APPENDIX C

CSU Guide to Completing the Voluntary Product Evaluation Template (VPAT)

Purpose:

This document will provide Vendors with instructions as to how they are expected to complete the Voluntary Product Evaluation Template (VPAT) for the California State University.

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 Voluntary Product Evaluation Template (VPAT) is organized:

The Voluntary Product Evaluation Template (VPAT) consists of a long series of tables. The initial one, the **Summary Table**, is used to provide a sense of your product's **overall** "level-of-compliance" with the Section 508 Standards. Subsequently, the **Section 1194.xx Tables** contain the detailed subparagraphs of each section of the Standards. 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 both the Summary Table and the individual Section 1194.xx Table:

Summary Table	
Column Name	**Use**
Criteria:	Describes Subparts B, C, and D of the Section 508 Standards.
Supporting Features:	To **Enter** information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify **Not Applicable**.
Remarks/Explanations:	To **Enter** general comments regarding a product's overall "level-of-compliance" with the **Applicable** Subpart.

Section 1194.xx Table	
Column Name	**Use**
Criteria:	Describes a specific guideline that a Subpart is composed of.
Supporting Features:	To **Enter** information summarizing a product's "level-of-support" for a specific guideline.
Remarks/Explanations:	To **Enter** 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. In order to promote consistency in Vendor responses, which will ensure a quicker review process by CSU's contracting and procurement officials, we encourage you to answer these columns in the following manner:

Supporting Features (second column on 508 Evaluation Template)	
Language	**Description**
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 provides some level of access.
Supports through Equivalent Facilitation	Product provides *alternative* 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 2nd 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 **how** they are used to support the Criteria. **AND** List exactly **what** parts of the product **do not** meet and describe **how** they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly **what** *other* methods exist in the product and describe **how** they are used to support the Criteria.
Supports when combined with Compatible Assistive Technology	Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible Assistive Technology. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for people who are blind).

Does not Support	Describe exactly **<u>how</u>** the product **does not** support the Criteria.
Not Applicable	Describe exactly **<u>why</u>** the criteria is not applicable to the product.
Not Applicable -- Fundamental Alteration Exception Supplies	Use this language when you determine a Fundamental Alteration to the product would be required to meet the Criteria (see the Access Board standards for the definition of "fundamental alteration").

Typical Scenario for Completing a Voluntary Product Evaluation Template (VPAT):

To begin the process of completing the Voluntary Product Evaluation Template (VPAT), you should enlist the services of your company's technical specialist for the product being sought for purchase. The reason for this is because CSU requires a measure of technical detail in your responses. Once you've enlisted their assistance:

1) Determine which sections of the **Technical Standards (Subpart B-1194.21-26)** apply to your product.***** In some cases more than one set of Technical Standards will apply.

2) Keep in mind that you must **always** complete the **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the Voluntary Product Evaluation Template (VPAT).

3) Fill out the **Functional Performance Criteria (Subpart C – 1194.31)** if you are claiming Equivalent Facilitation. Equivalent Facilitation must yield equal or greater access.

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

5) Using the information found in the **How the Voluntary Product Evaluation Template (VPAT) is organized** section, document in the **Section 1194.xx Tables** exactly **how** your product **did** or **did not** meet the applicable standard.

   - If your product **supports** the standard, provide detailed examples of **what** accessibility features exist and **how** they are used to support the standard.

   - If your product **does not support** the standard, remember that Section 508 allows for products to meet the Access Board Standards in innovative, non-traditional ways. Your 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.

   - If your product **does not** possess an *innovative, non-traditional way* of access to the standard, provide detailed examples of exactly **how** the product **did not** meet the standard.

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

7) Post your final Voluntary Product Evaluation Template (VPAT) on your company's web site. Please keep in mind that it is the Vendor's responsibility to maintain the integrity of the data on the Voluntary Product Evaluation Template (VPAT). The information provided on your Voluntary Product Evaluation Template (VPAT) is considered to be a self-representation unless expressly affirmed otherwise.

