

Voluntary Product Accessibility Template® (VPAT®)

WCAG & Section 508

Version 2.3 (Revised) - April 2019

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About This Document

The VPAT is provided in four editions based on the guidelines/standards being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International that includes all of the standards.

This is a modified version of the WCAG 2.1 VPAT that includes both WCAG and Section 508. It includes the following standards/guidelines:

- [Web Content Accessibility Guidelines 2.0](#)
- [Web Content Accessibility Guidelines 2.1](#); use is optional; included for reference purposes
- [Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018](#)

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 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.

F.A. Davis Accessibility Conformance Report

WCAG 2.1 + Section 508

VPAT® Version 2.3 (Revised) – April 2019

Name of Product/Version: Dosage Calc 360° / Version 1.8.0 Updated on Jul 01, 2019

Product Description: Content management system delivering educational materials

Report Date: August 16th, 2019

Contact Information: accessibility@fadavis.com

Notes: The evaluation and subsequent report is a product of a third-party testing entity in an effort to provide an unbiased report of the state of the product. This report is the evaluation report of a web-based product which contains no software or hardware in conformance of the Revised Section 508 standards, and the Web Content Accessibility Guidelines. All non-relevant standards or sections have been removed to improve document readability.

The product has a companion ebook that is delivered through another product platform and is not included in this VPAT®. Contact us for more information on the accessibility of the eBook platform.

Evaluation Methods Used:

Keyboard only navigation, screen reading technology, screen magnification, and automated testing tools.

Automated Testing Tools: aXe, Wave, AInspector

Screen Reading Software: JAWS 2018 (Internet Explorer / FireFox), VoiceOver (Safari)

Other Software: ZoomText

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) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)
EN 301 549 Accessibility requirements suitable for public procurement of ICT products and services in Europe , - V2.1.2 (2018-08)	(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 be used only in WCAG 2.0 Level AAA.

WCAG 2.1 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Sections 10.1-10.4 of Chapter 10 - Non-Web documents, and Sections 11.1-11.4 and 11.8.2 of Chapter 11 - Non-Web Software (open and closed functionality), and Sections 12.1.2 and 12.2.4 of Chapter 12 – Documentation
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and 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

