



**Section 508 Conformance Audit**  
**Voluntary Product Accessibility Template**  
*CITI Program Website (Public Facing)*

**CITI Program**

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## Section 508 Evaluation Template

This Voluntary Product Accessibility Template (VPAT) provides guidance on the accessibility characteristics of **CITI Program Website (Public Facing)** as of **December 21, 2017**.

**Name of Product:** CITI Program Website (Public Facing)

The current version of **CITI Program Website (Public Facing)** was tested for conformance with Section 508 of the Rehabilitation Act, specifically, the U.S. Access Board's Technical Requirements. This product was tested as of **December 21, 2017** and is only valid for the version and date it was tested.

### VPAT™ Summary Table Voluntary Product Accessibility Template®

VPAT Summary	Total Standards	Total Applicable Standard	Supports	Exceptions
Section 1194.21 Software Applications and Operating Systems	12	10	6	4
Section 1194.22 Web-based Internet Information and Applications	16	7	2	5
Section 1194.23 Telecommunications Products	14	0	0	0
Section 1194.24 Video and Multi-media Products	5	0	0	0
Section 1194.25 Self-Contained, Closed Products	13	2	1	1
Section 1194.26 Desktop and Portable Computers	4	0	0	0
Section 1194.31 Functional Performance Criteria	6	6	4	2
Section 1194.41 Information, Documentation and Support	3	3	3	0
<b>Total</b>	<b>73</b>	<b>28</b>	<b>16</b>	<b>12</b>

## Section 1194.21 Software Applications and Operating Systems - Detail

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Criteria	Supporting Features	Remarks and explanations
<p>(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.</p>	<p>Supports with Exceptions</p>	<p>Some functions of the application are keyboard operable. Some functions, such as some links and tabs are not keyboard operable.</p>
<p>(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 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.</p>	<p>Supports</p>	<p>The application does not interfere with other assistive technology.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Supports</p>	<p>The visual focus is well-defined. The focus is programmatically exposed to assistive technology.</p>
<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.</p>	<p>Supports with Exceptions</p>	<p>The application provides name, role, state and value information to assistive technology for some components. Some components do not provide required information such as name, role or state.</p>
<p>(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.</p>	<p>Supports</p>	<p>The meaning of images is consistent throughout the application.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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	Textual information is provided through operating system functions.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	The application honors user selected color and contrast settings such as Windows High Contrast.
(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	Animation is not used.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supports with Exceptions	Color coding is not used as the sole means of conveying information on some screens. Some links use color only to indicate focus.
(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	The application does not permit users to adjust color and contrast settings.

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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	Flashing or blinking does not occur in the prohibited range.
(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	The application provides name, role, state and value information to assistive technology for some components. Some components do not provide required information such as name, role or state.

**Section 1194.22 Web-based Internet information and applications -  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports with Exceptions	Some images have alternative text. Some graphical buttons and graphics do not have alternative text.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	Multimedia is not used.
(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	Color coding is not used as the sole means of conveying information on some screens. Some links use color only to indicate focus.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports with Exceptions	The application is readable without the use of style sheets. Headings are not properly used on some pages.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Server-side image maps are not used.

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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.	Not Applicable	Client-side image maps are not used.
(g) Row and column headers shall be identified for data tables.	Not Applicable	Tables are not used.
(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.	Not Applicable	Tables of two or more logical levels are not used.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Not Applicable	Frames are not used.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports	Flickering does not occur in the prohibited range.



<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>The application is interactive and cannot be represented by text alone.</p>
<p>(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.</p>	<p>Supports</p>	<p>Functional text created by client-side scripting can be read by assistive technology.</p>
<p>(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).</p>	<p>Not Applicable</p>	<p>Plug-ins are not used.</p>

Criteria	Supporting Features	Remarks and explanations
(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.	Supports with Exceptions	The application provides name, role, state and value information to assistive technology for some components. Some components do not provide required information such as name, role or state.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Does Not Support	No method for skipping repetitive navigation links is provided.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	A timed response is not required.

**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.

**Section 1194.23 Telecommunications Products – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product. Does not provide voice communication functionality.</p>
<p>(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product. Does not provide voice communication functionality.</p>
<p>(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product. Does not contain voice mail, auto-attendant, and interactive voice response telecommunications systems.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product. Does not contain voice mail, auto-attendant, and interactive voice response telecommunications systems.</p>
<p>(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product. Does not contain telecommunications functionality such as caller ID.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product or System.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product or System.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product or System.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product or System.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>Not a Telecommunications Product or System.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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.	Not Applicable	Not a Telecommunications Product or System.
(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.	Not Applicable	Not a Telecommunications Product or System.
(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.	Not Applicable	Not a Telecommunications Product or System.

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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.	Not Applicable	Not a Telecommunications Product or System.

**Section 1194.24 Video and Multi-media Products – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a Video or Multi-media Product. Does not have analog television receiver or display circuitry.</p>



<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not Applicable	This product is not a Video or Multi-media Product. Does not have tuner capabilities.
(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.	Not Applicable	This product is not a Video or Multi-media Product. This product contains no user required multimedia presentations.
(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.	Not Applicable	This product is not a Video or Multi-media Product. This product contains no user required multimedia presentations.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Not Applicable	This product is not a Video or Multi-media Product. This product contains no user required multimedia presentations.

**Section 1194.25 Self-Contained, Closed Products – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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.	Not Applicable	This product is not a self-contained, closed product.
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	A timed response is not 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).	Not Applicable	This product is not a self-contained, closed product.
(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.	Not Applicable	This product is not a self-contained, closed product.

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>
<p>(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.</p>	<p>Supports with Exceptions</p>	<p>Color coding is not used as the sole means of conveying information on some screens. Some links use color only to indicate focus.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>The application does not permit the user to change display settings.</p>
<p>(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<p>Supports</p>	<p>Flickering does not occur in the prohibited range.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>
<p>(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.</p>	<p>Not Applicable</p>	<p>This product is not a self-contained, closed product.</p>

**Section 1194.26 Desktop and Portable Computers – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Not Applicable	Product does not use mechanically operated controls.
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not Applicable	Product does not use touch-operated controls.
(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.	Not Applicable	Product does not use biometric forms of user identification or control.
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not Applicable	Product is a software application, not hardware.

**Section 1194.31 Functional Performance Criteria – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Supports with Exceptions</p>	<p>The application provides name, role, state and value information to assistive technology for some components. See 1194.21 and 1194.22 for details.</p>
<p>(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.</p>	<p>Supports</p>	<p>The application can be used by users with a visual acuity of 20/70 when used with screen magnification assistive technology.</p>
<p>(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</p>	<p>Supports</p>	<p>Does not require user hearing.</p>

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
<p>(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.</p>	<p>Supports</p>	<p>Does not require user hearing.</p>
<p>(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.</p>	<p>Supports</p>	<p>Does not require user speech.</p>
<p>(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.</p>	<p>Supports with Exceptions</p>	<p>The application is partially keyboard operable.</p>



**Section 1194.41 Information, Documentation and Support – Detail**  
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<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	The documentation is in electronic format and can be converted to other formats.
(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.	Supports	The documentation is in electronic format and can be converted to other formats.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support services accommodate end users with disabilities.