Health and Human Services (HHS)

Exhibit U

Voluntary Product Accessibility Template (VPAT)
WCAG Edition
Version 2.5Rev

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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 WCAG edition of the VPAT. It includes the following standards/guidelines:

- Web Content Accessibility Guidelines 2.0
- Web Content Accessibility Guidelines 2.1
- Web Content Accessibility Guidelines 2.2

If you need to report on a different combination of standards/guidelines, use the appropriate alternate edition of the VPAT found on 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 an 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 product 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®").
2. Users of the VPAT agree not to deviate from the Essential Requirements for Authors.
3. 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.
4. 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 available

- **Report Date** – Date of report publication. At a minimum, provide the month and year of the report publication. For example, “May 2025”. If a date is included, ensure it is clear “4 May 2025” or “May 4, 2025”.
- **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 WCAG versions used to evaluate the product.
    - The applicable WCAG versions that are included in this edition of the VPAT template are:
        - Web Content Accessibility Guidelines 2.0 or WCAG 2.0 (ISO/IEC 40500)
        - Web Content Accessibility Guidelines 2.1 or WCAG 2.1
        - Web Content Accessibility Guidelines 2.2 or WCAG 2.2
    - 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 WCAG versions 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 guideline. To indicate what the report covers, leave the appropriate yes or no on each guideline.
    - If multiple WCAG tables are included, each table must identify the 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:
    - **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 Level AAA criteria.

- **Tables for Each Standard or Guideline** – Tables showing the responses to the criteria.

5. 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:
     - The selected levels of WCAG 2.x Guidelines.
   - When only reporting on WCAG 2.0 criteria, it is acceptable to remove the WCAG 2.1 and 2.2-specific criteria from the table. These are marked ‘2.1 and 2.2’ or ‘2.2 only’ within the row. Likewise, if only reporting on WCAG 2.1, it is acceptable to remove the rows with criteria marked ‘2.2 only’ from the table.
6. 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.

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 –** Describe the testing performed. Information to enter may include details on some combination of the following:
    - Indicate whether testing is performed by testers with knowledge of general product functionality. (Instructional note: This would mean the tester knows how to use the common uses and flows of the product in addition to accessibility.)
    - If the product is similar to another evaluated product, (provide a link to the report of the other product that contains the description of the evaluation methods used.
    - Describe testing conducted with assistive technologies. (Optional: Include the assistive technologies that were used in testing.)
    - Describe testing conducted with manual and automated testing tools. (Optional: Provide a list of the tools used for testing the product.)
    - If a published test method was used, provide name, publisher, and URL link to the test method.
    - If a vendor proprietary test method was used, provide the vendor's name and any non-proprietary details of the testing performed.
    - If another test method was used, provide a description of the 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 the following situations:
    - When only reporting on WCAG 2.0 criteria, it is acceptable to remove the WCAG 2.1 and WCAG 2.2-specific criteria from the tables. These are marked '2.1 and 2.2' or '2.2 only' within the row. Likewise, if only reporting on WCAG 2.1, it is acceptable to remove the rows with criteria marked '2.2 only' from the table.
    - 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.x Tables:** The WCAG 2.x 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 for the particular version of WCAG that the report includes.
- **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 guideline tables appear may be changed to facilitate reading. For example, instead of separating the Level A, Level AA and Level AAA criteria, they may be put in one table in numerical order.
- **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 2.5Rev)**
    - **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.

[Company] Accessibility Conformance Report

WCAG Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version:

Report Date:

Product Description:

Contact Information:

Notes:

Evaluation Methods Used:

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 / No) Level AA (Yes / No) Level AAA (Yes / No)
Web Content Accessibility Guidelines 2.1	Level A (Yes / No)

Standard/Guideline	Included In Report
	Level AA (Yes / No) Level AAA (Yes / No)
Web Content Accessibility Guidelines 2.2	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)

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 only be used in WCAG Level AAA criteria.

