Google Drive Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: Google Drive version 2023.03

Report Date: March 28th, 2023

Product Description: Google Drive is a web application that allows users to store and organize files online and access them from any device.

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Notes: This evaluation was performed using NVDA and Chrome Browser.

Evaluation Methods Used/Detailed Scope:

This report was created by evaluating several 'User Journeys' detailing common usage and experiences for users of the product.

User Journey	Description
Create - Create and name file	Your colleague asked you to take notes during the Accounting meeting. Start a document with the filename "Accounting Notes."

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User Journey	Description
Create - Upload a file	You wrote down some pitch ideas in a file on your laptop. Now you want to add the file to My Drive. The file is on your desktop, and it is called "Pitch Ideas."
Create - Create a place where I can collaborate with other people	You're starting to work on a brand new project called "Project Acadia." Set up a place where all project members (projectacadia@acme-goods.com) can collaborate and put files related to this project
Find / View - Find a file that has been shared with me	Zig Jones has added you to a presentation earlier today, but you can't remember the name of the presentation. Find and open that presentation.
Find / View - Find a file I use often	"Financial Statements" is a file that you use all the time. Show me how you would find and open that file.
Find / View - Find a file that needs my attention	Zig Jones passed you in the hallway and said he left a comment for you in one of the files you have been working on. You get back to your desk and you want to find the comment. How would you do it without leaving Google Drive?
Find / View - Find files that are available offline	You are about to get on a plane where you probably won't have Wi-Fi. You want to check which Drive files will be available for you to edit while on the flight. Figure out which files are available offline. Tell me when you are done
Find / View - Find a file without knowing its name or location	You need to review a file but don't remember the name of the file or where you put it. All you remember is that it is a Slides presentation and has something to do with marketing. Find the file and start reviewing it.
Find / View - View and take action on a non-Google file	Your colleague asked you to provide feedback on the graphics in the "How To Brochure." Take a look at this PDF file and the image on the first page. Leave a comment that the image needs to be updated.
Organize - Organize a file for easy retrieval	"Acme Goods Q4 2019 Report" is a file that you will need frequently over the next few weeks. Make that file easy to get to every time you come to Google Drive. It is currently located in the FY2019 folder under Quarterly Reports.
Organize - Make a file accessible from multiple locations	You are working on a file called "Revised Handbook" that is stored in the FY2019 folder. You also want this file to be accessible from the FY2020 folder. However, you want to make sure that no matter which folder you use to open the file, you edit the main file, not a copy of the file. Show me how you would make the "Revised Handbook" file also accessible from the FY2020 folder.
Organize - Move multiple files to another location	Since you have been using Drive for some time, you have a lot of files. You want to organize them a little better. You have several files for the 2020 Conference. Move all of the files that begin with "2020 Conference" to the folder called "2020 Conference" at the same time.
Organize - Make sure I can access content when I'm offline	You're about to board a plane and want to work on several files ("Culture Summit - Milan," "Culture Summit - Moscow," and "Culture Summit - Paris") while in the air. You won't have access to cell service or Wi-Fi on the plane. Make sure that you can work on these files regardless of whether you have internet access or not, and that when you land and are back on Wi-Fi, your updates will sync.

User Journey	Description
Organize - Find information about a file	You want to know who owns the "Customer relationship management" file and when it was created.
Share / Collaborate - Share a file with a specific person	You have been working on a confidential presentation called, "Acme Analytics." Your boss has given you permission to give Jamie Smith (Jamie.smith@acme-goods.com) access to this file so she can update the numbers in the presentation. Without opening the file, how would you do this?
Share / Collaborate - Share a file with everyone at my company	You have finished working on an onboarding document for new employees, "Onboarding to Acme Goods." Without opening the file, make sure that everyone at your company, Acme Goods, can access this file.
Share / Collaborate - Limit what others can do in my file (reduce permissions)	At long last, management has approved the final version of the file "Budget 2020". Without opening the file, make the appropriate changes to "Budget 2020" so that no one can make changes to it or comment on it.
Grid View	Component
List view	Component
Filter modal	Component
Share modal	Component
Move to Drive / Add Shortcuts Drive modal	Component

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 2.1	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Revised Section 508 standards published January 18, 2017, and corrected January	Yes
22, 2018	
EN 301 549 Accessibility requirements suitable for public procurement of ICT	
products and services in Europe, - V3.1.1 (2019-11)	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 2.1 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, the criteria are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the <u>WCAG 2.1 Conformance Requirements</u>.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
 1.1.1 Non-text Content (Level A) All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. Controls, Input: If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Success Criterion 4.1.2 for additional requirements for controls and content that accepts user input.) Time-Based Media: If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content. (Refer to Guideline 1.2 for additional requirements for media.) Test: If non-text content is a test or exercise that would be invalid if presented in text, then text alternatives at least provide descriptive identification of the non-text content. Sensory: If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide descriptive identification of the non-text content. CAPTCHA: If the purpose of non-text content is to confirm that content is being accessed by a person rather than a computer, then text alternatives that identify and describe the purpose of the non-text content are provided, and alternative forms of CAPTCHA using 	Supports	The non-text content has text alternatives or has a text alternate that serve equivalent purpose across the user journeys tested.

Criteria	Conformance Level	Remarks and Explanations
 output modes for different types of sensory perception are provided to accommodate different disabilities. Decoration, Formatting, Invisible: If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it is implemented in a way that it can be ignored by assistive technology. 		
 1.2.1 Audio-only and Video-only (Prerecorded) (Level A) For prerecorded audio-only and prerecorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labeled as such: Prerecorded Audio-only: An alternative for time-based media is provided that presents equivalent information for prerecorded audio-only content. Prerecorded Video-only: Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content. 	Not Applicable	There is no prerecorded video on the tested user journeys.
1.2.2 Captions (Prerecorded) (Level A) Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such.	Not Applicable	There is no prerecorded audio in the tested user journeys, therefore no captions.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such.	Not Applicable	There is no prerecorded video in the tested user journeys, therefore no audio description.
1.3.1 Info and Relationships (Level A) Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.	Partially Supports	Most information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. However, there are exceptions: • Role="presentation" is used incorrectly on the "Find / View - Find a file I use often" user journey, and the "Grid Layout" and "List Layout" components.

