VPAT Accessibility Conformance Report

(Based on ITI VPAT©)

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| **Name of Product** | **User Privacy Center** |
| **Date Last Updated** | **April 8, 2021** |
| Completed by | Jay Nemchik (Digital Accessibility Team, Dayton) |
| **Applicable Standards/Guidelines** | This document rates User Privacy Center according to the W3C WCAG 2.1 A and AA requirements. |
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| **Testing Tools and Methods** | **Hands-on keyboard operation Firebug/Code inspection Firefox Web Developer Toolbar (removing style sheets) JAWS 18 on Mozilla Firefox 63 and MS IE 11 on Windows 10 NVDA screen reader v2019.2.1 Wave Extension**  **Color Contrast Analyzer W3C WAI Pages** Elsevier Accessibility Checklist: <http://romeo.elsevier.com/accessibility_checklist/> |
| **Document Sections** | The review document below includes all WCAG 2.1 A and AA checkpoints and is organized into 6 logical sections:   * Visuals * Keyboard * Headings and Structure * Labeling * Multimedia * Usability |
| **Pages Covered** | Header, Footer, Homepage, Privacy Settings |
| **Terms** | * **Supports: The functionality of the product has at least one method that meets the criteria without known defects or meets with equivalent facilitation.** * **Partially supports: Some functionality of the product does not meet the criteria.** * **Does not support: Majority of functionality of the product does not meet the criteria.** * **Supports (N/A): According to W3C on conformance, "If there is no content to which a success criterion applies, the success criterion is satisfied."** |
| **Notes/Terminology** | **“AT” stands for Assistive Technology such as screen readers, voice input, etc.** |

| **WCAG 2.1 Success Criterion** | **Level** | **Evaluation** |
| --- | --- | --- |
| 1.1.1: Non-text Content | A | Supports |
| 1.2.1: Audio-only and Video-only (Prerecorded) | A | Supports (N/A) |
| 1.2.2: Captions (Prerecorded) | A | Supports (N/A) |
| 1.2.3: Audio Description or Full Text Alternative | A | Supports (N/A) |
| 1.2.4: Captions (Live) | AA | Supports (N/A) |
| 1.2.5: Audio Description | AA | Supports (N/A) |
| 1.3.1: Info and Relationships | A | Supports |
| 1.3.2: Meaningful Sequence | A | Supports |
| 1.3.3: Sensory Characteristics | A | Supports |
| 1.3.4 Orientation (2.1) | AA | Supports |
| 1.3.5 Identify Input Purpose (2.1) | AA | Supports (N/A) |
| 1.4.1: Use of Color | A | Supports |
| 1.4.2: Audio Control | A | Supports (N/A) |
| 1.4.3: Contrast (Minimum) | AA | Supports |
| 1.4.4: Resize text | AA | Supports |
| 1.4.5: Images of Text | AA | Supports |
| 1.4.10 Reflow (2.1) | AA | Supports |
| 1.4.11 Non-Text Contrast (2.1) | AA | Supports |
| 1.4.12 Text Spacing (2.1) | AA | Supports |
| 1.4.13 Content on Hover or Focus (2.1) | AA | Supports |
| 2.1.1: Keyboard | A | Supports |
| 2.1.2: No Keyboard Trap | A | Supports |
| 2.1.4 Character Key Shortcuts (2.1) | A | Supports (N/A) |
| 2.2.1: Timing Adjustable | A | Supports (N/A) |
| 2.2.2: Pause, Stop, Hide | A | Supports |
| 2.3.1: Three Flashes or Below Threshold | A | Supports (N/A) |
| 2.4.1: Bypass Blocks | A | Supports |
| 2.4.2: Page Titled | A | Supports |
| 2.4.3: Focus Order | A | Supports |
| 2.4.4: Link Purpose (In Context) | A | Supports |
| 2.4.5: Multiple Ways | AA | Supports |
| 2.4.6: Headings and Labels | AA | Supports |
| 2.4.7: Focus Visible | AA | Supports |
| 2.5.1 Pointer Gestures (2.1) | A | Supports (N/A) |
| 2.5.2 Pointer Cancellation (2.1) | A | Supports (N/A) |
| 2.5.3 Label in Name (2.1) | A | Supports |
| 2.5.4 Motion Actuation (2.1) | A | Supports (N/A) |
| 3.1.1: Language of Page | A | Supports |
| 3.1.2: Language of Parts | AA | Supports |
| 3.2.1: On Focus | A | Supports |
| 3.2.2: On Input | A | Supports |
| 3.2.3: Consistent Navigation | AA | Supports |
| 3.2.4: Consistent Identification | AA | Supports |
| 3.3.1: Error Identification | A | Supports |
| 3.3.2: Labels or Instructions | A | Supports |
| 3.3.3: Error Suggestion | AA | Supports |
| 3.3.4: Error Prevention (Legal, Financial, Data) | AA | Supports |
| 4.1.1: Parsing | A | Supports |
| 4.1.2: Name, Role, Value | A | Supports |
| 4.1.3 Status Messages (2.1) | AA | Supports |

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| **Visuals** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.1.1: Non-Text Content](http://www.w3.org/TR/WCAG20/#text-equiv-all) (A) Provide text alternatives for non-text content (e.g. images) | Supports | All images and icons include text equivalents. |
| [1.3.3: Sensory Characteristics](http://www.w3.org/TR/WCAG20/#content-structure-separation-understanding) (A) Do not rely on sensory characteristics of components such as shape, size, visual location, orientation, or sound | Supports | Content does not rely on sensory characteristics for all content. |