8) When responding to any CSU request for proposals, the Vendor must submit a completed and up-to-date Voluntary Product Evaluation Template (VPAT) with the submission. Proposals without an attached completed Voluntary Product Evaluation Template (VPAT) may be disqualified from competition.

* Please Note: Any **WEB** application being purchased by CSU **requires** the Vendor to complete **Section 1194.21** of the Voluntary Product Evaluation Template (VPAT) in addition to **Sections 1194.22**, **1194.31** and **1194.41**.

Voluntary Product Evaluation Template (VPAT)

Date: 30-May-2007
Name of Product: ebrary eContent Platform
Contact for more Information: Badsah Mukherji, Sr. Strategic Product Manager, ebrary

Refer to the **ITIC Best Practices** for filling out the following form.

Summary Table		
Criteria	**Supporting Features**	**Remarks and explanations**
Section 1194.21 Software Applications and Operating Systems	Supports with Exceptions	
Section 1194.22 Web-based internet information and applications	Supports with Exceptions	
Section 1194.23 Telecommunications Products	Not Applicable	
Section 1194.24 Video and Multi-media Products	Not Applicable	
Section 1194.25 Self-Contained, Closed Products	Not Applicable	
Section 1194.26 Desktop and Portable Computers	Not Applicable	
Section 1194.31 Functional Performance Criteria	Supports with Exceptions	
Section 1194.41 Information, documentation, and support.	Supports	

Return to the top of the page.

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.		
NOTE: THIS SECTION REFERS TO THE <u>EBRARY DOCVIEWER</u> APPLICATION		
Criteria	**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.	Supports	Features meeting criteria: ▪ Supports keyboard navigation for ebrary DocViewer menu items ▪ Supports keyboard navigation between DocViewer menu and righthand pane ▪ Supports keyboard navigation between tabs in righthand pane

		- Supports keyboard navigation between menus/buttons of DocViewer and document text - Supports keyboard navigation between pages/sections of document - Supports use of keyboard for text selection: select by word, select by sentence, select by paragraph; expand or contract a selection; change selection mode - Must use Assistive Technology, e.g. O/S keyboard navigation (Windows MouseKeys: control pointer using numeric keypad), to access certain features: e.g. enter/exit sticky note
(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.	Supports	Features meeting criteria: - Does not disable or disrupt Windows Accessibility Keyboard Options: StickyKeys, FilterKeys, ToggleKeys - Does not disable or disrupt most Windows Accessibility Sound Options: SoundSentry, ShowSounds - Does not disable or disrupt most Windows Accessibility Display Options: High Contrast, Cursor Options - Does not disable or disrupt Windows Accessibility Mouse Options: MouseKeys (control pointer with numeric keypad) - DocViewer menu/button/tab labels respond to Windows Narrator; not tested with

		other text-to-speech programs • Does not disable or disrupt Windows Magnifier capabilities • Menus/buttons/icons in the DocViewer cannot resized; however, users with low vision may view these images through an external magnification utility (e.g. Windows Magnifier) • A future release of the ebrary DocViewer will provide an inherent text-to-speech capability, allowing a user with visual limitations to have the full document text read to him or her. This feature would replace the text-to-speech features of the O/S or other external programs.
(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.	Supports	Features meeting criteria: • Each ebrary DocViewer menu option, button, and tab changes in appearance when the cursor focus is on it • As the user changes focus from one UI element to another, Assistive Technology such as Windows Narrator can "speak" aloud the element label • Screen focus is visible when a screen magnifier such as Windows Magnifier is used
(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.	Supports through Equivalent Facilitation	Features meeting criteria: • Each button and icon on the DocViewer has a text equivalent that appears when the user hovers the pointer over that interface element • Each button/icon in the DocViewer toolbar has an equivalent textual menu

