



Ally Voluntary Product Accessibility Template June 2017

§ 1194.22 – Web-based Intranet and Internet Information and Applications § 1194.31 – Functional Performance Criteria §1194.41 – Information, Documentation and Support

Overview

The information contained within this Voluntary Product Accessibility Template (VPAT) is the result of a third-party performing an audit. The audit tested the compliance of Blackboard Ally, which includes Ally web interface, PDF, HTML and ePub format conversion of the files. Ally and all format conversions were tested against the applicable requirements of Section 508 of the Rehabilitation Act of 1973 as Amended 1998.

Blackboard Ally was tested within a third-party application; the Canvas LMS. It must be noted that there may be accessibility issues within the Canvas LMS that impact the ability of users to access content in Ally.

The purpose of the Voluntary Product Accessibility Template is to assist Federal contracting officials in making preliminary assessments regarding the availability of commercial electronics and information technology products and services with features that support accessibility. It is assumed that offerors will provide additional contact information to facilitate more detailed inquiries.

The testing methodology included extensive manual testing techniques, such as keyboard-only testing, color contrast evaluation, and testing with the high contrast setting typically used by those who have low vision. It also included assistive technology testing with JAWS 18.0, a screen reading software used by people who are blind and VoiceOver OSX, a screen reading software for Mac.

The first table of the report provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. The first column of the Summary Table describes the subsections of Subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, "e.g., equivalent facilitation". The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.







Compliance Summary

Criteria	Supported
Section 1194.22 Web-based Intranet and Internet Information and Applications	Supports with Exceptions
Section 1194.31 Functional Performance Criteria	Supports with Exceptions
Section 1194.41 Information, Documentation, and Support	Applicable- Not Tested

Support Levels

Support Level	Description
Supports	The application fully meets the letter and intent of the Criteria.
Supports with Exceptions/Minor Exceptions	The application does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria.
Supports through Equivalent Facilitation	The application provides an alternate way to meet the intent of the Criteria.
Supports when Combined with Compatible AT	The application fully meets the letter and intent of the Criteria when used in combination with compatible ATs.
Does Not Support	The application does not meet the letter or intent of the Criteria.
Not Applicable	The Criteria does not apply.
Not Applicable - Fundamental Alteration Exception Applies	A Fundamental Alteration of the application is required to meet the Criteria.
Applicable - Not Tested	The Standard is applicable but was not tested.





§ 1194.22 Web-based Intranet and Internet Information and Applications

Criteria	Support Level	Remarks and Explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Ally: Supports	Accessible text equivalents are provided for all non-text elements within Ally. Alt attributes are provided to all image elements and all complex images, charts and graphs are accompanied with meaningful textual alternatives.
	HTML Output: Supports With Exceptions	Images were not included in the HTML output that could be used for verification. The rating for Supports with exception is provided due to numerical formulas are not coherently rendered to screen reader users. Note, content authors must ensure that the images have alternative text in originating document type.
	PDF Output: Supports with Exceptions	When a Word file is viewed in a PDF format, images are missing alternative text. This exception is a limitation based on content author to ensure that the images have alternative text in word document.
	ePub Output: Supports with Exceptions	Text within ePub document did not render Math equations in a coherent way to the screen reader. List structure within the document was not rendered as a list to screen reader users.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Ally: Supports	Ally does not present multimedia content.
	HTML Output: Not Applicable	Multimedia content is not available in the HTML output.
	PDF Output: Not Applicable	Multimedia content is not available in PDF output.
	ePub Output: Not Applicable	Multimedia content is not available in ePub output.

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Criteria	Support Level	Remarks and Explanations
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Ally: Supports	Color is not used as the sole means of conveying information, indicating an action, prompting a response, or distinguishing a visual element within Ally.
	HTML Output: Supports with Exceptions	The HTML output does not natively use color alone to convey information. However, a rating of Supports with Exceptions has been given as content authors may use color alone to convey meaning in the originating document.
	PDF Output: Supports with Exceptions	The PDF output does not natively use color alone to convey information. However, a rating of Supports with Exceptions has been given as content authors may use color alone to convey meaning in the originating document.
	ePub Output: Supports with Exceptions	The ePub output does not natively use color alone to convey information. However, a rating of Supports with Exceptions has been given as content authors may use color alone to convey meaning in the originating document.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Ally: Supports	Ally can be accessed without associated style sheets. The reading order of content is logical and content is organized in an order such that it is readable without an associated style sheet. Consistent HTML heading structures are present within the application.
	HTML Output: Supports	The HTML output does not require an associated style sheet. The focus order and reading order of content is meaningful without reliance on CSS positioning.
	PDF Output: Supports	The PDF output does not require an associated style sheet to view content. Reading order of content is meaningful without the reliance on CSS.
	ePub Output: Supports	The PDF output does not require an associated style sheet to view

