



National Institute of  
Environmental Health Sciences

# 2018 ANNUAL REPORT

for the National Clearinghouse  
for Worker Safety and Health Training





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for Worker Safety and Health Training

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**Operated by MDB, Inc.**

1101 Connecticut Avenue NW, Suite  
550, Washington, DC 20036  
t: 202.331.7733 • f: 202.331.0044  
• <http://tools.niehs.nih.gov/wetp>

Report on contract activities  
performed by MDB, Inc. on  
Contract HHSN273201500075U#  
between September 22, 2017 and  
September 21, 2018

2018 Annual Report for the National  
Clearinghouse for Worker Safety  
and Health Training



# Overview

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Each year, MDB, Inc. highlights its work providing a range of communication and technical assistance services to the National Institute of Environmental Health Sciences (NIEHS) Worker Training Program (WTP). This report covers the activities of the NIEHS WTP National Clearinghouse for Worker Safety and Health Training (Clearinghouse) from Sept. 22, 2017, to Sept. 21, 2018 – the second option year in MDB’s current contract period.

The Clearinghouse supported efforts to provide comprehensive safety and health training to workers in a variety of ways. This report is organized by the tasks that are designated in the MDB contract, and details how we undertook and fulfilled those assignments. Highlights include:

- **Hurricane Response Support**—Clearinghouse staff continued to work with WTP staff and grantees to support local communities affected by hurricanes Harvey, Maria, and Irma, as well as the workers supporting the recovery of these communities.
- **Minimum Criteria Update**—To ensure that training guidelines remain current, the Clearinghouse worked closely with WTP staff and grantees to update “Minimum Health and Safety Training Criteria: Guidance for HAZWOPER and HAZWOPER-Supporting Training,” a national guidance document for training hazardous waste workers and emergency responders.
- **Opioid Training Tool**—Clearinghouse staff supported the WTP’s efforts to protect workers from exposure to opioids by developing a training tool that helps workers identify the different types of opioids, recognize the ways exposure can occur, identify the symptoms of exposure, and identify ways to avoid exposure and decontaminate if exposure does occur.

# TASK 1

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NIEHS WTP National Clearinghouse management, coordination, reporting, and advisory board establishment.



## Monthly Reports and Meetings

Monthly meetings and reports are core management tools used by the Clearinghouse to ensure clear communication about project plans, program updates, and the status of budgets. Clearinghouse Director Deborah Weinstock attends monthly meetings with Worker Education and Training Branch (WETB) staff in Research Triangle Park, North Carolina. These meetings provide WETB and Clearinghouse staff an opportunity to set priorities and identify the steps required to achieve project goals. Each month, Weinstock presents a progress and budget report, and reviews accomplishments and upcoming deadlines. Subject matter experts and other Clearinghouse staff join these meetings as necessary, in person or via teleconference, to provide detailed project updates.



## Strategic Planning

WETB and Clearinghouse staff held an annual planning meeting in Richmond, Virginia, on Dec. 11 – 12, 2017, to discuss current and emerging future issues, current and upcoming events, progress reports, program metrics, the Minimum Criteria workshop, program evaluation, and partnerships within the various program areas. The director of the NIEHS Division of Extramural Research and Training joined the meeting this year to discuss the NIEHS Strategic Plan. Representatives from the Office of the Director, Bethesda also joined the meeting to contribute to conversations about disasters and training, including the responses to the 2017 hurricanes, best practices, and lessons learned. Meeting attendees also participated in exercises to review and update the WTP operational matrix and program goals for 2018. The operational matrix was revised soon after the meeting to reflect new program priorities.



## Clearinghouse Advisory Board

The Clearinghouse Advisory Board met on Oct. 16, 2017, prior to the Fall 2017 WTP Grantee Meeting and Workshop. Clearinghouse Director Deborah Weinstock facilitated the meeting. Discussions focused on the impacts of hurricanes Harvey, Irma, and Maria, the WTP's role in disaster response/recovery activities, and the uniqueness of each hurricane response; the need for program evaluation; the role of the Clearinghouse; and planning for the 2017/2018 year, including plans for the 2018 National Trainers' Exchange.

# TASK 2

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Develop, analyze, compile, and disseminate program research products to enhance ongoing initiatives and to support new training initiatives and the continuation of program efficacy measures. This includes development of program materials and research products, information dissemination, expert editorial review, partnerships and representation, and support for the HDPTP, ECWTP, and DOE training programs.



## Information Dissemination

### Webinars

The Clearinghouse conducted webinars to continue to engage WTP grantees and share information on the latest emerging topics. These included:

#### *WTP Evaluation Community of Practice Webinar Series:*

Clearinghouse staff supported NIEHS Public Health Educator Demia Wright's efforts to organize and moderate two Evaluation Community of Practice webinars. Clearinghouse staff ran the webinar platform and posted materials to the website following the webinars.

- **Evaluation Community of Practice Training Follow-Up: Grantee Examples of Data Collection Methods (Nov. 30, 2017)**

Speakers included Carol Rice, Ph.D., University of Cincinnati (UC)/Midwest Consortium (MWC) for Hazardous Waste Worker Training, and Kevin Riley, Ph.D., University of California Los Angeles – Labor and Occupational Safety and Health Program (LOSH)/Western Regional Universities Consortium (WRUC). Rice gave a presentation on using feedback from repeat participants to assess impact of the program. Riley presented on WRUC's impact evaluation processes.

- **WTP Evaluation Community of Practice (April 12, 2018)**

Speakers included Wright and Ruth Ruttenberg, President, Ruth Ruttenberg & Associates. Ruttenberg gave an overview of the evaluation work that she has been doing with grantees. Wright discussed collecting trainer stories at the National Trainers' Exchange as a method of evaluating the WTP.

#### *Other Webinars:*

- **Data Management System Course Data Excel Upload Refresher (Feb. 21, 2018)**

The Clearinghouse provided a refresher for grantees on how to upload Excel files into the Data Management System, a feature that was introduced in FY2017.

- **National Trainers' Exchange Presenter Webinars (March 19 and 21, 2018)**

The Clearinghouse hosted two webinars to help National Trainers' Exchange presenters prepare for their workshop sessions. The webinars provided a broad overview of a Trainers' Exchange, reviewed presenter expectations, reviewed 508 compliance requirements for presentations, and answered questions from presenters.

## Grantee Updates

The Clearinghouse continues to prepare quarterly Grantee Updates that focus on specific issues related to grantees, including WTP-sponsored events, grantee-sponsored events, and relevant workshops and conferences; training summaries and highlights; and other relevant information. This is one way the Clearinghouse works to keep grantees informed about ongoing and upcoming activities.

