

## APPENDIX C

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## CSU Guide to Completing the Voluntary Product Evaluation Template (VPAT)

### Purpose:

This document will provide Vendors with instructions as to how they are expected to complete the Voluntary Product Evaluation Template (VPAT) for the California State University.

### Background:

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the 508 Evaluation Template – a simple, web-based checklist that allows Vendors to document how their product did or did not meet the various Section 508 Requirements.

### How the Voluntary Product Evaluation Template (VPAT) is organized:

The Voluntary Product Evaluation Template (VPAT) consists of a long series of tables. The initial one, the **Summary Table**, is used to provide a sense of your product's **overall** "level-of-compliance" with the Section 508 Standards. Subsequently, the **Section 1194.xx Tables** contain the detailed subparagraphs of each section of the Standards. It is within these **Section 1194.xx Tables** that you will define in detail how your product did or did not comply with a specific requirement.

### Understanding the columns

Use the following to understand the use of the three columns in both the Summary Table and the individual Section 1194.xx Table:

#### Summary Table

Column Name	Use
<b>Criteria:</b>	Describes Subparts B, C, and D of the Section 508 Standards.
<b>Supporting Features:</b>	To <u>Enter</u> information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify <b>Not Applicable</b> .
<b>Remarks/Explanations:</b>	To <u>Enter</u> general comments regarding a product's overall "level-of-compliance" with the <b>Applicable</b> Subpart.

#### Section 1194.xx Table

Column Name	Use
<b>Criteria:</b>	Describes a specific guideline that a Subpart is composed of.
<b>Supporting Features:</b>	To <u>Enter</u> information summarizing a product's "level-of-support" for a specific guideline.
<b>Remarks/Explanations:</b>	To <u>Enter</u> detailed information on how the product <u>did</u> or <u>did not</u> support a specific guideline.

**What information do I enter in columns 2 and 3?**

The **Supporting Features** and **Remarks/Explanations** columns are used to document exactly how a product **did** or **did not** meet the Section 508 Standards. In order to promote consistency in Vendor responses, which will ensure a quicker review process by CSU's contracting and procurement officials, we encourage you to answer these columns in the following manner:

<b>Supporting Features (second column on 508 Evaluation Template)</b>	
<b>Language</b>	<b>Description</b>
<b>Supports</b>	Product <b>FULLY meets</b> the letter and intent of the Criteria.
<b>Supports with Exceptions</b>	Product <b>does not ENTIRELY</b> meet the letter and intent of the Criteria, but does provides some level of access.
<b>Supports through Equivalent Facilitation</b>	Product provides <i>alternative</i> methods to <b>meet</b> the intent of the Criteria.
<b>Does not Support</b>	Product <b>does not</b> meet the letter or intent of the Criteria.
<b>Not Applicable</b>	The Criteria <b>does not</b> apply to the product.

<b>Remarks &amp; Explanations (third column on 508 Evaluation Template)</b>	
<b>If 2<sup>nd</sup> column states...</b>	<b>Then...</b>
<b>Supports</b>	List exactly <b><u>what</u></b> features of the product <b>do</b> meet and describe <b><u>how</u></b> they are used to support the Criteria.
<b>Supports with Exceptions</b>	<p>List exactly <b><u>what</u></b> features of the product <b>do</b> meet and describe <b><u>how</u></b> they are used to support the Criteria.</p> <p align="center"><b>AND</b></p> <p>List exactly <b><u>what</u></b> parts of the product <b>do not</b> meet and describe <b><u>how</u></b> they fail to support the Criteria.</p>
<b>Supports through Equivalent Facilitation</b>	List exactly <b><u>what</u></b> <i>other</i> methods exist in the product and describe <b><u>how</u></b> they are used to support the Criteria.
<b>Supports when combined with Compatible Assistive Technology</b>	Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible Assistive Technology. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for

	people who are blind).
<b>Does not Support</b>	Describe exactly <b><u>how</u></b> the product <b>does not</b> support the Criteria.
<b>Not Applicable</b>	Describe exactly <b><u>why</u></b> the criteria is not applicable to the product.
<b>Not Applicable -- Fundamental Alteration Exception Supplies</b>	Use this language when you determine a Fundamental Alteration to the product would be required to meet the Criteria (see the Access Board standards for the definition of “fundamental alteration”).

