

**InContact MAX 16.3  
Voluntary Product Accessibility Template  
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## Overview

The information contained within this Voluntary Product Accessibility Template (VPAT) is the result of a third-party performing an audit using the JAWS 17.0 screen reader and extensive manual testing techniques. The audit tested the compliance of InContact's MAX (My Agent eXperience) version 16.3 against the applicable requirements of Section 508 of the Rehabilitation Act of 1973 as Amended 1998<sup>1</sup>. This audit covered the Phone, Chat, Voicemail, and Email functionality.

The purpose of the VPAT is to assist Federal contracting officials in making preliminary assessments regarding the availability of commercial electronic and information technology products and services with features that support accessibility. It is assumed that offerers will provide additional contact information to facilitate more detailed inquiries.

The core issues identified in this VPAT include severe keyboard accessibility problems impacting the Email functionality, the lack of textual equivalents for some controls rendered by images or other visual methods, the lack of valid labels for some form controls, a few simulated controls that do not support direct voice commands by speech input software, a few cases of invalid or incomplete use of ARIA that may cause difficulty for screen reader users, and some uses of color that lack either textual or visual equivalents. Some additional problems of lower frequency and severity also occur.

Note that MAX version 16.2 added several ADA updates and configuration options including a Screen Reader setting and a High Contrast mode to enhance the accessibility of the MAX interface. The scores and Remarks in this VPAT are predicated on having these settings enabled. Persons with disabilities should also acquire and utilize documentation regarding keyboard shortcuts in MAX.

The first table of the report 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.

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<sup>1</sup>§1194.22 – Web-based Intranet and Internet Information and Applications  
§1194.31 Functional Performance Criteria  
§1194.41 – Information, Documentation and Support



## Compliance Summary

Criteria	Supported
<a href="#">Section 1194.22 Web-based Intranet and Internet Information and Applications</a>	<b>Supports with Exceptions</b>
<a href="#">Section 1194.31 Functional Performance Criteria</a>	<b>Supports with Exceptions</b>
<a href="#">Section 1194.41 Information, Documentation, and Support</a>	<b>Supports</b>

## Support Levels

Support Level	Description
<b>Supports</b>	The application fully meets the letter and intent of the Criteria.
<b>Supports with Exceptions/Minor Exceptions</b>	The application does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria.
<b>Supports through Equivalent Facilitation</b>	The application provides an alternate way to meet the intent of the Criteria.
<b>Supports when Combined with Compatible AT</b>	The application fully meets the letter and intent of the Criteria when used in combination with compatible ATs.
<b>Does Not Support</b>	The application does not meet the letter or intent of the Criteria.
<b>Not Applicable</b>	The Criteria does not apply.
<b>Not Applicable - Fundamental Alteration Exception Applies</b>	A Fundamental Alteration of the application is required to meet the Criteria.
<b>Applicable – Not Tested</b>	The Standard is applicable but was not tested.



## § 1194.22 Web-based Intranet and Internet Information and Applications

Criteria	Support Level	Remarks and Explanations
<p>(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).</p>	<p><b>Supports with Exceptions</b></p>	<p>MAX makes extensive use of images throughout its user interface to render both static and active elements. In most cases, appropriate text equivalents are provided. However, in a small number of cases, the meanings of icons and shapes are not indicated textually to users who are blind.</p> <p>Visual rendering methods are also utilized to convey the meanings of a variety of elements. In many cases, text equivalents to these visual methods are provided, but in other cases, text equivalents are not provided. These exceptions include the selected state of tabs, the pressed state of toggle buttons, the active role of certain elements, and the boundaries between the many dynamically-displayed MAX panels or dialogs and the main interface behind them.</p>
<p>(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.</p>	<p><b>Not Applicable</b></p>	<p>MAX does not utilize multimedia.</p>
<p>(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.</p>	<p><b>Supports with Exceptions</b></p>	<p>MAX utilizes color in a variety of ways and components to convey meaning. In most cases, other visual rendering methods provide redundant alternatives to these uses of color for users with low vision who may be unable to perceive the colors or who may change certain operating system or browser settings that override the specification of colors. In many cases, text equivalents to these uses of color are also provided for users who are blind. However, some exceptions occur in which equivalents are not provided.</p> <p>Exceptions include the selected element from a set of toggle buttons or tabs, and the pressed state of certain buttons in the Call and Voicemail panels. Also, fields in error in forms such as to schedule a commitment indicate their</p>