| [1.4.1: Use of Color](http://www.w3.org/TR/WCAG20/#visual-audio-contrast-without-color) (A) Color is not used as the only visual means of conveying info | Supports | Color is not used as the only means of conveying information. |
| [1.4.3: Color Contrast (Minimum)](http://www.w3.org/TR/WCAG20/#visual-audio-contrast-contrast) (AA) Text has enough contrast with the background (4.5:1 for small text and 3:1 for large text) | Supports | All text has enough contrast with its corresponding background. |
| [1.4.4: Resize Text](http://www.w3.org/TR/WCAG20/#visual-audio-contrast-scale) (AA)  Text can be enlarged up to 200% without loss of functionality. | Supports | Text can be enlarged to 200% and content remains functional. |
| [1.4.5: Images of Text](http://www.w3.org/TR/WCAG20/#visual-audio-contrast-text-presentation) (AA) Text is used rather than images of text, except where the presentation of text is essential, such as logos | Supports | No images of text are used other than for Logos or essential presentation. |
| [1.4.10 Reflow](https://www.w3.org/TR/WCAG21/#reflow) (AA) Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for:  Vertical scrolling content at a width equivalent to 320 CSS pixels;  Horizontal scrolling content at a height equivalent to 256 CSS pixels. | Supports | User Privacy Center uses a responsive view that properly scrolls in only one direction once width reaches low CSS pixels. |
| [1.4.11 Non-Text Contrast (AA](https://www.w3.org/TR/WCAG21/#non-text-contrast)) User interact components and graphical objects have a contrast ratio of at least 3:1 against adjacent color(s). | Supports | All non-text UI components and graphical objects have at least a 3:1 contrast ratio. |
| [1.4.12 Text Spacing (AA)](https://www.w3.org/TR/WCAG21/#text-spacing)  In content implemented using markup languages that support the following text style properties, no loss of content or functionality occurs by setting all the following and by changing no other style property:  Line height (line spacing) to at least 1.5 times the font size;  Spacing following paragraphs to at least 2 times the font size;  Letter spacing (tracking) to at least 0.12 times the font size;  Word spacing to at least 0.16 times the font size. | Supports | The site allows users to adjust the text spacing without causing loss of content or functionality. |
| [1.4.13 Content on Hover or Focus (AA)](https://www.w3.org/TR/WCAG21/#content-on-hover-or-focus)  Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true:   * Dismissable * Hoverable * Persistent | Supports | The content that appears on hover or focus is dismissable, hoverable, and persistent. |
| [2.3.1: Three Flashes or Below Threshold](http://www.w3.org/TR/WCAG20/#seizure-does-not-violate) (A) No more than three flashes in a 1-second period, or the flashes are below the defined thresholds | Supports (N/A) | No flashing content exists. |
| **Keyboard** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.3.2: Meaningful Sequence](http://www.w3.org/TR/WCAG20/#content-structure-separation-sequence) (A)  The correct reading sequence can be programmatically determined | Supports | The correct reading sequence is logical is all places, matching the visual ordering of content. |
| [2.1.1: Keyboard](http://www.w3.org/TR/WCAG20/#keyboard-operation-keyboard-operable) (A)  All functionality is available from a keyboard, except for tasks such as drawing | Supports | All content can be reached and activated by keyboard. |
| [2.1.2: No Keyboard Trap](http://www.w3.org/TR/WCAG20/#keyboard-operation-trapping) (A)  The user can use the keyboard to move through page elements and is not trapped on a particular element | Supports | No keyboard traps exist on any page. |
| [2.1.4 Character Key Shortcuts (A)](https://www.w3.org/TR/WCAG21/#character-key-shortcuts)  If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true:   * Turn off * Remap * Active only on focus | Supports (N/A) | User Privacy Center does not have any single character key shortcuts on the site. |
| [2.4.3: Focus Order](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-focus-order) (A)  Users can tab through the elements of a page in a logical order | Supports | Tab order is logical on the site. |
| [2.4.7: Focus Visible](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-focus-visible) (AA)  The page element with the current keyboard focus has a visible focus indicator | Supports | All elements have a visible focus indicator. |
| [3.2.1: On Focus](http://www.w3.org/TR/WCAG20/#consistent-behavior-receive-focus) (A)  When a UI component receives focus, this does not trigger unexpected actions. | Supports | Focusable elements do not cause unexpected actions when receiving focus. |