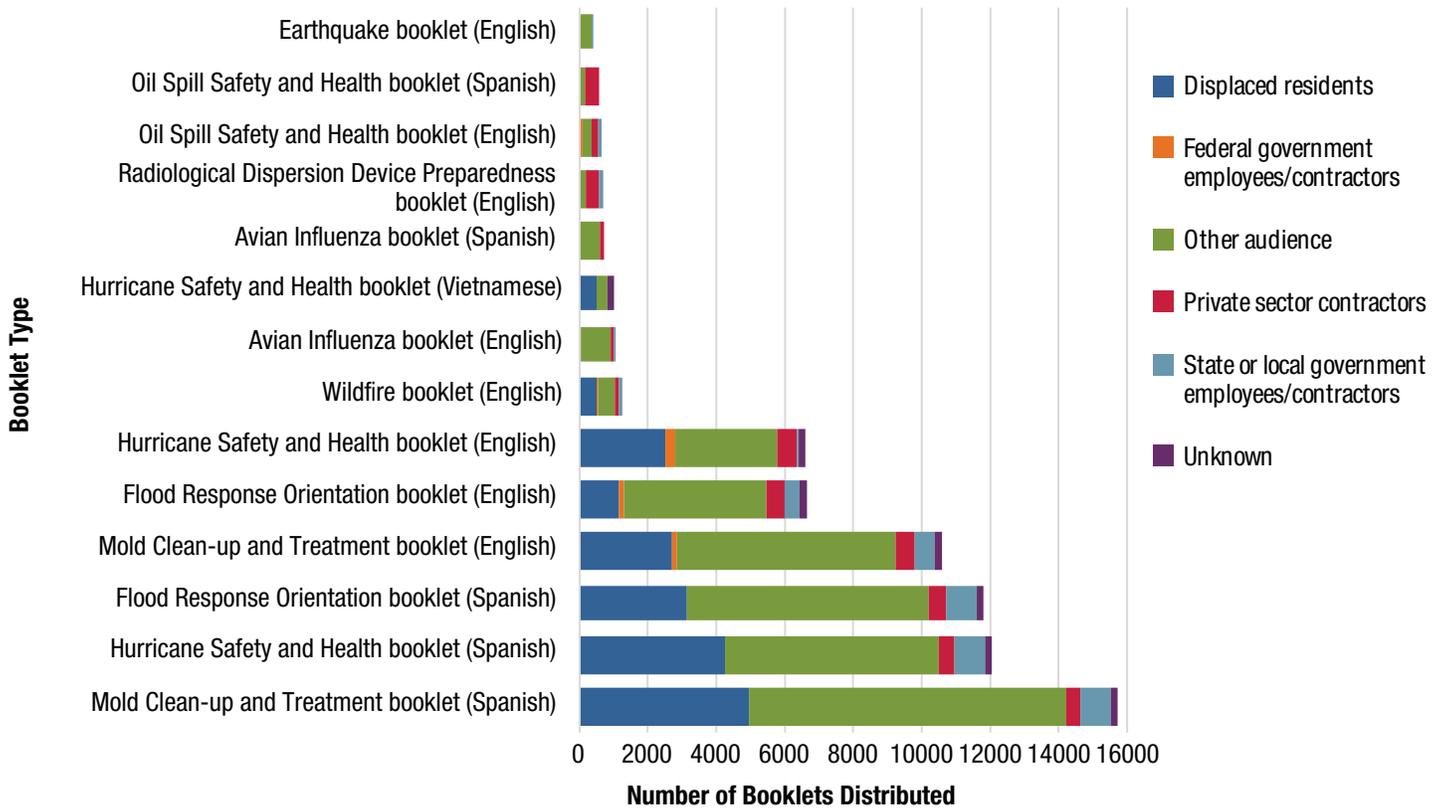
## Emergency Response Booklets

The Clearinghouse continues to develop and disseminate awareness-level training tools and companion booklets for workers participating in disaster response and cleanup activities. The pocket-size booklets may be distributed with the training and used as a resource when workers are on a disaster site. Some of these booklets are produced in more than one language.

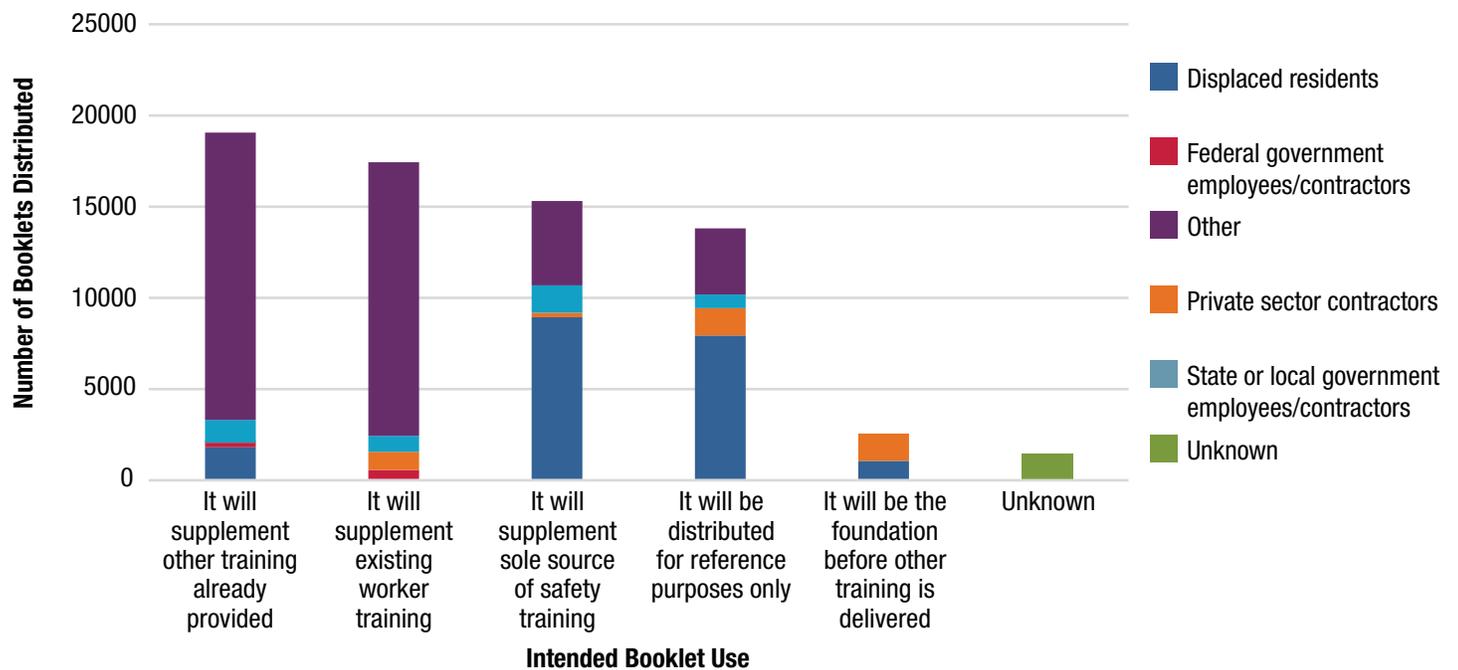
Booklets continue to be distributed to grantees and organizations familiar with the Clearinghouse. People learn about the booklets from visiting the Clearinghouse website, email alerts, involvement in the Disaster Research Response Program (DR2), and online searches.

