



Voatz™ Mobile App Accessibility Conformance Statement

Voatz Remote Accessible Ballot Marking System
Voatz, Inc.

This Voluntary Product Accessibility Template® (VPAT®) disclosure assesses Voatz' compliance with regulatory and industry accessibility guidelines. Voatz Inc.'s native smartphone apps comply to the accessibility standards below:

- World Wide Web Consortium's *Web Content Accessibility Guidelines v2.1* level AA (WCAG 2.1/AA)
- U.S. Election Assistance Commission's *Voluntary Voting System Guidelines (VVSG 1.1)*
- Apple iOS and Android accessibility best practices

Test Process

Voatz partnered with the **National Center for Accessible Media** during the design process for their recommendations on accessibility and WCAG 2.1. The resulting apps were systematically evaluated by professional testers with previous WCAG and voting systems experience. Finally, Voatz engaged an **independent voting system testing laboratory (VSTL)** certified in assessing Accessibility compliance to VVSG 1.1. Pro V&V's report dated May 28, 2020, concludes that the Voatz apps conform to applicable federal accessibility requirements.

Voatz for iOS and Android are native smartphone apps, not web applications, so where HTML structure is referenced in WCAG, this report considers the comparable programming conventions to ensure optimal support the following native smartphone assistive capabilities:

- VoiceOver and TalkBack screen readers
- Configurable font sizes and display options
- Voice Control (iOS)
- Speech-to-Text for data entry

Compliance with WCAG 2.1 Guidelines

WCAG Guideline 1.1: Text Alternatives

Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.

| Success Criteria | Comment |
|--|---|
| 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. | Supports All non-text content presented to the user has a text alternative. |

| Success Criteria | Comment |
|--|---------|
| <ul style="list-style-type: none"> • Controls, Input: If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 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 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. | |

WCAG Guideline 1.3: Adaptable

Create content that can be presented in different ways (for example simpler layout) without losing information or structure.

| Success Criteria | Comment |
|---|-----------------|
| <p>1.3.1 Info and Relationships (Level A): Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.</p> | Supports |
| <p>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.</p> | Supports |
| <p>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, size, visual location, orientation, or sound.</p> <p>Note: For requirements related to color, refer to Guideline 1.4.</p> | Supports |

| Success Criteria | Comment |
|--|--|
| <p>1.3.4 Orientation (Level AA): Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential.</p> <p>Examples where a particular display orientation may be essential are a bank check, a piano application, slides for a projector or television, or virtual reality content where binary display orientation is not applicable.</p> | <p>Does not support.</p> <p>VVSG recommendations conflict with using landscape mode as it reduces the number of candidates displayed on screen.</p> |

WCAG Guideline 1.4: Distinguishable

Make it easier for users to see and hear content including separating foreground from background.

| Success Criteria | Comment |
|---|------------------------|
| <p>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.</p> <p>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.</p> | <p>Supports</p> |
| <p>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:</p> <ul style="list-style-type: none"> • 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 minimum contrast requirement. | <p>Supports</p> |
| <p>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.</p> | <p>Supports</p> |
| <p>1.4.11 Non-text Contrast (Level AA): The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s):</p> <ul style="list-style-type: none"> • 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; | <p>Supports</p> |

- Graphical Objects: Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed.

WCAG Guideline 2.1: Keyboard Accessible

Make all functionality available from a keyboard.

| Success Criteria | Comment |
|--|---|
| <p>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.</p> <p>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.</p> <p>Note 2: This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation.</p> | <p>Supports with exception</p> <p>With VoiceOver (IOS) or TalkBack (Android) enabled, standard gestures (swipe right/left, tap and double-tap), combined with visible navigation focus ensure that precise mouse-like inputs are not required.</p> <p>For jurisdictions requiring use of Voatz' ID verification, a sighted individual can assist a visually-impaired voter by scanning a photo ID and following video 'selfie' instructions, prior to voting without compromising the privacy of the voter's ballot.</p> <p>Bluetooth keyboard use has not been evaluated.</p> |
| <p>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 unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away.</p> <p>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 or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference.</p> | <p>Supports</p> |

WCAG Guideline 2.2: Enough Time

Provide users enough time to read and use content.

