

ACCESSIBILITY POLICY

Effective Date: March 20, 2017

OVERVIEW

The federal government requires all public institutions to comply with Rehabilitation Act of 1973, 29 U.S.C. 794d, Section 508, subpart B 1194.22 "Web-based intranet and internet information and applications". While StockTrak is a private institution, we strive to make our platform accessible to all students and users to help universities achieve their teaching goals.

SUMMARY OF COMPLIANCE

We have used the Section 508 provisions as our benchmark for site accessibility. In pursuit of these benchmarks, we have added a fully "Accessible" version of our trading platform, which is accessed through a link in our website footer. The "Accessible" version includes all the same functionality and usage of our "Desktop" version, but with many styling and dynamic elements modified specifically for users with limited vision and motor skills.

COMPLIANCE SPECIFICS

Below are the and steps StockTrak has taken to comply, directly paired with the Section 508 provisions:

- a. A text equivalent for every non-text element shall be provided (examples: via "alt," "longdesc," or in element content).***

We have removed almost all non-text elements from the website. Of the view graphics that are used as part of the website, appropriate "alt" descriptions have been applied.

- b. Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.***

StockTrak includes some tutorial videos as part of our platform to help students get started, which is the only multimedia content used. These videos all include closed captioning (CC). For students who are unable to view the videos, a text-only user guide has also been provided.

- c. Web pages shall be designed so that all information conveyed with color is also available without color. For example, from context or markup.***

Color is only used in StockTrak for emphasis and styling – no color is required to use or understand any part of the platform.

- d. Documents shall be organized so they are readable without requiring an associated style sheet.***

All documents on StockTrak have been tested with screen reading software (without visuals) to ensure legibility without stylesheets.

- e. Redundant text links shall be provided for each active region of a server-side image map.***

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- f. Client-side image maps shall be provided instead of server-side image maps, except where the regions cannot be defined with an available geometric shape.***

StockTrak includes only two image maps:

1. A pie chart showing user's portfolio breakdowns (found on the Dashboard page) – This image map is just a graphical representation of the student's holdings, which is in full on the Open Positions page. This pie chart has been removed from the Accessible version
2. A progress bar showing a student's assignment progress. This progress bar is overlaid a text number conveying the same information

- g. Row and column headers shall be identified for data tables.***

All tables have been optimized with the appropriate headers and row labels

- h. Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.***

The desktop version does have some areas with multiple logical levels of column headings. These tables have been re-drawn to remove these levels while keeping all data on the Accessible version.

- i. Frames shall be titled with text that facilitates frame identification and navigation.***

The StockTrak platform does not utilize frames in any functional way.

- j. Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.***

Our platform has been tested to ensure flicker falls within standard operating ranges.

- k. A text-only page, with equivalent information or functionality, shall be provided to make a Web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.***

We have added text-only user guides for users who are not able to view our standard tutorial videos.

- l. When pages utilize scripting languages to display content or create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.***

The desktop version of the platform utilizes scripting to continually update prices as new market data is made available. This scripting may cause conflict with assistive technology, and thus is not present on our Accessible version (new market data is loaded instead when the page is refreshed, instead of automatically).

- m. When a Web page requires that an applet, plug-in, or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).***

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No applets, plugins, or any other external resources are required to take advantage of all functionality of the StockTrak platform.

- n. Online forms shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.***

All forms throughout the site have been optimized using appropriate label and field elements, and tested using the NVDA screen reader to ensure compliance.

- o. A method shall be provided that permits users to skip repetitive navigation links.***

Appropriate tab indices have been added to the Accessible version of the platform, allowing users to skip the navigation sections as needed.

- p. When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.***

No timed responses are required throughout the platform.

QUESTIONS AND RECOMMENDATIONS

Stock-Trak, Inc. is committed to keeping our platform open and accessible for all users. If there are any changes or recommendations on how we can improve our site accessibility, please email accessibility@stocktrak.com.

