

Voluntary Product Accessibility Template® (VPAT®)

Revised Section 508 Edition

Version 2.4

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About This Document

The VPAT is provided in four editions based on the standards/guidelines being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International, which 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 instructions)
- The VPAT

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

The purpose of these instructions is 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 Accessibility Conformance Report 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.

The Information Technology Industry Council (ITI) provides the VPAT. Use of the template and service mark does not require membership in ITI.

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

This section provides guidance for reporting product conformance for 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.

Getting Started

1. Before creating a report, read all of the materials provided in this document.
2. Determine which accessibility standards/guidelines will be included in the Accessibility Conformance Report and use the appropriate VPAT file.
3. 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 produce an Accessibility Conformance Report based on the 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 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 product version identifier if necessary

- **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”.
- **Product Description** – A brief description of the product
- **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 evaluation methods 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 used to evaluate the product.
 - The applicable Standards/Guidelines that are included in this VPAT edition are:
 - [Web Content Accessibility Guidelines 2.0](#) or WCAG 2.0 (ISO/IEC 40500)
 - [Revised Section 508 standards](#) – the U.S. Federal accessibility standard for ICT Products, published by the U.S. Access Board in the Federal Register on January 18, 2017 and corrected on January 22, 2018
 - If other Standards/Guidelines are reported, then use the appropriate VPAT edition.
 - 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. This information can alternatively be supplied in the introductory text of the report. In the VPAT we have used a table as an example and listed “(yes / no)” for each standard/guideline. To indicate what the report covers leave the appropriate yes or no on each standard/guideline.
 - If multiple Standards or Guideline tables are included, each table must identify the Standard or Guideline that the criteria in that table represent.
- **Terms** – 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: This can only be used in WCAG 2.x Level AAA

- **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.

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.

- **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG 2.x Level AAA.
 - **Tables for Each Standard or Guideline** – Tables showing the responses to the criteria.
4. 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 about which 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.
5. 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.
6. 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 does not 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
- **Report 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.
- **Report Size:** 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 does not 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:** Translation to other languages is permitted.

- **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 standard and guideline tables appear may be changed to facilitate reading. The current order is WCAG then Section 508. You can change this order to insert the WCAG criteria into the Section 508 tables.
- **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

- When publishing your Accessibility Conformance Report, be sure to remove the entire first 9 pages of this document, including the table of contents, introductory information and instructions.
- Check for each required item in the VPAT® document:
 - **[Company Name] Accessibility Conformance Report** (report title)
 - **(Based on VPAT® Version 2.4)**
 - **Name of Product/Version**
 - **Report Date**
 - **Product Description**

- **Contact Information**
- **Notes**
- **Evaluation Methods Used**
- **Applicable Standards/Guidelines**
- **Terms**
- **Tables for Each Standard or Guideline**
 - Check that there is a response for each criterion for ‘Conformance Level’ and ‘Remarks and Explanations.’
- Verify that the final document is accessible.
- Post your final document on your company’s web site, or make the document available to customers upon request.

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 are 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.

Pennington Publishing Accessibility Conformance Report



Revised Section 508 Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: e-Comments Chrome Extension v. 1.22.0

Report Date: 9/16/2021

Product Description:

The e-Comments Chrome Extension allows users to insert writing feedback comments with the floating e-Comments menu widget into Google docs, slides, or any webpage that accepts text. Four switchable writing feedback comment sets for grades 3-6, 6-9, 9-12, and college/workplace are provided. Users can create and save their own comments and record audio/video/screencast comments and link to other websites.

Contact Information: Mark Pennington, Pennington Publishing support@penningtonpublishing.com 888-565-1635

Notes:

Evaluation Methods Used: The e-Comments Chrome Extension v. 1.22.0 was evaluated using Chrome on Windows 10 desktop and macOS Mojave computers. Assistive technologies used in this evaluation included NVDA (screen reader) and the Windows screen magnification function as well as exclusive use of the keyboard to navigate and operate the site content and functionality.

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 Revised Section 508:

- 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

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) 	Partially Supports	The site provides sufficient text alternatives for most instances of non-text content. Examples include icons for audio, video, record screen functions
<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) 	Partially Supports	The site includes a quick YouTube video overview and a 10-minute YouTube training video.
<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) 	Not Applicable	The site does not contain prerecorded synchronized media.
<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) 	Partially Supports	The site includes a quick YouTube video overview and a 10-minute YouTube training video.
<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) 602.3 (Support Docs) 	Partially Supports	Visual structure and relationship information is provided through object information or is available in text.