Criteria	Conformance Level	Remarks and Explanations
		 Content should be in a data table but isn't on the 'List Layout' component.
		 Visual heading text is not marked as heading on the "Create - Upload a file", "Find / View - Find a file I use often", "Organize - Organize a file for easy retrieval" user journeys, and the "Grid Layout" and "List Layout" components.
1.3.2 Meaningful Sequence (Level A) When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.	Partially Supports	Most content is presented in a meaningful way that can be programmatically determined. However, there are exceptions: • Some content is hidden from users incorrectly on the "Find / View - Find a file I use often" user journey, and the "Grid Layout" and "List Layout" components. • Some hidden content is exposed to assistive technologies on the "Create - Upload a file", "Find / View - Find a file I use often", "Organize - Organize a file for easy retrieval" user journey. • Screen reader focus is lost on "Grid Layout" component.
1.3.3 Sensory Characteristics (Level A) Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, color, size, visual location, orientation, or sound. Note: For requirements related to color, refer to Guideline 1.4.	Supports	
1.4.1 Use of Color (Level A) Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Partially Supports	Use of alternates to color is widely supported across Drive. However, there is an exception: Color alone is used to convey information for one element on the "Find / View - View and

Criteria	Conformance Level	Remarks and Explanations
Note: This success criterion addresses color perception specifically. Other forms of perception are covered in Guideline 1.3 including programmatic access to color and other visual presentation coding.		take action on a non-Google file" user journey. • Link color contrast does not meet standards on some links on the "Find / View - Find a file that has been shared with me" and "Organize - Make sure I can access content when I'm offline" user journeys.
1.4.2 Audio Control (Level A) If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether or not it is used to meet other success criteria) must meet this success criterion. See Conformance Requirement 5: Non-Interference.	Not Applicable	There is no prerecorded audio in the tested user journeys, therefore no need for audio controls.
2.1.1 Keyboard (Level A) All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints. Note 1: This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input but the underlying function (text input) does not. Note 2: This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation.	Partially Supports	 Keyboard navigation is well-supported across Drive. However, there is one exception: Device dependent event handlers are used on some elements in the "Share modal" and "Find / View - View and take action on a non-Google file" user journeys.
2.1.2 No Keyboard Trap (Level A) If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than	Supports	

Criteria	Conformance Level	Remarks and Explanations
unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away. Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference.		
 2.1.4 Character Key Shortcuts (Level A 2.1 only) If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true: Turn off: A mechanism is available to turn the shortcut off; Remap: A mechanism is available to remap the shortcut to include one or more non-printable keyboard keys (e.g., Ctrl, Alt); Active only on focus: The keyboard shortcut for a user interface component is only active when that component has focus. 	Does Not Support	Drive does not support character key shortcuts for the following reasons: • Drive uses character key shortcuts site wide that cannot be turned off or remapped to a non-singular character key.
 2.2.1 Timing Adjustable (Level A) For each time limit that is set by the content, at least one of the following is true: Turn off: The user is allowed to turn off the time limit before encountering it; or Adjust: The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or Extend: The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or Real-time Exception: The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or Essential Exception: The time limit is essential and extending it would invalidate the activity; or 20 Hour Exception: The time limit is longer than 20 hours. 	Partially Supports	Drive meets the standards for 2.2.1 – Timing Adjustable. However, there are exceptions: • Content visually appears and disappears with no way to adjust timing on the "Organize - Organize a file for easy retrieval", "Organize - Move multiple files to another location", "Organize - Make sure I can access content when I'm offline", "Create - Create a place where I can collaborate with other people", "Organize - Find information about a file", "Share / Collaborate - Share a file with everyone at my company", "Share / Collaborate - Limit what others can do in my file (reduce permissions)" and "Organize - Make a file accessible from multiple locations" user journeys.

Criteria	Conformance Level	Remarks and Explanations
 2.2.2 Pause, Stop, Hide (Level A) For moving, blinking, scrolling, or auto-updating information, all of the following are true: Moving, blinking, scrolling: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and Auto-updating: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential. Note 1: For requirements related to flickering or flashing content, refer to Guideline 2.3. Note 2: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference. Note 3: Content that is updated periodically by software or that is streamed to the user agent is not required to preserve or present information that is generated or received between the initiation of the pause and resuming presentation, as this may not be technically possible, and in many situations could be misleading to do so. Note 4: An animation that occurs as part of a preload phase or similar situation can be considered essential if interaction cannot occur during that phase for all users and if not indicating progress could confuse users or cause them to think that content was frozen or broken. 	Supports	
2.3.1 Three Flashes or Below Threshold (Level A) Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.	Supports	

Criteria	Conformance Level	Remarks and Explanations
Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference.		
2.4.1 Bypass Blocks (Level A)A mechanism is available to bypass blocks of content that are repeated on multiple Web pages.	Supports	
2.4.2 Page Titled (Level A)Web pages have titles that describe topic or purpose.	Supports	
2.4.3 Focus Order (Level A) If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability.	Partially Supports	Drive provides focus order in a meaningful way across the user journeys. However, there is an exception: • The keyboard focus is not logical for parts for the "Organize - Make sure I can access content when I'm offline" and "Organize - Find information about a file" user journeys.
2.4.4 Link Purpose (In Context) (Level A) The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general.	Supports	
2.5.1 Pointer Gestures (Level A 2.1 only) All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential.	Supports	
 2.5.2 Pointer Cancellation (Level A 2.1 only) For functionality that can be operated using a single pointer, at least one of the following is true: No Down-Event: The down-event of the pointer is not used to execute any part of the function; Abort or Undo: Completion of the function is on the up-event, and a mechanism is available to abort the function before completion or to undo the function after completion; 	Supports	