Graphs 1-3 show the distribution of the booklets from Sept. 22, 2017, to Sept. 14, 2018.

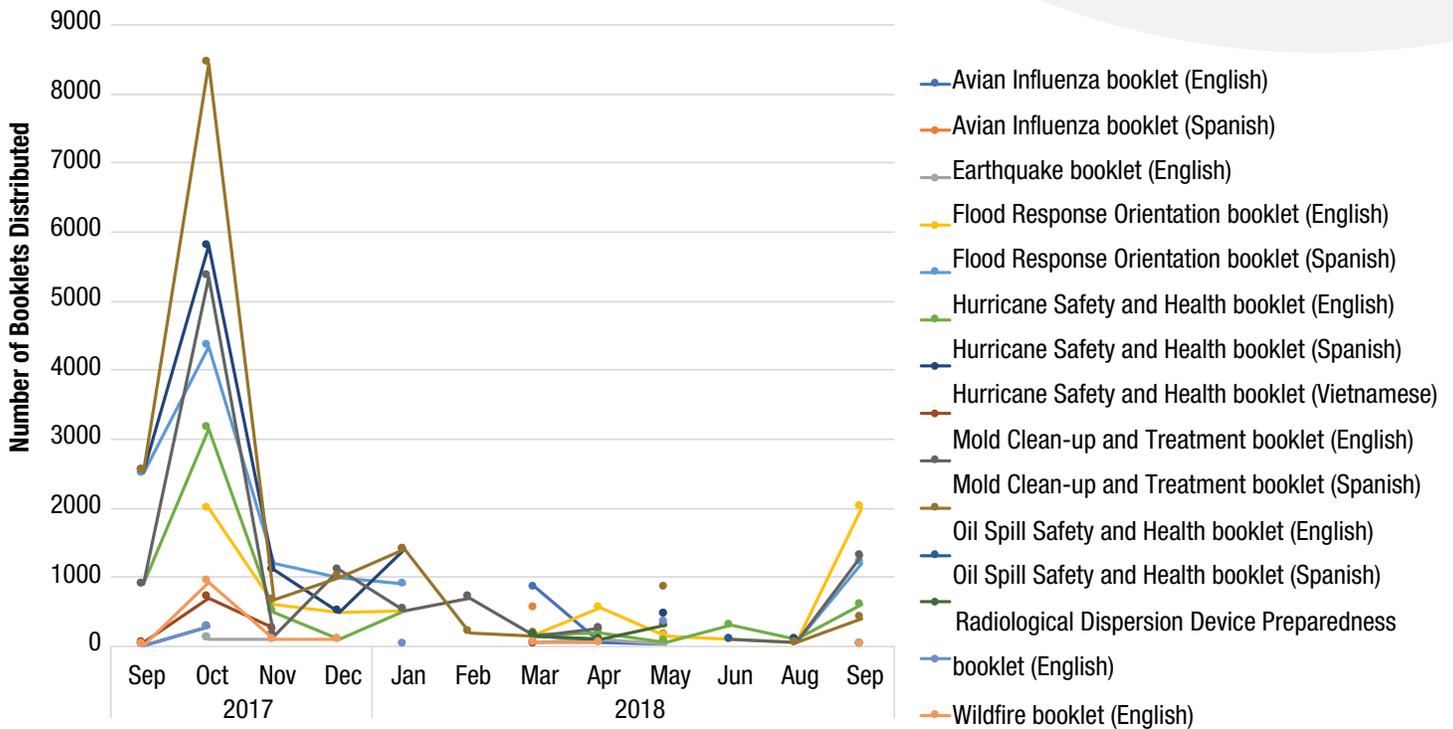
The top five booklets distributed during FY2018 were Mold Clean-up and Treatment (Spanish), Hurricane Safety and Health (Spanish), Flood Response Orientation (Spanish), Mold Clean-up and Treatment (English), and Flood Response Orientation (English). The majority of these five booklets were distributed to other audiences, state or local government employees/contractors, private sector contractors, and displaced residents (see Graph 1).



**Graph 1. Booklet Distribution by Intended Audience**

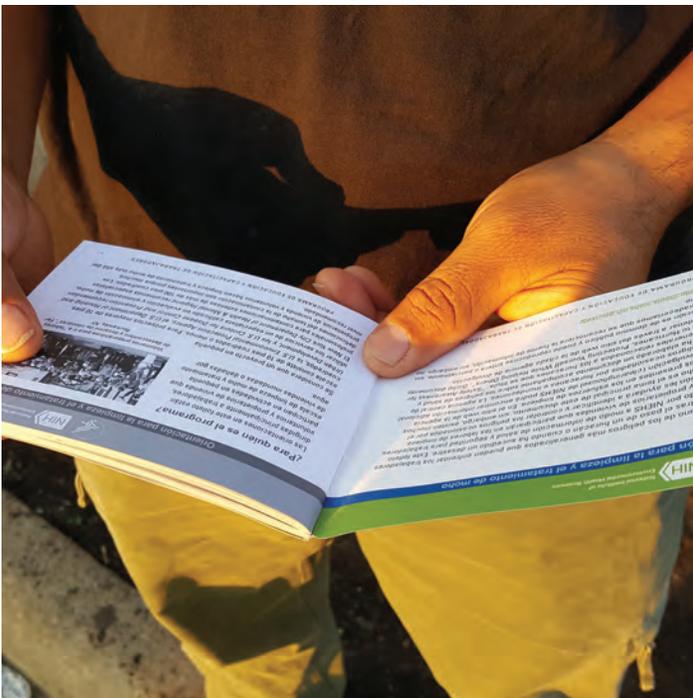


**Graph 2. Booklet Distribution by Intended Audience and Purpose**



Booklet Distribution by Month

Graph 3. Booklet Distributed By Month



Graph 2 shows the distribution of booklets by purpose and targeted audience. The majority of the booklets distributed to supplement other training already provided and the booklets distributed to supplement existing worker training were provided to other audiences. The booklets that serve as the sole source of safety training and the booklets distributed for reference purposes only were mostly provided to displaced residents and other audiences. The booklets that serve as a primary foundation before other training is delivered were mainly distributed to displaced residents and private sector contractors.

Graph 3 displays the distribution of the booklets by month between September 2017 and September 2018. As seen on the graph, the majority of the booklets were distributed in response to Hurricane Harvey, which landed in Texas on Aug. 25, 2017; Hurricane Irma, which made landfall in Florida on Sept. 10, 2017; and Hurricane Maria, which made landfall in Puerto Rico on Sept. 16, 2017.