## Typical Scenario for Completing a Voluntary Product Evaluation Template (VPAT):

To begin the process of completing the Voluntary Product Evaluation Template (VPAT), you should enlist the services of your company's technical specialist for the product being sought for purchase. The reason for this is because CSU requires a measure of technical detail in your responses. Once you've enlisted their assistance:

- 1) Determine which sections of the **Technical Standards (Subpart B-1194.21-26)** apply to your product. \* In some cases more than one set of Technical Standards will apply.
- 2) Keep in mind that you must **always** complete the **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the Voluntary Product Evaluation Template (VPAT).
- 3) Fill out the **Functional Performance Criteria (Subpart C – 1194.31)** if you are claiming Equivalent Facilitation. Equivalent Facilitation must yield equal or greater access.
- 4) For each section that applies, determine if your product does or does not meet the specific Criteria elements.
- 5) Using the information found in the [How the Voluntary Product Evaluation Template \(VPAT\) is organized](#) section, document in the **Section 1194.xx Tables** exactly **how** your product **did** or **did not** meet the applicable standard.
  - If your product **supports** the standard, provide detailed examples of **what** accessibility features exist and **how** they are used to support the standard.
  - If your product **does not support** the standard, remember that Section 508 allows for products to meet the Access Board Standards in innovative, non-traditional ways. Your product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user.
  - If your product **does not** possess an ***innovative, non-traditional way*** of access to the standard, provide detailed examples of exactly **how** the product **did not** meet the standard.
- 6) Once you've documented in the **Section 1194.xx Tables** exactly how your product **did** or **did not** meet the standard, return to the **Summary Table** and document the product's overall "level-of-conformance" in each of the applicable sections.
- 7) Post your final Voluntary Product Evaluation Template (VPAT) on your company's web site. Please keep in mind that it is the Vendor's responsibility to maintain the integrity of the data on the Voluntary Product Evaluation Template (VPAT). The information provided on your Voluntary Product Evaluation Template (VPAT) is considered to be a self-representation unless expressly affirmed otherwise.
- 8) When responding to any CSU request for proposals, the Vendor must submit a completed and up-to-date Voluntary Product Evaluation Template (VPAT) with the submission. Proposals without an attached completed Voluntary Product Evaluation Template (VPAT) may be disqualified from competition.

\* **Please Note:** Any **WEB** application being purchased by CSU **requires** the Vendor to complete **Section 1194.21** of the Voluntary Product Evaluation Template (VPAT) in addition to **Sections 1194.22, 1194.31 and 1194.41**.

## Voluntary Product Evaluation Template (VPAT)

**Date:**

**Name of Product:**

**Contact for more Information:**

Refer to the [ITIC Best Practices](#) for filling out the following form.

Summary Table		
Criteria	Supporting Features	Remarks and explanations
Section 1194.21 <a href="#">Software Applications and Operating Systems</a>		
Section 1194.22 <a href="#">Web-based internet information and applications</a>		
Section 1194.23 <a href="#">Telecommunications Products</a>		
Section 1194.24 <a href="#">Video and Multi-media Products</a>		
Section 1194.25 <a href="#">Self-Contained, Closed Products</a>		
Section 1194.26 <a href="#">Desktop and Portable Computers</a>		
Section 1194.31 <a href="#">Functional Performance Criteria</a>		
Section 1194.41 <a href="#">Information, documentation, and support.</a>		

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Section 1194.21 Software Applications and Operating Systems		
* Refer to ( <a href="http://www.access-board.gov/sec508/guide/1194.21.htm">http://www.access-board.gov/sec508/guide/1194.21.htm</a> ) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supports	While the product is designed to be used with a keyboard and mouse in combination, all functions could be performed using a keyboard.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to	Supports	Product will not disrupt accessibility features of other products or of operating system.

industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.		
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supports with Exceptions	<p>Since product is a web application, product makes use of built-in on-screen focus indicator, present in all major browsers.</p> <p>In some situations (ex. tabbing around between hyperlinks), the browser default focus is not well-defined.</p>
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.	Supports with Exceptions	We are in the process of implementing this criterion. It has been implemented for most product elements, but some exceptions still remain.
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supports	This is the case for all product elements.
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supports	Since product is a web application, product makes use of standard browser-based methods for displaying text.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	Contrast and color for all product elements are set via CSS and can be overridden by browser settings or OS settings.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Not Applicable	Product contains no animations.
(i) Color coding shall not be used as the only means of conveying information,	Does not Support	In many cases, hyperlinks are distinguished from normal

indicating an action, prompting a response, or distinguishing a visual element.		text only by color.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Not Applicable	Product does not permit user to adjust color and contrast settings.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supports	Product uses no blinking text, objects, or other elements.
(l) When electronic forms are used, 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.	Supports with Exceptions	In at least some cases, form field constraints are implied rather than explicitly indicated.