Criteria	Conformance Level	Remarks and Explanations
 Up Reversal: The up-event reverses any outcome of the preceding down-event; Essential: Completing the function on the down-event is essential. 		
2.5.3 Label in Name (Level A 2.1 only) For user interface components with labels that include text or images of text, the name contains the text that is presented visually.	Partially Supports	Drive supports 2.5.3 Label in Name. However, there is an exception: • An Accessible name is missing or not visible on the "Filter modal" and "Create - Create a place where I can collaborate with other people" user journeys.
 2.5.4 Motion Actuation (Level A 2.1 only) Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when: Supported Interface: The motion is used to operate functionality through an accessibility supported interface; Essential: The motion is essential for the function and doing so would invalidate the activity. 	Supports	
3.1.1 Language of Page (Level A) The default human language of each Web page can be programmatically determined.	Supports	
3.2.1 On Focus (Level A) When any user interface component receives focus, it does not initiate a change of context.	Supports	
3.2.2 On Input (Level A) Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.	Partially Supports	Drive does not cause a change of context without advising the user beforehand. However, there is one exception: • A form field causes an unexpected change on the "Find / View - Find files that are available offline" user journey.
3.3.1 Error Identification (Level A) If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text.	Supports	
3.3.2 Labels or Instructions (Level A) Labels or instructions are provided when content requires user input.	Partially Supports	Drive provides labels or instruction on content when required. However, there are exceptions:

Criteria	Conformance Level	Remarks and Explanations
		 A label is not persistent on the "Find / View - View and take action on a non-Google file" and "Share modal" user journeys. A visible label is missing on the "Move to Drive / Add Shortcuts Drive modal" user journey.
4.1.1 Parsing (Level A) In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. Note: Start and end tags that are missing a critical character in their formation, such as a closing angle bracket or a mismatched attribute value quotation mark are not complete.	Partially Supports	Most content is implemented with proper markup in Drive. However, there are exceptions: • Some elements lack the appropriate nested role on the "Find / View - Find a file without knowing its name or location" user journey, and the "Filter modal", "Share modal" and "List Layout" components. • An ID Value is not unique on the "Move to Drive / Add Shortcuts Drive modal" user journey.
4.1.2 Name, Role, Value (Level A) For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.	Partially Supports	 Drive provides compliant Name, Role and Value. However there are exceptions: A required attribute is missing for a piece of content site-wide as well as in the "Move to Drive / Add Shortcuts Drive modal", "Find / View - Find a file that has been shared with me", and "Organize - Make sure I can access content when I'm offline" user journeys. Some elements have disallowed attributes site-wide, as well as on the "Find / View - View and take action on a non-Google file", user journey and "Share Modal" component. An accessible name is missing on two elements, site-wide.

Criteria	Conformance Level	Remarks and Explanations
		 An aria attribute is invalid on an element, site-wide. There is a missing state for an element that is used site-wide. A field is missing a label on the "Create - Create a place where I can collaborate with other people" and "Move to Drive / Add Shortcuts Drive modal" user journeys. Tooltip content is not accessible on the "Move to Drive / Add Shortcuts Drive modal" user journey. An element lacks a name on the "share modal" component and the 'Create – Upload a file" user Journey. A hidden element is focusable on the "Find / View - Find a file that has been shared with me" user journey. A menu is missing an appropriate role on the "Create - Create and name file" user journey.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Captions are provided for all live audio content in synchronized media.	Supports	
1.2.5 Audio Description (Prerecorded) (Level AA) Audio description is provided for all prerecorded video content in synchronized media.	Supports	
1.3.4 Orientation (Level AA 2.1 only) Content does not restrict its view and operation to a single display	Supports	

Criteria	Conformance Level	Remarks and Explanations
orientation, such as portrait or landscape, unless a specific display orientation is essential.		
 1.3.5 Identify Input Purpose (Level AA 2.1 only) The purpose of each input field collecting information about the user can be programmatically determined when: The input field serves a purpose identified in the Input Purposes for User Interface Components section; and The content is implemented using technologies with support for identifying the expected meaning for form input data. 	Supports	
 1.4.3 Contrast (Minimum) (Level AA) The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following: Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1; Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement. Logotypes: Text that is part of a logo or brand name has no contrast requirement. 	Partially Supports	 The visual presentation of text and images meets or exceeds contrast ratios across Drive. However, there are exceptions: Some elements lack sufficient color contrast on the "Move to Drive / Add Shortcuts Drive modal" user journey. Some button text lacks sufficient color contrast on the "Move to Drive / Add Shortcuts Drive modal", "Find / View - Find a file that needs my attention" user journeys and the "Share Modal" component.
1.4.4 Resize text (Level AA) Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality.	Does Not Support	Resizing is not supported across Drive. Because zooming and scaling is disabled site wide.
 1.4.5 Images of Text (Level AA) If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: Customizable: The image of text can be visually customized to the user's requirements; Essential: A particular presentation of text is essential to the information being conveyed. Note: Logotypes (text that is part of a logo or brand name) are considered essential. 	Supports	

Criteria	Conformance Level	Remarks and Explanations
 1.4.10 Reflow (Level AA 2.1 only) Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for: Vertical scrolling content at a width equivalent to 320 CSS pixels; Horizontal scrolling content at a height equivalent to 256 CSS pixels; Except for parts of the content which require two-dimensional layout for usage or meaning. 	Partially Supports	Reflow is well supported across drive. However, there is one exception. • When, and only when, a user minimizes the desktop viewport below and expands the zoom to at least 200%, there is overlapping content. However, if you open Drive in any device, such as a phone or tablet, it rescales successfully to fit the device viewports with no overlapping content.
 1.4.11 Non-text Contrast (Level AA 2.1 only) The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s): User Interface Components: Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author; Graphical Objects: Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed. 	Partially Support	The Drive application does support 1.4.11 Non-text Contrast. However there are exceptions: • Several common components for elements used site wide lack 3 to 1 contrast ratio.
 1.4.12 Text Spacing (Level AA 2.1 only) In content implemented using markup languages that support the following text style properties, no loss of content or functionality occurs by setting all of the following and by changing no other style property: Line height (line spacing) to at least 1.5 times the font size; Spacing following paragraphs to at least 2 times the font size; Letter spacing (tracking) to at least 0.12 times the font size; Word spacing to at least 0.16 times the font size. Exception: Human languages and scripts that do not make use of one or more of these text style properties in written text can conform using only the properties that exist for that combination of language and script. 	Supports	
1.4.13 Content on Hover or Focus (Level AA 2.1 only) Where receiving and then removing pointer hover or keyboard focus	Partially Support	The Drive application does support 1.4.13 Content on Hover or Focus. However there are exceptions:

Criteria	Conformance Level	Remarks and Explanations
 triggers additional content to become visible and then hidden, the following are true: Dismissible: A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content; Hoverable: If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing; Persistent: The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid. Exception: The visual presentation of the additional content is controlled by the user agent and is not modified by the author. 		Content on hover and focus is not persistent site wide.
2.4.5 Multiple Ways (Level AA) More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process.	Supports	
2.4.6 Headings and Labels (Level AA) Headings and labels describe topic or purpose.	Supports	
2.4.7 Focus Visible (Level AA) Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.	Partially Supports	Focus is visible and supported across Drive. However, there is one exception: • A focus indicator is missing for one element on the "Find / View - View and take action on a non-Google file" user journey.
3.1.2 Language of Parts (Level AA) The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text.	Supports	
3.2.3 Consistent Navigation (Level AA) Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.	Supports	

Criteria	Conformance Level	Remarks and Explanations
3.2.4 Consistent Identification (Level AA) Components that have the same functionality within a set of Web pages are identified consistently.	Supports	
3.3.3 Error Suggestion (Level AA) If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content.	Supports	
 3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: Reversible: Submissions are reversible. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. 	Supports	
4.1.3 Status Messages (Level AA 2.1 only) In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus.	Partially Supports	Status messages are automatically announced across Drive with the following exceptions: • A status message is not announced on one updating element, site wide. • A status message is not announced on one element in the "Organize - Move multiple files to another location" user journey.

Table 3: Success Criteria, Level AAA

	Criteria	Conformance Level	Remarks and Explanations
	2.6 Sign Language (Prerecorded) (Level AAA)	Not Evaluated	
5	ign language interpretation is provided for all prerecorded audio		
C	content in synchronized media.		

Criteria	Conformance Level	Remarks and Explanations
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Where pauses in foreground audio are insufficient to allow audio descriptions to convey the sense of the video, extended audio description is provided for all prerecorded video content in synchronized media.	Not Evaluated	
1.2.8 Media Alternative (Prerecorded) (Level AAA) An alternative for time-based media is provided for all prerecorded synchronized media and for all prerecorded video-only media.	Not Evaluated	
1.2.9 Audio-only (Live) (Level AAA) An alternative for time-based media that presents equivalent information for live audio-only content is provided.	Not Evaluated	
1.3.6 Identify Purpose (Level AAA 2.1 only) In content implemented using markup languages, the purpose of User Interface Components, icons, and regions can be programmatically determined.	Not Evaluated	
 1.4.6 Contrast (Enhanced) (Level AAA) The visual presentation of text and images of text has a contrast ratio of at least 7:1, except for the following: Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 4.5:1; Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement. Logotypes: Text that is part of a logo or brand name has no contrast requirement. 	Not Evaluated	
 1.4.7 Low or No Background Audio (Level AAA) For prerecorded audio-only content that (1) contains primarily speech in the foreground, (2) is not an audio CAPTCHA or audio logo, and (3) is not vocalization intended to be primarily musical expression such as singing or rapping, at least one of the following is true: No Background: The audio does not contain background sounds. Turn Off: The background sounds can be turned off. 20 dB: The background sounds are at least 20 decibels lower than the foreground speech content, with the exception of occasional 	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
sounds that last for only one or two seconds. Per the definition of "decibel," background sound that meets this requirement will be approximately four times quieter than the foreground speech content.		
 1.4.8 Visual Presentation (Level AAA) For the visual presentation of blocks of text, a mechanism is available to achieve the following: Foreground and background colors can be selected by the user. Width is no more than 80 characters or glyphs (40 if CJK). Text is not justified (aligned to both the left and the right margins). Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. 	Not Evaluated	
1.4.9 Images of Text (No Exception) (Level AAA) Images of text are only used for pure decoration or where a particular presentation of text is essential to the information being conveyed. Note: Logotypes (text that is part of a logo or brand name) are considered essential.	Not Evaluated	
2.1.3 Keyboard (No Exception) (Level AAA) All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes.	Not Evaluated	
2.2.3 No Timing (Level AAA) Motion animation triggered by interaction can be disabled, unless the animation is essential to the functionality or the information being conveyed.	Not Evaluated	
2.2.4 Interruptions (Level AAA) Interruptions can be postponed or suppressed by the user, except interruptions involving an emergency.	Not Evaluated	
2.2.5 Re-authenticating (Level AAA) When an authenticated session expires, the user can continue the activity without loss of data after re-authenticating.	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
2.2.6 Timeouts (Level AAA 2.1 only) Users are warned of the duration of any user inactivity that could cause data loss, unless the data is preserved for more than 20 hours when the user does not take any actions.	Not Evaluated	
2.3.2 Three Flashes (Level AAA) Web pages do not contain anything that flashes more than three times in any one second period.	Not Evaluated	
2.3.3 Animation from Interactions (Level AAA 2.1 only) Motion animation triggered by interaction can be disabled, unless the animation is essential to the functionality or the information being conveyed.	Not Evaluated	
2.4.8 Location (Level AAA) Information about the user's location within a set of Web pages is available.	Not Evaluated	
2.4.9 Link Purpose (Link Only) (Level AAA) A mechanism is available to allow the purpose of each link to be identified from link text alone, except where the purpose of the link would be ambiguous to users in general.	Not Evaluated	
2.4.10 Section Headings (Level AAA) Section headings are used to organize the content. Note 1: "Heading" is used in its general sense and includes titles and other ways to add a heading to different types of content. Note 2: This success criterion covers sections within writing, not user interface components. User Interface components are covered under Success Criterion 4.1.2.	Not Evaluated	
 2.5.5 Target Size (Level AAA 2.1 only) The size of the target for pointer inputs is at least 44 by 44 CSS pixels except when: Equivalent: The target is available through an equivalent link or control on the same page that is at least 44 by 44 CSS pixels; Inline: The target is in a sentence or block of text; User Agent Control: The size of the target is determined by the user agent and is not modified by the author; Essential: A particular presentation of the target is essential to the information being conveyed. 	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only) Web content does not restrict use of input modalities available on a platform except where the restriction is essential, required to ensure the security of the content, or required to respect user settings.	Not Evaluated	
3.1.3 Unusual Words (Level AAA) A mechanism is available for identifying specific definitions of words or phrases used in an unusual or restricted way, including idioms and jargon.	Not Evaluated	
3.1.4 Abbreviations (Level AAA) A mechanism for identifying the expanded form or meaning of abbreviations is available.	Not Evaluated	
3.1.5 Reading Level (Level AAA) When text requires reading ability more advanced than the lower secondary education level after removal of proper names and titles, supplemental content, or a version that does not require reading ability more advanced than the lower secondary education level, is available.	Not Evaluated	
3.1.6 Pronunciation (Level AAA) A mechanism is available for identifying specific pronunciation of words where meaning of the words, in context, is ambiguous without knowing the pronunciation.	Not Evaluated	
3.2.5 Change on Request (Level AAA) Changes of context are initiated only by user request or a mechanism is available to turn off such changes.	Not Evaluated	
3.3.5 Help (Level AAA) Context-sensitive help is available.	Not Evaluated	
 3.3.6 Error Prevention (All) (Level AAA) For Web pages that require the user to submit information, at least one of the following is true: Reversible: Submissions are reversible. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. 	Not Evaluated	