# Products and Materials

Throughout the year, the Clearinghouse developed various products and materials that highlight the work of grantees and address current issues. These include:

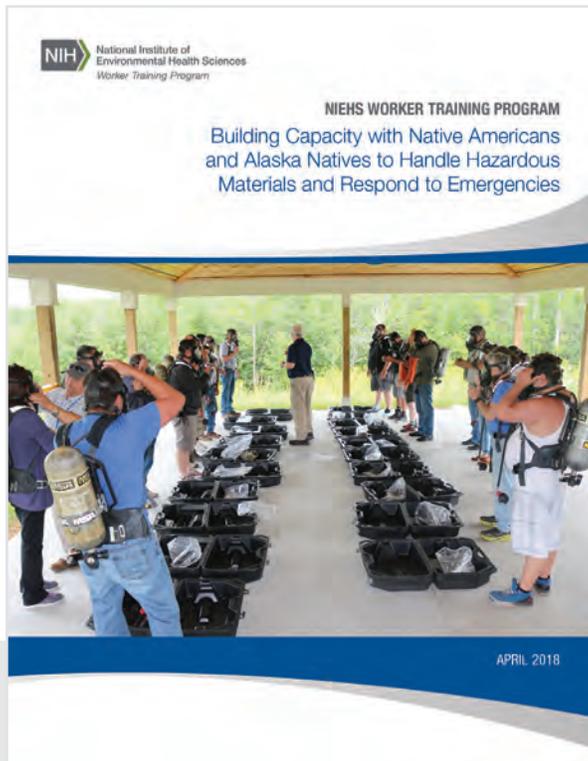
## Fact Sheets

The Clearinghouse Annual Overview fact sheet was updated with FY2017 training numbers. We also updated the WTP Grantee fact sheet to include Infectious Disease Response Training and Small Business and Innovative Research grantees. A Safety Training for Recovery Workers fact sheet was also developed following Hurricane Harvey to describe the training available during the recovery process. That fact sheet was then updated to make it more generic and was distributed following Hurricane Florence.

## Success Stories/Accomplishment Reports

### Native American and Alaskan Native Success Stories

Clearinghouse staff authored a report, “**Building Capacity with Native Americans and Alaska Natives to Handle Hazardous Materials and Respond to Emergencies**,” which details the safety and health training WTP grantees have provided to Native Americans and Alaska Natives.



## State Profiles

Clearinghouse staff worked with Demia Wright to develop state profiles that highlight grantee training accomplishments in various states. State profiles are currently available for Alaska, California, Minnesota, Mississippi, and New Mexico.

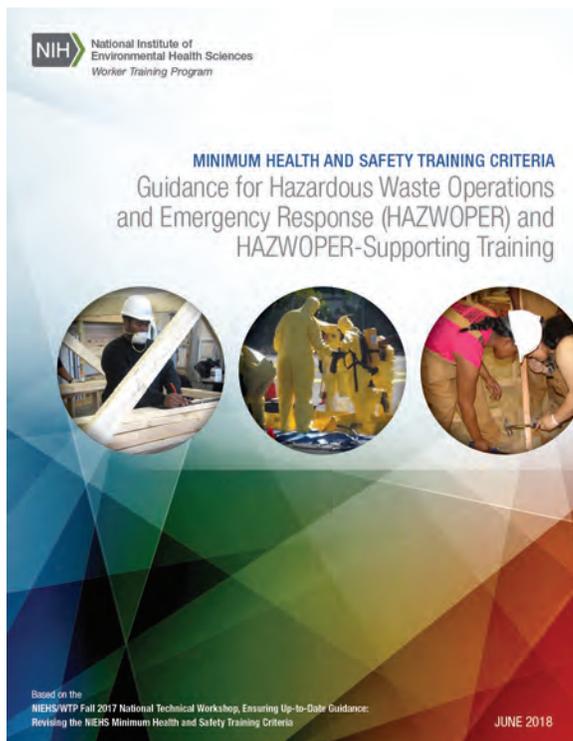
- **Worker Training Program: Alaska**
- **Worker Training Program: California**
- **Worker Training Program: Minnesota**
- **Worker Training Program: Mississippi**
- **Worker Training Program: New Mexico**



## Training

### Minimum Criteria Update

Following the Fall 2017 WTP Workshop, “Revising the NIEHS Minimum Health and Safety Training Criteria,” Clearinghouse staff began the process of revising the 2006 Minimum Criteria document based on comments received during the workshop and via email. To ensure that comments were appropriately captured and recorded, Clearinghouse staff created a comments matrix to document the comments and subsequent actions. The [revised document](#) is now available on the Clearinghouse website.



## Other

Clearinghouse staff worked on a policy statement on [language justice](#) that was adopted by the American Public Health Association Occupational Safety and Health Section. The statement discusses the need to ensure that safety and health training is provided in a language and at a literacy level that the worker being trained can understand. More broadly, the underlying principle of language justice is to “create multilingual spaces where language is used as a tool for empowerment so that people can communicate, learn, and strategize together.”<sup>1</sup>

1 Highlander Research and Education Center. 2018. Mission & Methodologies. Available: <http://www.highlandercenter.org/our-story/mission/> [accessed October 14, 2018].

## Partnerships and Representing WTP

Clearinghouse staff attended two dozen meetings over the last 12 months. Our attendance at these events ensures that the WTP is well represented at important meetings and conferences, participates in events hosted by WTP partners, and gathers useful information from stakeholders and other experts.

- Deborah Weinstock attended the International Association of Fire Fighters (IAFF) Advisory Board meeting and Instructor Development Conference in October 2017.
- Ryan Campbell attended an event at the Center for American Progress on lessons learned from Superstorm Sandy in October 2017.
- Deborah Weinstock attended the American Public Health Association (APHA) Annual Meeting and Expo in November 2017.
- Joy Lee presented a poster on the WTP trainer and researcher deployment guides at the APHA Annual Meeting and Expo in November 2017.



- Jonathan Rosen presented at the National Conference on Worker Safety and Health in December 2017.
- Joy Lee attended and exhibited at the National Conference on Worker Safety and Health in December 2017.
- Jonathan Rosen participated in the American Industrial Hygiene Association (AIHA) Opioids Work Group call in April 2018.
- Jonathan Rosen attended the American Industrial Hygiene Conference & Exposition in May 2018.
- Deborah Weinstock and Jonathan Rosen participated in the National Response Team monthly call in July 2018.
- Jonathan Rosen participated in the Department of Health and Human Services (HHS) Environmental Justice Working Group call in July 2018.
- Jonathan Rosen participates in the AIHA Opioid Task Force calls.

## Support for the Hazmat Disaster Preparedness Program (HDPTP)

In support of the HDPTP, the Clearinghouse accomplished several tasks, including supporting the responses to hurricanes Harvey, Irma, and Maria and creating the Opioid Training Tool.

