

Voluntary Product Accessibility Template®

VPAT™

Version 1.3

The purpose of the **Voluntary Product Accessibility Template (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 offerors 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 (3) columns in each table:

1. Column one (Criteria) of the Summary Table describes the subsections of subparts B and C of the Standards.
2. The second column describes the (supporting features) of the product or refers you to the corresponding detailed table, e.g. “equivalent facilitation.” Please respond with **(Yes, No, Partially Supports, N/A)**
3. 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 regarding that paragraph. The third column contains any additional remarks and explanations regarding the product.

Our responses, remarks and explanations are intentionally brief, and may require more detailed ‘due diligence’ and directed enquiries from a prospective buyer and more detailed and specific responses from us, if, as and when a potential acquisition or license of our products and services moves forward. Our responses, remarks and explanations are made in good faith as at a particular point in time and without warranty of any kind, either express or implied, including warranties of merchantability or fitness for a particular purpose, and all such warranties are expressly and specifically disclaimed. We are not liable, as a result of our response, remarks and explanations, for any direct, indirect, consequential, exemplary, special, incidental or punitive damages arising out of the use, the results of the use or an inability to use our products, services and materials, even if we have been advised of the possibility of such damages or claims.

Date	7 JANUARY 2019
Name of Product	TUMBLE BOOK LIBRARY WEBSITE www.tumblebooklibrary.com
Contact Info (name/phone/email)	

Summary Table (VPAT)		
Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Yes	User Interface includes ARIA landmarks and are navigable and content usable with keyboard
Section 1194.22 Web-based Internet Information and Applications	Yes	Text equivalent for non-text elements are provided e.g., via “alt”, “longdesc”, or in element content)
Section 1194.23 Telecommunications Products	Yes	Controls and keys are operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist

Section 1194.24 Video and Multi-Media Products	Yes	Display or presentation of alternate text presentation or audio descriptions are user-selectable unless permanent
Section 1194.25 Self-Contained, Closed Products	N/A	TumbleBookLibrary is not a Self-Self-Contained Closed Product
Section 1194.26 Desktop and Portable Computers	N/A	TumbleBookLibrary is not a Desktop or Portable Computer
Section 1194.31 Functional Performance Criteria	Partially Supports	At least one mode of operation and information retrieval that does not require user vision, speech or fine motor control are provided, or support use of assistive technology.
Section 1194.41 Information, Documentation and Support	Yes	Product support documentation provided to end-users is made available via the telephone support upon request, at no additional charge

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.	Yes	Links and content use validated code and ARIA Landmarks used for keyboard navigation
(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 per 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.	Yes	focus styles use browser defaults and high contrast custom :focus styles used for improved legibility

<p>(c) A well-defined on-screen indication of the current focus shall be if 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>Partially Supported</p>	<p>Navigation order is contextual and keyboard accessible. Book of day and scrolling bookcover carousels are somewhat difficult to use with Assistive Technology. Book Cover and List view pages are available for fully supported access to categories, search results of the TBL online collection.</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>Yes</p>	<p>Text equivalent for non-text user interface elements are provided e.g., via "alt", "title", "longdesc", or in element content)</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>Yes</p>	<p>Text equivalent for non-text controls are provided e.g., via "alt", "title", "longdesc", or in element content)</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>Yes</p>	<p>Text Content is valid XHTML code</p>
<p>(g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>	<p>Yes</p>	<p>User Interface uses validated CSS to set color pallet</p>
<p>(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.</p>	<p>Yes</p>	<p>All eBooks are available in HTML5 with text in html to accommodate screen readers.</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>Yes</p>	<p>There are User Interface elements that use CSS to set color pallet. Elements such as navigation tabs have ALT and TITLE tags to provide information about those elements</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>N/A</p>	<p>The website does not have color selections as an option. Contrast levels rely on the user's browser display settings</p>
<p>(k) Software shall not use flashing or blinking text, objects, or other elements</p>	<p>Yes</p>	<p>Scrolling sliders, book covers do not use flashing or blinking text or other elements</p>

having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.		having a flash or blink frequency greater than 2 Hz and lower than 55 Hz
(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.	Yes	Forms are programmed with required labels, IDs and values to allow alternate access to information

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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).	Yes	Text equivalent for non-text controls are provided e.g., via "alt", "title", "longdesc", or in element content)
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Yes	Text equivalent for sliders are provided e.g., via "alt" tags
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Yes	Web page content is available without color
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Yes	All website files are valid XHTML code and can be read without requiring associated style sheets
(e) Redundant text links shall be provided for each active region of a server-side image map.	N/A	No server side image map links are used
(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.	N/A	NO client side image maps are used
(g) Row and column headers shall be identified for data tables.	Yes	All data tables are coded with identical headers, columns and rows
(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.	Yes	Data tables with two or more logical levels of rows have alternating colors to easily distinguish rows
(i) Frames shall be titled with text that facilitates frame identification and navigation	Yes	The eBooks use iframes which have IDs for navigation and text in HTML format which is accessible to screen readers

(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Yes	Website and website content have been designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
(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.	No	Currently TBL does not have a server based text-only site with equivalent information or functionality.
(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.	Partially Supported	Pages with scrolling books are difficult to use with Assisted technology. There are 2 alternate book selection page formats available. Non Scrolling cover view and List View
(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).	Yes	Website has sniffer to determine browser and device to load appropriate website for end user (Flash/Non-Flash or mobile)
(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.	Yes	Forms are programmed with required labels, IDs and values to allow alternate access to information
(o) A method shall be provided that permits users to skip repetitive navigation links.	Yes	Keyboard can bypass repetitive blocks such as navigation via tab key
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Yes	The website does not have any timed responses.

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Section 1194.23 Telecommunications Products		
Criteria	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 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.

(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.

(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.

(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.

(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.

(g) If the telecommunications product allows a user to adjust the receive volume, a function 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.

<p>(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.</p>	
<p>(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.</p>	
<p>(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.</p>	
<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>(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>(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>	

Section 1194.24 Video and Multi-Media Product

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>(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.</p>		

Section 1194.25 Self-Contained, Closed Products

Criteria	Supporting Features	Remarks and Explanations
<p>(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.</p>		
<p>(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.</p>		
<p>(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).</p>		
<p>(d) 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 biological characteristics, shall also be provided.</p>		
<p>(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 any time.</p>		
<p>(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.</p>		
<p>(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.</p>		
<p>(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.</p>		

<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>(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>(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>(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 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>	

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<h2>Section 1194.26 Desktop and Portable Computers</h2>		
Criteria	Supporting Features	Remarks and Explanations
<p>(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).</p>		

(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).	
(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 biological characteristics, shall also be provided.	
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	

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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.	Partially Supported	Pages that use carousels and scrolling book covers are difficult to operate with Assisted Technology. Alternate pages are provided with the same content in Book List view
(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.	Partially Supported	Alternate pages are provided with the same content available on carousel and scrolling book covers in Book List view which operate with Assisted Technology for audio and enlarged print output.
(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	Yes	Captions are included for audio based content
(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.	Yes	Captions are included for audio based content

(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.	N/A	User speech is not required to operate the website
(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.	Yes	Links and content use validated code and ARIA Landmarks used for keyboard navigation

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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	Yes	FAQs, Help and User Guides are available online and there is telephone support available.
(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.	Yes	VPAT form will be provided upon request when end-users request description of accessibility compatibility features.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities	Yes	There is tech support on the website and live phone support available.

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