Turning Technologies Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: TurningPro

Report Date: May 7, 2021

Product Description: Online Learning Engagement Platform

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Evaluation Methods Used: A functional review was based on general product knowledge and manual testing using assistive technologies and website accessibility tools. Below are some of the key evaluation tools and testing methods used to inform this VPAT®.

- Tool-Based Testing: SiteImprove; pa11y; Deque aXe; Google Lighthouse
- Color Contrast Test: Chrome Developer Tools, WebAIM Color Contrast Checker.
- Screen Reader Tests: JAWS (Edge, Firefox, Chrome); NVDA (Chrome, Firefox); Voiceover (Safari)

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports**: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- **Not Applicable**: The criterion is not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Text alternatives are provided for non-text content that is used as part of the LMS such as images and icons. • Users can add alternative text to their uploaded course images.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Time-based media are not a part of the LMS. • Users control the content they produce. • Users can embed a video link that supports closed caption (e.g., YouTube).
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Does Not Support	Most content conveyed visually through presentation can be programmatically determined by assistive technologies or are available in text. • Input fields, text fields and drop-down menus (select boxes or role="listbox") should always

Criteria	Conformance Level	Remarks and Explanations
• 602.3 (Support Docs)		have a description that is explicitly associated with the field to make sure that users of assistive technologies will also know what the field is for. • No headings some pages
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	The reading and navigation order are logical and intuitive (moves left to right and top to bottom of the page).
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	Any concepts suggested through shape, size, visual location, orientation, or sound is also communicated through language. Textual equivalents may be visible or hidden (alternative text, title attribute, ARIA alerts, etc.). Exception: • The Hotspot question option is not accessible, due to requiring precise visual location on an image. • Users control their own content.
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Color is not used as the only visual means of conveying information.
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508	Supports	• Standard audio controls are available for video and audio content. • Users control their own content.

Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	• Forms are accessible by keyboard and assistive technologies. Forms could use a combination of fields, buttons, inline help, and links. • Some menu lists require navigation using the tab key rather than the arrow keys – the more commonly expected keyboard behavior. • The Hotspot question option is not keyboard accessible due to the visual requirement of the activity. • Users control their own content.
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	No keyboard traps.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Instructor roles control the time of sessions in real-time.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Instructor roles control the time of sessions in real-time.

Criteria	Conformance Level	Remarks and Explanations
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• The product does not contain any flashing contents that would violate this criterion. • Users control their own content.
2.4.1 Bypass Blocks (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Does Not Support	• The product currently lacks Skip to main content links, headings and ARIA landmarks to help users avoid repetitive and non-essential content. • Users control their own content.
2.4.2 Page Titled (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Web pages have titles or headings that describe the topic or purpose. • Users control their own content. Exception: • iFrames for embedded videos may not have the title attribute.
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Each page has a logical tab order. • Users control their own content.
2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Links are unique and contextual. • Users can add a title description to their content link text.
3.1.1 Language of Page (Level A)	Supports	Pages have a specified language embedded (English by

Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		default).
3.2.1 On Focus (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	When any user interface component receives focus, it does not initiate a change of context.
3.2.2 On Input (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Submission buttons are used to initiate a change of context, or description is provided to the user before action is taken.
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. Where possible, error messages describe each error and link to the appropriate field for resolving the error.
3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Does Not Support	• Input fields, text fields, select drop-down menus and some buttons are missing a description or label that is explicitly associated with the field. • The WAI-ARIA 'aria-describedby' attribute has a reference to an ID that does not exist or an ID that is not unique.
4.1.1 Parsing (Level A)	Supports	• Web pages are written to HTML5

Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		specifications. • Users control their own content.
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Does Not Support	• Tables for instructor roles are not semantically marked up as a table element. Thus, users of assistive technology will not be able to correctly or easily interpret the information.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Time-based media are not part of the LMS by default. • Users control their own content.
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Not applicable.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508	Does Not Support	• Some text or buttons do not have sufficient color contrast.

Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Text and icons can be resized up to 200% without loss of content or functionality. • Users control their own content.
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	• Images of text are not used by default. • Users control their own content.
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Supports	• Pages have consistent navigation areas. • The search and find features built into assistive technologies. • Users control their own content.
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Does Not Support	• Some pages do not have a descriptive semantic heading. • Users control their own content.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software)	Does Not Support	• No visible focus indicator is present for keyboard and screen reader navigation.

Criteria	Conformance Level	Remarks and Explanations
504.2 (Authoring Tool) 602.3 (Support Docs)		
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	- All parts have a specified language embedded (English by default). - Users control their own content.
3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Supports	Navigation models are consistent throughout the application.
3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Supports	Components with the same functionality are labeled and identified consistently throughout the application.
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. Where possible, error messages describe each error and link to the appropriate field for resolving the error. Exception: - Screen reader users during a session are not notified when the instructor moves to the next slide or question. - No accessible notification for screen readers when messages are sent/received during a chat session.

Criteria	Conformance Level	Remarks and Explanations

3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)
Also applies to:
Revised Section 508
    • 501 (Web)(Software)
    • 504.2 (Authoring Tool)
    • 602.3 (Support Docs)
	Supports	Not applicable.

