

Voluntary Product Accessibility Template® (VPAT®)

Revised Section 508 Edition

Version 2.2

July 2018

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Executive Summary: Trust Betrayed E-Learning Module VPAT

Access Ingenuity's evaluation of the Trust Betrayed E-Learning Module identified accessibility features and functionalities of the learning module. This evaluation provided the information required to assess the conformance of the Trust Betrayed E-Learning Module with the Revised Section 508 Accessibility Standards. Access Ingenuity concludes that the learning module *Partially Supports* the Revised Section 508 Standards.

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing VPAT documents that has been designed to create simplicity and uniformity/consistency in VPATs presented by a variety of suppliers. In preparing the Trust Betrayed E-Learning Module VPAT, Access Ingenuity has used the ITIC-recommended *VPAT 2.2 508* format.

Based on this evaluation and on information published on the ITIC website (<http://www.itic.org>), Access Ingenuity presents the VPAT 2.2 508 document for the Trust Betrayed E-Learning Module on the following pages.

United Educators Accessibility Conformance Report

Revised Section 508 Edition

VPAT® Version 2.2 – July 2018

Name of Product/Version: Trust Betrayed E-learning Module, accessed at https://ue-edurisk.com/demos/TrustBetrayed/story_html5.html?lms=1

Product Description: Web-based E-learning module on sexual harassment.

Date: May 3, 2019

Contact information: accessibility@ue.org

Notes:

1. The authoring tool used to create the Trust Betrayed Learning Module (Storyline) has some accessibility limitations which cannot be altered by course designers. United Educators has filed a request with Storyline to correct these issues in future releases of the tool.

Evaluation Methods Used:

Conformance to the listed accessibility standards was evaluated between April 22 – May 1, 2019 using a combination of static analysis tools and manual testing with assistive technologies.

The accessibility assessment was conducted according to 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 each screen using Chrome with the Wave and aXe toolbars. Code analysis was conducted using browser Developer Tools (Chrome and Firefox).
- II. Keyboard accessibility analysis (for mobility and physically impaired users) was conducted by attempting to thoroughly navigate the web application through the keyboard, without using a mouse.
- III. For deaf and hard of hearing users, any video and audio content were assessed for proper captioning as well as descriptive text transcripts (also benefits visually impaired users).
- IV. The accessibility for low vision users was evaluated three ways: (1) using the screen magnification, palette, and contrast controls provided by the operating systems; (2) using the font resizing capability offered by the browser, and (3) using Colour Contrast Analyzer version 2.5.
- V. The 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. The evaluator worked through the web application using Windows 10 with the JAWS for Windows (v. 2019.1903.47) screen reader with Chrome Version 73.0.3683.103 and Mac OS 10.14 with Safari and VoiceOver. Any pages found to have screen reader issues were re-examined in interactive sessions with a sighted evaluator.

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, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017 Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on January 22, 2018	(Yes) The following Section 508 Sections apply and are included below:

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 be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- 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 2.0 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
<p><u>1.1.1 Non-text Content</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) 	Partially Supports	<p>The Trust Betrayed E-Learning Module uses alt text and WAI-ARIA techniques to provide alternative text where necessary for users of assistive technology, with the following exceptions:</p> <ul style="list-style-type: none"> • <i>Global issues:</i> 'Transcript' button has duplicate labels.
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</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 Trust Betrayed E-Learning Module does not have any non-live audio-only or video-only content.
<p><u>1.2.2 Captions (Prerecorded)</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 non-live, web-based video content in the Trust Betrayed E-Learning Module has synchronized captions available.
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</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) 	Partially Supports	All non-live, web-based video content in the Trust Betrayed E-Learning Module has descriptive text transcripts available. Some supplemental on-screen content is not included in the video narrations and as a result, the audio is not fully described.

Criteria	Conformance Level	Remarks and Explanations
<p>1.3.1 Info and Relationships (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) 	Partially Supports	<p>The authoring tool used for the Trust Betrayed E-Learning Module (Storyline) does not provide for the conveyance of semantic structure in text blocks, as a result:</p> <ul style="list-style-type: none"> • Text elements which would normally be rendered as HTML are only available to assistive technology as aria-labels. These elements then lose their semantic structure and limit screen reader users' ability to navigate the content using standard reading commands. • The module does not use ARIA landmarks to identify page regions or use an ordered heading structure on every page.
<p>1.3.2 Meaningful Sequence (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) 	Partially Supports	<p>The markup of the Trust Betrayed E-Learning Module enables the reading and navigation order to be logical and intuitive for all users when using the tab key. However, if screen reader users use the arrow keys the order is not always meaningful.</p>
<p>1.3.3 Sensory Characteristics (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	<p>Instructions in the Trust Betrayed E-Learning Module do not rely on shape, size, visual location or sound.</p>
<p>1.4.1 Use of Color (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	<p>Color is not used as the sole method of conveying content or distinguishing visual elements in the Trust Betrayed E-Learning Module.</p>
<p>1.4.2 Audio Control (Level A)</p> <p>Also applies to:</p>	Supports	<p>All audio that automatically plays on any pages of the Trust Betrayed E-Learning Module for more than five</p>