Criteria	Support Level	Remarks and Explanations
		error state textually, but visually a change of border color is the only indication provided.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	<b>Does Not Support</b>	<p>The highly dynamic user interface rendered in the narrow MAX browser window requires stylesheets to be enabled for it to be usable. This is the sole basis for the score of Does Not Support. When stylesheets are enabled, only isolated exceptions occur (see below) that would, taken by themselves, warrant a score of Supports with Minor Exceptions.</p> <p>Most content headings in MAX are marked up as explicit headings. In a small number of cases, such as the Call History and commitment Schedule, the dates that organize the entries are rendered by visual methods alone.</p> <p>The reading order of content within MAX is correct with isolated exceptions, such as the contents of the Information panel.</p>
(e) Redundant text links shall be provided for each active region of a server-side image map.	<b>Not Applicable</b>	MAX does not utilize server-side image maps.
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	<b>Not Applicable</b>	MAX does not utilize client-side image maps.
(g) Row and column headers shall be identified for data tables.	<b>Supports</b>	MAX makes only a single isolated use of a data table, and it properly identifies its header cells.
(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.	<b>Not Applicable</b>	MAX does not utilize complex data tables.
(i) Frames shall be titled with text that facilitates frame identification and navigation	<b>Supports with Exceptions</b>	MAX uses frames for the rich text editor in which agents compose email. While a title is provided identifying the frame's contents, it is not concise, as it also includes a significant amount of



Criteria	Support Level	Remarks and Explanations
		<p>instructional text that is announced every time the frame gains focus.</p> <p>In version 16.3, MAX introduces Persistent Panels that provide an iframe displaying a website for the agent to reference. These iframes do not have titles for navigating in a meaningful manner.</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.	<b>Supports</b>	MAX does not utilize content that flickers.
(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.	<b>Not Applicable</b>	MAX does not utilize complex text-only pages.
(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.	<b>Supports with Exceptions</b>	<p>Most active elements in MAX are included in the tab order and can be activated via the keyboard or by screen readers.</p> <p>The Email functionality presents the only high severity keyboard accessibility problems in MAX. Several critical-path or important elements can only be activated by a mouse click. Some are not included in the tab order, while others cannot be activated from the keyboard even when they have keyboard focus.</p> <p>First, when creating a new Email, although the available email recipients that users can choose from receive keyboard focus, pressing Enter does not activate the Email panel. Next, the controls to enable the CC or BCC fields or to Add an Attachment are merely clickable text but are not included in the tab order. Finally, while various Email action buttons are dynamically displayed or enabled depending on context, critical-path buttons including Send and</p>

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		<p>Discard Draft are not included in the tab order. These problems make the Email feature inaccessible using the keyboard alone. However, assistive technology that can access controls not in the tab order and that can emulate a mouse click may be able to activate these elements.</p> <p>MAX offers the ability to “park” emails for the agent to work on later. Part of this feature is selecting multiple emails and parking them all at one time. Keyboard-only users are not provided a documented method of selecting multiple emails for parking.</p> <p>In a small number of cases, elements are not identified by roles or descriptions that convey their active purpose to screen reader users who are blind or that support the direct voice commands of speech input software. Also, a few inappropriate uses of ARIA menu markup cause the affected elements to be more difficult to use by screen readers.</p> <p>MAX version 16.3 brings forth a change in the Activity Queue. The individual Skills an agent has queues for are broken out into buttons. Previously they had all been hidden behind one button. With this change, each Skill gets a dialog that was previously hidden behind a tab interface. There are no active elements in the new dialog, but there is also no indication that the dialog has been opened.</p> <p>Some of MAX's simulated controls that can be activated from the keyboard and by screen readers nonetheless cannot be activated by the direct voice commands of speech input software (e.g., simulated listboxes). This forces users to utilize indirect and cumbersome methods, including mouse emulation.</p>

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		<p>Agents can activate a control to see their email inbox, however, the focus remains on the control that activates it and the agent must tab through more content to access the inbox instead of directly jumping to it.</p> <p>Focus is generally well-managed by MAX, which is a highly dynamic web application whose use spawns many special-purpose content panels. When these panels appear, focus is moved to or very near the beginning of the newly-displayed panel. Similarly, when these panels are closed by user action, focus is generally returned to an appropriate location, with a few exceptions. Many of these dynamic panels have buttons such as Back, Cancel or Close that allow them to be closed from the keyboard. For those that do not, MAX supports and documents the use of the Esc key to dismiss panels.</p> <p>In several critical situations, content appears spontaneously on screen. In most cases, MAX provides markup that allows screen readers to automatically announce the new content to users who are blind. Most significantly, the Chat Messages sent between an Agent and a Patron can be read automatically to users due to MAX's implementation of ARIA live regions, which allows users to keep keyboard focus in the Chat entry field.</p> <p>MAX has some indicators that both parties, the agent and the patron, are still engaged in the conversation by showing when one is typing. The messaging on the agent side indicating the patron has typed a message but not submitted it is not accessible via aria-live.</p> <p>Other cases where ARIA and focus management allow spontaneously-appearing prompts to be read automatically include prompts to accept</p>