Table 3: Success Criteria, Level AAA

Notes: Deleted; Not applicable.

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	The product uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies.
302.2 With Limited Vision	Partially Supports	The product supports standard browser magnification and contrast adjustments.
302.3 Without Perception of Color	Supports	Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.
302.4 Without Hearing	Not Applicable	No auditory alerts are used.
302.5 With Limited Hearing	Not Applicable	No auditory alerts are used.
302.6 Without Speech	Not Applicable	Speech input is not required.
302.7 With Limited Manipulation	Partially Supports	The product does not fully support standard input mechanisms such as user-provided keyboards and pointing devices. Usage of the product does not require fine motor controls nor simultaneous actions.
302.8 With Limited Reach and Strength	Not Applicable	
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	Efforts have been made to apply accessibility best practices to alternative software. See the responses in the WCAG 2.0 section of this report.

Chapter 4: Hardware

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen	Not Applicable	
402.2.2 Transactional Outputs	Not Applicable	
402.2.3 Speech Delivery Type and Coordination	Not Applicable	
402.2.4 User Control	Not Applicable	
402.2.5 Braille Instructions	Not Applicable	
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Not Applicable	
402.3.2 Non-private Listening	Not Applicable	
402.4 Characters on Display Screens	Not Applicable	
402.5 Characters on Variable Message Signs	Not Applicable	
[**403 Biometrics**](#)	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	
[**404 Preservation of Information Provided for Accessibility**](#)	Heading cell – no response required	Heading cell – no response required
404.1 General	Not Applicable	
[**405 Privacy**](#)	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	
[**406 Standard Connections**](#)	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	
[**407 Operable Parts**](#)	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	
407.3.2 Alphabetic Keys	Not Applicable	
407.3.3 Numeric Keys	Not Applicable	
407.4 Key Repeat	Not Applicable	
407.5 Timed Response	Not Applicable	
407.6 Operation	Not Applicable	
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	
407.8.2 Side Reach	Not Applicable	
407.8.2.1 Unobstructed Side Reach	Not Applicable	
407.8.2.2 Obstructed Side Reach	Not Applicable	
407.8.3 Forward Reach	Not Applicable	
407.8.3.1 Unobstructed Forward Reach	Not Applicable	
407.8.3.2 Obstructed Forward Reach	Not Applicable	
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	
408.3 Flashing	Not Applicable	
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	
412 ICT with Two-Way Voice Communication	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	
412.3.2 Wireline Handsets	Not Applicable	
412.4 Digital Encoding of Speech	Not Applicable	
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Not Applicable	
412.7 Video Communication	Not Applicable	
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
412.8.2 Voice and Hearing Carry Over	Not Applicable	
412.8.3 Signal Compatibility	Not Applicable	
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	
414.1.2 Other ICT	Not Applicable	
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not Applicable	
415.1.2 Audio Description Controls	Not Applicable	

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG 2.0 section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Not Applicable	The product is not considered platform software as defined by Section 508.
502.2.2 No Disruption of Accessibility Features	Supports	The product is compatible with operating system and browser accessibility features configured by the user.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Does Not Support	Most content conveyed visually through presentation can be programmatically determined by assistive technologies or are available in text.
502.3.2 Modification of Object Information	Does Not Support	Input fields, text fields and drop-down menus (select boxes or role="listbox") should always have a description that is explicitly associated with the field to make sure that users of assistive technologies

Criteria	Conformance Level	Remarks and Explanations
		will also know what the field is for.
502.3.3 Row, Column, and Headers	Not Applicable	
502.3.4 Values	Not Applicable	
502.3.5 Modification of Values	Not Applicable	
502.3.6 Label Relationships	Not Applicable	
502.3.7 Hierarchical Relationships	Not Applicable	
502.3.8 Text	Not Applicable	
502.3.9 Modification of Text	Not Applicable	
502.3.10 List of Actions	Not Applicable	
502.3.11 Actions on Objects	Not Applicable	
502.3.12 Focus Cursor	Not Applicable	
502.3.13 Modification of Focus Cursor	Not Applicable	
502.3.14 Event Notification	Not Applicable	
502.4 Platform Accessibility Features	Not Applicable	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	Turning Technologies does not provide user interfaces that function as assistive technology.
503.3 Alternative User Interfaces	Not Applicable	Turning Technologies does not provide any alternative user interfaces that function as assistive technology.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Not Applicable	
503.4.2 Audio Description Controls	Not Applicable	
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	See WCAG 2.0 section	See information in WCAG 2.0 section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	
504.2.2 PDF Export	Partially Supports	
504.3 Prompts	Not Applicable	
504.4 Templates	Not Applicable	

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Does Not Support	Accessibility related documentation is currently not available to users.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Does Not Support	Accessibility related documentation is currently not available to users.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Partially Supports	VPAT for products is publicly available on Turning Technologies official website (https://www.turning.com/accessibility)
603.3 Accommodation of Communication Needs	Supports	Turning Technologies support can be reached via telephone (1-866-756-3015), email (support@turningtechnologies.com), or through the teams support ticket system (turning.force.com/support/s/contactsupport).

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