| Success Criteria | Comment |
|--|------------------------|
| <p>Supports with exception (Level A): For each time limit that is set by the content, at least one of the following is true:</p> <ul style="list-style-type: none"> • 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. <p>Note: This success criterion helps ensure that users can complete tasks without unexpected changes in content or context that are a result of a time limit. This success criterion should be considered in conjunction with Success Criterion 3.2.1, which puts limits on changes of content or context as a result of user action.</p> | <p>Supports</p> |

WCAG Guideline 2.4: Navigable

Provide ways to help users navigate, find content, and determine where they are.

| Success Criteria | Comment |
|---|------------------------|
| <p>2.4.2 Page Titled (Level A): Web pages have titles that describe topic or purpose.</p> | <p>Supports</p> |
| <p>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.</p> | <p>Supports</p> |
| <p>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.</p> | <p>Supports</p> |

| Success Criteria | Comment |
|--|-----------------|
| 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. | Supports |

WCAG Guideline 2.5: Input Modalities

Make it easier for users to operate functionality through various inputs beyond keyboard.

| Success Criteria | Comment |
|---|-----------------|
| <p>2.5.1 Pointer Gestures (Level A): 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.</p> <p>This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology).</p> | N/A |
| <p>2.5.2 Pointer Cancellation (Level A): For functionality that can be operated using a single pointer, at least one of the following is true:</p> <ul style="list-style-type: none"> • 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; • Up Reversal: The up-event reverses any outcome of the preceding down-event; • Essential: Completing the function on the down-event is essential. • Functions that emulate a keyboard or numeric keypad key press are considered essential. <p>This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology).</p> | N/A |
| <p>2.5.3 Label in Name (Level A): For user interface components with labels that include text or images of text, the name contains the text that is presented visually.</p> <p>A best practice is to have the text of the label at the start of the name.</p> | Supports |

WCAG Guideline 3.1 Readable:

Make text content readable and understandable.

| Success Criteria | Comment |
|--|-----------------|
| 3.1.1 Language of Page (Level A): The default human language of each Web page can be programmatically determined. | Supports |
| 3.1.2 Language of Parts (Level AA): The human language of each Supportpage 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 |

WCAG Guideline 3.2: Predictable

Make Web pages appear and operate in predictable ways.

| Success Criteria | Comment |
|---|-----------------|
| 3.2.1 On Focus (Level A): When any 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. | Supports |
| 3.2.4 Consistent Identification (Level AA): Components that have the same functionality within a set of Web pages are identified consistently. | Supports |

WCAG Guideline 3.3 Input Assistance:

Help users avoid and correct mistakes.

| Success Criteria | Comment |
|---|-----------------|
| 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. | Supports |

| Success Criteria | Comment |
|---|-----------------|
| <p>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.</p> | Supports |
| <p>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:</p> <ul style="list-style-type: none"> • 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 |

WCAG Guideline 4.1: Compatible

Maximize compatibility with current and future user agents, including assistive technologies.

| Success Criteria | Comment |
|--|-----------------|
| <p>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.</p> <p>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.</p> | Supports |
| <p>4.1.3 Status Message (Level AA): 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.</p> | Supports |

Compliance with WSG 1.1 Accessible Voting Standards

Test results excerpted from *Test Report for the Test and Evaluation of Voatz Remote Accessible Ballot Marking System* (May 28, 2020) performed by Pro V&V, an independent, federally-approved Voting System Testing Laboratory (VSTL.)

WSG 3.3.1 - General Accessibility

| Requirement | Description | Comment |
|--------------------|---|-----------------|
| 3.3.1.a.i | The manufacturer shall supply documentation describing 1) recommended procedures that fully implement accessibility for voters with disabilities and 2) how the Acc-VS supports those procedures. | Supports |
| 3.3.1.b | When the provision of accessibility for the Acc-VS involves an alternative format for ballot presentation, then all information presented to non-disabled voters, including instructions, warnings, error and other messages, and contest choices, shall be presented in that alternative format. | Supports |
| 3.3.1.c | The support provided to voters with disabilities shall be intrinsic to the Acc-VS. Personal assistive devices of the voter shall not be necessary to operate the Acc-VS correctly. This does not apply to personal assistive technology required to comply with 3.3.4 b. | Supports |
| 3.3.1.d | If a voting system provides for voter identification or authentication by using biometric measures that require a voter to possess particular biological characteristics, then the Acc-VS shall provide a secondary means that does not depend on those characteristics. | Supports |
| 3.3.1.e | If the Acc-VS generates a paper record (or some other durable, human-readable record) that can be the official ballot or determinative vote record then the voting system shall allow the voter to verify that record using the same access features used by the voter to cast the ballot. | Supports |