### Hurricane Support

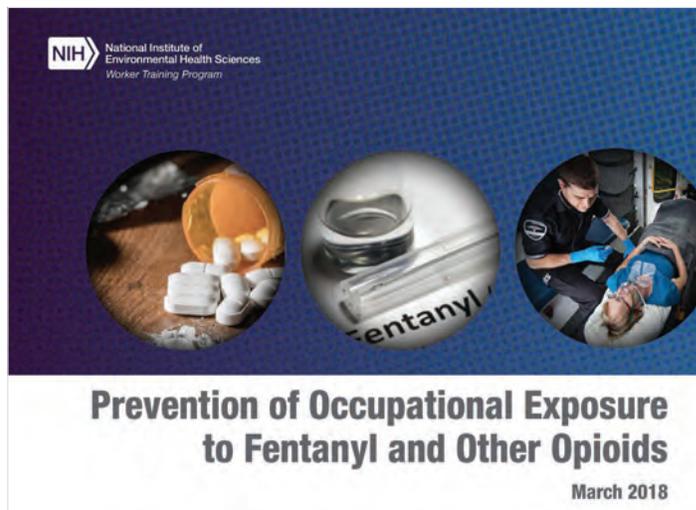
The Clearinghouse continued to work closely with WTP staff and grantees to support local communities affected by hurricanes Harvey, Irma, and Maria – which mainly impacted Texas, Florida, and Puerto Rico, respectively – and workers who were supporting the recovery of the communities. Clearinghouse staff participated on calls with WTP staff and grantees to discuss ongoing grantee activities in Texas and Puerto Rico and compiled weekly situation reports based on the discussions and on reports provided by the grantees. The English version of the Debris Removal fact sheet was translated into Spanish to accommodate the Spanish-speaking audience.

### Opioid Training Tool

In response to the opioid crisis, the Clearinghouse developed “Preventing Occupational Exposure to Fentanyl and Other Opioids.” The objectives of the course are to:

- Recognize occupations with potential exposure to fentanyl and other opiates.
- Describe signs and symptoms and treatment post-exposure.
- Explain use of control measures for worker protection.
- Detail methods for decontamination and cleanup.

Clearinghouse staff also participated in several interagency calls on the opioid crisis response.



## Department of Energy (DOE)—Integrated Safety Management

The Clearinghouse continued to support efforts to protect workers at DOE sites. We continued working with the National Training Center. In October 2017, Deborah Weinstock attended the Labor Training Workgroup meeting, the Medical Surveillance Subcommittee meeting, and the HAMMER Steering Committee meeting in Richland, Washington. Weinstock also attended the joint Training Energy Facilities Contractors Group and Labor Training Workgroup meeting in March 2018 in Washington, D.C. Clearinghouse staff also conducted outreach to support the various stakeholders throughout the year.

# TASK 3

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Arrange and manage technical meetings and workshops related to scientific, administrative, and regulatory issues associated with training for hazardous waste workers and emergency responders.





## National Trainers' Exchange: Looking to the Future, Generational Transitions

May 10 – 11, 2018 | Phoenix, Arizona

The 7th National Trainers' Exchange was hosted by WRUC in conjunction with the WTP. A Trainers' Exchange is designed for trainers to share best practices and new techniques through a series of workshops conducted by the trainers themselves. The goals are to meet and share ideas about how to create more effective and empowering training, improve training skills, and exchange best practices and techniques. The 2018 Trainers' Exchange brought together more than 350 DOE safety and health training stakeholders and trainers from all WTP hazardous waste training programs.

Clearinghouse staff collected workshop abstracts, supported the abstract review process, scheduled the workshops, led two webinars to prepare presenters, provided on-site meeting support, made workshop presentations 508 compliant, and posted the presentations to the meeting website.

A June 2018 [Environmental Factor article](#), written by Clearinghouse staff, provides additional information on the event.

## Opioid-Related Hazards in the Workplace

Oct. 24 – 25, 2018 | Research Triangle Park, North Carolina

The current opioid epidemic in the U.S. raises many concerns related to use, abuse, and exposure for individuals and communities. Workers fall into a population at high risk for exposure to opioids, and precautionary measures such as personal protective equipment (PPE), cleanup standards, and policies are needed to prevent injuries, illness, and fatalities. Employers and unions need to be well-informed on the risks for their workers and ways to protect them.

With grantees and partners across several domestic organizations, unions, and institutions, WTP is well-positioned to address the opioid epidemic and what it means for workers and communities. During this workshop, WTP grantees, partners, and federal stakeholders will convene to discuss the current opioid issue, and the threat it poses to workers in various occupations. The goal of this workshop is to shape a training framework and response that will raise awareness on the issue, and further ensure the protection of workers and communities.

# TASK 4

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Facilitate the transmission of technical information related to the development of safety and health training programs for hazardous waste workers and emergency responders through website development and maintenance.



## Website Development and Maintenance

### Webtrends

The WTP and Clearinghouse website had 60,150 total views during the fiscal year. This number is higher than last year's, possibly due to several factors, including viewers trying to access information on the National Trainers' Exchange and people accessing training materials and resources as a result of hurricanes Harvey, Irma, and Maria. Users from more than 150 countries visited the website, with the top five countries being the United States, India, Canada, Philippines, and the United Kingdom. Users who did not navigate directly to Clearinghouse pages were most often directed from major search engines such as Google, Bing, and Yahoo. Additional users were directed from NIEHS pages, the Occupational Safety and Health Administration (OSHA) website, GovDelivery, DR2 pages (hosted by the National Library of Medicine), and grantee pages.

### Top 10 Most Viewed WTP and Clearinghouse Pages

Page	Page Views
WTP Clearinghouse	5,118
HAZMAT Safety & Training	3,386
Hurricanes & Floods	2,386
2018 Trainers' Exchange	2,219
Curricula Catalog Search Form	1,987
CPWR – The Center for Construction Research and Training	1,282
Hazardous Waste Worker Training Program	1,128
Oil Spills	1,127
About WTP	1,100
Training Summaries & Highlights	1,072

### Top 10 Countries that Visit the WTP and Clearinghouse Pages

Country	Users
United States	13,914
India	385
Canada	321
Philippines	207
United Kingdom	107
Puerto Rico	88
Nigeria	68
Saudi Arabia	62
Australia	61
Malaysia	60

### Top Referrers to the WTP and Clearinghouse Pages

Referrer	Page Views
Google	19,460
NIEHS	17,561
Direct	13,290
Bing	3,011
NIEHS Search	1,154
Yahoo	944
OSHA	642
GovDelivery	564
National Library of Medicine	529
UCLA	490

## Website Updates

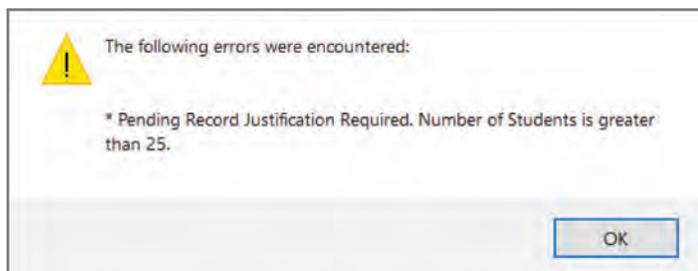
In response to the overall NIEHS site update, Clearinghouse staff modified the Clearinghouse website to use responsive layout tags. This allows the Clearinghouse pages to adjust appropriately to be easily read on all different mobile devices.