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Notes:

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.	Web: Partially Supports	4.1.2 Name, Role, Value Web: Most functions of the product are usable without vision.
		 Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 3.2.2 Context Changes (On Input) 4.1.1 Parsing 4.1.2 Name, role, value

Criteria	Conformance Level	Remarks and Explanations
302.2 With Limited Vision Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.	Web: Partially Supports	Web: Most functions of the product are usable with limited vision. Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 1.4.3 Contrast (minimum) 1.4.4 Resize text 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 2.4.7 Focus visible 3.2.2 Context Changes (On Input) 3.3.2 Labels or instructions 3.3.2 Visible Labels 4.1.2 Name, role, value
302.3 Without Perception of Color Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.	Web: Partially Supports	Web: Most functions of the product are usable without perception of color. Exceptions are noted in: 1.4.1 Use of Color 1.4.3 Contrast (minimum)
302.4 Without Hearing Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.	Web: Supports (Not Applicable)	Web: The product does not require the use of hearing.
302.5 With Limited Hearing Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.	Web: Supports (Not Applicable)	Web: The product does not require the use of hearing.

Criteria	Conformance Level	Remarks and Explanations
302.6 Without Speech Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.	Web: Supports (Not Applicable)	Web: The product does not require the use of speech.
302.7 With Limited Manipulation Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.	Web: Partially Supports	Web: Users with limited manipulation who use speech recognition or switch control software will not have difficulty navigating to most of the controls. Exceptions are noted in:
302.8 With Limited Reach and Strength Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.	Web: Supports (Not Applicable)	Web: The product does not provide a manual mode of operation.

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.	Web: Partially Supports	Web: The product is functional for users with limited language, cognitive, and learning abilities. Users with cognitive disabilities have varying needs for features that allow them to adapt content and work with assistive technology. The product provides labelling for most controls. Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 2.4.7 Focus visible 3.3.2 Labels or instructions 4.1.1 Parsing 4.1.2 Name, role, value

Chapter 4: Hardware

Notes: The ICT covered by this report is not hardware. As such, the requirements of this chapter do not apply.

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.1 section	See information in WCAG 2.1 section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	See WCAG 2.1 section	
502.2.2 No Disruption of Accessibility Features	See WCAG 2.1 section	
502.3 Accessibility Services	See WCAG 2.1 section	Heading cell – no response required
502.3.1 Object Information	See WCAG 2.1 section	
502.3.2 Modification of Object Information	See WCAG 2.1 section	
502.3.3 Row, Column, and Headers	See WCAG 2.1 section	
502.3.4 Values	See WCAG 2.1 section	
502.3.5 Modification of Values	See WCAG 2.1 section	
502.3.6 Label Relationships	See WCAG 2.1 section	
502.3.7 Hierarchical Relationships	See WCAG 2.1 section	
502.3.8 Text	See WCAG 2.1 section	
502.3.9 Modification of Text	See WCAG 2.1 section	
502.3.10 List of Actions	See WCAG 2.1 section	
502.3.11 Actions on Objects	See WCAG 2.1 section	
502.3.12 Focus Cursor	See WCAG 2.1 section	
502.3.13 Modification of Focus Cursor	See WCAG 2.1 section	
502.3.14 Event Notification	See WCAG 2.1 section	
502.4 Platform Accessibility Features	See WCAG 2.1 section	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	
503.3 Alternative User Interfaces	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	See WCAG 2.1 section	
503.4.2 Audio Description Controls	See WCAG 2.1 section	
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	See WCAG 2.1 section	See information in WCAG 2.1 section
applicable")		
504.2.1 Preservation of Information Provided for Accessibility in Format	Not Applicable	This functionality was not covered in
Conversion		the user flows tested.
504.2.2 PDF Export	Not Applicable	This functionality was not covered in
		the user flows tested.
504.3 Prompts	See WCAG 2.1 section	
504.4 Templates	See WCAG 2.1 section	

Chapter 6: Support Documentation and Services

Notes: Not Applicable

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Notes:

Chapter 4: Functional Performance Statements (FPS)

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Web: Partially Supports	4.1.2 Name, Role, Value Web: Most
Where ICT provides visual modes of operation, some users need ICT to provide at least one mode of operation that does not require vision.		functions of the product are usable without vision.

Criteria	Conformance Level	Remarks and Explanations
Note: Audio and tactile user interfaces may contribute towards meeting this clause.		Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 3.2.2 Context Changes (On Input) 4.1.1 Parsing 4.1.2 Name, role, value
4.2.2 Usage with limited vision Where ICT provides visual modes of operation, some users will need the ICT to provide features that enable users to make better use of their limited vision. Note 1: Magnification, reduction of required field of vision and control of contrast, brightness and intensity can contribute towards meeting this clause. Note 2: Where significant features of the user interface are dependent on depth perception, the provision of additional methods of distinguishing between the features may contribute towards meeting this clause. Note 3: Users with limited vision may also benefit from non-visual access (see clause 4.2.1).	Web: Partially Supports	Web: Most functions of the product are usable with limited vision. Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 1.4.3 Contrast (minimum) 1.4.4 Resize text 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 2.4.7 Focus visible 3.2.2 Context Changes (On Input) 3.3.2 Labels or instructions 3.3.2 Visible Labels 4.1.2 Name, role, value
4.2.3 Usage without perception of colour Where ICT provides visual modes of operation, some users will need the ICT to provide a visual mode of operation that does not require user perception of colour.	Web: Partially Supports	Web: Most functions of the product are usable without perception of color. Exceptions are noted in:

