

Table of Contents

Executive Summary FERPA: Protecting Student Privacy Learning Module Accessibility
Conformance Report..... iii

United Educators Accessibility Conformance Report Revised Section 508 Edition..... 1

WCAG 2.1 Report 3

 Table 1: Success Criteria, Level A..... 4

 Table 2: Success Criteria, Level AA 9

Revised Section 508 Report..... 14

 Chapter 3: Functional Performance Criteria (FPC)..... 14

 Chapter 6: Support Documentation and Services 15

Executive Summary

FERPA: Protecting Student Privacy Learning Module Accessibility Conformance Report

Access Ingenuity's evaluation of the FERPA: Protecting Student Privacy learning module identified accessibility features and functionalities of the learning module. This evaluation provided the information required to assess the conformance of the FERPA: Protecting Student Privacy learning module with the Revised Section 508 Accessibility Standards and WCAG 2.1 Accessibility Guidelines. Based on our evaluation, Access Ingenuity concludes that the learning module *Supports* these requirements with the exception of text spacing.

Access Ingenuity, an independent authority in web accessibility, has evaluated the FERPA: Protecting Student Privacy and certifies it to be substantially conformant with Level A and Level AA of the Web Content Accessibility Guidelines version 2.1. All conformance issues that pose a significant barrier for users with disabilities have been addressed.

Access Ingenuity cannot verify the conformance of content changed after the date of our evaluation. However, based on our interactions with United Educators, Access Ingenuity is confident in their efforts to maintain a substantially conformant product.

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing Accessibility Conformance Reports (ACRs) that has been designed to create simplicity and uniformity/consistency in ACRs presented by a variety of suppliers. In preparing the FERPA: Protecting Student Privacy learning module ACR, Access Ingenuity has used the ITIC-recommended *VPAT 2.5 508* format with the addition of WCAG 2.1 requirements.

Based on this evaluation and on information published on the ITIC website (<http://www.itic.org>), Access Ingenuity presents the ACR for the FERPA: Protecting Student Privacy learning module on the following pages.

United Educators Accessibility Conformance Report Revised Section 508 Edition

(Based on VPAT[®] Version 2.5)

Name of Product/Version: [FERPA: Protecting Student Privacy](#) (FERPA: Family Educational Rights and Privacy Act)

Report Date: September 16, 2024

Product Description: Web-based e-learning module for understanding the Family Educational Rights and Privacy Act and when it applies.

Contact Information: accessibility@ue.org

Notes: This course was created in Storyline, which contains accessibility barriers that are not author-controllable. United Educators has filed bugs with Articulate (Storyline) to try and address any outstanding issues.

Evaluation Methods Used:

Conformance to the listed accessibility standards was evaluated between April 12 – September 16, 2024, using a combination of static analysis tools and manual testing with assistive technologies.

The evaluation was conducted in the following desktop operating systems and browser/screen reader combinations:

1. Windows 11:
 - a. Chrome 123-128/JAWS 2024
2. Mac OS 12.7.1:
 - a. Safari/VoiceOver

The accessibility assessment was executed per the following steps:

- I. A sighted accessibility expert conducted an overall technical analysis to identify issues of technical compliance that would affect mobility-impaired, deaf/hearing impaired, and low-vision users. The evaluator inspected the web pages using Chrome and the Chrome Developer tools as well as the axe DevTools extension.
- II. Keyboard accessibility analysis (for mobility and physically challenged users) was conducted by attempting to thoroughly navigate the web pages through the keyboard, without using a mouse.
- III. The accessibility for low-vision users was evaluated two ways: (1) using the resizing capability offered by the browser, and (2) using Colour Contrast Analyser (CCA) Version 3.5.1.
- IV. If videos were present, they were assessed for proper captioning for deaf and hard-of-hearing users as well as the need for audio descriptions and transcripts for screen reader users.
- V. Screen reader testing was conducted by an expert screen reader user. The goal was to identify accessibility barriers that are likely to be experienced by users who are blind.

Any usability issues for users with disabilities encountered during the accessibility assessments were also noted.