The “Meth Labs” page was renamed “Illicit Drug Exposure” and new resources were added to the page. The page now includes the new Opioid Training Tool, as well as other health and safety resources related to occupational exposure to opioids.

## Data Management System (DMS)

The Clearinghouse continued to improve the DMS’s course data entry Excel upload feature that was introduced last year. We added additional validation to check for common data entry errors and developed and instituted a way for the system to handle Excel files with an extremely large numbers of records (800+). At the DMS breakout sessions at the Fall 2017 WTP Grantee Meeting, Clearinghouse staff focused on teaching DMS users how to use the new Excel course data upload feature, including tips and tricks to make it even easier.

Also introduced this year was the requirement that a justification must be entered for any in-person course data record that has less than five workers, over 25 workers, or a course state of “Other.” A pop-up is displayed when a justification is required but has not been entered into the justification field on the course data entry form. The justification gives WTP staff the information they need to be able to approve these courses.



## Mapping Training Locations

Clearinghouse staff researched and created several demonstration websites that use the training location data provided by WTP grantees when they enter their course data into the DMS. We used training location data to look up the U.S. Congressional districts for the addresses, then compiled it into bar charts, line charts, donut difference charts, and maps by state, Environmental Protection Agency region, and U.S. Congressional district. WTP staff may access the mapping application at [https://tools.niehs.nih.gov/wetp/maps/training\\_sites.cfm](https://tools.niehs.nih.gov/wetp/maps/training_sites.cfm).

# TASK 5

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Support of the WTP National Clearinghouse, including the HAZWOPER training information collection, Curricula Catalog, weekly digital newsbrief, and issue and trend identification.



## HAZWOPER Training Information Collection (HASL) and Curricula Catalog

The Health and Safety Library (HASL) contains a vast collection of diverse, Section 508-compliant materials related to worker safety and health. The Clearinghouse information technology team collects, catalogs, and uploads new materials to HASL to ensure that it remains a valuable resource for WTP grantees, other members of the training community, and the public. The public can also access curricular materials produced by WTP grantees via the Curricula Catalog on the Clearinghouse website.

Between Sept. 1, 2017, and Sept. 10, 2018:

- 111,727 files were downloaded from HASL
- 129,993 files were downloaded from the Curricula Catalog
- 97 new curricula files were uploaded by grantees
- 57 courses were modified
- 24 new courses were added

## Weekly Digital Newsbrief

Distributed every Friday to nearly 1,500 subscribers, the Clearinghouse e-Newsbrief continues to be an important communication tool for reaching WTP grantees, stakeholders, and interested community members. The e-Newsbrief is produced by Clearinghouse and WTP staff and contains summaries of the latest worker health and safety news from newspapers, magazines, journals, government reports, and the Web, along with links to the original documents. The weekly newsletter also features updates from government agencies that handle hazardous materials and worker safety issues.

## Issue and Trend Identification

Clearinghouse staff continue to provide the WTP with updates on new issues and trends by remaining up-to-date on current literature and news articles on worker safety and health, hazardous materials and worker issues, and emergency and disaster response and recovery issues. In FY2018, Clearinghouse staff stayed apprised of news and developments related to the opioid crisis and the hazards and risks faced by community members and workers responding to the hurricanes.

# Appendix A

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NIEHS worker training program curricula information and data management system (WETCIS) section 508 annual report.

Prepared by MDB, Inc., September 20, 2018



## Instructions for Completing the Section 508 Annual Report

### Purpose

The purpose of the Section 508 Annual Report is to assist contracting officials and other persons in HHS in making assessments regarding the deployment of Electronic and Information Technology (EIT) Item(s) and services with features that support accessibility.

### Who should complete the Section 508 Annual Report?

HHS requires a measure of technical detail in the responses submitted in a Section 508 Annual Report in order to effectively determine compliance of the identified EIT Item(s). Therefore, a technical specialist for the manufacturer, developer, or vendor of the EIT Item(s) should complete the Section 508 Annual Report.

It is the responsibility of the manufacturer, developer, or vendor of the EIT Item(s) to maintain the integrity of the data provided in the Section 508 Annual Report. The information provided in the completed Section 508 Annual Report for an EIT Item(s) is considered to be a self-representation unless expressly affirmed otherwise.

### Procedure for Completing the Section 508 Annual Report

**Step 1:** Utilizing the information provided in the following table, determine which sections of the **Technical Standards (Subpart B - 1194.21 through 1194.26)** apply to the EIT contract items. Note that the **Functional Performance Criteria (Subpart C – 1194.31)** and the **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the HHS Section 508 Annual Report must be completed for every EIT item.

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Item(s)	Applicable Sections
Software	1194.21 Software Applications and Operating Systems 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Web	1194.22 Web-Based Internet Information and Applications 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Web Application	1194.21 Software Applications and Operating Systems 1194.22 Web-Based Internet Information and Applications 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Telecommunications	1194.23 Telecommunications products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Video/Multimedia	1194.24 Video and Multimedia products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Self-Contained	1194.25 Self-Contained, Closed products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Personal Computers	1194.26 Desktop and Portable Computers 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support

**Step 2:** Determine if the EIT item(s) **does** or **does not** meet the individual Criteria elements listed in the 1st column of each applicable section of the Section 508 Annual Report. Utilizing the guidance provided in the following table, provide the appropriate responses in the **Supporting Features** column (2nd column) of the Section 508 Annual Report document for each Criteria element.

Response	Means...
Supports	Item(s) <b>fully meets</b> the letter and intent of the Criteria.
Supports with Exceptions	Item(s) <b>does not entirely meet</b> the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Item(s) <b>provides alternative methods to meet</b> the intent of the Criteria.
Does Not Support	Item(s) <b>does not meet</b> the letter or intent of the Criteria.
Not Applicable	The Criteria <b>does not apply</b> to the Item(s).

If the EIT Item(s) **Does Not Support** the Criteria, remember that Section 508 allows for Item(s) to meet the Access Board Standards in innovative, non-traditional ways. The EIT Item(s) can meet the standard (i.e., **Supports through Equivalent Facilitation**) by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user.

**Step 3:** Utilizing the guidance provided in the following table, document in the **Remarks & Explanations** column (3rd column) for each Criteria listed in the 1st column of the applicable sections of the Section 508 Annual Report document, exactly **how** the EIT Item(s) **does** or **does not** meet the Criteria.