Criteria	Conformance Level	Remarks and Explanations
Note: Where significant features of the user interface are colour-coded, the provision of additional methods of distinguishing between the features may contribute towards meeting this clause.		1.4.1 Use of Color1.4.3 Contrast (minimum)
4.2.4 Usage without hearing Where ICT provides auditory modes of operation, some users need ICT to provide at least one mode of operation that does not require hearing. Note: Visual and tactile user interfaces may contribute towards meeting this clause.	Web: Supports (Not Applicable)	Web: The product does not require the use of hearing.
4.2.5 Usage with limited hearing Where ICT provides auditory modes of operation, some users will need the ICT to provide enhanced audio features. Note 1: Enhancement of the audio clarity, reduction of background noise, increased range of volume and greater volume in the higher frequency range can contribute towards meeting this clause. Note 2: Users with limited hearing may also benefit from nonhearing access (see clause 4.2.4).	Web: Supports (Not Applicable)	Web: The product does not require the use of hearing.
4.2.6 Usage with no or limited vocal capability Where ICT requires vocal input from users, some users will need the ICT to provide at least one mode of operation that does not require them to generate vocal output. Note 1: This clause covers the alternatives to the use of orally-generated sounds, including speech, whistles, clicks, etc. Note 2: Keyboard, pen or touch user interfaces may contribute towards meeting this clause.	Web: Supports (Not Applicable)	Web: The product does not require the use of speech.
4.2.7 Usage with limited manipulation or strength Where ICT requires manual actions, some users will need the ICT to provide features that enable users to make use of the ICT through alternative actions not requiring manipulation or hand strength. Note 1: Examples of operations that users may not be able to perform include those that require fine motor control, path dependent gestures, pinching, twisting of the wrist, tight grasping, or simultaneous manual actions. Note 2: One-handed operation, sequential key entry and speech user interfaces may contribute towards meeting this clause.	Web: Partially Supports	Web: Most functions are usable by people with limited reach and strength. Exceptions include: • 2.1.1 Keyboard • 2.2.1 Timing adjustable • 2.4.3 Focus Order • 2.4.7 Focus visible • 4.1.1 Parsing • 4.1.2 Name, role, value

Criteria	Conformance Level	Remarks and Explanations
Note 3: Some users have limited hand strength and may not be able to achieve the level of strength to perform an operation. Alternative user interface solutions that do not require hand strength may contribute towards meeting this clause.		
4.2.8 Usage with limited reach Where ICT products are free-standing or installed, the operational elements will need to be within reach of all users. Note: Considering the needs of wheelchair users and the range of user statures in the placing of operational elements of the user interface may contribute towards meeting this clause.	Not Applicable	Web: The Drive application is not a free- standing or installed product.
4.2.9 Minimize photosensitive seizure triggers Where ICT provides visual modes of operation, some users need ICT to provide at least one mode of operation that minimizes the potential for triggering photosensitive seizures. Note: Limiting the area and number of flashes per second may contribute towards meeting this clause.	Web: Supports	Web: The Drive application does not contain flashing content or media.
Some users will need the ICT to provide features that make it simpler and easier to use. Note 1: This clause is intended to include the needs of persons with limited cognitive, language and learning abilities. Note 2: Adjustable timings, error indication and suggestion, and a logical focus order are examples of design features that may contribute towards meeting this clause.	Web: Partially Supports	Web: The product is functional for users with limited language, cognitive, and learning abilities. Users with cognitive disabilities have varying needs for features that allow them to adapt content and work with assistive technology. The product provides labelling for most controls. Exceptions are noted in: 1.3.1 Info and Relationships 1.3.2 Meaningful Sequence 1.4.1 Use of Color 2.1.1 Keyboard 2.2.1 Timing adjustable 2.4.3 Focus Order 2.4.7 Focus visible 3.3.2 Labels or instructions 4.1.1 Parsing

Criteria	Conformance Level	Remarks and Explanations
		• 4.1.2 Name, role, value
4.2.11 Privacy Where ICT provides features that are provided for accessibility, some users will need their privacy to be maintained when using those ICT features that are provided for accessibility. Note: Enabling the connection of personal headsets for private listening, not providing a spoken version of characters being masked and enabling user control of legal, financial and personal data are examples of design features that may contribute towards meeting this clause.	Web: Supports	The Drive application does not provide any privacy features.

Chapter <u>5: Generic Requirements</u>

Criteria	Conformance Level	Remarks and Explanations
5.1 Closed functionality	Heading cell – no response required	Heading cell – no response required
5.1.2 General	Heading cell – no response required	Heading cell – no response required
5.1.2.1 Closed functionality Note 1: ICT may close some, but not all, of its functionalities. Only the closed functionalities have to conform to the requirements of clause 5.1. Note 2: The provisions within this clause are requirements for the closed functionality of ICT that replace those requirements in clauses 5.2 to 13 that specifically state that they do not apply to closed functionality. This may be because they relate to compatibility with assistive technology or to the ability for the user to adjust system accessibility settings in products with closed functionality (e.g. products that prevent access to the system settings control panel).	See 5.2 through 13	See information in 5.2 through 13

Criteria	Conformance Level	Remarks and Explanations
5.1.2.2 Assistive technology Where ICT has closed functionality, that closed functionality shall be operable without requiring the user to attach, connect or install assistive technology and shall conform to the generic requirements of clauses 5.1.3 to 5.1.6 as applicable. Personal headsets and induction loops shall not be classed as assistive technology for the purpose of this clause.	See 5.1.3 through 5.1.6	See information in 5.1.3 through 5.1.6
5.1.3 Non-visual access	Heading cell – no response required	Heading cell – no response required
5.1.3.1 Audio output of visual information Where visual information is needed to enable the use of those functions of ICT that are closed to assistive technologies for screen reading, ICT shall provide at least one mode of operation using nonvisual access to enable the use of those functions. Note 1: Non-visual access may be in an audio form, including speech, or a tactile form. Note 2: The visual information needed to enable use of some functions may include operating instructions and orientation, transaction prompts, user input verification, error messages and non-text content.	Not Applicable	The product does not have closed functionality.
 5.1.3.2 Auditory output delivery including speech Where auditory output is provided as non-visual access to closed functionality, the auditory output shall be delivered: a) either directly by a mechanism included in or provided with the ICT; or b) by a personal headset that can be connected through a 3,5 mm audio jack, or an industry standard connection, without requiring the use of vision. Note 1: Mechanisms included in or provided with ICT may be, but are not limited to, a loudspeaker, a built-in handset/headset, or other industry standard coupled peripheral. Note 2: An industry standard connection could be a wireless connection. Note 3: Some users may benefit from the provision of an inductive loop. 	Not Applicable	The product does not have closed functionality.