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

Standard/Guideline	Included In Report
	Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017, and corrected January 22, 2018	(Yes)

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 2.1 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.1 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

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All images and interactive elements have alternate text and/or accessible labels.
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	There is no non-live audio-only or video-only content in the module.
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Accurate, synchronized captions are provided for the video content in the FERPA learning module.
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The video content is sufficiently described in the audio narration for the FERPA learning module. A transcript is also provided for the videos.
<p><u>1.3.1 Info and Relationships</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Semantic structure, including heading information is available to assistive technology.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The reading order of the accessible text for the slides in the learning module reflects the visual order and is logical.
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Instructions in the learning module do not rely on shape, size, visual location, or sound.
<p><u>1.4.1 Use of Color</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Throughout the learning module, color alone is not used as the sole method of conveying content or distinguishing visual elements.
<p><u>1.4.2 Audio Control</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	There is no automatically playing audio in the FERPA learning module.
<p><u>2.1.1 Keyboard</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All content in the learning module is operable through a keyboard interface.
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to: Revised Section 508</p>	Supports	No keyboard traps were present in the learning module.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p><u>2.1.4 Character Key Shortcuts</u> (Level A)</p> <p>Revised Section 508 – Does not apply</p>	Supports	<p>Built-in shortcuts support this criterion. There are no author-defined shortcuts.</p> <p>Built-in keyboard shortcuts do not use single keys. Accidental activation of shortcuts is avoided by requiring modifier keys. For example, Ctrl+Alt+M mutes/unmutes the course audio. Learners can also turn off built-in keyboard shortcuts altogether if they prefer.</p>
<p><u>2.2.1 Timing Adjustable</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The FERPA learning module is not timed at any point.
<p><u>2.2.2 Pause, Stop, Hide</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	There is no automatically moving content in the learning module.
<p><u>2.3.1 Three Flashes or Below Threshold</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	There is no flashing content in the learning module.

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.1 Bypass Blocks</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The learning module provides a “Back to Top” link to skip navigation elements on every screen.
<p><u>2.4.2 Page Titled</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The learning module has a descriptive and informative page title and unique slide titles.
<p><u>2.4.3 Focus Order</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The focus order was found to be logical throughout the learning module.
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) <p>602.3 (Support Docs)</p>	Supports	The purpose of links in the learning module is adequately identified.
<p><u>2.5.1 Pointer Gestures</u> (Level A)</p> <p>Revised Section 508 – Does not apply</p>	Supports	Storyline 360 courses support touchscreen gestures, but learners are not required to use them.
<p><u>2.5.2 Pointer Cancellation</u> (Level A)</p> <p>Revised Section 508 – Does not apply</p>	Supports	Click events happen when learners release the mouse button, not when they press the mouse button down. They can move the mouse away

Criteria	Conformance Level	Remarks and Explanations
		from the target before releasing the button if they do not want to activate the target.
<p><u>2.5.3 Label in Name</u> (Level A)</p> <p>Revised Section 508 – Does not apply</p>	Supports	Interface components within the module contained appropriate labeling within the name.
<p><u>2.5.4 Motion Actuation</u> (Level A)</p> <p>Revised Section 508 – Does not apply</p>	Not Applicable	Storyline 360 does not support motion controls so this is not present in the course and learners cannot control courses by moving their tablets or smartphones.
<p><u>3.1.1 Language of Page</u> (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The language of the learning module is appropriately identified.
<p><u>3.2.1 On Focus</u> (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	When focus changes in the FERPA learning module, this does not ever cause a change in page content, spawn a new browser window, or cause any other change that disorients the user.
<p><u>3.2.2 On Input</u> (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No content is being revealed unexpectedly in the learning module.
<p><u>3.3.1 Error Identification</u> (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) 	Supports	Adequate error identification is provided when forms are submitted without selecting a value(s) in the learning module.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 504.2 (Authoring Tool) 602.3 (Support Docs) 		
<u>3.3.2 Labels or Instructions</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	The FERPA learning module has sufficient labels, cues, and instructions for required interactive elements.
<u>4.1.1 Parsing</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	For WCAG 2.0 and the 508 standards, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata .
<u>4.1.2 Name, Role, Value</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	State information is being conveyed correctly throughout the learning module.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
<u>1.2.4 Captions (Live)</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	There is no live multimedia content in the learning module.
<u>1.2.5 Audio Description (Prerecorded)</u> (Level AA) Also applies to:	Supports	The videos in the learning module are sufficiently described with audio narration.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<u>1.3.4 Orientation</u> (Level AA) Revised Section 508 – Does not apply	Supports	Courses work in both landscape and portrait modes.
<u>1.3.5 Identify Input Purpose</u> (Level AA) Revised Section 508 – Does not apply	Supports	Although Storyline 360 does not currently support programmatic input-field identification or auto-filling forms. However, there are no forms that would require this in the learning module.
<u>1.4.3 Contrast (Minimum)</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All text in the learning module meets minimum contrast requirements.
<u>1.4.4 Resize text</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The module content is readable and functional when the page is zoomed to 200% in the environments tested.
<u>1.4.5 Images of Text</u> (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All content within the slides of the learning module is presented as an accessible SVG that can be adjusted to modify the text presentation.