Criteria	Conformance Level	Remarks and Explanations
1.3.2 Meaningful Sequence (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	The site content is presented in a meaningful sequence.
1.3.3 Sensory Characteristics (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 solely on sensory characteristics
1.4.1 Use of Color (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	Site content and functionality does not convey information through color alone.
1.4.2 Audio Control (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	The site does not contain audio that plays automatically
2.1.1 Keyboard (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	All site functionality can be accessed and operated using a keyboard. The site does not provide character key shortcuts.
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) 	Supports	The site does not include keyboard traps.

Criteria	Conformance Level	Remarks and Explanations
<u>2.2.1 Timing Adjustable</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	The site does not include time limits.
<u>2.2.2 Pause, Stop, Hide</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	Users can scroll, move, minimize, and hide the e-Comments menu.
<u>2.3.1 Three Flashes or Below Threshold</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	The site does not contain flashing content.
<u>2.4.1 Bypass Blocks</u> (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 	Not Applicable	The site does not contain bypass blocks.
<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) 	Does Not Support	The site's webpage does not have a title. The app is titled "e-Comments Chrome Extension" on the Chrome Web Store.
<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) 	Supports	The site's components receive focus in a meaningful order. Authoring Tool:

Criteria	Conformance Level	Remarks and Explanations
<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) 	Supports	The purpose of each link in the site can be determined from the link text alone or from the programmatic context of the link.
<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	The default language of the site's webpage is identified using the lang attribute in the html element.
<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	The site's components do not initiate a change of context when focused.
<u>3.2.2 On Input</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	Changes of context do not occur automatically on user input.
<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) 	Supports	Where errors are automatically detected, the error is identified, and an error message is provided as text.
<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	A label is provided for each of the site's input fields.

Criteria	Conformance Level	Remarks and Explanations
<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) 	Partially Supports	The site's webpage uses semantically correct markup for all interface elements; has complete start and end tags; and has tags with unique ID values. However, several HTML tags are not properly nested.
<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) 	Partially Supports	Most user interface components in the site provide programmatic name, role, and/or state information. However, the elements containing the "Edit" button (pencil icon) for each recipe do not have a role attribute.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.4 Captions (Live)</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	The site does not contain live synchronized media.
<p><u>1.2.5 Audio Description (Prerecorded)</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	The site does not contain prerecorded video content that would require audio description.
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	The text in the site meets minimum contrast requirements.
<p><u>1.4.4 Resize text</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	The site content and user interfaces support standard zoom capabilities built into modern web browsers and operating systems.
<p><u>1.4.5 Images of Text</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) • 	Supports	The site uses text instead of images of text.

Criteria	Conformance Level	Remarks and Explanations
<u>2.4.5 Multiple Ways</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 	Not Applicable	The site has one page.
<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) 	Supports	The headings and labels in the site are descriptive.
<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) 	Supports	All focusable elements in site have a visible keyboard focus indicator.
<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	Within the site's webpage, the language of each portion of the page is programmatically determinable.
<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	Components that have the same functionality within the site are identified consistently.
<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) 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Components that have the same functionality within the site are identified consistently.

Criteria	Conformance Level	Remarks and Explanations
<u>3.3.3 Error Suggestion</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	When an error is automatically detected within a data entry form in the site, the resulting error message provides suggestions for correction.
<u>3.3.4 Error Prevention (Legal, Financial, Data)</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	No forms within the site submit actions that cause legal commitments or financial transactions to occur, nor do any forms submit actions that modify or delete user-controllable data in data storage systems.

Table 3: Success Criteria, Level AAA

Notes: Not applicable. The e-Comments Chrome Extension site was not evaluated for WCAG 2.1 Level AAA conformance.

