Index Analytics Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT® Version 2.5)

Name of Product/Version: Encounter Data Workbench (EDWB)

Report Date: April 5, 2024

Product Description: Custom development and electronic documentation (including training materials) in support of the EDDA contract

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Notes: Section 508 compliance for CMS Enterprise Business Intelligence tools used by the EDWB are outside the scope of the contract. VPATs for those products can be obtained from their respective vendors.

Evaluation Methods Used: Testing with Assistive Technology (JAWS)

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 only be used in WCAG Level AAA criteria.

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
Notes: EDWB custom development is not considered Software as defined by the Revised Section 508 Requirements which define Software as "non-web software." Therefore, we have removed every instance of "Software" in the Conformance Level column.

Furthermore, EDWB custom development is not considered an Authoring Tool as defined by the Revised Section 508 Requirements which define "authoring tool" as "any software, or collection of software components, that can be used by authors, alone or collaboratively, to create or modify content for use by others, including other authors." Therefore, we have removed every instance of "Authoring Tool" in the Conformance Level column.

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)	Web: Supports Electronic Docs: Supports	Web: For all meaningful non-text content that is presented to users, an equivalent text alternative is provided. The text alternative is descriptive for the content and in the order, it is displayed. Electronic Docs: EDWB documentation provides text equivalents for non-text elements through alternative text.
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)	Web: N/A Electronic Docs: Supports	Web: The EDWB does not contain any audio only or video only related content, so this criterion is not applicable. Electronic Docs: Where applicable, EDWB documentation will have an alternative for time-based media and provided equivalent information for video and audio content.
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The EDWB contains training videos that have open captions. Electronic Docs: Where applicable, EDWB documentation will provide captions for audio content.
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)	Web: Supports Electronic Docs: Supports	Web: Training videos for EDWB have audio or text descriptions available. Electronic Docs: Where applicable, EDWB documentation will provide an audio track that includes audio descriptions.
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Where applicable information conveyed through presentation is programmatically marked up using Hypertext Markup Language (HTML) 5 and Accessible Rich Internet Applications (ARIA) to ensure this rule. Electronic Docs: Info and relationships are established through use of Microsoft Office styles, which identify headings, titles, and other text relationships.

Criteria	Conformance Level	Remarks and Explanations
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The EDWB has logical reading order sequence and can be programmatically determined. Where applicable the application is structured in such a way that the information appearing on the screen is in the same orientation in the Document Object Model (DOM). Electronic Docs: The information presented in our documents is built from the DOM structure, as presented on the page. Meaningful sequence is preserved in the ordering of text and use of headings and tables.
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Color, shape, size, or visual location will never individually be the sole representation of information on a given page. All information is represented with text in some way or a combination of the listed properties. Electronic Docs: EDWB documentation will not rely on sensory characteristics like shape, size, visual location, or sound to convey information or instructions.
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)	Web: Supports Electronic Docs: Supports	Web: The EDWB does not use color as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. Color is calibrated to ensure colorblind users are still capable of using the site effectively. Where color may become an issue, shape and/or text is used to fill informational gaps. Electronic Docs: EDWB documentation will not use color as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. Color is calibrated to ensure colorblind users are still capable of using the site effectively. Where color may become an issue, shape and/or text is used to fill informational gaps.
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The EDWB does not have any audio that plays automatically for more than 3 seconds. Audio controls are provided for pre-recorded content. Electronic Docs: Where applicable, EDWB documentation will provide the means to pause audio content.
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: All the functionality of the content is operable through a keyboard interface. Appropriate tab index attribute values are used to meet this rule. Electronic Docs: All parts of EDWB documentation is navigable using only the keyboard.

Criteria	Conformance Level	Remarks and Explanations
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)	Web: Supports Electronic Docs: Supports	Web: Where applicable User Interface components are navigable using only the keyboard, including navigating away from a focused element. Electronic Docs: All parts of EDWB documentation are navigable using only the keyboard, including navigating away from a focused element.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: N/A Electronic Docs: N/A	Web: The EDWB does not have any time-based content, i.e., sending out alerts based on the user actions, so this criterion is not applicable. Electronic Docs: EDWB supporting documentation will not use timed responses in forms, so this criterion is not applicable.
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)	Web: Supports Electronic Docs: Supports	Web: The User Interface does not include elements that move, blink, scroll, or auto-update. Electronic Docs: No moving, blinking, scrolling, or auto-updating is present on any supporting documentation.
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)	Web: Supports Electronic Docs: Supports	Web: The User Interface does not include any flashing content. Electronic Docs: No flashing or blinking is present on any supporting documentation.
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	Web: Supports Electronic Docs: Supports	Web: Where applicable the User Interface will allow users to bypass blocks of content repeated on multiple pages using the keyboard or a link and will place users into the main content area. Electronic Docs: The user will be able to bypass blocks of content repeated on multiple pages using the keyboard or a link.
2.4.2 Page Titled (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Where applicable there is only one title for each page. Electronic Docs: Documentation title is captured in the properties field.

