

VPAT™

Voluntary Product Accessibility Template®

Version 1.4

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date: June 15, 2017

Name of Product: Cerego

Contact for more Information (name/phone/email): Jon-David Hague, 415-509-9075, jdhague@cerego.com

Summary Table

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Section 1194.22 <u>Web-based Internet Information and Applications</u>	Supports with exceptions	Please see details in this section below
Section 1194.23 <u>Telecommunications Products</u>	Not applicable	Cerego is not a telecommunications product
Section 1194.24 <u>Video and Multi-media Products</u>	Not applicable	Cerego is not video product nor a product that creates video or multi-media
Section 1194.25 <u>Self-Contained, Closed Products</u>	Not applicable	Cerego is not a self-contained product
Section 1194.26 <u>Desktop and Portable Computers</u>	Not applicable	Cerego is not a computer

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Section 1194.21 Software Applications and Operating Systems – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
<p>(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.</p>	<p>a) Supports with exception</p> <p>b) Does not support</p>	<p>a) All features of Cerego’s core study and quiz experience are keyboard accessible.</p> <p>The exception to this is a single “Regions” quiz type which requires the user to indicate a location on an image map using a mouse click or finger tap (on mobile touchscreen).</p> <p>b) Cerego’s settings, help, and content flagging buttons are currently not keyboard accessible. This is scheduled to be corrected.</p>
<p>(b) Applications shall not disrupt or disable activated features of</p>	<p>Supports</p>	<p>Cerego does not disrupt or disable any activated features of other</p>

<p>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.</p>		<p>products including the operating system</p>
<p>(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.</p>	<p>Supports with exceptions</p>	<p>Cerego's learn app provides indication of the current selection focus in it's buttons and multiple choice quiz options through screen highlighting and/or visible borders.</p> <p>Exceptions to the above are the non-core (non learning) elements of the app are the settings, help, and content flagging buttons in the learn app, or elements of the memory bank. Focus cannot be exposed programmatically at this time.</p>

<p>(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.</p>	<p>Supports with exceptions</p>	<p>All icons in the Cerego learn app have supporting text.</p>
<p>(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.</p>	<p>Supports</p>	<p>All icons used to identify programmatic elements are consistent throughout the Cerego learn app.</p>
<p>(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.</p>	<p>Supports</p>	<p>All information is provided through text in the web-browser and is not dependent upon the operating system.</p>
<p>(g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>	<p>Supports</p>	<p>Cerego does not override user settings.</p>
<p>(h) When animation is displayed, the information shall be displayable in at least one</p>	<p>Supports</p>	<p>Cerego's Memory Bank Animates as a part of the loading of the page. For a non-animated experience of the information, the</p>

<p>non-animated presentation mode at the option of the user.</p>		<p>“Dashboard” tab of the Memory Bank is available to users.</p>
<p>(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.</p>	<p>a) Supports b) Supports through equivalent facilitation</p>	<p>a) Cerego does not use color coding as the sole method to convey information, indicate an action, or prompt a response. Color coding during quiz screen presentations (showing correct/incorrect) is in addition to other indicators of user performance.</p> <p>b) Cerego’s Memory Bank uses color coding to indicated level achievement for any given piece of content studied by a user, however this information is also available in text through the dashboard view of the Memory Bank.</p>
<p>(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.</p>	<p>Not applicable</p>	<p>Cerego does not allow users to adjust color from within the learn app</p>
<p>(k) Software shall not use flashing or blinking text, objects, or other elements having a flash</p>	<p>Not Applicable</p>	<p>Cerego does not utilize flashing or blinking text, objects, or other elements.</p>

<p>or blink frequency greater than 2 Hz and lower than 55 Hz.</p>		
<p>(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.</p>	<p>a) Non applicable</p> <p>b) Supports</p> <p>c) Not Supported</p>	<p>a) Cerego does not require form submission when integrated as a component of other learning products via LTI.</p> <p>b) Cerego’s “Sign in” form is fully accessible using assistive technology, including screen readers.</p> <p>c) Cerego’s “Sign up” form is not yet fully accessible using assistive technology, including screen readers.</p> <p>This is scheduled for correction.</p>

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Section 1194.22 Web-based Internet information and applications – Detail

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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).	<ul style="list-style-type: none"> a) Supports b) Supports with exception 	<ul style="list-style-type: none"> a) Cerego supports the option to add alternative text to images added as a part of study content. b) Actionable information included memory bank data visualization is addressed through other progress statistics such as “[#] concepts need review”
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports	Cerego does not provide any multimedia presentations. If a user provides multimedia presentations as content in the product, they are

		provided with a means to provide equivalent alternatives.
(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	Color is not used as the only method for conveying information in any occurrence. Text or alternative text is available for the user.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Not applicable	Cerego does not include any documents or files.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Server-side image maps are not utilized in the product
(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	Client-side image maps are not utilized in the product
(g) Row and column headers shall be identified for data tables.	Supports	Cerego's learn app does not include data tables. Cerego's analytics and reports label headers of rows and columns
(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.	Not Applicable	No tables with two or more logical levels.