Criteria	Support Level	Remarks and Explanations
		<p>a Chat invitation, and confirmation prompts to end a Call or Chat or to log out. Isolated cases occur where prompts that appear spontaneously are not announced, such as a new Message that may appear immediately after login. Because those post-login messages appear only briefly and are not announced by screen readers, users would need to manually navigate to and open the Messages panel to determine if there is a new message to be read.</p> <p>MAX utilizes “Toast” messages in browser that support it for informing the agent visually that there is new work to be done or a response to a chat. Mouse based users may bring their MAX window to the front by clicking on one of these messages. Keyboard-only users have no access to the message to activate it. Finally, periodic entries automatically added to the Event Log may be automatically announced even if the Event Log panel is not currently open.</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 page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).</p>	<p><b>Not Applicable</b></p>	<p>Depending on its configuration, MAX may require Java to be installed to facilitate integration with external applications. However, no user-facing content is rendered by Java. Therefore, this requirement is not applicable.</p>
<p>(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.</p>	<p><b>Supports with Exceptions</b></p>	<p>The majority of form controls in MAX forms are properly marked up with valid, compliant labels, but many others are not.</p> <p>In particular, custom listboxes and comboboxes used in various forms are generally identified only by their default or current value, rather than by a fixed, compliant label. Other fields may be indirectly labeled by a placeholder, which is not a compliant method of labeling fields.</p>



Criteria	Support Level	Remarks and Explanations
		<p>The Cancel Commitment form has a field for notes related to the cancellation. Depending on configuration this field may be required, yet it does not have a specific label and uses a placeholder instead. This makes the field difficult for users who are blind to complete when needing to do so.</p> <p>Some panels such as Call History may have multiple Call buttons that do not have reliable methods for users who are blind to identify each unique target.</p> <p>In a few forms, errors are not fully accessible to users who are blind or colorblind.</p>
(o) A method shall be provided that permits users to skip repetitive navigation links.	<b>Not Applicable</b>	The MAX user interface does not utilize a set of repetitive navigation links.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	<b>Supports</b>	MAX users are prompted to extend their session.

**§ 1194.31 Functional Performance Criteria**

Criteria	Support Level	Remarks and Explanations
<p>(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.</p>	<p><b>Supports with Exceptions</b></p>	<p>MAX has a Screen Reader setting to enhance the accessibility of the MAX interface. The scores and remarks in this VPAT are predicated on having this Screen Reader setting enabled.</p> <p>Nearly all of the accessibility issues that affect users who are blind have been discussed in the technical paragraphs of <a href="#">§1194.22</a> above. A small number of issues of a more functional nature also occur.</p> <p>In a small number of cases, heading elements are used excessively or the designated levels are inappropriate, both of which can impair the comprehension of content organization and hierarchy by users who are blind.</p> <p>In the Email panel, screen readers encounter instances of error text and unlabeled but non-functional buttons that are hidden visually, but that are still announced to users who are blind.</p> <p>In isolated cases, screen readers encounter text that is not properly spaced, reducing the comprehension of the content. In one case, a series of inactive elements are included in the tab order.</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><b>Supports with Exceptions</b></p>	<p>MAX has a High Contrast setting to enhance the accessibility of the MAX interface. While not all users with low vision may need to use this setting, the scores and remarks in this VPAT are predicated on having this High Contrast setting enabled.</p> <p>Most of the accessibility issues that affect users who have low vision or color vision impairments have been discussed in the technical paragraphs of <a href="#">§1194.22</a> above. A few issues of more functional natures also occur.</p>

Criteria	Support Level	Remarks and Explanations
		<p>The visual display of keyboard focus is difficult or impossible to discern in some controls. This is due to the focused element missing a highly visible form of focus indication, or to the contrast between the adjacent focused and unfocused elements being insufficient.</p> <p>Also, users with low vision who need to increase text size can only increase the size to a limited degree before text or controls begin to overlap, get truncated, or disappear.</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.	<b>Supports</b>	MAX does not require user hearing for operation or information retrieval.
(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.	<b>Supports</b>	MAX does not provide audio information.
(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.	<b>Supports</b>	MAX does not require user speech for operation or information retrieval.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	<b>Supports with Exceptions</b>	<p>Nearly all of the accessibility issues that affect users with mobility impairments, including keyboard-only users, have been discussed in the technical paragraphs of <a href="#">§1194.22</a> above.</p> <p>Most importantly, as mentioned in §1194.22 paragraph (I), most active elements in MAX are included in the tab order and can be activated via the keyboard. However, the Email functionality suffers from multiple critical-path points of failure that render it inaccessible when using the keyboard alone. In other cases, elements cannot</p>

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		<p>be activated by the direct voice commands of speech input software, forcing users to utilize more cumbersome mouse emulation commands.</p> <p>A few issues of a more functional nature also occur.</p> <p>The visual display of keyboard focus is difficult or impossible to discern in some controls. This is due to the focused element missing a highly visible form of focus indication or to the contrast between adjacent focused and unfocused elements being insufficient.</p>

**§ 1194.41 Information, Documentation and Support**

Criteria	Support Level	Remarks and Explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	<b>Supports</b>	InContact provides alternative documentation formats to users on request, free of charge.
(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.	<b>Supports</b>	InContact provides an overview of the accessibility features present in the product, optimal assistive technology configurations for use, means of requesting alternate formats, and known accessibility issues with the product.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	<b>Supports</b>	InContact support services provide support for users with hearing impairments via relay services and web chat.