		option in the InfoTools menu
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supports	Features meeting criteria: ▪ Every bitmap image representing a control or other programmatic element, in the ebrary DocViewer interface, is used consistently throughout the application
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supports through Equivalent Facilitation	Features meeting criteria: ▪ Sticky Notes allow text input; the note input box indicates text input caret location; also, the text content within the Sticky Note is available to the O/S. Equivalent Facilitation: ▪ Document text is NOT made available to external programs directly, in order to protect copyrighted content. However, the text Copy/Paste feature allows the user to select text for transfer to a third-party text editor, which in turn would support interaction with Assistive Technology. Copy/Paste maintains the integrity of words, sentences, columns, and paragraphs. When using the mouse to control the pointer, text selection across facing pages is supported. ▪ Within the DocViewer, the user can magnify the document page image (i.e. ALL of the text on that page, but not selective portions of text) up to 200% of the original page size
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	Features meeting criteria: ▪ User-selected display contrast and color selections apply to the

		ebrary DocViewer ▪ The windows opened through ebrary on the user's desktop will display user-selected themes, and window title font sizes & styles.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Not Applicable	
(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.	Supports	Features meeting criteria: ▪ Color coding is not used in the ebrary DocViewer to convey information, indicate an action, prompt a response, or distinguish a visual element, with one exception described below.
(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.	Not Applicable	
(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.	Not Applicable	
(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.	Supports	Features meeting criteria: ▪ The ebrary DocViewer supports only one text input feature: "Sticky Notes" that appear as floating text boxes. Users can use Sticky Notes with Assistive Technology such as Windows MouseKeys and keyboard navigation within the text box while inputting. ▪ The simple instruction text that appears by default within a new Sticky Note box, "Enter notes here," may be read by a screenreader

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.**

NOTE: THIS SECTION REFERS TO THE EBRARY HOSTED PLATFORM WEB INTERFACE – accessed by patrons - AND THE EBOOK ORDERING PLATFORM (EBOP) – accessed by librarians.

Here "channel" refers to a restricted area within the ebrary hosted platform, where users of a specific customer institution may access content acquired from ebrary.

Criteria	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).	Supports	Features meeting criteria: ▪ Every non-text interface element on an ebrary channel's web UI has a text equivalent ▪ Every non-text interface element on eBOP has a text equivalent Limitations: ▪ None
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not applicable	Features meeting criteria: ▪ Limitations: ▪
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports	Features meeting criteria: ▪ Most information conveyed on the ebrary channel web UI is independent of color coding, or can be discerned through other methods (e.g. label, alternative text) ▪ eBOP uses color coding (i.e. YELLOW) only to indicate whether a title on a newly-created order is already present on another order-in-progress. However, a user can discern such order lines by shading alone: such order lines are shaded while other lines are not shaded. Additionally, such order lines indicate a separate order number, for reference, in a particular column.
(d) Documents shall be organized so they are readable without	Not Applicable	Style sheets not required

11

requiring an associated style sheet.		
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Features meeting criteria: ▪ Limitations: ▪
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Not Applicable	Features meeting criteria: ▪ Limitations: ▪
(g) Row and column headers shall be identified for data tables.	Supports	Features meeting criteria: ▪ Within the ebrary web UI and in eBOP, data tables contain headers identifying all columns (data tables include Search Results, Recommendations, Orders) ▪ Individual rows within a table are separated by visible borders, and the title of each document in the table is clearly displayed at the left of each row Limitations: ▪ None
(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.	Supports	Features meeting criteria: ▪ Borders are used to associate data cells and header cells for data tables Limitations: ▪ None
(i) Frames shall be titled with text that facilitates frame identification and navigation	Not Applicable	Features meeting criteria: ▪ Limitations: ▪
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not Applicable	Features meeting criteria: ▪ Limitations: ▪
(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	Not Applicable	Features meeting criteria: Limitations: ▪

compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.		
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Supports	Features meeting criteria: ▪ Limitations: ▪
(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 Û1194.21(a) through (l).	Supports	Features meeting criteria: ▪ Document viewing in ebrary requires the Java Runtime Environment from Sun Microsystems, and the ebrary DocViewer. Both are Section 508 compliant (with exceptions) ▪ ebrary automatically detects whether the user's desktop has the required version of J2SE RE. If not, the user is prompted to install this plug-in. This is typically a one-time event. After that, the ebrary DocViewer is automatically launched each time the user wishes to view a document. Limitations: ▪ See U1194.21(a) through (l) for details related to the ebrary DocViewer ▪ Details regarding J2SE Runtime Environment and Accessibility may be found at: http://java.sun.com/javase/ technologies/desktop/accessibility.jsp
(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.	Supports	Features meeting criteria: ▪ Limitations: ▪
(o) A method shall be provided that permits users to skip repetitive navigation links.	Not Applicable	Features meeting criteria: ▪ screen readers would do this Limitations: ▪