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) 		seconds has a mechanism available for the user to pause it.
<u>2.1.1 Keyboard</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) 	Partially Supports	All functionality with the Trust Betrayed E-Learning Module is available to keyboard-only users using standard keyboard navigation and input functions, with the following exceptions: <ul style="list-style-type: none"> • If the page size is doubled, the scroll bars are not keyboard accessible.
<u>2.1.2 No Keyboard Trap</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	Keyboard focus is never locked or trapped at any page element in the Trust Betrayed E-Learning Module.
<u>2.2.1 Timing Adjustable</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 Trust Betrayed E-Learning Module is not timed at any point.
<u>2.2.2 Pause, Stop, Hide</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	There is no continuously moving or blinking content that lasts longer than 5 seconds.
<u>2.3.1 Three Flashes or Below Threshold</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) 	Supports	There is no flashing content in the Trust Betrayed E-Learning Module.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<p>2.4.1 Bypass Blocks (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 	Partially Supports	<p>The Trust Betrayed E-Learning Module partly meets these criteria by providing a link to skip navigation elements on every page. The exceptions are as follows:</p> <ul style="list-style-type: none"> The 'Skip to Main Content' link remains visually hidden even when it gets keyboard focus. The module does not use ARIA landmarks to identify all page regions or an ordered heading structure on every page to provide an alternative to the skip link.
<p>2.4.2 Page Titled (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) 	Partially Supports	<p>The Trust Betrayed E-Learning Module uses the same page title for every page in the course, therefore the page titles are not as descriptive and informative about where the user is in the course as they could be.</p>
<p>2.4.3 Focus Order (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) 	Partially Supports	<p>The Trust Betrayed E-Learning Module has a logical tab order for all of its content, with the following exceptions:</p> <ul style="list-style-type: none"> <i>Global Issue:</i> There are non-interactive elements in the tab order (text blocks, images) on nearly every page of the module.
<p>2.4.4 Link Purpose (In Context) (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	<p>The purpose of the links in the Trust Betrayed E-Learning Module is adequately identified in all cases.</p> <p>There are no links or form image buttons with the same text that go to different locations.</p>
<p>3.1.1 Language of Page (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 	Supports	<p>The language of the Trust Betrayed E-Learning Module is appropriately identified.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<p>3.2.1 On Focus (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	When focus changes in the Trust Betrayed E-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>3.2.2 On Input (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	When a user inputs information or interacts with a form control in the Trust Betrayed E-Learning Module, this does not result in a change in the page content, change focus, launch an additional window, or otherwise disorient the user.
<p>3.3.1 Error Identification (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 are no required form elements or form elements that require a specific format, value or length in the Trust Betrayed E-Learning Module.
<p>3.3.2 Labels or Instructions (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 Trust Betrayed E-Learning Module has sufficient labels, cues and instructions for required interactive elements.
<p>4.1.1 Parsing (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 Trust Betrayed E-Learning Module has no errors in HTML validation.
<p>4.1.2 Name, Role, Value (Level A)</p>	Partially Supports	Global issues associated with the Storyline learning