Criteria	Conformance Level	Remarks and Explanations
5.1.3.3 Auditory output correlation Where auditory output is provided as non-visual access to closed functionality, and where information is displayed on the screen, the ICT should provide auditory information that allows the user to correlate the audio with the information displayed on the screen. Note 1: Many people who are legally blind still have visual ability, and use aspects of the visual display even if it cannot be fully comprehended. An audio alternative that is both complete and complementary includes all visual information such as focus or highlighting, so that the audio can be correlated with information that is visible on the screen at any point in time. Note 2: Examples of auditory information that allows the user to correlate the audio with the information displayed on the screen include structure and relationships conveyed through presentation.	Not Applicable	The product does not have closed functionality.
5.1.3.4 Speech output user control Where speech output is provided as non-visual access to closed functionality, the speech output shall be capable of being interrupted and repeated when requested by the user, where permitted by security requirements. Note 1: It is best practice to allow the user to pause speech output rather than just allowing them to interrupt it. Note 2: It is best practice to allow the user to repeat only the most recent portion rather than requiring play to start from the beginning.	Not Applicable	The product does not have closed functionality.
5.1.3.5 Speech output automatic interruption Where speech output is provided as non-visual access to closed functionality, the ICT shall interrupt current speech output when a user action occurs and when new speech output begins. Note: Where it is essential that the user hears the entire message, e.g. a safety instruction or warning, the ICT may need to block all user action so that speech is not interrupted.	Not Applicable	The product does not have closed functionality.
5.1.3.6 Speech output for non-text content Where ICT presents non-text content, the alternative for non-text content shall be presented to users via speech output unless the non-	Not Applicable	The product does not have closed functionality.

Criteria	Conformance Level	Remarks and Explanations
text content is pure decoration or is used only for visual formatting. The speech output for non-text content shall follow the guidance for "text alternative" described in WCAG 2.1 [5] Success Criterion 1.1.1.		
5.1.3.7 Speech output for video information Where pre-recorded video content is needed to enable the use of closed functions of ICT and where speech output is provided as non-visual access to closed functionality, the speech output shall present equivalent information for the pre-recorded video content. Note: This speech output can take the form of an audio description or an auditory transcript of the video content.	Not Applicable	The product does not have closed functionality.
5.1.3.8 Masked entry Where auditory output is provided as non-visual access to closed functionality, and the characters displayed are masking characters, the auditory output shall not be a spoken version of the characters entered unless the auditory output is known to be delivered only to a mechanism for private listening, or the user explicitly chooses to allow non-private auditory output. Note 1: Masking characters are usually displayed for security purposes and include, but are not limited to, asterisks representing personal identification numbers. Note 2: Unmasked character output might be preferred when closed functionality is used, for example, in the privacy of the user's home. A warning highlighting privacy concerns might be appropriate to ensure that the user has made an informed choice.	Not Applicable	The product does not have closed functionality.
5.1.3.9 Private access to personal data Where auditory output is provided as non-visual access to closed functionality, and the output contains data that is considered to be private according to the applicable privacy policy, the corresponding auditory output shall only be delivered through a mechanism for private listening that can be connected without requiring the use of vision, or through any other mechanism explicitly chosen by the user. Note 1: This requirement does not apply in cases where data is not defined as being private according to the applicable privacy policy or where there is no applicable privacy policy.	Not Applicable	The product does not have closed functionality.

Criteria	Conformance Level	Remarks and Explanations
Note 2: Non-private output might be preferred when closed functionality is used, for example, in the privacy of the user's home. A warning highlighting privacy concerns might be appropriate to ensure that the user has made an informed choice.		
5.1.3.10 Non-interfering audio output Where auditory output is provided as non-visual access to closed functionality, the ICT shall not automatically play, at the same time, any interfering audible output that lasts longer than three seconds.	Not Applicable	The product does not have closed functionality.
5.1.3.11 Private listening volume Where auditory output is provided as non-visual access to closed functionality and is delivered through a mechanism for private listening, ICT shall provide at least one non-visual mode of operation for controlling the volume.	Not Applicable	The product does not have closed functionality.
5.1.3.12 Speaker volume Where auditory output is provided as non-visual access to closed functionality and is delivered through speakers on ICT, a non-visual incremental volume control shall be provided with output amplification up to a level of at least 65 dBA (-29 dBPaA). Note: For noisy environments, 65 dBA may not be sufficient.	Not Applicable	The product does not have closed functionality.
5.1.3.13 Volume reset Where auditory output is provided as non-visual access to closed functionality, a function that resets the volume to be at a level of 65 dBA or less after every use, shall be provided, unless the ICT is dedicated to a single user. Note: A feature to disable the volume reset function may be provided in order to enable the single-user exception to be met.	Not Applicable	The product does not have closed functionality.
 5.1.3.14 Spoken languages Where speech output is provided as non-visual access to closed functionality, speech output shall be in the same human language as the displayed content provided, except: a) for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text; b) where the content is generated externally and not under the control of the ICT vendor, clause 5.1.3.14 shall not be required 	Not Applicable	The product does not have closed functionality.