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Section 1194.22 Web-based Internet information and applications		
* Refer to ( <a href="http://www.access-board.gov/sec508/guide/1194.22.htm">http://www.access-board.gov/sec508/guide/1194.22.htm</a> ) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports with Exceptions	We are in the process of implementing this criterion. It has been implemented for most product elements, but some exceptions still remain.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	Product contains no multimedia elements.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports with Exceptions	Although (as noted in 1194.21.i) many hyperlinks are visually distinguished from normal text only by color, they are distinguished via markup.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	Semantic structure of all product pages remains intact when CSS is disabled.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Product contains no server-side image maps.
(f) Client-side image maps shall be provided instead of server-side image	Not Applicable	Product contains no image maps of any kind.



maps except where the regions cannot be defined with an available geometric shape.		
(g) Row and column headers shall be identified for data tables.	Supports with Exceptions	Many, but not all, data tables semantic markup to include column headers.
(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.	Supports with Exceptions	Some company profile pages and search results do not make use of table headers.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Supports	
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not Applicable	Product contains no animated elements.
(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.	Not Applicable	There are no text-only versions of our pages.
(l) 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.	Does not Support	If the assistive technology employed by the user does not support JavaScript, the user may miss key pieces of information.
(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).	Supports	
(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.	Does not Support	Some JavaScript layers contain hidden content to that must be populated by clicking links.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Does not Support	Skip navigation links are not present on product's pages.
(p) When a timed response is required, the user shall be alerted and given sufficient	Not Applicable	No timed responses are required by any page of the

time to indicate more time is required.

product.

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.

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#### Section 1194.23 Telecommunications Products

\* Refer to ( <http://www.access-board.gov/sec508/guide/1194.23.htm> ) for details on the guidelines listed below.

Criteria	Supporting Features	Remarks and explanations
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.		
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.		
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.		
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.		
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a		

minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.		
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.		
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.		
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.		
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.		
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.		
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.		
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall		

be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.		
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.		

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Section 1194.24 Video and Multi-media Products		
* Refer to ( <a href="http://www.access-board.gov/sec508/guide/1194.24.htm">http://www.access-board.gov/sec508/guide/1194.24.htm</a> ) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.		
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.		
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.		
(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.		
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.		

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Section 1194.25 Self-Contained, Closed Products		
* Refer to ( <a href="http://www.access-board.gov/sec508/guide/1194.25.htm">http://www.access-board.gov/sec508/guide/1194.25.htm</a> ) for details on the guidelines		

listed below.

Criteria	Supporting Features	Remarks and explanations
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with 1194.23 (k) (1) through (4).		
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.		
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.		
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.		
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.		
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.		
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.		
(j)(3) Products which are freestanding, non-portable, and intended to be		

used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.		

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Section 1194.26 Desktop and Portable Computers		
* Refer to ( <a href="http://www.access-board.gov/sec508/guide/1194.26.htm">http://www.access-board.gov/sec508/guide/1194.26.htm</a> ) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with Û1194.23 (k) (1) through (4).		
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with Û1194.23 (k) (1) through (4).		
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards		

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Section 1194.31 Functional Performance Criteria		
Criteria	Supporting Features	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.	Supports with Exceptions	Pages are designed in such a way that they can be used and understood with assistive technology.
(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.	Supports with Exceptions	Some pages contain smaller font sizes, but browser settings allow them to be changed and the page resized.
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or	Supports	All videos contain closed captioning

support for Assistive Technology used by people who are deaf or hard of hearing shall be provided		
(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.	Supports	Audio information is presented as a video with closed captioning
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Supports	No part of the product requires user speech.
(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.	Does not Support	

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Section 1194.41 Information, documentation, and support		
Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Support	
(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.	Support	
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Support	

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