Criteria	Conformance Level	Remarks and Explanations
<p>1.4.10 Reflow (Level AA)</p> <p>Revised Section 508 – Does not apply</p>	Supports	<p>The learning module is built in Storyline 360 which is a two-dimensional presentation with fixed aspect ratios. They are designed to zoom in and out, but they cannot reflow without losing meaning and context. As a result, learners might see vertical and/or horizontal scroll bars at the highest zoom levels. The exception in the guideline allows two-dimensional content, such as presentations, to scroll in both directions.</p>
<p>1.4.11 Non-text Contrast (Level AA)</p> <p>Revised Section 508 – Does not apply</p>	Supports	<p>A contrast ratio of 3:1 or higher for images and background elements has been implemented so learners with low vision can see them.</p>
<p>1.4.12 Text Spacing (Level AA)</p> <p>Revised Section 508 – Does not apply</p>	Partially Supports	<p>Learners can use custom stylesheets or browser extensions to adjust text properties, such as line spacing, to make content easier to read. However, on some pages, text may be cut off or some text can become inaccessible without the use of a mouse to scroll the content.</p>
<p>1.4.13 Content on Hover or Focus (Level AA)</p> <p>Revised Section 508 – Does not apply</p>	Supports	<p>No content became available on hover or focus.</p>
<p>2.4.5 Multiple Ways (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	<p>Users can navigate the course using the previous and next buttons on each slide. However, the course must be followed in a sequence as each page is a step in a process.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Headings and labels are logical and appropriate throughout the learning module.
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The learning module has a focus indicator on all page elements.
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The content in the learning module is only delivered in one language.
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The navigation of the learning module is in the same relative order to the main content across all screens of the module.
<p><u>3.2.4 Consistent Identification</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) 	Supports	Components that have the same function across multiple screens of the FERPA learning module are labeled consistently.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) – Does not apply to non-web docs 		
<p><u>3.3.3 Error Suggestion</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	The learning module has timely and accessible error suggestions when an error has been made in a knowledge check question.
<p><u>3.3.4 Error Prevention (Legal, Financial, Data)</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	The learning module does not collect data or record scores.
<p><u>4.1.3 Status Messages</u> (Level AA)</p> <p>Revised Section 508 – Does not apply</p>	Supports	There are appropriate status messages presented throughout the course.

Revised Section 508 Report

Chapter 3: [Functional Performance Criteria \(FPC\)](#)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	The learning module is accessible to users of assistive technology such as screen readers.
302.2 With Limited Vision	Supports	All visual content in the learning module can be enlarged using zoom features.
302.3 Without Perception of Color	Supports	All visual content in the learning module has sufficient color contrast and color alone is not used to convey meaning.
302.4 Without Hearing	Supports	Captions are provided for the videos in the learning module.
302.5 With Limited Hearing	Supports	Captions are provided for the videos in the learning module.
302.6 Without Speech	Supports	The learning module does not require speech input.
302.7 With Limited Manipulation	Supports	The learning module is accessible to keyboard-only users.
302.8 With Limited Reach and Strength	Supports	The use of the learning module does not require reach and strength beyond keyboard input.

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	The learning module is not timed at any point and allows users to self-pace their learning.

Chapter 6: [Support Documentation and Services](#)

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
<u>602 Support Documentation</u>	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	The FERPA learning module includes built-in accessibility features that are compatible with assistive technology.
602.3 Electronic Support Documentation	See <u>WCAG 2.0</u> section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	No non-electronic support documentation is available.
<u>603 Support Services</u>	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	United Educators will share the results of the FERPA learning module ACR upon request. It can also be accessed at: https://rgprodlearningdesign.blob.core.windows.net/\$web/learningdesign/VPATs/TitleIXandYouEmployees/VPAT2.5_508_FERPA_REV.1.0.pdf
603.3 Accommodation of Communication Needs	Supports	Support services for the FERPA learning module can accommodate the communication needs of end-users with disabilities.

Criteria	Conformance Level	Remarks and Explanations
		For general Customer Service questions or technical support contact: accessibility@ue.org