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VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Summary Table

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Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems		N/A
Section 1194.22 Web-based Internet Information and Applications		
Section 1194.23 Telecommunications Products		N/A
Section 1194.24 Video and Multi-media Products		
Section 1194.25 Self-Contained, Closed Products		N/A
Section 1194.26 Desktop and Portable Computers		N/A
Section 1194.31 Functional Performance Criteria		
Section 1194.41 Information, Documentation and Support		

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***Section 1194.22 Web-based Internet information
and applications – Detail***

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Criteria	Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).		We have removed almost all non-text elements from the website. Of the view graphics that are used as part of the website, appropriate "alt" descriptions have been applied.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	StockTrak includes some tutorial videos as part of our platform to help students get started, which is the only multimedia content used. These videos all include closed captioning (CC). For students who are unable to view the videos, a text-only user guide has also been provided.	
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.		Color is only used in StockTrak for emphasis and styling – no color is required to use or understand any part of the platform.

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<p>(d) Documents shall be organized so they are readable without requiring an associated style sheet.</p>		<p>All documents on StockTrak have been tested with screen reading software (without visuals) to ensure legibility without stylesheets.</p>
<p>(e) Redundant text links shall be provided for each active region of a server-side image map.</p>		<p>StockTrak includes only two image maps:</p> <ol style="list-style-type: none"> 1. A pie chart showing user's portfolio breakdowns (found on the Dashboard page) – This image map is just a graphical representation of the student's holdings, which is in full on the Open Positions page. This pie chart has been removed from the Accessible version 2. A progress bar showing a student's assignment progress. This progress bar is overlaid a text number conveying the same information
<p>(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.</p>		

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<p>(g) Row and column headers shall be identified for data tables.</p>		<p>All tables have been optimized with the appropriate headers and row labels</p>
<p>(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.</p>	<p>The desktop version does have some areas with multiple logical levels of column headings. These tables have been re-drawn to remove these levels while keeping all data on the Accessible version.</p>	
<p>(i) Frames shall be titled with text that facilitates frame identification and navigation</p>		<p>The StockTrak platform does not utilize frames in any functional way.</p>
<p>(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>		<p>Our platform has been tested to ensure flicker falls within standard operating ranges.</p>
<p>(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.</p>	<p>We have added text-only user guides for users who are not able to view our standard tutorial videos.</p>	
<p>(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.</p>	<p>The desktop version of the platform utilizes scripting to continually update prices as new market data is made available. This scripting may cause conflict with assistive technology, and thus is not present on our Accessible version (new market data is loaded instead when the page is refreshed, instead of automatically).</p>	
<p>(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the</p>		<p>No applets, plugins, or any other external resources are required to take</p>

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page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).		advantage of all functionality of the StockTrak platform.
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	All forms throughout the site have been optimized using appropriate label and field elements, and tested using the NVDA screen reader without the use of a computer mouse to ensure compliance.	
(o) A method shall be provided that permits users to skip repetitive navigation links.	Appropriate tab indices have been added to the Accessible version of the platform, allowing users to skip the navigation sections as needed.	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		No timed responses are required throughout the platform.

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

***Section 1194.31 Functional Performance Criteria –
Detail***

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or	Site has been optimized for usage with a screen reader	

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<p>support for Assistive Technology used by people who are blind or visually impaired shall be provided.</p>		
<p>(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.</p>	<p>The site has been fully tested with screen readers to ensure utility for the visually impaired</p>	
<p>(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided</p>	<p>Only item requiring visual aid is optional tutorial videos, which include closed captioning and text alternatives</p>	
<p>(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.</p>		<p>No part of the site requires audio</p>
<p>(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.</p>		<p>No part of the site requires speech</p>
<p>(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is</p>		<p>No part of the site requires fine motor action which does not have a keyboard-based alternative</p>

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operable with limited reach and strength shall be provided.		
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Section 1194.41 Information, Documentation and Support – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge		This will be provided by our team in a variety of requested formats
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.		This will be provided by our team in a variety of requested formats
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.		Support services currently are provided by email, phone support is also available

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