

Voluntary Product Accessibility Template (VPAT) for FDMS.gov

Date: 08-20-2014

Name of Product: FDMS.gov

Voluntary Product Accessibility Template Summary Table

Criteria	Supporting Features	Remarks and Explanations
Section 1194.21 Software Applications and Operating Systems	Supported	See Table 1 below for more information.
Section 1194.22 Web-Based Internet Information and Applications	Supported	See Table 2 below for more information.
Section 1194.23 Telecommunications Products	Not applicable	The FDMS.gov user interface contains no phone-based elements.
Section 1194.24 Video and Multimedia Products	Supported	See Table 3 below for more information.
Section 1194.25 Self-Contained, Closed Products	Not applicable	FDMS.gov does not make use of kiosks or other self-contained, closed products.
Section 1194.26 Desktop and Portable Computers	Not applicable	Contract requirements for the eRulemaking Program do not include desktop and portable computers, so these criteria are not applicable.
Section 1194.31 Functional Performance Criteria	Supported (with minor exceptions)	See Table 4 below for more information.
Section 1194.41 Documentation and Support	Supported (with minor exceptions)	See Table 5 below for more information.

Table 1. Section 1194.21 Software Applications and Operating Systems

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.	Not Applicable	FDMS.gov is a web-based application that is subject to the web-browser's built-in functions.
(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.	Supported	FDMS.gov is a web-based application that does not disrupt other applications and/or operating systems on a machine.
(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.	Supported	FDMS is designed using Adobe Flex user interface components which allows assistive technology to easily track application focus
(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,	Supported	FDMS is designed using Adobe Flex user interface components which includes robust support for assistive technologies

Criteria	Supporting Features	Remarks and Explanations
the information conveyed by the image must also be available in text.		
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supported	All images used to identify controls, status indicators, or other programmatic elements have consistent labels and meanings throughout the Regulations.gov application.
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Not Applicable	FDMS.gov is a web-based application that is subject to the web-browser's built-in functions.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supported	In FDMS only the login/logout pages are designed using traditional HTML. These pages have custom styles that can be overridden by browser settings. The remaining portions of the application are rendered using the Adobe Flash Runtime
(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	FDMS.gov does not use animation.
(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.	Supported	FDMS.gov does not use color coding as the only means to convey information.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Not Applicable	FDMS.gov is a web-based application; color and contrast settings are as provided by the user's web browser.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Not Applicable	FDMS.gov does not use flashing or blinking text.
(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.	Supported	FDMS is designed using Adobe Flex user interface components which includes robust support for assistive technologies

Table 2. Section 1194.22 Web-based Internet Information and Applications

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).	Supported	FDMS is designed using Adobe Flex user interface components which includes robust support for assistive technologies including the ability to expose additional or helpful information to assistive technologies through the use of the 'accessibilityDescription' attribute of various UI components
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supported	For each video presentation in FDMS.gov, there is a word document equivalent containing contains the same content.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supported	Throughout the application, menu/item selections are indicated by highlight color but that information is also exposed to assistive technologies Required fields are indicated by a red star, but the star itself is sufficient to identify the required fields.
(d) Documents shall be organized so they are	Supported	In FDMS only the login/logout pages are designed using

Criteria	Supporting Features	Remarks and Explanations
readable without requiring an associated style sheet.		traditional HTML. These pages have custom styles that can be overridden by browser settings. These pages are still readable when overriding associated styles. The remaining portions of the application are rendered using the Adobe Flash Runtime
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not applicable	The website 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.	Supported	FDMS does not use image maps however there are various image links in the application. These image links convey appropriate information to assistive technologies
(g) Row and column headers shall be identified for data tables.	Supported	FDMS is designed using Adobe Flex user interface components which includes robust support for assistive technologies including the ability to expose additional or helpful information to assistive technologies through the use of the 'accessibilityDescription' attribute of various UI components
(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	FDMS does not display data in tables/data grids using more than one logically level of row/column headers
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Not applicable	The website does not use frames.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not applicable	The website does not contain flashing or flickering text or images.
(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.	Not applicable	The website does not offer a text-only page and strives to make all aspects accessible by default.
(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.	Supported	When scripting is used to create interface elements an alternative method to convey the content is also 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).	Supported	When a plug-in is required, a link to the free download site for that plug-in is provided.
(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.	Supported	All form information displayed on screen is also conveyed to assistive technologies by the use of Adobe Flex user interface components
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supported	Each screen that has an array of navigation links or menu bars at the top has a link to skip-to-content at the top of the screen that is exposed to accessibility software.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supported	The website does not contain any elements for which timed responses are required.

Table 3. Section 1194.24 Video and Multimedia Products

Criteria	Supporting Features	Remarks and Explanations
(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.	Not applicable	FDMS.gov is a web application and is not subject to this criteria.
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not applicable	FDMS.gov is a web application and is not subject to this criteria.
(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.	Supported	Videos presented on FDMS.gov are captioned via YouTube.
(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.	Supported	Videos presented on FDMS.gov are audio described.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Supported	Users can select to turn on captioning when viewing videos via YouTube

Table 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.	Supported (with minor exceptions)	FDMS.gov is a web-based application and modern COTS Assistive Technology can be used by the user to meet this requirement. FDMS.gov supports modern COTS assistive technology products. Older versions of browsers and COTS assistive technology products may not be supported.
(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.	Supported	FDMS.gov does not limit a web-browser from increasing font size and supports modern COTS screen reader products.
(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	Not Applicable	Hearing is not required to use this application.

Criteria	Supporting Features	Remarks and Explanations
provided		
(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	This application does not make use of audio information.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Not Applicable	Speech is not required to use this application.
(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.	Supported (with minor exceptions)	FDMS.gov is a web-based application and modern COTS Assistive Technology can be used by the user to meet this requirement. FDMS.gov supports modern COTS assistive technology products. Older versions of browsers and COTS assistive technology products may not be supported.

Table 5. 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	Supported (with minor exceptions)	Documentation can be provided in alternate formats upon request.
(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.	Supported (with minor exceptions)	Description of the accessibility and compatibility features of products can be provided in alternate formats upon request.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supported	Support is provided via telephone and email.