(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	Features meeting criteria: ▪ Limitations: ▪

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 (http://www.access-board.gov/sec508/guide/1194.23.htm) for details on the guidelines listed below.**

Not applicable to ebrary

Criteria	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.	Not Applicable	
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Not Applicable	
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	
(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.	Not Applicable	
(e) Where provided, caller identification and similar telecommunications functions	Not Applicable	

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.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	
(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	Not Applicable	

Criteria		
to activate controls and keys shall be 5 lbs. (22.2N) maximum.		
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.	Not Applicable	
(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.	Not Applicable	

Section 1194.24 Video and Multi-media Products
 * Refer to (http://www.access-board.gov/sec508/guide/1194.24.htm) for details on the guidelines listed below.

Not applicable to ebrary

Criteria	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.	Not Applicable	
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	

(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Not Applicable	

Section 1194.25 Self-Contained, Closed Products * Refer to (http://www.access-board.gov/sec508/guide/1194.25.htm) for details on the guidelines listed below. *Not applicable to ebrary*		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	Not Applicable	
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with Û1194.23 (k) (1) through (4).	Not Applicable	
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not Applicable	
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	Not Applicable	
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	Not Applicable	
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Not Applicable	
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.	Not Applicable	
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not Applicable	
(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 operable control, and at the maximum protrusion of the product	Not Applicable	

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.	Not Applicable	
(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.	Not Applicable	
(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.	Not Applicable	

Section 1194.26 Desktop and Portable Computers * Refer to (http://www.access-board.gov/sec508/guide/1194.26.htm) for details on the guidelines listed below. *Not applicable to ebrary*		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) All mechanically operated controls and keys shall comply with Û1194.23 (k) (1) through (4).	Not Applicable	
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with Û1194.23 (k) (1) through (4).	Not Applicable	
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not Applicable	
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not Applicable	

Section 1194.31 Functional Performance Criteria		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) At least one mode of operation and information retrieval	Supports	▪ Compatible with UI

Criteria	Supporting Features	Remarks and explanations
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.		magnification technology ▪ Document page image enlargement up to 200% ▪ Keyboard shortcuts with Windows Narrator (speak aloud menus & button labels) ▪ Future inherent text-to-speech feature planned
(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.	Supports	▪ Compatible with UI magnification technology ▪ Document page image enlargement up to 200% ▪ Keyboard shortcuts with Windows Narrator (speak aloud menus & button labels) ▪ Future inherent text-to-speech feature planned
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Supports	▪ Users who are deaf or hard of hearing can use all features of ebrary without any problems
(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.	Not Applicable	Audio information is not relevant to ebrary at this time
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Not Applicable	User speech is not relevant to ebrary at this time
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supports with Exceptions	▪ Keyboard control with some exceptions, as listed in previous sections of this document

Return to the top of the page.

Section 1194.41 Information, documentation, and support		
Criteria	**Supporting Features**	**Remarks and explanations**
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supports	Features meeting criteria: ▪ Product user guide(s) are provided to customers in different formats: PDF, Flash videos (with audio), and HTML help pages accessible from the main web user interface and from within the DocViewer
(b) End-users shall have access to a	Supports	Features meeting criteria:

description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.		- Such information will be made available to end users who request it, at no additional charge - ebrary Customer Support will be available to personally assist affected users over the phone, and if warranted, through on-site training.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Features meeting criteria: - E-mail support is primary means of communications - Telephone may be used for followup by Customer Support, when needed