WSG 3.3.2 – Enhanced Visual Interfaces

| Requirement | Description | Comment |
|--------------------|---|-----------------|
| 3.3.2.a | An Acc-VS with a color electronic image display shall allow the voter to adjust the color saturation throughout the voting session while preserving the current votes. | Supports |
| 3.3.2.a.i | At a minimum, two alternative display options listed shall be available: 1) black text on white background, 2) white text on black background, 3) yellow text on a black background, or 4) light cyan text on a black background. | Supports |

| Requirement | Description | Comment |
|-------------|--|-----------------|
| 3.3.2.b | Groups of buttons and controls which perform different functions on the Acc-VS shall be distinguishable by both shape and color. This applies to buttons and controls implemented either "on-screen" or in hardware. This requirement does not apply to sizeable groups of keys in wide use by individuals with disabilities, such as a full alphabetic keyboard when used for purposes other than basic navigation and selection (e.g. entering a write-in candidate name). | Supports |
| 3.3.2.c.i | There shall be a means by which the voter can disable either the audio or the video output, resulting in a video-only or audio-only presentation, respectively. | Supports |
| 3.3.2.c.ii | The system shall allow the voter to switch among the three modes (synchronized audio/video, video-only, or audio-only) throughout the voting session while preserving the current votes. | Supports |

VSG 3.3.3 – Audio-Tactile Interfaces

| Requirement | Description | Comment |
|---------------------|---|---------|
| 3.3.3.a & 3.3.3.a.i | The vendor shall conduct summative usability tests on the voting system using individuals who are blind. The vendor shall document the testing performed and report the test results using the Common Industry Format. This documentation shall be included in the Technical Data Package submitted to the EAC for national certification. | N/A |
| 3.3.3.b | <p>The accessible voting station shall provide an audio-tactile interface (ATI) that supports the full functionality of the visual ballot interface, as specified in Subsection 2.3.3.</p> <ul style="list-style-type: none"> • Instructions and feedback on initial activation of the ballot (such as insertion of a smart card), if this is normally performed by the voter on comparable voting stations • Instructions and feedback to the voter on how to operate the accessible voting station, including settings and options (e.g., volume control, repetition) • Instructions and feedback for navigation of the ballot • Instructions and feedback for contest choices, including write-in candidates • Instructions and feedback on confirming and changing selections • Instructions and feedback on final submission of ballot | N/A |
| 3.3.3.b.i | The ATI of the accessible voting station shall provide the same capabilities to vote and cast a ballot as are provided by other voting machines or by the visual interface of the standard voting machine. Discussion: For example, if a visual ballot supports voting a straight | N/A |

| Requirement | Description | Comment |
|-------------|--|---|
| | party ticket and then changing the choice in a single contest, so must the ATI. | |
| 3.3.3.b.ii | The ATI shall allow the voter to have any information provided by the voting system repeated. | N/A |
| 3.3.3.b.iii | The ATI shall allow the voter to pause and resume the audio presentation. | N/A |
| 3.3.3.b.iv | <p>The ATI shall allow the voter to skip to the next contest or return to previous contests.</p> <p>Discussion: This is analogous to the ability of sighted voters to move on to the next contest once they have made a selection or to abstain from voting on a contest altogether.</p> <p>v. The ATI shall allow the voter to skip over the reading of a referendum so as to be able to vote on it immediately.</p> | N/A |
| 3.3.3.b.v | The ATI shall allow the voter to skip over the reading of a referendum so as to be able to vote on it immediately. | N/A |
| 3.3.3.c.i | The ATI shall provide its audio signal through an industry standard connector for private listening using a 3.5mm stereo headphone jack to allow voters to use their own audio assistive devices. | N/A |
| 3.3.3.c.ii | When a voting machine utilize es a telephone style handset or headphone to provide audio information, it shall provide a wireless T-Coil coupling for assistive hearing devices so as to provide access to that information for voters with partial hearing. That coupling shall achieve at least a category T4 rating as defined by American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids, ANSI C63.19. | N/A |
| 3.3.3.c.iii | A sanitized headphone or handset shall be made available to each voter. | N/A |
| 3.3.3.c.iv | The audio system shall set the initial volume for each voting session between 60 and 70 dB SPL. | <p>Not Tested*</p> <p>3.3.3.c.iv, 3.3.3.c.v, and 3.3.3.c.vi relate to volume control and audio presentation and were not tested, as they are dependent upon the device being utilized</p> |