| **Headers and Structure** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.3.1: Information and Relationships](http://www.w3.org/TR/WCAG20/#content-structure-separation-programmatic) (A)  Info, structure, and relationships can be programmatically determined | Partially supports | Headings and lists are used pretty well throughout the application.  **Exceptions:** |
| [2.4.1: Bypass Blocks](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-skip) (A)  Users can bypass repeated blocks of content. | Supports | Headings and HTML5 tags exist, which allow users using Assistive Technology to jump to the different areas of content quickly. A visible "Skip to Main Content" link is included. |
| [2.4.6: Headings and Labels](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-descriptive) (AA)  Headings and labels are clear and consistent. | Supports | The headings and labels that exist are typically clear and descriptive. |
| [3.1.1: Language of Page](http://www.w3.org/TR/WCAG20/#meaning-doc-lang-id) (A)  The language of the page is specified | Supports | The language is defined as lang="en" on all pages. |
| [3.1.2: Language of Parts](http://www.w3.org/TR/WCAG20/#meaning-other-lang-id) (AA)  Specify the language of text passages that are in a different language than the default language of the page. | Supports (N/A) | There are no passages of text that are a different language than the page default. |
| [4.1.1: Parsing](http://www.w3.org/TR/WCAG20/#ensure-compat-parses) (A)  Use valid, error-free HTML | Supports | HTML and CSS passes concerning these 4 specific criteria:  (i) elements have complete start and end tags,  (ii) elements are nested according to their specifications  (iii) elements do not contain duplicate attributes (iv) any IDs are unique, except where the specifications allow these features.  Note: There are other general HTML validation errors outside the scope of this criterion. |
| **Labeling** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.3.5 Identify Input Purpose (AA)](https://www.w3.org/TR/WCAG21/#identify-input-purpose) The purpose of each input field collecting information about the user can be programmatically determined when:  The input field serves a purpose identified in the Input Purposes for User Interface Components section; and the content is implemented using technologies with support for identifying the expected meaning for form input data. | Supports (N/A) | There are no pages on User Privacy Center that collect personal information from the user. |
| [2.4.2: Page Titled](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-title) (A)  The page has a title describing its topic or purpose | Supports | All page tiles are unique and descriptive. |
| [2.4.4: Link Purpose (In Context)](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-refs) (A)  The purpose of each link can be determined from the link text or surrounding context. | Supports | All links used have an identifiable purpose from the link text or surrounding context. |
| [2.5.3 Label in Name](https://www.w3.org/TR/WCAG21/#label-in-name) (A)  For user interface components with labels that include text or images of text, the name contains the text that is presented visually. | Supports | All user interface components that have visible text contain that text consistently within the accessible name. |
| [3.2.4: Consistent Identification](http://www.w3.org/TR/WCAG20/#consistent-behavior-consistent-functionality) (AA)  UI components used across the web site are identified consistently on every page. | Supports | UI components are consistent across the site. |
| [3.3.1: Error Identification](http://www.w3.org/TR/WCAG20/#minimize-error-identified) (A)  Input errors are clearly marked and described to the user. | Supports (N/A) | There are no forms that would give errors described by this criterion. |
| [3.3.2: Labels and Instructions](http://www.w3.org/TR/WCAG20/#minimize-error-cues) (A)  Items requiring user input are clearly labeled or have clear instructions. | Supports | All inputs are clearly labelled or have clear instructions. |
| [3.3.3: Error Suggestion](http://www.w3.org/TR/WCAG20/#minimize-error-suggestions) (AA)  When the user makes an input error, give suggestions for valid input. | Supports (N/A) | There are no forms that would give errors described by this criterion. |
| [4.1.2: Name, Role, Value](http://www.w3.org/TR/WCAG20/#ensure-compat-rsv) (A)  For all UI components, the name, value, and role can be programmatically determined. | Supports | All UI components communicate their state programmatically. Some ARIA attributes are used unnecessarily. |