If Supporting Features (2nd column) response is...	Then Remarks & Explanations (3rd column) response should be...
Supports	List exactly <b>what</b> features of the Item(s) <b>do</b> meet the Criteria and describe <b>how</b> the features are used to support the standard.
Supports with Exceptions	List exactly <b>what</b> features of the Item(s) <b>do</b> meet the Criteria and describe <b>how</b> the features are used to support the standard. <b>AND</b> List exactly <b>what</b> aspects of the Item(s) <b>do not</b> meet the Criteria and describe <b>how</b> they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly <b>what</b> <i>alternative</i> methods exist in the Item(s) and describe <b>how</b> they are used to support the Criteria.
Does Not Support	Describe exactly <b>how</b> the Item(s) <b>does not</b> support the Criteria.
Not Applicable	Describe exactly <b>why</b> the Criteria are not applicable to the Item(s).

**Step 4:** Provide the completed Section 508 Annual Report to the OPDIV Contracts Officer.



## Section 508 Annual Report

HHS Requestor: Superfund Research Program (SRP)

Date: 10/08/2014

Item(s) Name: Worker Training Program Curricula Information and Data Management System (WETCIS)

Version:

Vendor: MDB, Inc.

Vendor Contact: Deborah Weinstock

### Section 1194.21 Software Applications and Operating Systems

*Refer to <http://www.access-board.gov/sec508/guide/1194.21.htm> for details on the criteria 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	Pages follow a consistent tab order.
(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.	Not applicable	The application does not contain any code that disrupts or disables any accessibility features.
(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	Current focus is indicated onscreen. Focus indicator moves among the interactive interface elements as the input focus changes.
(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	All images and buttons have descriptive alternative text.
(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.	Not applicable	Bitmap images are not used in the application.
(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	The application uses operating system functions for displaying text. The program does not use unique schemes for writing text on the screen.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	The application does not change any display attributes
(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	The application does not use animation.

## Section 1194.21 Software Applications and Operating Systems

*Refer to <http://www.access-board.gov/sec508/guide/1194.21.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(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	All use of color has enough contrast to allow the user to see all text and information. Color is not used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.
(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 the 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	The application does not use flashing or 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	All input fields and buttons contain tags and labels. Alternative text is available for all images/buttons.

## Section 1194.22 Web-Based Internet Information and Applications

*Refer to <http://www.access-board.gov/sec508/guide/1194.22.htm> for details on the criteria 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	All non-text elements have appropriate descriptive alternative text.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	The application does not use any multimedia presentations.
(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	No information is conveyed with color only.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	The pages are formatted such that style sheets are not required to properly render the content.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	The application does not use 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.	Not Applicable	The application does not use any server-side or client-side image maps.
(g) Row and column headers shall be identified for data tables.	Supports	All data tables use row and 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.	Not Applicable	Tables in this application do not have two or more logical levels of row or column headers.
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Supports	All frames in the application are titled with text that identifies the frame and facilitates navigation.

## Section 1194.22 Web-Based Internet Information and Applications

*Refer to <http://www.access-board.gov/sec508/guide/1194.22.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(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	All pages were developed to avoid screen flicker. Elements such as <blink> and <marquee> are not used.
(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.	Supports	All pages can be displayed as text-only. No content is displayed in images, buttons, or JavaScript that is not also displayed in text.
(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.	Supports	All JavaScript elements can be read by Assistive Technology.
(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).	Not Applicable	The application does not use any applets, plug-ins or other applications 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.	Supports	All input fields and buttons have associated tags and labels to allow users using assistive technology to access all information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	Hidden text and links, readable by screen readers, are available to allow a user using assistive technology to skip repetitive navigation links.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Does not support	The application does not alert the user before the application times out. The user is alerted after the session has timed out.

## Section 1194.23 Telecommunications Products

*Refer to <http://www.access-board.gov/sec508/guide/1194.23.htm> for details on the criteria 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.		

### Section 1194.23 Telecommunications Products

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

Criteria	Supporting Features	Remarks and Explanations
(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.		

### Section 1194.24 Video and Multimedia Products

*Refer to ( <http://www.access-board.gov/sec508/guide/1194.24.htm> ) for details on the criteria 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.		

## Section 1194.25 Self-Contained, Closed Products

*Refer to <http://www.access-board.gov/sec508/guide/1194.25.htm> for details on the criteria 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.		

### Section 1194.25 Self-Contained, Closed Products

*Refer to <http://www.access-board.gov/sec508/guide/1194.25.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(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.		

### Section 1194.26 Desktop and Portable Computers

*Refer to <http://www.access-board.gov/sec508/guide/1194.26.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(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).		
(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.		

### 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	All information can be retrieved because input fields and buttons have associated tags and labels. Alternative text is available for all images.
(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	The application provides support for assistive technology through the use of tags, labels, and alternative text.
(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.	Not Applicable	The application does not require user hearing.
(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.	Not Applicable	Audio information is not used in this application.
(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.	Not Applicable	The application does not require 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	The application does require the use of a keyboard for data entry and data submission.

## 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.	Supports	On-line, context sensitive help exists and the icons to display the help have alternate text to identify their purpose. Telephone numbers and email addresses for user support are also provided.
(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	Telephone numbers and email addresses for user support and accessibility and compatibility information are provided.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	All support services, i.e. phone and email, can accommodate the communication needs of the end user through common assistive technologies such as phone relay services, screen magnification or screen readers.



# Appendix B

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WTP clearinghouse section 508 annual report.

Prepared by MDB, Inc., September 20, 2018



## Instructions for Completing the Section 508 Annual Report

### Purpose

The purpose of the Section 508 Annual Report is to assist contracting officials and other persons in HHS in making assessments regarding the deployment of Electronic and Information Technology (EIT) Item(s) and services with features that support accessibility.

### Who should complete the Section 508 Annual Report?

HHS requires a measure of technical detail in the responses submitted in a Section 508 Annual Report in order to effectively determine compliance of the identified EIT Item(s). Therefore, a technical specialist for the manufacturer, developer, or vendor of the EIT Item(s) should complete the Section 508 Annual Report.

It is the responsibility of the manufacturer, developer, or vendor of the EIT Item(s) to maintain the integrity of the data provided in the Section 508 Annual Report. The information provided in the completed Section 508 Annual Report for an EIT Item(s) is considered to be a self-representation unless expressly affirmed otherwise.

### Procedure for Completing the Section 508 Annual Report

**Step 1:** Utilizing the information provided in the following table, determine which sections of the **Technical Standards (Subpart B - 1194.21 through 1194.26)** apply to the EIT contract items. Note that the **Functional Performance Criteria (Subpart C - 1194.31)** and the **Information, Documentation, and Support (Subpart D - 1194.41)** sections of the HHS Section 508 Annual Report must be completed for every EIT item.

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Item(s)	Applicable Sections
Software	1194.21 Software Applications and Operating Systems 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Web	1194.22 Web-Based Internet Information and Applications 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Web Application	1194.21 Software Applications and Operating Systems 1194.22 Web-Based Internet Information and Applications 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Telecommunications	1194.23 Telecommunications products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Video/Multimedia	1194.24 Video and Multimedia products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Self-Contained	1194.25 Self-Contained, Closed products 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support
Personal Computers	1194.26 Desktop and Portable Computers 1194.31 Functional Performance Criteria 1194.41 Information, Documentation, and Support

**Step 2:** Determine if the EIT item(s) **does** or **does not** meet the individual Criteria elements listed in the 1st column of each applicable section of the Section 508 Annual Report. Utilizing the guidance provided in the following table, provide the appropriate responses in the **Supporting Features** column (2nd column) of the Section 508 Annual Report document for each Criteria element.