Criteria	Conformance Level	Remarks and Explanations
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Where applicable Focus order is handled by placing the elements into the DOM in the expected order of user interaction. Where this is not possible (alerts, messages), there are dialog handlers for managing proper order of focus and release of focus out of the message. Additionally, "tabindex" attribute is used to manage focus for interactive elements and headings for the main section. Electronic Docs: Focus order (cursor) will conform to a meaningful sequence. Users will be able to use keyboard functions like the arrow and tab keys to move focus in the correct order.
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)	Web: Supports Electronic Docs: Supports	Web: The purpose of each link is determinable from the link text alone or from the link text together with its programmatically determined link context. Electronic Docs: Where links are used, the link text will convey the purpose of the link.
3.1.1 Language of Page (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The application default is English language for each web page and is programmatically determined. Electronic Docs: Language will be identified in the properties of the document.
3.2.1 On Focus (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Where applicable User Interface does not initiate a change of context when any application component receives focus. Electronic Docs: Moving focus will not cause a change of context. Change of context must be initiated by the user using specific keyboard keys (e.g., to navigate to a section from the Table of Contents or activate a link).
3.2.2 On Input (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Changing the setting of any application user interface component does not automatically cause a change of context unless the user has been instructed or advised of the behavior before using the component. Electronic Docs: Changing the user setting of any documentation component will not cause a change of context.
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: N/A	Web: Wherever applicable both client-side validation (CSV) and server-side validation (SSV) is present in the application to prevent erroneous data from entering the system. Electronic Docs: Does not apply. EDWB documentation does not have any input/fillable forms.

Criteria	Conformance Level	Remarks and Explanations
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)	Web: Supports Electronic Docs: Supports	Web: The labels or instructions are provided when content requires user input. Electronic Docs: EDWB supporting documentation will contain descriptive labels that enable screen reader users to understand the flow and components of the document.
4.1.1 Parsing (Level A) Also applies to: WCAG 2.0 – Always answer 'Supports' Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: This rule is supported by using Markup language, which includes start and end tags. Electronic Docs: Formatting of EDWB supporting documentation will include proper headings and subheadings, enabling nesting and parsing of the document by assistive technologies.
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)	Web: Supports Electronic Docs: Supports	Web: Where applicable application user interface components have name and role that can be programmatically determined; states, properties, and values that can be set by the user can be programmatically established. Electronic Docs: Formatting of EDWB supporting documentation will include proper headings and subheadings, enabling nesting and parsing of the document by assistive technologies.

Table 2: Success Criteria, Level AA

Notes: None

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)	Web: N/A Electronic Docs: N/A	Web: The EDWB does not contain live synchronized media, so this criterion is not applicable. Electronic Docs: Does not apply. EDWB does not have content that requires live captions, so this criterion is not applicable.
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)	Web: Supports Electronic Docs: Supports	Web: Training videos for EDWB have audio or text descriptions available. Electronic Docs: Where applicable, EDWB documentation will provide an audio description of video content.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The visual presentation of text and images of text have a contrast ratio of at least 4.5:1. Electronic Docs: The visual presentation of text has a contrast ratio of at least 4.5:1.
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Users are able to resize text without assistive technology up to 200 percent, without loss of content or functionality. Electronic Docs: The user can change the zoom percentage to resize the text without loss of content or functionality.