<p>(i) Frames shall be titled with text that facilitates frame identification and navigation</p>	<p>Supports</p>	<p>Cerego allows content authors to add embeddable iframes with captions into the supplemental “notes” area of each study item.</p>
<p>(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<p>Not Applicable</p>	
<p>(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.</p>	<p>a) Supports</p> <p>b) Supports with equivalent facilitation</p>	<p>a) Cerego is compliant with the text alternative provisions of this section, so a text-only version is unnecessary.</p> <p>b) Actionable information included memory bank data visualization is addressed through other progress statistics such as “[#] concepts need review”</p>
<p>(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.</p>	<p>Supports with exception</p>	<p>Scripting language is used to display and hide interface elements. However, the content of the interface elements are a part of the body of the HTML and are therefore understood by screen readers.</p> <p>The exception is the memory bank, which is a dynamic graphical</p>

		data visualization created with SVG, and functional text is not provided.
(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).	Not Applicable	Cerego's learn app does not require any other application or plug in on the client system.
(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.	<ul style="list-style-type: none"> a) Non applicable b) Supports c) Not supported 	<ul style="list-style-type: none"> a) Cerego does not require form submission when integrated as a component of other learning products via LTI. b) Cerego's "Sign in" form is fully accessible using assistive technology, including screen readers. c) Cerego's "Sign up" form is not yet fully accessible using assistive technology, including screen readers. <p>This is scheduled for correction.</p>

(o) A method shall be provided that permits users to skip repetitive navigation links.	Not Supported	The Cerego learn app does not allow full keyboard and screen reader accessibility of header elements and navigation links, and therefore skips into the body content. This is scheduled for redesign.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	There are no timed quizzes in Cerego.

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.

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Section 1194.23 Telecommunications Products – Detail VPAT™ Voluntary Product Accessibility Template®

<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being	Not applicable	Cerego is not a telecommunications product

turned on and off to allow the user to intermix speech with TTY use.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Not applicable	Cerego is not a telecommunications product
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not applicable	Cerego is not a telecommunications product
(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	Cerego is not a telecommunications product
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Not applicable	Cerego is not a telecommunications product
(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	Cerego is not a telecommunications product
(g) If the telecommunications product allows a user to adjust the receive volume, a function	Not applicable	Cerego is not a telecommunications product

shall be provided to automatically reset the volume to the default level after every use.		
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.	Not applicable	Cerego is not a telecommunications product
(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	Cerego is not a telecommunications product
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.	Not applicable	Cerego is not a telecommunications product
(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	Cerego is not a telecommunications product

<p>(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.</p>	<p>Not applicable</p>	<p>Cerego is not a telecommunications product</p>
<p>(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.</p>	<p>Not applicable</p>	<p>Cerego is not a telecommunications product</p>
<p>(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.</p>	<p>Not applicable</p>	<p>Cerego is not a telecommunications product</p>

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**Section 1194.24 Video and Multi-media Products –
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Criteria	Supporting Features	Remarks and explanations
<p>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.</p>	<p>Not applicable</p>	<p>Cerego is not a multimedia product</p>

(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not applicable	Cerego is not a multimedia product
(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	Cerego is not a multimedia product
(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	Cerego is not a multimedia product
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Not applicable	Cerego is not a multimedia product

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**Section 1194.25 Self-Contained, Closed Products –
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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	Cerego is not a self-contained, closed product
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not applicable	Cerego is not a self-contained, closed product
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not applicable	Cerego is not a self-contained, closed product
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the	Not applicable	Cerego is not a self-contained, closed product

user to possess particular biological characteristics, shall also be provided.		
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	Not applicable	Cerego is not a self-contained, closed product
(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	Cerego is not a self-contained, closed product
(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	Cerego is not a self-contained, closed product
(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	Cerego is not a self-contained, closed product

<p>(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<p>Not applicable</p>	<p>Cerego is not a self-contained, closed product</p>
<p>(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 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.</p>	<p>Not applicable</p>	<p>Cerego is not a self-contained, closed product</p>
<p>(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.</p>	<p>Not applicable</p>	<p>Cerego is not a self-contained, closed product</p>
<p>(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</p>	<p>Not applicable</p>	<p>Cerego is not a self-contained, closed product</p>

<p>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.</p>		
<p>(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.</p>	<p>Not applicable</p>	<p>Cerego is not a self-contained, closed product</p>

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**Section 1194.26 Desktop and Portable Computers –
Detail**

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Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Not applicable	Cerego is not a desktop or portable computer
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not applicable	Cerego is not a desktop or portable computer
(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	Cerego is not a desktop or portable computer
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with	Not applicable	Cerego is not a desktop or portable computer

publicly available industry standards		
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**Section 1194.31 Functional Performance Criteria –
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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.	Supported with exception when combined with Compatible Assistive Technology	Cerego’s learn app is partially accessible accessible using a screen reader, and is currently being used by Visually Impaired Students. Exceptions include: image content is currently not accessible to screen readers. Furthermore the Memory Bank, which is rendered in SVG, is presently not accessible.
(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	Supported with exception when combined with Compatible Assistive Technology	Cerego’s learn app is partially accessible accessible using a screen reader, and is currently being used by Visually Impaired Students. Exceptions are that image content is currently not accessible to screen readers. Furthermore the Memory Bank,

used by people who are visually impaired shall be provided.		which is rendered in SVG, is presently not accessible.
(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	The default mode of Cerego does not require the user to have hearing. Content creators may choose to create an item that requires listening. Users can disable items requiring audio during the learn experience.
(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 important for the use of Cerego.
(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	Cerego does not require speech.

<p>(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.</p>	<p>Supports with exception</p>	<p>The core experience of the Cerego learn app does not require fine motor skills. The user can use a keyboard and/or mouse of their choosing to navigate.</p> <p>On occasion, a content creator may elect to build a region item with a small clickable target area, which for one quiz type would require fine motor control of that quiz type.</p>
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**Section 1194.41 Information, Documentation and
Support – Detail**

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	Cerego provides resources in text and image form online by default; additional support material will be provided as requested.
(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	Cerego provides information describing accessibility and compatability upon request.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	The Cerego team handles special support requests on an ad hoc basis.

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