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Criteria	Support Level	Remarks and Explanations	
		content. Reading order of content is meaningful without the reliance on CSS.	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Ally: Supports	Ally does not contain any serverside image maps.	
	HTML Output: Not Applicable	The HTML output does not contain nor inherit any server-side image maps.	
	PDF Output: Not Applicable	The PDF output does not contain nor inherit any server-side image maps.	
	ePub Output: Not Applicable	The ePub output does not contain nor inherit any server-side image maps.	
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Ally: Supports	Ally does not contain any client-side image maps in HTML output or inherited by ePub files or PDF files.	
	HTML Output: Supports	The HTML output does not contain nor inherit any client-side image maps.	
	PDF Output: Supports	The PDF output does not contain nor inherit any client-side image maps.	
	ePub Output: Supports	The ePub output does not contain nor inherit any client-side image maps.	
(g) Row and column headers shall be identified for data tables.	Ally: Supports	Ally has content displayed within well-defined data table structures where table headers are associated with their corresponding data cells. Most of the tables within the application successfully implement data table structures to display data.	
	HTML Output: Supports with Exceptions	Some tables in the HTML output of an original inaccessible PDF document display data tables which are not semantically structured to include <th> element for column headers.</th>	element for column headers.







Criteria	Support Level	Remarks and Explanations
		Tables that have been imported contain scope="col" attributes, but are missing scope="row" attributes.
	PDF Output: Applicable - Not Tested	Data tables were not included in the PDF output that could be used for verification.
	ePub Output: Applicable - Not Tested	Data tables were not included in the ePub output that could be used for verification.
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	Ally: Supports	Complex tables with several logical levels within a data table are not present in Ally.
	HTML Output: Supports with Exceptions	Within the HTML output generated from a PDF a small set of complex data tables (i.e., more than one header level) do not utilize header and id attributes.
	PDF Output: Applicable - Not Tested	A complex data table structure was not included in PDF output that could be used for verification.
	ePub Output: Applicable - Not Tested	A complex data table structure was not included in ePub output that could be used for verification.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Ally: Supports	Frames within Ally provide users meaningful textual descriptions via the HTML title attribute.
	HTML Output: Supports	Within HTML output, frames within Ally provide users meaningful textual descriptions via the HTML title attribute.
	PDF Output: Not Applicable	Frames are not available within PDF output.
	ePub Output: Not Applicable	Frames are not available within ePub output.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Ally: Supports	Ally does not display blinking or flashing elements.
	HTML Output: Supports	Blinking or flashing elements were not included in the HTML output that could be used for verification.



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Criteria	Support Level	Remarks and Explanations
		Note, content authors must ensure that the content must not include blinking or flashing images or elements in originating document type.
	PDF Output: Supports	Flashing or blinking content is not available in PDF output.
	ePub Output: Supports	Flashing or blinking content is not available in ePub output.
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Ally: Supports	Ally does not require a text-only alternative page.
	HTML Output: Supports	HTML output supports text-only content.
	PDF Output: Supports	PDF output supports text-only content.
	ePub Output: Supports	ePub output supports text-only content.
(I) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Ally: Supports with Exceptions	Ally allows users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection, unless explicitly invoked by the user. Page tabs in the Admin Courses page set programmatic focus to the associated tab panel that displays content when a page tab is activated. This enables users to quickly navigate to the content. A rating of Supports with Exceptions has been given for the following reasons:







Criteria	Support Level	Remarks and Explanations
		While navigating with a keyboard in the Admin Ally Overview tab, Accessibility Score Chart, Total Courses, Total Files uploaded and Overall Accessibility Score are in the logical tab order, however they lack visual keyboard focus. Within Teacher files – image accessibility; programmatic focus moves out of the simulated modal dialog without the user dismissing the dialog when the user activates the cancel element when an error message is generated.
	HTMLOutput: Supports	HTML output allows users to navigate and interact with all interface elements using the keyboard. The use of scripting does not prohibit navigation with the keyboard and the use of scripting on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user.
	PDF Output: Not Applicable	PDF output does not utilize scripting languages to display content or to create interface elements.
	ePub Output: Not Applicable	ePub output does not utilize scripting languages to display content or to create interface elements.
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).	Ally: Supports with Minor Exceptions	Ally includes several links to PDF pages. The PDF files can be viewed in the browser. A rating of Supports with Minor Exceptions has been given for the following reason: While all PDF files can be viewed in the browser, users are not provided with a link to download the PDF reader to view PDF files within a PDF reader.
	HTML Output: Not Applicable	HTML output does not require an applet, plug-in or other application



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Criteria	Support Level	Remarks and Explanations
		be present or installed on the client system to interpret page content.
	PDF Output: Not Applicable	PDF output does not require an applet, plug-in or other application be present or installed on the client system to interpret page content.
	ePub Output: Not Applicable	ePub output does not require an applet, plug-in or other application be present or installed on the client system to interpret page content
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Ally: Supports	Most forms in the applications within Ally includes labels that are programmatically associated with their form fields. A majority of form fields are explicitly labeled (i.e., the label element includes the for attribute value that matches the id value of the corresponding form field). Additionally, radio buttons on the Download Accessible Version modal box include explicit labels. However, a rating of Supports with Exceptions has been given for the following reasons:
	HTML Output: Applicable – Not Tested	Form fields were not included in the HTML output that could be used for verification.
	PDF Output: Applicable – Not Tested	Form fields were not included in the PDF output that could be used for verification.
	ePub Output: Applicable – Not Tested	Form fields were not included in the ePub output that could be used for verification.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Ally: Not Applicable	Ally does not contain repetitive navigation links.
	HTML Output: Not Applicable	HTML output does not contain repetitive navigation links.
	PDF Output: Not Applicable	PDF output does not contain repetitive navigation links.
	ePub Output: Not Applicable	PDF output does not contain repetitive navigation links.



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Criteria	Support Level	Remarks and Explanations
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Ally: Supports	Ally does not require a timed response.
	HTML Output: Not Applicable	HTML output does not require a time based response and does not sign out the user due to inactivity.
	PDF Output: Not Applicable	PDF output does not require a time based response and does not sign out the user due to inactivity.
	ePub Output: Not Applicable	ePub output does not require a time based response and does not sign out the user due to inactivity.

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.







§ 1194.31 Functional Performance Criteria

Criteria	Support Level	Remarks and Explanations	
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Ally: Supports with Exceptions	Ally provides accessibility information such as name, state, and role for most of their controls. They also allow keyboard access to most active elements. However, a rating Supports with Exceptions has been given for the following reasons: As stated in §1194.22 (I), within files – image accessibility; programmatic focus moves out of the simulated modal dialog without the user dismissing the dialog when cancel is activated within the error message. This may disorient the user as they navigate through the content.	
	HTMLOutput: Supports with Exceptions	As stated in §1194.22 (g), some of the tables in the generated from a PDF lack the <th> element. As stated in §1194.22 (g), in the HTML generated from a PDF, the data tables lack header markup via id and headers attributes to associate the row and column headers to cells within the table. As stated in §1194.22 (l), Numerical formulas are not accurately rendered to screen reader users. Layout tables are used to structure content generated from a Word document which may disorient screen reader users.</th>	element. As stated in §1194.22 (g), in the HTML generated from a PDF, the data tables lack header markup via id and headers attributes to associate the row and column headers to cells within the table. As stated in §1194.22 (l), Numerical formulas are not accurately rendered to screen reader users. Layout tables are used to structure content generated from a Word document which may disorient screen reader users.
	ePub Output: Supports with Exceptions	As stated in §1194.22 (a), Text within ePub document did not render Math equations in a coherent way to the screen reader. When ePub content is used with Adobe Digital Editions on Mac OS X the reader exposes only the text content of the document. VoiceOver users cannot	

