



# CBORD®'s Response to Voluntary Product Evaluation Template for NetNutrition®

September 2016

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# Voluntary Product Evaluation Template

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

## 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 web-based checklist that allows Vendors to document how their product *did* or *did not* meet the various Section 508 Requirements.

## How the VPAT is Organized

The VPAT consists of a long series of tables. 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

The use of the three columns in the tables is explained below:

### Summary Table

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

### Section 1194.xx Table

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

Information 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:

<b>Supporting Features (Second Column on 508 Evaluation Template)</b>	
<b>Language</b>	<b>Description</b>
Supports	Product <i>FULLY</i> meets the letter and intent of the criteria.
Supports with Exceptions	Product <i>does not ENTIRELY</i> meet the letter and intent of the criteria, but does provides some level of access.
Supports through Equivalent Facilitation	Product provides <i>alternative</i> methods to <i>meet</i> the intent of the criteria.
Does not Support	Product <i>does not</i> meet the letter or intent of the criteria.
Not Applicable	The Criteria <i>does not</i> apply to the product.

<b>Remarks &amp; Explanations (Third Column on 508 Evaluation Template)</b>	
<b>If 2<sup>nd</sup> Column states...</b>	<b>Then...</b>
Supports	List exactly <i>what</i> features of the product <i>do</i> meet and describe <i>how</i> they are used to support the criteria.
Supports with Exceptions	List exactly <i>what</i> features of the product <i>do</i> meet and describe <i>how</i> they are used to support the criteria. List exactly <i>what</i> parts of the product <i>do not</i> meet and describe <i>how</i> they fail to support the criteria.
Supports through Equivalent Facilitation	List exactly <i>what other</i> methods exist in the product and describe <i>how</i> they are used to support the criteria.
Supports when combined with Compatible Assistive Technology	Use this language when you determine the product <i>fully meets</i> 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 <i>how</i> the product <i>does not</i> support the criteria.
Not Applicable	Describe exactly <i>why</i> the criteria are 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”).

**Date:** 8/25/2016

**Name of Product:** NetNutrition®

**Contact for more Information:** Christine Curkendall-Carter

**Description:** NetNutrition is an online solution putting nutritional information at diners' fingertips, allowing them to view menu offerings and allergen information.

## Summary Table

Criteria	Supporting Features	Remarks and Explanations
Section 1194.21: <a href="#">Software Applications and Operating Systems</a>	Supports	CBORD's NetNutrition software meets or exceeds all requirements of Section 1194.21.
Section 1194.22: <a href="#">Web-Based Internet Information and Applications</a>	Supports	CBORD's NetNutrition web application meets or exceeds all requirements of Section 1194.22.
Section 1194.23: Telecommunications Products	Not Applicable	NetNutrition is a software program that does not utilize TTY functionality.
Section 1194.24: Video and Multi-Media Products	Not Applicable	NetNutrition does not provide multimedia elements or presentations.
Section 1194.25: Self-Contained, Closed Products	Not Applicable	NetNutrition is a software program, not a self-contained, closed product.
Section 1194.26: Desktop and Portable Computers	Not Applicable	NetNutrition is a software program, not a desktop or portable computer.
Section 1194.31: <a href="#">Functional Performance Criteria</a>	Supports when combined with Compatible Assistive Technology	The NetNutrition website can work with screen readers.
Section 1194.41: <a href="#">Information, Documentation, and Support</a>	Supports with Exceptions	See section for detailed response on support offerings.

## 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.

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	Keyboard support is compliant.
(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	NetNutrition does not interfere with any accessibility features of operating systems or browsers.
(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	Both NetNutrition Administration and the NetNutrition Web application use default browser focus styles or enhanced styles which are compatible with the browser's focus functions and Assistive Technology.
(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	NetNutrition Web application is compliant with label attributes and compliant with labeling.
(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	The use of icons to depict interface elements is consistent throughout NetNutrition Administration. If the icon does not also provide a text description alongside it, an appropriate HTML attribute is used.
(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	All textual information is provided through the Web browser, and is independent of operating system.

Criteria	Supporting Features	Remarks and Explanations
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	NetNutrition does not override user settings or 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.	Not Applicable	NetNutrition does not use animation unless animations are embedded into the website design by an administrator. CBORD relies on the client to comply with accessibility rules in these cases.
(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	NetNutrition does not use color alone to convey information. Other context is always available.
(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.	Supports	The NetNutrition website display permits an administrator to design the website and adjust color and contrast. NetNutrition Administration interface does not allow color or contrast setting adjustment.
(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.	Supports	NetNutrition does not use flashing or blinking text, objects, or other elements unless they are embedded into the website design by an administrator. CBORD relies on the client to comply with accessibility rules in these cases.
(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	The NetNutrition website is read-only and does not require completion or submission of forms. The forms in NetNutrition Administration interface work with screen readers and keyboard controls.

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.

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	The NetNutrition website supports a text equivalent for non-text elements. Standard icons that ship with the application have alt-text descriptions. If administrators add their own icons, they are also responsible for adding text descriptions. All images in the NetNutrition Administration user interface have alt-text descriptions.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	NetNutrition default layouts do not include multimedia presentations.
(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	NetNutrition does not use color alone to convey information. NetNutrition Administration allows incomplete values to be displayed in either color or italics. Alt-text for the color display is not supported.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	NetNutrition style sheets for HTML documents are compliant with accessibility standards.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	NetNutrition does not use server-side image maps.
(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	NetNutrition does not use client-side image maps.
(g) Row and column headers shall be identified for data tables.	Supports	NetNutrition website data tables contain descriptive row and column headers.
(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	NetNutrition uses data cells and header cells.
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Not Applicable	NetNutrition does not use frames unless they are embedded into the website design by an administrator. CBORD relies on the client to comply with accessibility rules in these cases.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports	NetNutrition administration and the default NetNutrition website layouts do not cause the screen to flicker outside the recommended range.

Criteria	Supporting Features	Remarks and Explanations
(k) A text-only page, with equivalent information or functionality, shall be provided to make a website 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.	Supports	NetNutrition is compliant with the provision of this part, so a text-only version is not needed.
(l) When pages use 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	NetNutrition uses techniques that are supported 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).	Supports	NetNutrition does not use plug-ins or applets.
(n) When electronic forms are designed to be completed online, 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	The NetNutrition website is read-only and does not require completion of forms. The forms in NetNutrition Administration interface support screen readers and keyboard controls.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	By default, NetNutrition does not contain 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.	Supports	NetNutrition does not require timed responses.

**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 1194.31: Functional Performance Criteria

Criteria	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.	Supports when combined with Compatible Assistive Technology	The NetNutrition website can work with screen readers.
(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	NetNutrition does not override any built-in screen magnification or zoom functionality provided by the browser or assistive device.
(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	NetNutrition does not require hearing for any core functionality.
(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.	Supports	While NetNutrition does not require hearing for any functionality, users have the ability to embed their own multimedia presentations, which may require hearing, into the NetNutrition website.
(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.	Supports	NetNutrition does not require speech for any functionality.
(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	NetNutrition does not require fine motor control or simultaneous action for any functionality. A mouse, track ball, touchscreen, or other input device is required to select and navigate.

## 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	Support documentation is available within the application and can be printed. NetNutrition Administrators can add their own support documentation to the NetNutrition website in various formats.
(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.	Supports when combined with Compatible Assistive Technology	Internet browsers support Assistive Technologies to provide this support. Product features are all accessible by screen readers through browser support for the websites.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support services include in person, telephone, email, and Web portal. Special requests and arrangements can be made for other methods necessary upon request.