supports browser-based high contrast mode accessibility add-ons. Exception: Parts of the viewer do not support scale to zoom accessibility features.
302.3 Without Perception of Color	Partially Supports	 Application is in conformance with providing alternative formats to convey information such as through text, font weight, and shape. Exception: The PDF viewer technology used to display the document is an embedded third-party product and may be missing color contrast requirements. This does not limit the user's ability to

		use the product and consume the document content.
302.4 Without Hearing	Supports	 Application does not use audio. User-generated content may contain audio, the content author has control over publishing audio or video files in PowerDMS.
302.5 With Limited Hearing	Supports	 Application does not use audio. User-generated content may contain audio, the content author has control over publishing audio or video files in PowerDMS.
302.6 Without Speech	Supports	 Application does not require the use of voice or speech.
302.7 With Limited Manipulation	Supports	Most product functionality is operable for people with limited manipulation through a keyboard interface.
302.8 With Limited Reach and Strength	Supports	Application does not require motions that need complex gestures, reach, or strength. The product is functional with limited reach and strength.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	 As described in 3.3.2 Labels or Instructions, users with limited language, cognitive and learning disabilities may have issues using the product. Element text is meaningful within context. Error messages are presented with meaningful

	information to resolve the issue in most cases. • Multimedia playback can be controlled. • Error prevention is provided when applicable.
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Chapter 4: Hardware

Notes: The product is not being evaluated for this level of the criteria. PowerDMS does not provide a hardware product. Customer is responsible for hardware that runs the PowerDMS Public Facing Documents Web Page..

The table for Chapter 4: Hardware has been omitted from this VPAT.

Chapter 5: Software

Notes: The product is not being evaluated for this level of the criteria. PowerDMS is a web application and is not subject to the requirements of this section.

The table for Chapter 5: Software has been omitted from this VPAT.

Chapter 6: <u>Support Documentation and Services</u>

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Not Applicable	No documentation was evaluated.
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	Not Applicable	No documentation was evaluated.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Not Applicable	No Support Services were evaluated.
603.3 Accommodation of Communication Needs	Not Applicable	No Support Services were evaluated.

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