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Partially Supports</p>	<p>Web: Images used as buttons or links maintain appropriate alternative text labels.</p> <p>Videos are not labeled with the video name that appears visually.</p> <p>Alt text attributes for content images are all labeled as “zoomed image”</p> <p>Electronic Docs: System help documentation offers text alternatives to non-text content upon request.</p> <p>Majority of content in resource documents are images of text, with no text alternative.</p>
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.1 (Web) • 10.1.2.1 (Non-web document) • 11.1.2.1.1 (Open Functionality Software) • 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Does Not Support</p>	<p>Web: No non-time based alternative is available for media.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.2 (Web) • 10.1.2.2 (Non-web document) • 11.1.2.2 (Open Functionality Software) • 11.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Captions are provided for all core content materials Captions are not provided for resource videos. Captions are available for support materials.</p> <p>Electronic Docs: Not Applicable</p>
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.3 (Web) • 10.1.2.3 (Non-web document) • 11.1.2.3.1 (Open Functionality Software) • 11.1.2.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Does Not Support</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No audio descriptions or transcripts are provided for media content.</p> <p>Electronic Docs: Not Applicable</p>
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.1 (Web) • 10.1.3.1 (Non-web document) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Majority of form elements are associated with labels</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.1.3.1.1 (Open Functionality Software) • 11.1.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		<p>Check boxes in practice questions and assignments specifically are not associated with question answers, and do not announce current/change state.</p> <p>Tables organized in a visual only manor using div tags as opposed to semantic HTML. This leaves headings unlinked to information.</p> <p>Images of important information do not present text alternatives.</p> <p>ARIA labels used for system structure and interactable elements.</p> <p>Electronic Docs: Not Applicable</p>
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.2 (Web) • 10.1.3.2 (Non-web document) • 11.1.3.2.1 (Open Functionality Software) • 11.1.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Supports</p>	<p>Web:</p> <p>Content is presented in a logical order which maintains the logical order with changes to the screen for all elements except the following:</p> <ul style="list-style-type: none"> • Calculator, which jumps to the end of the page machine read order when activated. • Interactions within the practice questions/assignments move virtual cursor back to the top of the page frequently. <p>Electronic Docs: Documents maintain meaningful sequence.</p>
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.3 (Web) 	<p>Web: Partially supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web:</p> <p>All instructions offer meaningful descriptions for operation with the exception of the following:</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 10.1.3.3 (Non-web document) • 11.1.3.3 (Open Functionality Software) • 11.1.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		Practice question/Assignment's correct/incorrect designation is visual only. Electronic Docs: No operational functionality is present in documents.
<u>1.4.1 Use of Color</u> (Level A) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.1 (Web) • 10.1.4.1 (Non-web document) • 11.1.4.1 (Open Functionality Software) • 11.1.4.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Supports Electronic Docs: Supports	Web: Color is not used as sole representation for meaning and has text-based elements to accompany it. Electronic Docs: Color is not used as sole representation for meaning and has text-based elements to accompany it.
<u>1.4.2 Audio Control</u> (Level A) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.2 (Web) • 10.1.4.2 (Non-web document) • 11.1.4.2 (Open Functionality Software) • 11.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) 	Web: Partially Supports Electronic Docs: Not Applicable	Web: All audio elements contain controls to start and stop them, as well as to adjust volume in the case of video. Audio controls for terms/definitions are not interactable via keyboard. Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p><u>2.1.1 Keyboard</u> (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.1.1 (Web) • 10.2.1.1 (Non-web document) • 11.2.1.1.1 (Open Functionality Software) • 11.2.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Partially Supports Electronic Docs: Supports	Web: Non-text based system elements such as navigation elements, buttons, dropdowns, form fields and media objects are reachable and operable via a keyboard. Audio controls for terms/definitions are not interactable via keyboard. Calculator is not interactable using only a keyboard input without a screen reader running. Reviewing Quiz results is not possible using keyboard navigation without a screen reader active. Electronic Docs: Documents can be accessed via the keyboard
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.1.2 (Web) • 10.2.1.2 (Non-web document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508	Web: Supports Electronic Docs: Supports	Web: No part of the system presents as a keyboard trap. All elements are able to be entered and exited by standard means. Electronic Docs: No part of the system presents as a keyboard trap. All elements are able to be entered and exited by standard means.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p>2.1.4 Character Key Shortcuts (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.4 (Web) • 10.2.1.4 (Non-web document) • 11.2.1.4.1 (Open Functionality Software) • 11.2.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No character key shortcuts are in use.</p> <p>Electronic Docs: Not Applicable</p>
<p>2.2.1 Timing Adjustable (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.1 (Web) • 10.2.2.1 (Non-web document) • 11.2.2.1 (Open Functionality Software) • 11.2.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No time limits are present.</p> <p>Electronic Docs: Not Applicable</p>
<p>2.2.2 Pause, Stop, Hide (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.2 (Web) • 10.2.2.2 (Non-web document) 	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No time limits or auto updating content is present.</p> <p>Electronic Docs: Not Applicable</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.2.2.2 (Open Functionality Software) • 11.2.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p>2.3.1 Three Flashes or Below Threshold (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.3.1 (Web) • 10.2.3.1 (Non-web document) • 11.2.3.1 (Open Functionality Software) • 11.2.3.1(Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Not Applicable Electronic Docs: Not Applicable	Web: No Flashing or blinking is present. Electronic Docs: Not Applicable
<p>2.4.1 Bypass Blocks (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.4.1 (Web) • 10.2.4.1 (Non-web document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply • 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) 	Web: Supports Electronic Docs: Not Applicable	Web: Makes use of HTML5 Regions for containing sections of the page including repeating elements such as navigation. Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 12.2.4 (Support Docs) Revised Section 508 <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 		
<p>2.4.2 Page Titled (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.4.2 (Web) • 10.2.4.2 (Non-web document) • 11.2.4.2 (Open Functionality Software) - Does not apply • 11.2.4.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Partially Supports Electronic Docs: Supports	Web: Page title is unique to the product overall, but is not unique to the individual page content. Electronic Docs: Electronic Documents are uniquely titled with the title containing document purpose.
<p>2.4.3 Focus Order (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.4.3 (Web) • 10.2.4.3 (Non-web document) • 11.2.4.3 (Open Functionality Software) • 11.2.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Partially Supports Electronic Docs:	Web: Both visual, and navigational order is presented in a sequential order with the exception of the Calculator Electronic Docs:

Criteria	Conformance Level	Remarks and Explanations
<p>2.4.4 Link Purpose (In Context) (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Purpose is clearly provided for links as they appear in context and outside of context.</p> <p>Electronic Docs: Not Applicable</p>
<p>2.5.1 Pointer Gestures (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.1 (Web) • 10.2.5.1 (Non-web document) • 11.2.5.1 (Open Functionality Software) • 11.2.5.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No multipoint or path-based gestures are actively defined beyond native device/browser behavior.</p> <p>Electronic Docs: Not Applicable</p>
<p>2.5.2 Pointer Cancellation (Level A 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.2 (Web) • 10.2.5.2 (Non-web document) • 11.2.5.2 (Open Functionality Software) • 11.2.5.2 (Closed Software) • 11.8.2 (Authoring Tool) 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Functionality using a single pointer will not execute on the down event alone.</p> <p>Electronic Docs: Not Applicable</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
<p>2.5.3 Label in Name (Level A 2.1 only)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.5.3 (Web) • 10.2.5.3 (Non-web document) • 11.2.5.3 (Open Functionality Software) • 11.2.5.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Partially Supports Electronic Docs: Not Applicable	Web: Labels are present throughout the web content via HTML or ARIA with exception to the search close button found in the gradebook, multiple select checkboxes in Assignments, and answer feedback (correct/incorrect indicator) for assignments. Electronic Docs: Not Applicable
<p>2.5.4 Motion Actuation (Level A 2.1 only)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.5.4 (Web) • 10.2.5.4 (Non-web document) • 11.2.5.4 (Open Functionality Software) • 11.2.5.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Not Applicable Electronic Docs: Not Applicable	Web: No functionality using device or user motion is present. Electronic Docs: Not Applicable
<p>3.1.1 Language of Page (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.3.1.1 (Web) • 10.3.1.1 (Non-web document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) 	Web: Supports Electronic Docs: Not Applicable	Web: Language is defined Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p>3.2.1 On Focus (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.1 (Web) • 10.3.2.1 (Non-web document) • 11.3.2.1 (Open Functionality Software) • 11.3.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Some regions such as the top navigation and header implement on-focus styles, while the rest of the page content utilizes the browser alone to provide visible focus.</p> <p>Electronic Docs: No focusable elements are present in documents</p>
<p>3.2.2 On Input (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.2 (Web) • 10.3.2.2 (Non-web document) • 11.3.2.2 (Open Functionality Software) • 11.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No user interface component context is changed without being reported back to the user</p> <p>Electronic Docs: Not Applicable</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<p>3.3.1 Error Identification (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> 9.3.3.1 (Web) 10.3.3.1 (Non-web document) 11.3.3.1.1 (Open Functionality Software) 11.3.3.1.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Errors notifications are present and display in a way that is accessible via multiple means.</p> <p>Electronic Docs: Not Applicable</p>
<p>3.3.2 Labels or Instructions (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> 9.3.3.2 (Web) 10.3.3.2 (Non-web document) 11.3.3.2 (Open Functionality Software) 11.3.3.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	<p>Web: Partially supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web:</p> <p>Elements such as content/organization tabs are properly labeled, including current state (active/inactive) as well as how to interact with exception to those elements listed below:</p> <ul style="list-style-type: none"> Calculator doesn't provide interaction instructions. Viewing video button doesn't notify the user of opening in a new tab/window prior, or after the action. <p>Electronic Docs: No interactive elements exist in documents.</p>
<p>4.1.1 Parsing (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p>	<p>Web: Supports</p>	<p>Web: All content properly ends tags and contain no missing characters, duplicate attributes, or mismatched quotations.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 9.4.1.1 (Web) 10.4.1.1 (Non-web document) 11.4.1.1.1 (Open Functionality Software) 11.4.1.1.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Electronic Docs: Not Applicable	Electronic Docs: No markup language is used in documents.
4.1.2 Name, Role, Value (Level A) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> 9.4.1.2 (Web) 10.4.1.2 (Non-web document) 11.4.1.2.1 (Open Functionality Software) 11.4.1.2.2 (Closed Software) – Not required 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Web: Partially Supports Electronic Docs: Not Applicable	Web: Content makes use of ARIA throughout to apply labels and information to supplement where semantic information is not possible and in a few cases such as radio and check boxes, in place of semantic labels. All elements contain role, name and current value with the exception to “X” button in the gradebook search function. Electronic Docs: Not Applicable

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Web: Not Applicable	Web: No live content is used