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Does not apply	No prerecorded audio.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Does not apply	No prerecorded audio.
1.2.8 Media Alternative (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Does not apply	No prerecorded media.
1.2.9 Audio-only (Live) (Level AAA) Revised Section 508 – Does not apply	Does not apply	No audio only content.
1.4.6 Contrast (Enhanced) (Level AAA) Revised Section 508 – Does not apply	Supports	Text is all high contrast.
1.4.7 Low or No Background Audio (Level AAA) Revised Section 508 – Does not apply	Does not apply	Program can be used without audio.
1.4.8 Visual Presentation (Level AAA) Revised Section 508 – Does not apply	Partially supports	Width is no more than 80 characters or glyphs (40 if CJK). Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window.
1.4.9 Images of Text (No Exception) (Level AAA) Revised Section 508 – Does not apply	Does not apply	There are no images of text other than the logo.
2.1.3 Keyboard (No Exception) (Level AAA) Revised Section 508 – Does not apply	Partially supports	Buttons, inputs, etc. can be used via keyboard. Right clicking on a button is required to open certain menus.
2.2.3 No Timing (Level AAA) Revised Section 508 – Does not apply	Does not apply	There is no functionality which has a time limit.
2.2.4 Interruptions (Level AAA) Revised Section 508 – Does not apply	Does not apply	No interruptions.

Criteria	Conformance Level	Remarks and Explanations
2.2.5 Re-authenticating (Level AAA) Revised Section 508 – Does not apply	Uses Google Chrome Sync for authentication. If a user is logged out, they will be immediately prompted to log in again.	Uses Google Chrome Sync for authentication. If a user is logged out, they will be immediately prompted to log in again.
2.3.2 Three Flashes (Level AAA) Revised Section 508 – Does not apply	There are no flashing lights in the program.	There are no flashing lights in the program.
2.4.8 Location (Level AAA) Revised Section 508 – Does not apply	There is only a single page.	There is only a single page.
2.4.9 Link Purpose (Link Only) (Level AAA) Revised Section 508 – Does not apply	Links all have titles or explanatory text.	Links all have titles or explanatory text.
2.4.10 Section Headings (Level AAA) Revised Section 508 – Does not apply	Sections of text in comments as well as the instructions and troubleshooting contain clear headings.	Sections of text in the comments as well as the instructions and troubleshooting contain clear headings.
3.1.3 Unusual Words (Level AAA) Revised Section 508 – Does not apply	The program uses only standard English words with standard usage.	The program uses only standard English words with standard usage.
3.1.4 Abbreviations (Level AAA) Revised Section 508 – Does not apply	Hovering over comment abbreviations displays the full comment in a tooltip.	Hovering over comment abbreviations displays the full comment in a tooltip.
3.1.5 Reading Level (Level AAA) Revised Section 508 – Does not apply	Does not apply	The program is specifically for English teachers.
3.1.6 Pronunciation (Level AAA) Revised Section 508 – Does not apply	Doesn't apply/ Doesn't support	Possibly not applicable because the program is for teachers that should already know the pronunciation of the words they are teaching.
3.2.5 Change on Request (Level AAA) Revised Section 508 – Does not apply	Supports	There are no changes of context without user input.
3.3.5 Help (Level AAA) Revised Section 508 – Does not apply	Supports	There are clear labels for all functionality.
3.3.6 Error Prevention (All) (Level AAA) Revised Section 508 – Does not apply	Not applicable	Users do not need to submit forms to use the app.

Revised Section 508 Report

Notes: Not applicable. The e-Comments Chrome Extension was not evaluated for WCAG 2.1 Level AAA Chapter 3 conformance.

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

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	AA	Most features work with the use of a screen narrator.
302.2 With Limited Vision	AAA	All text is large and high contrast enough to be seen clearly by users with limited vision.
302.3 Without Perception of Color	AAA	All features can be used without color perception.
302.4 Without Hearing	AAA	All features with the exception of audio only comments do not require hearing.
302.5 With Limited Hearing	AAA	All features with the exception of audio only comments do not require hearing.
302.6 Without Speech	AAA	All features with the exception of recording audio only comments do not require speaking.
302.7 With Limited Manipulation	AAA	Does not require manipulation of objects.
302.8 With Limited Reach and Strength	AAA	Does not require reach or strength.
302.9 With Limited Language, Cognitive, and Learning Abilities	A	Requires a proficiency in English, but no obscure or non-standard English is used.

Chapter 4: [Hardware](#)

Notes: Not applicable. The e-Comments Chrome Extension was not evaluated for WCAG 2.1 Level AAA Chapter 4 conformance.