Criteria	Conformance Level	Remarks and Explanations
<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) 		<p>module interface design:</p> <ul style="list-style-type: none"> • Screen readers are not able to read all the content onscreen using standard reading commands. Only the tab key can be used to access content; • Caption buttons do not indicate their selected state.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.4 Captions (Live)</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	There is no live multimedia content in the Trust Betrayed E-Learning Module.
<p><u>1.2.5 Audio Description (Prerecorded)</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) 	Partially Supports	All non-live, web-based video content in the Trust Betrayed E-Learning Module has descriptive text transcripts available. However, some content presented visually is not included in the video narrations.
<p><u>1.4.3 Contrast (Minimum)</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	Text and text with images in the Trust Betrayed E-Learning Module have a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text.
<p><u>1.4.4 Resize text</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) 	Partially Supports	<p>Mouse users can resize the browser up to 200% but Chrome keyboard-only users are not able to increase the size of the browser window using standard keyboard shortcuts.</p> <p>United Educators has filed a bug fix with Articulate to address the keyboard accessibility noted above.</p>
<p><u>1.4.5 Images of Text</u> (Level AA)</p> <p>Also applies to: Revised Section 508</p>	Partially Supports	Storyline uses images of text with aria-labels in some places as part of the e-learning platform design.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<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 	Not Applicable	The pages in the Trust Betrayed E-Learning Module can only be accessed in sequence. However, the course is set up to bookmark where the user left off for later access.
<p>2.4.6 Headings and Labels (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) 	Partially Supports	The Trust Betrayed E-Learning Module identifies each screen of the module uniquely and has informative labels with the following exceptions: <ul style="list-style-type: none"> • <i>Global issues</i>: Page titles are not unique; ‘Transcript’ and ‘Accessibility Statement’ buttons in slide navigation area have duplicate labels;
<p>2.4.7 Focus Visible (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) 	Partially Supports	The Trust Betrayed E-Learning Module has a focus indicator on all elements of the page, with the following exception: <ul style="list-style-type: none"> • The “Skip to main content” link does not display a visual focus indicator.
<p>3.1.2 Language of Parts (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 Trust Betrayed E-Learning Module is only delivered in one language.
<p>3.2.3 Consistent Navigation (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 Trust Betrayed E-Learning Module is in the same relative order to the main content across all screens of the module.

Criteria	Conformance Level	Remarks and Explanations
<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) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Components that have the same function across multiple screens of the Trust Betrayed E-Learning Module are labeled consistently.
<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) 	Partially Supports	<p>The Trust Betrayed E-Learning Module has timely and accessible error suggestions, with the following exception:</p> <ul style="list-style-type: none"> • <i>Global issue:</i> When dialog boxes appear, screen readers do not read any of the content until the user tabs to it.
<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 Trust Betrayed E-Learning Module does not collect data or record scores.

Revised Section 508 Report

Notes:

Chapter 3: Functional Performance Criteria (FPC)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	The Trust Betrayed E-Learning Module uses alt text and WAI-ARIA techniques to provide alternative text where necessary for users of assistive technology, with the following exceptions: <ul style="list-style-type: none">• Screen readers are not able to read all the content onscreen using standard reading commands, only the tab key can be used to access content; standard techniques for organizing content semantically which assist screen reader navigation are not used.
302.2 With Limited Vision	Partially Supports	The Trust Betrayed E-Learning Module supports browser magnification, but Chrome users are unable to magnify the pages using standard keyboard commands.
302.3 Without Perception of Color	Supports	Color is not used as the sole method of conveying content or distinguishing visual elements in the Trust Betrayed E-Learning Module.
302.4 Without Hearing	Supports	All audio content in the Trust Betrayed E-Learning Module has captions.
302.5 With Limited Hearing	Supports	All audio content in the Trust Betrayed E-

Criteria	Conformance Level	Remarks and Explanations
		Learning Module has captions.
302.6 Without Speech	Not Applicable	The Trust Betrayed E-Learning Module does not require speech input.
302.7 With Limited Manipulation	Partially Supports	All functionality with the Trust Betrayed E-Learning Module is available to users using pointing devices and there are no elements which require fine motor controls or simultaneous actions. Content is also accessible to keyboard-only users using standard keyboard navigation and input functions, with the following exceptions: <ul style="list-style-type: none"> Chrome users are not able to increase the size of the browser window using standard keyboard shortcuts; if the page size is doubled, the scroll bars are not keyboard accessible.
302.8 With Limited Reach and Strength	Not Applicable	Use of the Trust Betrayed E-Learning Module does not require reach and strength beyond keyboard input.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	The Trust Betrayed E-Learning Module is not timed at any point and allows users to self-pace their learning.

Chapter 6: Support Documentation and Services

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
	required	
602.2 Accessibility and Compatibility Features	Supports	The Trust Betrayed E-Learning Module includes built-in accessibility features that are compatible with assistive technology. There is also documentation available to course participants documenting what these features are and how to access them.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not applicable	The documentation will only be available in an accessible electronic format.
603 Support Services	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 Trust Betrayed E-Learning Module VPAT upon request. It can also be accessed at: https://ue-edurisk.com/VPATs/TrustBetrayed/VPAT2_2_508_Rev1_0.pdf
603.3 Accommodation of Communication Needs	Supports	Support services for the Trust Betrayed E-Learning Module can accommodate the communication needs of end-users with disabilities. For general Customer Service questions or technical support call ...