Criteria	Conformance Level	Remarks and Explanations
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)	Web: Supports Electronic Docs: Supports	Web: Text is used to convey information rather than images of text. Images of text are confined to logos and emblems and are accompanied by alternative text. Electronic Docs: Text is used to convey information rather than images of text. Images of text are confined to logos and emblems and are accompanied by alternative text.
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	Web: Supports Electronic Docs: Supports	Web: Multiple styles of navigation are presented to the user. Navigation lists, breadcrumbs, and sequential operation buttons will be available. Electronic Docs: Formatting of supporting documentation includes proper headings and subheadings to enable table of contents, cross-referencing, and quick navigation.
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)	Web: Supports Electronic Docs: Supports	Web: Headings are present and properly nested. Every input has a defining label attached. Web applicable headings and labels describe the topic or purpose of sections. Semantic HTML along with ARIA attributes are used to conform to this rule. Electronic Docs: Headings will be present and properly nested. Every input will have a defining label attached. EDWB documentation will provide descriptive headings.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: The keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. Headings are present and properly nested. Every input will have a defining label attached. Electronic Docs: The keyboard focus indicator is visible. Visible focus provided by the document viewer is not blocked or circumvented.
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)	Web: Supports Electronic Docs: N/A	Web: The default English language of each web page can be programmatically determined. Electronic Docs: EDWB documentation does not contain text with a change in language, so this criterion is not applicable.
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	Web: Supports Electronic Docs: Supports	Web: Where applicable repeated Navigational elements are in the same order. Dynamically generated navigation across all pages follows the same structure each time. Electronic Docs: EDWB supporting documentation is linear and does not require such navigation between pages.

Criteria	Conformance Level	Remarks and Explanations
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	Web: Supports Electronic Docs: Supports	Web: Where applicable components that have the same functionality are identified consistently. Dynamically generated content blocks follow the same structures each time. Electronic Docs: EDWB supporting documentation includes proper and consistent formatting of headings and subheadings, figures, tables, and other document components.
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 ▪ 501 (Web)(Software) ▪ 504.2 (Authoring Tool) ▪ 602.3 (Support Docs)	Web: Supports Electronic Docs: N/A	Web: Both Client-Side Validation and Server-Side Validation are present to prevent erroneous data from entering the system. Electronic Docs: Does not apply. EDWB documentation does not have any input forms, so this criterion is not applicable.
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)	Web: N/A Electronic Docs: N/A	Web: Does not apply. EDWB does not require any legal or financial commitments, so this criterion is not applicable. Electronic Docs: Does not apply. EDWB documentation does not require any legal or financial commitments, so this criterion is not applicable.

Table 3: Success Criteria, Level AAA

Notes: This section has been removed. The EDWB was not evaluated against this criterion.

Revised Section 508 Report

Notes: None

Chapter 3: Functional Performance Criteria **(FPC)**

Notes: None

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	The features and controls in EDWB and EDWB documentation are reachable using the keyboard alone and announced by assistive technology.
302.2 With Limited Vision	Supports	EDWB and EDWB documentation are compatible with assistive technologies and supports the use of screen readers for the visually impaired.
302.3 Without Perception of Color	Supports	EDWB and EDWB documentation do not use color as only means of conveying information.
302.4 Without Hearing	Supports	The EDWB without hearing can be accessible. Where applicable, EDWB documentation supports users without hearing via captions.
302.5 With Limited Hearing	Supports	The EDWB with limited hearing can be accessible. Where applicable, EDWB documentation supports users with limited hearing via captions.
302.6 Without Speech	Not Applicable	EDWB and EDWB documentation do not require speech to operate or retrieve information, so this criterion is not applicable.

![index ANALYTICS]

Centers for Medicare & Medicaid Services (CMS)
Medicare Advantage Encounter Data Dashboard and Analytics (EDDA)
Volume II – Technical Proposal

Criteria	Conformance Level	Remarks and Explanations
302.7 With Limited Manipulation	Supports	EDWB and EDWB documentation support standard input mechanisms such as user-provided keyboards and pointing devices. Use of the application does not require fine motor controls nor simultaneous actions.
302.8 With Limited Reach and Strength	Supports	EDWB and EDWB documentation have large target areas that would not cause problems for people with fine motor control or limited reach and strength.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	EDWB and EDWB documentation do not function in a way that is prohibitive to users with cognitive or learning impairments.

Chapter 4: Hardware

Notes: This section has been removed. EDWB is not hardware-based and therefore it is not an applicable standard to the contract.

Chapter 5: Software

Notes: This section has been removed. EDWB is not Software as defined in the Revised 508 Requirements and therefore it is not an applicable standard to this contract.

Chapter 6: Support Documentation and Services

Notes: None

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	Supports	EDWB provides electronic accessible versions of all support documentation related to EDWB.
602.3 Electronic Support Documentation	See WCAG 2.x section	See information in WCAG 2.x section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	EDWB does not provide any non-electronic support documentation, so this criterion is not applicable.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	A description of the accessibility and compatibility features in alternative formats can be provided on request.
603.3 Accommodation of Communication Needs	Supports	EDWB help desk provides technical support via e-mail and documentation, at no charge.

Legal Disclaimer (Company)

Include your company legal disclaimer here, if needed.

Not Applicable