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- [HHS Guide to Completing the Section 508 Product Accessibility Template](#)
- [Section 508 Evaluation Template](#)

HHS Guide to Completing the Section 508 Product Accessibility Template

Purpose:

This document provides Vendors with instructions on completing the Section 508 Evaluation Template for the Department of Health and Human Services (HHS).

Background:

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the 508 Evaluation Template "a simple, web-based checklist that allows Vendors to document how their product **did** or **did not** meet the various Section 508 Requirements.

How the Section 508 Evaluation Template is organized:

This template is also known as the Voluntary Product Accessibility Template (VPAT)

The Section 508 Evaluation Template consists of a long series of tables. The **Summary Table** is used to provide a sense of your product's **overall** "level-of-conformance" with the Section 508 Standards. Subsequently, the **Section 1194.xx Tables** contain the detailed subparagraphs that a Section 508 Standard is composed of. It is within these **Section 1194.xx Tables** that you will define in detail how your product **did** or **did not** comply with a specific requirement.

Understanding the columns

Use the following to understand the use of the three columns in the Section 508 Evaluation Template's tables:

Summary Table

Column Name	Use
Criteria:	Describes Subparts B, C, and D of the Section 508 Standards.
Supporting Features:	Enter information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify Not Applicable . DO NOT ENTER REMARKS OR EXPLANATIONS

	IN THIS COLUMN.
Remarks/Explanations:	<i>Enter</i> general comments regarding a product's overall "level-of-conformance" with the <i>Applicable</i> Subpart.

Section 1194.xx Tables

Column Name	Use
Criteria:	Describes a specific guideline that a Subpart is composed of.
Supporting Features:	<i>Enter</i> information summarizing a product's "level-of-support" for a specific guideline.
Remarks/Explanations:	<i>Enter</i> detailed information on how the product did or did not support a specific guideline.

What information do I enter in columns 2 and 3?

The *Supporting Features* and *Remarks/Explanations* columns are used to document exactly how a product **did** or **did not** meet the Section 508 Standards.

Supporting Features (second column on 508 Evaluation Template)

Language	What It Means
Supports	Product FULLY meets the letter and intent of the Criteria.
Supports with Exceptions	Product does not ENTIRELY meet the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Product provides <i>alternative</i> methods to meet the intent of the Criteria.
Does not Support	Product does not meet the letter or intent of the Criteria.
Not Applicable	The Criteria does not apply to the product.

Remarks & Explanations (third column on 508 Evaluation Template)

If 2 nd column states	Then
Supports	List exactly what features of the product do meet and describe how they are used to support the Criteria.
Supports with Exceptions	List exactly what features of the product do meet and describe

	<p>how they are used to support the Criteria.</p> <p style="text-align: center;">AND</p> <p>List exactly what parts of the product do not meet and describe how they fail to support the Criteria.</p>
Supports through Equivalent Facilitation	List exactly what other methods exist in the product and describe how they are used to support the Criteria.
Does not Support	Describe exactly how the product does not support the Criteria.
Not Applicable	Describe exactly why the criterion is not applicable to the product.

Typical Scenario for Completing a Section 508 Evaluation Template:

To complete the Section 508 Evaluation Template, enlist the services of your company's **technical specialist** for the product being sought for purchase. The HHS requires a measure of technical detail in the responses. Once you have enlisted their assistance:

1) Determine which sections of the **Technical Standards (Subpart B-1194.21-26)** apply to your product. * Keep in mind that you **always** must complete the **Functional Performance Criteria (Subpart C "1194.31)** and **Information, Documentation, and Support (Subpart D "1194.41)** sections of the Section 508 Evaluation Template.

2) For each section that applies, determine if the product does or does not meet the specific Criteria elements.

3) Using the information found in the [How the Section 508 Evaluation Template is organized](#) section, document in the **Section 1194.xx Tables** exactly **how** your product **did** or **did not** meet the applicable standard.

- If the product **supports** the standard, provide detailed examples of **what** accessibility features exist and **how** they are used to support the standard.
- If the product **does not support** the standard, remember that Section 508 allows products to meet the Access Board Standards in innovative, non-traditional ways. The product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user without a disability.
- If the product **does not** possess an **innovative, non-traditional way** of supporting the standard, provide detailed examples of exactly **how** the product **did not** meet the standard.

4) Once documented in the **Section 1194.xx Tables** exactly how the product **did** or **did not** meet, return to the **Summary Table** and document the product's overall "level-of-conformance" in each of the applicable sections.

5) Post the final Section 508 Evaluation Template on your company's web site or on the [GSA Buy Accessible Wizard](#).