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Criteria	Support Level	Remarks and Explanations
		interact with it and can only read each page as one large chunk. For this reason, users may use other app such as iBooks to read ePub files. iBooks provides the ability to navigate by heading as well as by line.
	PDF Output: Supports with Exceptions	As stated in §1194.22 (a), images are missing alternative text. This exception however, is a limitation based on content author to ensure that the images have alternative text in word document. When a Word file is viewed in PDF accessible form, the header and footer on every page of the document is marked as an artifact, including the first page. Although repeated header and footer information should be marked as an artifact, the header and footer information should initially be read to the user. The page numbers of the document should be visible to assistive technology so that users are able to properly navigate the document. When a Word file is viewed in PDF accessible form, a list with 3 items appears to be a single list, but is announced as 2 different lists due to the presence of an orphan paragraph tag.
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Ally: Supports with Exceptions	Ally provides some support that does not require a visual acuity of greater than 20/70. A rating of Supports with Exceptions has been given for the following reasons: The lack of visual indication of keyboard focus as listed in §1194.22 (I) may affect people who are visually impaired and are using screen magnifier software with the keyboard.
	ePub Output: Supports with Exceptions	Most content ePub output does not require visual acuity greater than 20/70. A rating of Supports with Exceptions has been given for the following reasons:



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Criteria	Support Level	Remarks and Explanations
		It is also important to note that color contrast of content is dependent on the author.
	HTMLOutput: Supports	Content generated in HTML output does not require visual acuity greater than 20/70.
		Content authors must ensure content do not require visual acuity greater than 20/70 in the originating document type.
	PDF Output: Supports	Content generated in PDF output does not require visual acuity greater than 20/70.
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided.	Ally: Supports	Ally does not use content that relies on hearing for information retrieval.
	HTML Output:Supports	HTML output does not use content that relies on hearing for information retrieval.
	PDF Output: Supports	PDF output does not use content that relies on hearing for information retrieval.
	ePub Output: Supports	ePub output does not use content that relies on hearing for information retrieval.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Ally: Supports	Ally does not communicate information in an auditory fashion.
	HTML Output:Supports	HTML Output does not communicate information in an auditory fashion.
	PDF Output: Supports	PDF Output does not communicate information in an auditory fashion.
	ePub Output: Supports	ePub Output does not communicate information in an auditory fashion.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive	Ally: Supports	Ally does not require speech for operation and information retrieval.



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Criteria	Support Level	Remarks and Explanations
Technology used by people with disabilities shall be provided.		
	HTML Output: Supports	HTML Output does not require speech for operation and information retrieval.
	PDF Output: Supports	PDF Output does not require speech for operation and information retrieval.
	ePub Output: Supports	ePub Output does not require speech for operation and information retrieval.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Ally: Supports with Exceptions	Ally functionality, for the most part, can be accessed by users with limited mobility and provides functional support with the keyboard as a primary input device. However, a rating of Supports with Exceptions has been given for the following reasons: As stated in §1194.22 (I), While navigating with a keyboard in the Admin Ally Overview tab, Accessibility Score Chart, Total Courses, Total Files uploaded and Overall Accessibility Score are in the logical tab order, however they lack visual keyboard focus which may disorient users. There is lack of visual focus while navigating within Ally overview tab in Admin – Test section with keyboard.
	HTML Output: Supports with Minor Exceptions	The HTML output does not natively contain elements that require fine motor control or simultaneous actions. A Supports with Minor Exceptions is provided as the original document may contain interface elements which require interaction with keyboard.
	PDF Output: Supports with Minor Exceptions	The PDF output does not contain elements that require fine motor control or simultaneous actions. A Supports with Minor Exceptions is provided as the original document may contain interface elements which require interaction with keyboard.
	ePub Output:	The ePub output does not contain elements that require fine motor control or simultaneous actions.



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Criteria	Support Level	Remarks and Explanations
		A Supports with Minor Exceptions is provided as the original document may contain interface elements which require interaction with keyboard.







§ 1194.41 Information, Documentation and Support

Criteria	Support Level	Remarks and Explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Applicable- Not Tested	
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Applicable - Not tested	
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Applicable - Not tested	