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		
402.2.2 Transactional Outputs		
402.2.3 Speech Delivery Type and Coordination		
402.2.4 User Control		
402.2.5 Braille Instructions		
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening		
402.3.2 Non-private Listening		
402.4 Characters on Display Screens		
402.5 Characters on Variable Message Signs		
403 Biometrics	Heading cell – no response required	Heading cell – no response required
403.1 General		
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required
404.1 General		
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General		
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General		
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast		
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible		

Criteria	Conformance Level	Remarks and Explanations
407.3.2 Alphabetic Keys		
407.3.3 Numeric Keys		
407.4 Key Repeat		
407.5 Timed Response		
407.6 Operation		
407.7 Tickets, Fare Cards, and Keycards		
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane		
407.8.1.1 Vertical Plane for Side Reach		
407.8.1.2 Vertical Plane for Forward Reach		
407.8.2 Side Reach		
407.8.2.1 Unobstructed Side Reach		
407.8.2.2 Obstructed Side Reach		
407.8.3 Forward Reach		
407.8.3.1 Unobstructed Forward Reach		
407.8.3.2 Obstructed Forward Reach		
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach		
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach		
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility		
408.3 Flashing		
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General		
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General		
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General		
412 ICT with Two-Way Voice Communication	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
412.2.1 Volume Gain for Wireline Telephones		
412.2.2 Volume Gain for Non-Wireline ICT		
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets		
412.3.2 Wireline Handsets		
412.4 Digital Encoding of Speech		
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID		
412.7 Video Communication		
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability		
412.8.2 Voice and Hearing Carry Over		
412.8.3 Signal Compatibility		
412.8.4 Voice Mail and Other Messaging Systems		
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions		
413.1.2 Pass-Through of Closed Caption Data		
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners		
414.1.2 Other ICT		
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls		
415.1.2 Audio Description Controls		

Chapter 5: [Software](#)

Notes: Not applicable. The e-Comments Chrome Extension was not evaluated for WCAG 2.1 Level AAA Chapter 5 conformance.

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	Not Applicable	It's not platform software - it's an extension that runs in the Chrome browser, and the browser handles interoperation with assistive technology.
502.2.2 No Disruption of Accessibility Features	AAA	It doesn't interfere with browser accessibility features
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Not Applicable	It's not platform software.
502.3.2 Modification of Object Information	Not Applicable	It's not platform software.
502.3.3 Row, Column, and Headers	Not Applicable	It's not platform software.
502.3.4 Values	Not Applicable	It's not platform software.
502.3.5 Modification of Values	Not Applicable	It's not platform software.
502.3.6 Label Relationships	Not Applicable	It's not platform software.
502.3.7 Hierarchical Relationships	Not Applicable	It's not platform software.
502.3.8 Text	Not Applicable	It's not platform software.
502.3.9 Modification of Text	Not Applicable	It's not platform software.
502.3.10 List of Actions	Not Applicable	It's not platform software.
502.3.11 Actions on Objects	Not Applicable	It's not platform software.
502.3.12 Focus Cursor	Not Applicable	It's not platform software.
502.3.13 Modification of Focus Cursor	Not Applicable	It's not platform software.
502.3.14 Event Notification	Not Applicable	It's not platform software.
502.4 Platform Accessibility Features	Not Applicable	It's not platform software.
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	AA	User can adjust text size and contrast using browser settings.
503.3 Alternative User Interfaces	Not Applicable	No Alternative User Interfaces

Criteria	Conformance Level	Remarks and Explanations
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	No audio is required to use the extension.
503.4.2 Audio Description Controls	Not Applicable	No audio is required to use the extension.
<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	AAA	Converts text to Google Docs Comments, which can be read with assistive technology.
504.2.2 PDF Export	Not Applicable	Does not provide pdf export.
504.3 Prompts	Not Applicable	Data format uses plain text.
504.4 Templates	Not Applicable	No templates provided.

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

Notes: Not applicable. The e-Comments Chrome Extension was not evaluated for WCAG 2.1 Level AAA Chapter 6 conformance.

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
602.2 Accessibility and Compatibility Features	A	Program can be used with standard assistive technologies, but there is no specific documentation included.
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	All documentation is electronic.
<u>603 Support Services</u>	Heading cell – no response required	Heading cell – no response required.
603.2 Information on Accessibility and Compatibility Features	A	Support email is provided.
603.3 Accommodation of Communication Needs	A	Support email is provided.

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