Criteria	Conformance Level	Remarks and Explanations
<p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.4 (Web) • 10.1.2.4 (Non-web document) • 11.1.2.4 (Open Functionality Software) • 11.1.2.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Electronic Docs: Not Applicable</p>	<p>Electronic Docs: Not Applicable</p>
<p>1.2.5 Audio Description (Prerecorded) (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.5 (Web) • 10.1.2.5 (Non-web document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Does Not Support</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No audio descriptions are available for media content.</p> <p>Electronic Docs: Not Applicable</p>
<p>1.3.4 Orientation (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.4 (Web) • 10.1.3.4 (Non-web document) • 11.1.3.4 (Open Functionality Software) 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Page adjusts to user device orientation.</p> <p>Electronic Docs: Not Applicable</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.1.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
<p><u>1.3.5 Identify Input Purpose</u> (Level AA 2.1 only)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.3.5 (Web) • 10.1.3.5 (Non-web document) • 11.1.3.5 (Open Functionality Software) • 11.1.3.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: Not Applicable	Web: Purpose is included with input fields that is able to be programmatically determined. Electronic Docs: Not Applicable
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Partially Supports Electronic Docs: Supports	Web: Contrast is sufficient in all areas with exception to the header navigation link text, which presents a contrast of only 2.12:1 for user interface component font. Electronic Docs: Contrast used in documents surpasses contrast minimums.
<p><u>1.4.4 Resize text</u> (Level AA)</p> Also applies to: EN 301 549 Criteria	Web: Supports	Web: Text can be resized using the browser resize functions, and will scale while remaining on screen.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 9.1.4.4 (Web) • 10.1.4.4 (Non-web document) • 11.1.4.4.1 (Open Functionality Software) • 11.1.4.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Electronic Docs: Not Applicable	Electronic Docs: Documents use images of text as opposed to actual text.
<u>1.4.5 Images of Text</u> (Level AA) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.5 (Web) • 10.1.4.5 (Non-web document) • 11.1.4.5.1 (Open Functionality Software) • 11.1.4.5.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Does Not Support Electronic Docs: Does Not support	Web: Content images do not contain text base alternatives either in image attributes or in the contextual content. Electronic Docs: Document content is images of text with no text-based alternative.
<u>1.4.10 Reflow</u> (Level AA 2.1 only) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.10 (Web) • 10.1.4.10 (Non-web document) • 11.1.4.10.1 (Open Functionality Software) • 11.1.4.10.2 (Closed Software) 	Web: Supports Electronic Docs: Not Applicable	Web: All content reflows with change in screen size without introducing horizontal scroll or a loss of functionality. Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
1.4.11 Non-text Contrast (Level AA 2.1 only) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.11 (Web) • 10.1.4.11 (Non-web document) • 11.1.4.11 (Open Functionality Software) • 11.1.4.11 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: Not Applicable	Web: Contrast of non-text content maintains a 3:1 ratio for any items that are necessary to be understood as content. Electronic Docs: Not Applicable
1.4.12 Text Spacing (Level AA 2.1 only) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.12 (Web) • 10.1.4.12 (Non-web document) • 11.1.4.12 (Open Functionality Software) • 11.1.4.12 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: Not Applicable	Web: No loss of content or functionality will occur under changing operating conditions Electronic Docs: Not Applicable
1.4.13 Content on Hover or Focus (Level AA 2.1 only) Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.1.4.13 (Web) • 10.1.4.13 (Non-web document) • 11.1.4.13 (Open Functionality Software) • 11.1.4.13 (Closed Software) 	Web: Not Applicable Electronic Docs: Not Applicable	Web: No functionality exists where it is set to trigger on hover. Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
<p>2.4.5 Multiple Ways (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.4.5 (Web) • 10.2.4.5 (Non-web document) – Does not apply • 11.2.4.5 (Open Functionality Software) – Does not apply • 11.2.4.5 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <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 	Web: Supports Electronic Docs: Not Applicable	Web: Multiple ways to access pages are available. Electronic Docs: Not Applicable
<p>2.4.6 Headings and Labels (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Web: Supports Electronic Docs: Not Applicable	Web: Headings and labels are descriptive of topic or purpose. Electronic Docs: Headings and labels are not used in documents.