Criteria	Conformance Level	Remarks and Explanations
to apply for languages not supported by the ICT's speech synthesizer; c) for displayed languages that cannot be selected using nonvisual access; d) where the user explicitly selects a speech language that is different from the language of the displayed content.		
5.1.3.15 Non-visual error identification Where speech output is provided as non-visual access to closed functionality and an input error is automatically detected, speech output shall identify and describe the item that is in error.	Not Applicable	The product does not have closed functionality.
5.1.3.16 Receipts, tickets, and transactional outputs Where ICT is closed to visual access and provides receipts, tickets or other outputs as a result of a self-service transaction, speech output shall be provided which shall include all information necessary to complete or verify the transaction. In the case of ticketing machines, printed copies of itineraries and maps shall not be required to be audible. Note: The speech output may be provided by any element of the total ICT system.	Not Applicable	The product does not have closed functionality.
 5.1.4 Functionality closed to text enlargement Where any functionality of ICT is closed to the text enlargement features of platform or assistive technology, the ICT shall provide a mode of operation where the text and images of text necessary for all functionality is displayed in such a way that a non-accented capital "H" subtends an angle of at least 0,7 degrees at a viewing distance specified by the supplier. The subtended angle, in degrees, may be calculated from: Ψ = (180 x H) / (π x D) Where: Ψ is the subtended angle in degrees H is the height of the text D is the viewing distance D and H are expressed in the same units Note: The intent is to provide a mode of operation where text is large enough to be used by most users with low vision. 	Not Applicable	The product does not have closed functionality.

Criteria	Conformance Level	Remarks and Explanations
5.1.5 Visual output for auditory information Where pre-recorded auditory information is needed to enable the use of closed functions of ICT, the ICT shall provide visual information that is equivalent to the pre-recorded auditory output. Note: This visual information can take the form of captions or text transcripts.	Not Applicable	The product does not have closed functionality.
5.1.6 Operation without keyboard interface	Heading cell – no response required	Heading cell – no response required
5.1.6.1 Closed functionality	See 5.1.3.1 through 5.1.3.16	See information in 5.1.3.1 through 5.1.3.16
5.1.6.2 Input focus Where ICT functionality is closed to keyboards or keyboard interfaces and where input focus can be moved to a user interface element, it shall be possible to move the input focus away from that element using the same mechanism, in order to avoid trapping the input focus.	Not Applicable	The product does not have closed functionality.
5.2 Activation of accessibility features Where ICT has documented accessibility features, it shall be possible to activate those documented accessibility features that are required to meet a specific need without relying on a method that does not support that need.	Not Applicable	The product does not have specific accessibility features
5.3 Biometrics Where ICT uses biological characteristics, it shall not rely on the use of a particular biological characteristic as the only means of user identification or for control of ICT. Note 1: Alternative means of user identification or for control of ICT could be non-biometric or biometric. Note 2: Biometric methods based on dissimilar biological characteristics increase the likelihood that individuals with disabilities possess at least one of the specified biological characteristics. Examples of dissimilar biological characteristics are fingerprints, eye retinal patterns, voice, and face.	Not Applicable	Biometrics is not included in the product.
5.4 Preservation of accessibility information during conversion Where ICT converts information or communication it shall preserve all documented non-proprietary information that is provided for accessibility, to the extent that such information can be contained in or supported by the destination format.	Not Applicable	The product does not convert content.

Criteria	Conformance Level	Remarks and Explanations
5.5 Operable parts	Heading cell – no response required	Heading cell – no response required
5.5.1 Means of operation Where ICT has operable parts that require grasping, pinching, or twisting of the wrist to operate, an accessible alternative means of operation that does not require these actions shall be provided.	Not Applicable	The product has only non-mechanical operable parts, such as on-screen buttons, which do not require grasping, pinching, or twisting of the wrist to operate.
5.5.2 Operable parts discernibility Where ICT has operable parts, it shall provide a means to discern each operable part, without requiring vision and without performing the action associated with the operable part. Note: One way of meeting this requirement is by making the operable parts tactilely discernible.	Not Applicable	The product has only non-mechanical operable parts, such as on-screen buttons, which do not require grasping, pinching, or twisting of the wrist to operate.
5.6 Locking or toggle controls	Heading cell – no response required	Heading cell – no response required
S.6.1 Tactile or auditory status Where ICT has a locking or toggle control and that control is visually presented to the user, the ICT shall provide at least one mode of operation where the status of the control can be determined either through touch or sound without operating the control. Note 1: Locking or toggle controls are those controls that can only have two or three states and that keep their state while being used. Note 2: An example of a locking or toggle control is the "Caps Lock" key found on most keyboards. Another example is the volume button on a pay telephone, which can be set at normal, loud, or extra loud volume.	Not Applicable	Tactile or auditory status is not included in the product.
5.6.2 Visual status Where ICT has a locking or toggle control and the control is non- visually presented to the user, the ICT shall provide at least one mode of operation where the status of the control can be visually determined when the control is presented. Note 1: Locking or toggle controls are those controls that can only have two or three states and that keep their state while being used.	Supports	Visual status of controls is discernible in the product.

Criteria	Conformance Level	Remarks and Explanations
Note 2: An example of a locking or toggle control is the "Caps Lock" key found on most keyboards. An example of making the status of a control determinable is a visual status indicator on a keyboard.		
 5.7 Key repeat Where ICT has a key repeat function that cannot be turned off: a) the delay before the key repeat shall be adjustable to at least 2 seconds; and b) the key repeat rate shall be adjustable down to one character per 2 seconds. 	Not Applicable	Key repeat functionality is not found in the product.
5.8 Double-strike key acceptance Where ICT has a keyboard or keypad, the delay after any keystroke, during which an additional key-press will not be accepted if it is identical to the previous keystroke, shall be adjustable up to at least 0,5 seconds.	Not Applicable	Double -strike key acceptance is not found in the product.
5.9 Simultaneous user actions Where ICT uses simultaneous user actions for its operation, such ICT shall provide at least one mode of operation that does not require simultaneous user actions to operate the ICT. Note: Having to use both hands to open the lid of a laptop, having to press two or more keys at the same time or having to touch a surface with more than one finger are examples of simultaneous user actions.	Not Applicable	The product does not require simultaneous user actions to achieve any functionality.

Chapter 6: ICT with Two-Way Voice Communication

Notes: Not Applicable

Chapter 7: ICT with Video Capabilities

Notes: Not Applicable

Chapter 8: Hardware

Notes: Not Applicable

Chapter 9: Web

Notes: See WCAG 2.1 section

Chapter 10: Non-Web Documents

Notes: Not Applicable

Chapter 11: Software

Notes: Not Applicable

Chapter 12: Documentation and Support Services

Notes: Not Applicable

Chapter 13: ICT Providing Relay or Emergency Service Access

Notes: Not Applicable

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