6) It is the Vendor's responsibility to maintain the integrity of the data on the Section 508 Evaluation Template. The information provided on the Section 508 Evaluation Template is considered a self-representation unless expressly affirmed otherwise. *Even so*, the HHS uses this form to complete required Market Research associated with the agency complying with Section 508 and may use the form to eliminate this product compared to other **more accessible** products that meet the HHS's business needs.

***Please Note:** Any **WEB** application being purchased by HHS also **requires** the Vendor to complete **Section 1194.21** of the Section 508 Evaluation Template in addition to **Sections 1194.22, 1194.31, and 1194.41**.

- HHS reserves the right to reject a VPAT if the answers do not address the standards. HHS needs the VPAT to address the standards to evaluate it for conformance.
- Please answer honestly and be prepared to work with HHS to improve accessibility for your product if it is purchased.

Contact: [Section 508 Coordinator](#) for assistance.

Section 508 Evaluation Template

Date:

Name of Product:

Contact for more Information:

**** Denotes Required**

Summary Table

<i>Criteria</i>	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems		
Section 1194.22 Web-based internet information and applications		
Section 1194.23 Telecommunications Products		
Section 1194.24 Video and Multi-media Products		
Section 1194.25 Self-Contained, Closed Products		
Section 1194.26 Desktop and Portable Computers		
** Section 1194.31 Functional Performance Criteria		

<i>Criteria</i>	Supporting Features	Remarks and explanations
** Section 1194.41 Information, documentation, and support.		

Section 1194.21 Software Applications and Operating Systems

* Refer to (<http://www.access-board.gov/sec508/guide/1194.21.htm>) for details on the guidelines listed below.

<i>Criteria</i>	Supporting Features	Remarks and explanations
(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.		
(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.		
(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.		
(d) Sufficient information about a user		

<i>Criteria</i>	Supporting Features	Remarks and explanations
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.		
(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.		
(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.		
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.		
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.		
(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.		
(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.		
(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.		
(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,		

<i>Criteria</i>	Supporting Features	Remarks and explanations
including all directions and cues.		

Section 1194.22 Web-based Internet information and applications

* Refer to (<http://www.access-board.gov/sec508/guide/1194.22.htm>) for details on the guidelines listed below.

<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).		
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.		
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.		
(d) Documents shall be organized so they are readable without requiring an associated style sheet.		
(e) Redundant text links shall be provided for each active region of a server-side image map.		
(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.		
(g) Row and column headers shall be identified for data tables.		
(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.		
(i) Frames shall be titled with text that		

<i>Criteria</i>	Supporting Features	Remarks and explanations
facilitates frame identification and navigation		
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.		
(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.		
(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).		
(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.		
(o) A method shall be provided that permits users to skip repetitive navigation links.		
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

Section 1194.23 Telecommunications Products

* Refer to ([Access Board Section 1194.23](#)) for details on the guidelines listed below.

<i>Criteria</i>	Supporting Features	Remarks and explanations
(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.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.		
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.		
(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.		
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.		
(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.		

<i>Criteria</i>	Supporting Features	Remarks and explanations
(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.		
(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.		
(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.		
(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.		
(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.		
(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.		
(k)(3) Products which have mechanically		

<i>Criteria</i>	Supporting Features	Remarks and explanations
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.		
(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.		

Section 1194.24 Video and Multi-media Products

* Refer to ([Access Board Section 1194.24](#)) for details on the guidelines listed below.

<i>Criteria</i>	Supporting Features	Remarks and explanations
(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.		

<i>Criteria</i>	Supporting Features	Remarks and explanations
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.		
(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.		
(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.		
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.		

Section 1194.25 Self-Contained, Closed Products

** Refer to ([Access Board Section 1194.25](#)) for details on the guidelines listed below.*

<i>Criteria</i>	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.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		
(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).		
(d) When biometric forms of user		

<i>Criteria</i>	Supporting Features	Remarks and explanations
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.		
(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 any time.		
(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 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.		
(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.		
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the		

<i>Criteria</i>	Supporting Features	Remarks and explanations
operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.		
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: 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.		
(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: 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.		
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.		

Section 1194.26 Desktop and Portable Computers

* Refer to ([Access Board Section 1194.26](#)) for details on the guidelines listed below.

<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(b) If a product utilizes touchscreens or touch-operated controls, an input method		

<i>Criteria</i>	Supporting Features	Remarks and explanations
shall be provided that complies with §1194.23 (k) (1) through (4).		
(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.		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards		

Section 1194.31 Functional Performance Criteria

<i>Criteria</i>	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.		
(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.		
(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		
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall		

<i>Criteria</i>	Supporting Features	Remarks and explanations
be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.		
(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.		
(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.		

Section 1194.41 Information, documentation, and support.

<i>Criteria</i>	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.		
(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.		
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.		