| [4.1.3 Status Messages](https://www.w3.org/TR/WCAG21/#status-messages) (AA)  In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus. | Supports | "Saved" status messages appear when changing settings on the Privacy Settings page, which are fully communicated to assistive technology. |
| **Multimedia** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.2.1: Audio-only or Video-only (Prerecorded)](http://www.w3.org/TR/WCAG20/#media-equiv-av-only-alt) (A)  Provide alternatives for pre-recorded audio-only or video-only content. | Supports (N/A) | There is no pre-recorded audio-only or video-only content. |
| [1.2.2: Captions (Prerecorded)](http://www.w3.org/TR/WCAG20/#media-equiv-captions) (A)  Provide captions for pre-recorded audio | Supports (N/A) | There is no pre-recorded audio or synchronized media in the applications. |
| [1.2.3: Audio Description or Media Alternative (Prerecorded)](http://www.w3.org/TR/WCAG20/#media-equiv-audio-desc) (A)  Provide alternatives for pre-recorded synchronized audio/video | Supports (N/A) | There is no synchronized media in the applications. |
| [1.2.4: Captions (Live)](http://www.w3.org/TR/WCAG20/#media-equiv-real-time-captions) (AA)  Provide captions for live audio in synchronized audio/video. | Supports (N/A) | There is no live audio in synchronized audio/video. |
| [1.2.5: Audio Description (Prerecorded)](http://www.w3.org/TR/WCAG20/#media-equiv-audio-desc-only) (AA)  Provide an audio description of pre-recorded video. | Supports (N/A) | There is no pre-recorded video in the applications. |
| [1.4.2: Audio Control](http://www.w3.org/TR/WCAG20/#visual-audio-contrast-dis-audio) (A)  Audio can be paused and stopped, or the audio volume can be changed. | Supports (N/A) | There is no automatically playing audio on the site. |
| [2.2.2: Pause, Stop, Hide](http://www.w3.org/TR/WCAG20/#time-limits-pause) (A)  Users can stop, pause, or hide moving, blinking, scrolling, or auto-updating information. | Supports (N/A) | There is no moving, blinking, or scrolling content. |
| **Usability** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [2.2.1: Timing Adjustable](http://www.w3.org/TR/WCAG20/#time-limits-required-behaviors) (A)  Users are warned of time limits shorter than 20 hours and time limits can be turned off or extended | Supports (N/A) | No time limit seems to exist. |
| [2.4.5: Multiple Ways](http://www.w3.org/TR/WCAG20/#navigation-mechanisms-mult-loc) (AA)  More than one way is available to navigate to other web pages. | Supports | Users can reach all pages in the system using the global navigation.  Content pages can be reached through the global nav or homepage. |
| [3.2.2: On Input](http://www.w3.org/TR/WCAG20/#consistent-behavior-unpredictable-change) (A)  Changing the setting of a checkbox, radio button, or other UI component does not trigger unexpected changes in context. | Supports | User inputs do not cause unexpected actions. |
| [3.2.3: Consistent Navigation](http://www.w3.org/TR/WCAG20/#consistent-behavior-consistent-locations) (AA)  Navigation menus are in the same location and order on every web page. | Supports | Navigation menus are consistently in the same place and in same order. |
| [3.3.4: Error Prevention (Legal, Financial, Data)](http://www.w3.org/TR/WCAG20/#minimize-error-reversible) (AA)  For web pages with legal or financial commitments, input can be reviewed and corrected before final submission, and submissions can be reverted. | Supports | There are no submissions which require legal or financial commitments. |
| **Mobile User Experience** | | |
| **WCAG 2.1**  **Checkpoint** | **Supporting Features** | **Remarks** |
| [1.3.4 Orientation](https://www.w3.org/TR/WCAG21/#orientation)  (AA) Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential. | Supports | User Privacy Center does not restrict its view to a single orientation. |
| [2.5.1 Pointer Gestures](https://www.w3.org/TR/WCAG21/#pointer-gestures) (A) All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential. | Supports (N/A) | User Privacy Center does not use any multipoint or path-based gestures. |
| [2.5.2 Pointer Cancellation (A)](https://www.w3.org/TR/WCAG21/#pointer-cancellation)  For functionality that can be operated using a single pointer, at least one of the following is true:   * No Down-Event * Abort or Undo * Up Reversal * Essential | Supports | All interactive content functions through the Up-Event, allowing users to potentially move their pointer off the component to cancel. |
| [2.5.4 Motion Actuation (A)](https://www.w3.org/TR/WCAG21/#motion-actuation)  Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when:   * Supported Interface * Essential | Supports (N/A) | There is no content on User Privacy Center that utilizes device or user motion. |