WCAG 2.x Report

Note: When reporting on conformance with the WCAG 2.x 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

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)		
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)		
1.2.2 Captions (Prerecorded) (Level A)		
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)		
1.3.1 Info and Relationships (Level A)		
1.3.2 Meaningful Sequence (Level A)		
1.3.3 Sensory Characteristics (Level A)		
1.4.1 Use of Color (Level A)		
1.4.2 Audio Control (Level A)		
2.1.1 Keyboard (Level A)		
2.1.2 No Keyboard Trap (Level A)		
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)		
2.2.1 Timing Adjustable (Level A)		
2.2.2 Pause, Stop, Hide (Level A)		
2.3.1 Three Flashes or Below Threshold (Level A)		
2.4.1 Bypass Blocks (Level A)		
2.4.2 Page Titled (Level A)		
2.4.3 Focus Order (Level A)		
2.4.4 Link Purpose (In Context) (Level A)		
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)		
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)		
2.5.3 Label in Name (Level A 2.1 and 2.2)		
2.5.4 Motion Actuation (Level A 2.1 and 2.2)		
3.1.1 Language of Page (Level A)		
3.2.1 On Focus (Level A)		
3.2.2 On Input (Level A)		

Criteria	Conformance Level	Remarks and Explanations
3.2.6 Consistent Help (Level A 2.2 only)		
3.3.1 Error Identification (Level A)		
3.3.2 Labels or Instructions (Level A)		
3.3.7 Redundant Entry (Level A 2.2 only)		
4.1.1 Parsing (Level A) WCAG 2.0 and 2.1 – Always answer 'Supports' WCAG 2.2 (obsolete and removed) - Does not apply	Supports	For WCAG 2.0 and 2.1, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata.
4.1.2 Name, Role, Value (Level A)		

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)		
1.2.5 Audio Description (Prerecorded) (Level AA)		
1.3.4 Orientation (Level AA 2.1 and 2.2)		
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)		
1.4.3 Contrast (Minimum) (Level AA)		
1.4.4 Resize text (Level AA)		
1.4.5 Images of Text (Level AA)		
1.4.10 Reflow (Level AA 2.1 and 2.2)		
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)		
1.4.12 Text Spacing (Level AA 2.1 and 2.2)		
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)		
2.4.5 Multiple Ways (Level AA)		
2.4.6 Headings and Labels (Level AA)		
2.4.7 Focus Visible (Level AA)		

Criteria	Conformance Level	Remarks and Explanations
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)		
2.5.7 Dragging Movements (Level AA 2.2 only)		
2.5.8 Target Size (Minimum) (Level AA 2.2 only)		
3.1.2 Language of Parts (Level AA)		
3.2.3 Consistent Navigation (Level AA)		
3.2.4 Consistent Identification (Level AA)		
3.3.3 Error Suggestion (Level AA)		
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)		
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)		
4.1.3 Status Messages (Level AA 2.1 and 2.2)		

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)		
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)		
1.2.8 Media Alternative (Prerecorded) (Level AAA)		
1.2.9 Audio-only (Live) (Level AAA)		
1.3.6 Identify Purpose (Level AAA 2.1 and 2.2)		
1.4.6 Contrast (Enhanced) (Level AAA)		
1.4.7 Low or No Background Audio (Level AAA)		
1.4.8 Visual Presentation (Level AAA)		
1.4.9 Images of Text (No Exception) (Level AAA)		
2.1.3 Keyboard (No Exception) (Level AAA)		
2.2.3 No Timing (Level AAA)		
2.2.4 Interruptions (Level AAA)		
2.2.5 Re-authenticating (Level AAA)		

Criteria	Conformance Level	Remarks and Explanations
2.2.6 Timeouts (Level AAA 2.1 and 2.2)		
2.3.2 Three Flashes (Level AAA)		
2.3.3 Animation from Interactions (Level AAA 2.1 and 2.2)		
2.4.8 Location (Level AAA)		
2.4.9 Link Purpose (Link Only) (Level AAA)		
2.4.10 Section Headings (Level AAA)		
2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only)		
2.4.13 Focus Appearance (Level AAA 2.2 only)		
2.5.5 Target Size (Level AAA 2.1 and 2.2)		
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 and 2.2)		
3.1.3 Unusual Words (Level AAA)		
3.1.4 Abbreviations (Level AAA)		
3.1.5 Reading Level (Level AAA)		
3.1.6 Pronunciation (Level AAA)		
3.2.5 Change on Request (Level AAA)		
3.3.5 Help (Level AAA)		
3.3.6 Error Prevention (All) (Level AAA)		
3.3.9 Accessible Authentication (Enhanced) (Level AAA 2.2 only)		

Legal Disclaimer (Company)

Include your company legal disclaimer here, if needed.