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.7 (Web) • 10.2.4.7 (Non-web document) • 11.2.4.7 (Open Functionality Software) • 11.2.4.7 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Some sections of the page rely on the browser functionality to provide visible focus when using keyboard equivalent navigation.</p> <p>Electronic Docs: Not Applicable</p>
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.2 (Web) • 10.3.1.2 (Non-web document) • 11.3.1.2 (Open Functionality Software) – Does not apply • 11.3.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No language changes are present in content.</p> <p>Electronic Docs: No language changes are present in content.</p>
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.3 (Web) • 10.3.2.3 (Non-web document) – Does not apply 	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: Navigation behaves consistently throughout pages.</p> <p>Electronic Docs: Not Applicable</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <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 		
<p>3.2.4 Consistent Identification (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.3.2.4 (Web) • 10.3.2.4 (Non-web document) – Does not apply • 11.3.2.4 (Open Functionality Software) – Does not apply • 11.3.2.4 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 <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 	Web: Supports Electronic Docs: Not Applicable	Web: Identification of functions, elements, and content are consistent throughout the pages. Electronic Docs: Not Applicable
<p>3.3.3 Error Suggestion (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> • 9.3.3.3 (Web) • 10.3.3.3 (Non-web document) • 11.3.3.3 (Open Functionality Software) • 11.3.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) 	Web: Not Applicable Electronic Docs: Not Applicable	Web: Suggestions are not necessary or provided within the product itself. Electronic Docs: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p>3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.4 (Web) • 10.3.3.4 (Non-web document) • 11.3.3.4 (Open Functionality Software) • 11.3.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: No legal commitments, financial transaction, or irreversible actions impacting grades exist.</p> <p>Electronic Docs: Not Applicable</p>
<p>4.1.3 Status Messages (Level AA 2.1 only)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.3 (Web) • 10.4.1.3 (Non-web document) – Does not apply • 11.4.1.3 (Open Functionality Software) – Does not apply • 11.4.1.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Docs: Not Applicable</p>	<p>Web: All status messages can be programmatically determined and are presented in such a way that assistive technologies receive notification or focus.</p> <p>Electronic Docs: Not Applicable</p>

Table 3: Success Criteria, Level AAA

Notes: Product not evaluated for conformance of Level AAA

Revised Section 508 Report

Notes:

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

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	<p>In cases where semantic labels and information are not present, ARIA is in use, or Assistive technology has some means to compensate with exception to the following:</p> <p>Search cancel button is not properly labeled.</p> <p>Images of text are not accompanied with text alternatives.</p>
302.2 With Limited Vision	Supports	<p>Enlargements to text and content can be made through the use browser function and/or assistive technology.</p>
302.3 Without Perception of Color	Partially Supports	<p>The product does not rely on color alone to convey information, context, or meaning.</p> <p>Main Navigation links fall below required threshold</p>
302.4 Without Hearing	Partially Supports	<p>Audio is not solely used for indicating system changes.</p>

Criteria	Conformance Level	Remarks and Explanations
		All audible content has closed captions with exception to additional resource videos.
302.5 With Limited Hearing	Partially Supports	Audio is not solely used for indicating system changes. All audible content has closed captions with exception to additional resource videos.
302.6 Without Speech	Supports	Product does not make use of speech functionality.
302.7 With Limited Manipulation	Supports	Fine motor skills are not required to perform and function in the product.
302.8 With Limited Reach and Strength	Supports	Product does not require fixed physical characteristics.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	The product makes use of a simple and intuitive interface. Because it is an educational platform, there is an expectation of cognitive load on a user. The product allows the use of assistive technology that can aid in relieving the cognitive load.

Chapter 4: [Hardware](#)

Notes: Product is web only and contains no hardware solution.

Chapter 5: [Software](#)

Notes: Product is web only and therefore sections 502 and 503 are not applicable.

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.1 section	See information in WCAG 2.x section

Criteria	Conformance Level	Remarks and Explanations
<u>504 Authoring Tools</u>	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)	See WCAG 2.1 section	See information in WCAG 2.x section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Supports	Authoring tool is for arranging existing content provided in the product, and does not convert content.
504.2.2 PDF Export	Not Applicable	There is no PDF Export function present in the system.
504.3 Prompts	Supports	Authoring tool is for arranging existing content provided in the product, and does not include new content creation.
504.4 Templates	Supports	Authoring tool is for arranging existing content provided in the product, and does not make use of templates.

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

Notes:

Criteria	Conformance Level	Remarks and Explanations
<u>601.1 Scope</u>	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	Does Not Support	Documentation does not list and explain how to use accessibility and compatibility features.
602.3 Electronic Support Documentation	See WCAG 2.1 section	See information in WCAG 2.x section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	Alternative formats are available on request.
<u>603 Support Services</u>	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Does Not Support	Documentation does not list and explain how to use accessibility and compatibility features.

Criteria	Conformance Level	Remarks and Explanations
603.3 Accommodation of Communication Needs	Supports	Multiple communication options are available based on need.

Legal Disclaimer

The information above describes this product's ability to support the applicable Standards/Guidelines, subject to F.A. Davis and the evaluator's interpretation of those standards and the remarks in this document.

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