| Requirement | Description | Comment |
|--------------------|---|-----------------|
| 3.3.3.c.v | The voting machine shall provide a volume control with an adjustable volume from a minimum of 20dB SPL up to a maximum of 100 dB SPL, in increments no greater than 10 dB. | Not Tested* |
| 3.3.3.c.vi | The audio system shall be able to reproduce frequencies over the audible speech range of 315 Hz to 10 KHz. | Not Tested* |
| 3.3.3.c.vii | The audio presentation of verbal information should be readily comprehensible by voters who have normal hearing and are proficient in the language. This includes such characteristics as proper enunciation, normal intonation, appropriate rate of speech, and low background noise. Candidate names should be pronounced as the candidate intends. | Supports |
| 3.3.3.c.viii | The audio system shall allow voters to control the rate of speech. The range of speeds supported should be at least 75% to 200% of the nominal rate. | Supports |
| 3.3.3.d | If the normal procedure is to have voters initialize the activation of the ballot, the accessible voting station shall provide features that enable voters who are blind to perform this activation. | Supports |
| 3.3.3.e | If the normal procedure is for voters to submit their own ballots, then the accessible voting station shall provide features that enable voters who are blind to perform this submission. | Supports |
| 3.3.3.f | All mechanically operated controls or keys on an accessible voting station shall be tactilely discernible without activating those controls or keys. | N/A |
| 3.3.3.g | On an accessible voting station, the status of all locking or toggle controls or keys (such as the "shift" key) shall be visually discernible, and discernible either through touch or sound. | N/A |

WVG 3.3.4 – Enhanced Input and Control Characteristics

| Requirement | Description | Comment |
|--------------------|---|----------------|
| 3.3.4.a | The Acc-VS shall provide a 3.5 mm industry standard jack used to connect a personal assistive technology switch to the Acc-VS. This jack shall allow only switch data to be transmitted to the voting system. The voting system shall accept switch input that is functionally equivalent to tactile input. All the functionality of the Acc-VS (e.g., straight party voting, write-in candidates) that is available through the conventional forms of input, such as tactile, shall also be available through this non-manual input mechanism. | N/A |

| Requirement | Description | Comment |
|-------------|--|--|
| 3.3.4.b | The Acc-VS shall provide features that enable voters who lack fine motor control or the use of their hands to submit their ballots privately and independently without manually handling the ballot. | Partially Supports* * iPhone 6s & higher and iOS 13 & higher support hands-free operation using Voice Control. Android devices do not have this capability yet. However, both devices support limited dexterity with VoiceOver or TalkBack navigation (audio can be turned off.) |
| 3.3.4.c | All keys and controls on the accessible voting station shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys shall be no greater 5 lbs. (22.2 N). | Supports |
| 3.3.4.d | The accessible voting station controls shall not require direct bodily contact or for the body to be part of any electrical circuit. | N/A |