Response	Means...
Supports	Item(s) <b>fully meets</b> the letter and intent of the Criteria.
Supports with Exceptions	Item(s) <b>does not entirely meet</b> the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Item(s) <b>provides alternative methods to meet</b> the intent of the Criteria.
Does Not Support	Item(s) <b>does not meet</b> the letter or intent of the Criteria.
Not Applicable	The Criteria <b>does not apply</b> to the Item(s).

If the EIT Item(s) **Does Not Support** the Criteria, remember that Section 508 allows for Item(s) to meet the Access Board Standards in innovative, non-traditional ways. The EIT Item(s) can meet the standard (i.e., **Supports through Equivalent Facilitation**) by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user.

**Step 3:** Utilizing the guidance provided in the following table, document in the **Remarks & Explanations** column (3rd column) for each Criteria listed in the 1st column of the applicable sections of the Section 508 Annual Report document, exactly **how** the EIT Item(s) **does** or **does not** meet the Criteria.

If Supporting Features (2nd column) response is...	Then Remarks & Explanations (3rd column) response should be...
Supports	List exactly <b>what</b> features of the Item(s) <b>do</b> meet the Criteria and describe <b>how</b> the features are used to support the standard.
Supports with Exceptions	List exactly <b>what</b> features of the Item(s) <b>do</b> meet the Criteria and describe <b>how</b> the features are used to support the standard. <b>AND</b> List exactly <b>what</b> aspects of the Item(s) <b>do not</b> meet the Criteria and describe <b>how</b> they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly <b>what</b> <i>alternative</i> methods exist in the Item(s) and describe <b>how</b> they are used to support the Criteria.
Does Not Support	Describe exactly <b>how</b> the Item(s) <b>does not</b> support the Criteria.
Not Applicable	Describe exactly <b>why</b> the Criteria are not applicable to the Item(s).

**Step 4:** Provide the completed Section 508 Annual Report to the OPDIV Contracts Officer.



## Section 508 Annual Report

HHS Requestor: Worker Training Program (WTP)

Date: 10/9/2015

Item(s) Name: Worker Training Program Clearinghouse website

Version:

Vendor: MDB, Inc.

Vendor Contact: Deborah Weinstock

### Section 1194.21 Software Applications and Operating Systems

*Refer to <http://www.access-board.gov/sec508/guide/1194.21.htm> for details on the criteria 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	Pages follow a consistent tab order.
(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.	Not applicable	The application does not contain any code that disrupts or disables any accessibility features.
(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	The web browser built-in screen and form field focus indications are utilized.
(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	All images and buttons contain appropriate alternative text to describe each image and button.
(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.	Not applicable	Bitmap images are not used in the application.
(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	The application uses operating system functions for displaying text. The program does not use unique schemes for writing text on the screen.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	The application does not change any display attributes
(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	The application does not use animation.
(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	All use of color has enough contrast to allow the user to see all text and information. Color is not used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.

## Section 1194.21 Software Applications and Operating Systems

*Refer to <http://www.access-board.gov/sec508/guide/1194.21.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(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 the 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	The application does not use flashing or 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	All input fields and buttons contain tags and labels. Alternative text is available for all images/buttons.

## Section 1194.22 Web-Based Internet Information and Applications

*Refer to <http://www.access-board.gov/sec508/guide/1194.22.htm> for details on the criteria 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	All non-text elements have appropriate descriptive alternative text.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports	All multimedia presentations contain text-based closed captioning text that is synchronized with the media.
(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	No information is conveyed with color only.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	The pages are formatted such that style sheets are not required to properly render the content.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	The application does not use 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.	Not Applicable	The application does not use any server-side or client-side image maps.
(g) Row and column headers shall be identified for data tables.	Supports	All data tables incorporate row and 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.	Not Applicable	Tables in this application do not have two or more logical levels of row or column headers.
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Not Applicable	Frames are not used in this application.
(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	All pages were developed to avoid screen flicker. Elements such as <blink> and <marquee> were not used.

## Section 1194.22 Web-Based Internet Information and Applications

*Refer to <http://www.access-board.gov/sec508/guide/1194.22.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(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.	Supports	All pages can be displayed as text-only. No content is displayed in images, buttons, or JavaScript that is not also displayed in text.
(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.	Supports	All JavaScript elements can be read by Assistive Technology.
(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).	Not Applicable	The application does not use any applets, plug-ins or other applications 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.	Supports	Input fields and buttons contain id tags and labels. There is alternate text for images (buttons). A screen reader can read the buttons or the input fields.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	The application uses the NIEHS layout which allows users to skip repetitive navigation links.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	The application does alert the user before the application times out.

## Section 1194.23 Telecommunications Products

*Refer to <http://www.access-board.gov/sec508/guide/1194.23.htm> for details on the criteria 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.		

## Section 1194.23 Telecommunications Products

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

Criteria	Supporting Features	Remarks and Explanations
(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.		

### Section 1194.24 Video and Multimedia Products

*Refer to ( <http://www.access-board.gov/sec508/guide/1194.24.htm> ) for details on the criteria 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.		

### Section 1194.25 Self-Contained, Closed Products

*Refer to <http://www.access-board.gov/sec508/guide/1194.25.htm> for details on the criteria 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.		

## Section 1194.25 Self-Contained, Closed Products

Refer to <http://www.access-board.gov/sec508/guide/1194.25.htm> for details on the criteria listed below.

Criteria	Supporting Features	Remarks and Explanations
(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.		

### Section 1194.26 Desktop and Portable Computers

*Refer to <http://www.access-board.gov/sec508/guide/1194.26.htm> for details on the criteria listed below.*

Criteria	Supporting Features	Remarks and Explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(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).		
(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.		

### 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	Radio buttons, check boxes and submit buttons are labeled.
(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	The application currently supports browsers that allow users to magnify the screen.
(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.	Supports	Transcripts are provided for any audio that is available on the website.
(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.	Not Applicable	Use of the application does not require user hearing.
(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.	Not Applicable	The application does not require 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.	Supports	Radio buttons, check boxes and submit buttons can all be selected by clicking a specific item via a mouse or keyboard.

## 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.	Not Applicable	The website does not provide support documentation to the end user.
(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.	Not Applicable	The website does not provide a description of the accessibility and compatibility features of the website.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	All support services, i.e. phone and email, can accommodate the communication needs of the end user through common assistive technologies such as phone relay services, screen magnification or screen readers.



National Institute of  
Environmental Health Sciences

This publication was made possible by contract number  
HHSN273201500075U from the National Institute of  
Environmental Health Sciences (NIEHS), NIH.