VSG 3.3.5 – Design for Mobility Aids

| Requirement | Description | Comment |
|-----------------------------|---|---------|
| 3.3.5.a | The accessible voting station shall provide a clear floor space of 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum for a stationary mobility aid. The clear floor space shall be level with no slope exceeding 1:48 and positioned for a forward approach or a parallel approach. | N/A |
| 3.3.5.1.a | If the accessible voting station has a forward approach with no forward reach obstruction then the high reach shall be 48 inches maximum and the low reach shall be 15 inches minimum. | N/A |
| 3.3.5.1.b.i 3.3.5.1.b.ii | If the accessible voting station has a forward approach with a forward reach obstruction, the following requirements apply: <ul style="list-style-type: none"> • The forward obstruction shall be no greater than 25 inches in depth, its top no higher than 34 inches and its bottom surface no lower than 27 inches. | N/A |

| Requirement | Description | Comment |
|-----------------------------|--|---------|
| | <ul style="list-style-type: none"> If the obstruction is no more than 20 inches in depth, then the maximum high reach shall be 48 inches, otherwise it shall be 44 inches. | |
| 3.3.5.1.b.iii | <p>Space under the obstruction between the finish floor or ground and 9 inches (230 mm) above the finish floor or ground shall be considered toe clearance and shall comply with the following provisions:</p> <ul style="list-style-type: none"> Toe clearance shall extend 25 inches (635 mm) maximum under the obstruction The minimum toe clearance under the obstruction shall be either 17 inches (430 mm) or the depth required to reach over the obstruction to operate the accessible voting station, whichever is greater Toe clearance shall be 30 inches (760 mm) wide minimum | N/A |
| 3.3.5.1.b.iv | <p>Space under the obstruction between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with the following provisions:</p> <ul style="list-style-type: none"> Knee clearance shall extend 25 inches (635 mm) maximum under the obstruction at 9 inches (230 mm) above the finish floor or ground. The minimum knee clearance at 9 inches (230 mm) above the finish floor or ground shall be either 11 inches (280 mm) or 6 inches less than the toe clearance, whichever is greater. Between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for each 6 inches (150 mm) in height. Knee clearance shall be 30 inches (760 mm) wide minimum. | N/A |
| 3.3.5.c | <p>All labels, displays, controls, keys, audio jacks, and any other part of the accessible voting station necessary for the voter to operate the voting machine shall be easily legible and visible to a voter in a wheelchair with normal eyesight (no worse than 20/40, corrected) who is in an appropriate position and orientation with respect to the accessible voting station</p> | N/A |
| 3.3.5.1.c | <p>If the accessible voting station has a parallel approach with no side reach obstruction then the maximum high reach shall be 48 inches and the minimum low reach shall be 15 inches.</p> | N/A |
| 3.3.5.1.d.i 3.3.5.1.d.ii | <p>If the accessible voting station has a parallel approach with a side reach obstruction, the following sub-requirements apply.</p> <ul style="list-style-type: none"> The side obstruction shall be no greater than 24 inches in depth and its top no higher than 34 inches. If the obstruction is no more than 10 inches in depth, then the maximum high reach shall be 48 inches, otherwise it shall be 46 inches. | N/A |

VVSG 3.3.6 – Enhanced Auditory Interfaces

| Requirement | Description | Comment |
|-------------|---|--|
| 3.3.6 a | The Acc-VS shall incorporate the features listed under Requirement 3.3.3 c for voting systems that provide audio presentation of the ballot. | Partially Supports |
| 3.3.6 b | If voting equipment provides sound cues as a method to alert the voter, the tone shall be accompanied by a visual cue, unless the station is in audio-only mode. | Supports |
| 3.3.6.c | No voting device shall cause electromagnetic interference with assistive hearing devices that would substantially degrade the performance of those devices. The voting device, measured as if it were a wireless device, shall achieve at least a category T4 rating as defined by [ANSI01] American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids, ANSI C63.19. | Not Tested* * These requirements relate to volume control and audio presentation and were not tested, as they are dependent upon the device being utilized. |

VVSG 3.3.8 – English Proficiency

| Requirement | Description | Comment |
|-------------|---|-----------------|
| 3.3.8.a | For voters who lack proficiency in reading English, the Acc-VS shall provide an audio interface for instructions and ballots as described in 3.3.3 b. | Supports |

VVSG 3.3.9 – Speech Not Required

| Requirement | Description | Comment |
|-------------|---|-----------------|
| 3.3.9.a | The voting system shall not require voter speech for its operation. | Supports |