



Lenovo Accessibility Conformance Report

Revised Section 508 Edition

VPAT® Version 2.3 – December 2018

Name of Product/Version: Lenovo Smart Key v4.x

Product Description: Software - Windows

Date: 21 June 2023

Contact information: compliance@Lenovo.com

Evaluation Methods Used:

Manual testing is performed on hardware products using a number of different tools to evaluate access by users with disabilities. Chroma optical test: brightness, contrast, color chromaticity tools are used to ensure contrast, a force gauge is used to evaluate key button force. One handed, and non-biometric operation is evaluated alongside stylus and other tools that are used to evaluate use without tight pinching or grasping. Measurement tools and meters are used to measure operable controls while audio meters are used to measure volume and gain. Connection ports are evaluated from design to ensure standard connection points are available. Any transducers designed to be held to the ear are evaluated by an outside laboratory for conformance to non-interference and coupling standards. Additional tests are performed based on applicable features of the product. For software, testing includes using the software as the user would by navigating all screens, built in screen readers are used (if applicable), built in high contrast mode, keyboard accessibility testing, and sticky keys are tested.

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, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017 Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on 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 be used only in WCAG 2.0 Level AAA.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All non text content has alternate text descriptions.
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	If prerecorded audio only and/or prerecorded video only are used, text transcript or audio track of video only presentations are provided.
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	If prerecorded audio is used, synchronized captions are provided.
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	If prerecorded video only is used, synchronized captions are provided.
<p><u>1.3.1 Info and Relationships</u> (Level A) Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Structure information is conveyed programmatically.
<p><u>1.3.2 Meaningful Sequence</u> (Level A) Also applies to:</p>	Supports	Reading order of content is logical.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<u>1.3.3 Sensory Characteristics</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Instructions do not rely solely on sensory characteristics.
<u>1.4.1 Use of Color</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Use of color has a descriptive text, for example error states do not solely rely on the font color.
<u>1.4.2 Audio Control</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No audio is used.
<u>2.1.1 Keyboard</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All functionality is operable through a keyboard.
<u>2.1.2 No Keyboard Trap</u> (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The product does not have keyboard traps.

Criteria	Conformance Level	Remarks and Explanations
<p>2.2.1 Timing Adjustable (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	If time-based sessions are used, they are accessible.
<p>2.2.2 Pause, Stop, Hide (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The product does not have any scrolling text, non-static animation, or banners.
<p>2.3.1 Three Flashes or Below Threshold (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The product does not have any flashing.
<p>2.4.1 Bypass Blocks (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 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 	Supports	Screens use a consistent navigation structure and there is a mechanism to skip past repetitive navigation links.
<p>2.4.2 Page Titled (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Pages have titles that describe topic or purpose.
<p>2.4.3 Focus Order (Level A)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) 	Supports	Focus order is in logical order.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The text of each element is meaningful.
<p><u>3.1.1 Language of Page</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Language of the program can be determined programmatically.
<p><u>3.2.1 On Focus</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Focus item does not change context.
<p><u>3.2.2 On Input</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Focus is not forcibly shifted on input.
<p><u>3.3.1 Error Identification</u> (Level A)</p> <p>Also applies to: Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The product provides a clear indication of errors.
<p><u>3.3.2 Labels or Instructions</u> (Level A)</p> <p>Also applies to:</p>	Supports	Instructions or labels are provided when content requires user input.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		
4.1.1 Parsing (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Markup languages were not used.
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	The user interface components name and role can be determined programmatically.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	If live audio content is used, synchronized captions are provided for multimedia content.
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	If prerecorded video content is used, audio descriptions are provided.
1.4.3 Contrast (Minimum) (Level AA) Also applies to:	Supports	Text and images of text provide sufficient contrast.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Users can change text size.
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Text is used to convey images.
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 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 	Supports	There is more than one way to locate information.
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Headings and labels are descriptive and unique.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Navigation and input focus is indicated visually and programmatically.

Criteria	Conformance Level	Remarks and Explanations
<p>3.1.2 Language of Parts (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Users can programmatically determine human language of each passage or phrase in the content.
<p>3.2.3 Consistent Navigation (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 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 	Supports	Navigation is consistent.
<p>3.2.4 Consistent Identification (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 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 	Supports	Components are identified consistently.
<p>3.3.3 Error Suggestion (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Suggestions are provided for error messages when known.
<p>3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)</p> <p>Also applies to:</p> <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	If legal commitments and financial data are used, error prevention is provided.

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.	Supports	Keyboard accessible.
302.2 With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.	Supports	Keyboard accessible.
302.3 Without Perception of Color. Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.	Supports	Color alone is not used to communicate meaning.
302.4 Without Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.	Supports	No audio.
302.5 With Limited Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.	Supports	No audio.
302.6 Without Speech. Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.	Supports	User speech is not required.
302.7 With Limited Manipulation. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.	Supports	Features are managed using standard intuitive controls based on design from UX team
302.8 With Limited Reach and Strength. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.	Supports	The application does not forcibly shift focus to a new location without user interventions. Design rarely use form and there's no case of nesting element.
302.9 With Limited Language, Cognitive, and Learning Abilities. ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.	Supports	Labeling is used consistently. Error messages are indicated.

Chapter 4: Hardware – Not Applicable

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Supports	User control over platform features are provided.
502.2.2 No Disruption of Accessibility Features	Supports	The product will not disrupt accessibility features.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Supports	All controls and non-decorative content support accessibility.
502.3.2 Modification of Object Information	Supports	All controls that can be set by the user are capable of being set programmatically through assistive technology.
502.3.3 Row, Column, and Headers	Supports	
502.3.4 Values	Supports	
502.3.5 Modification of Values	Supports	
502.3.6 Label Relationships	Supports	Valid labels are provided for all form elements.
502.3.7 Hierarchical Relationships	Supports	Form control groups are properly formed. Multi-part or grouped controls are accessible and provide context. If used, radio buttons are grouped. Shape and location are not the sole methods used to communicate information or hierarchy.
502.3.8 Text	Supports	Text is displayed using proper platform functions.

Criteria	Conformance Level	Remarks and Explanations
502.3.9 Modification of Text	Supports	Editable text that can be set by the user can be set programmatically, including through assistive technology.
502.3.10 List of Actions	Supports	Assistive technology can execute all actions.
502.3.11 Actions on Objects	Supports	Assistive technology can execute available actions on objects.
502.3.12 Focus Cursor	Supports	Assistive technology can track focus and focus changes.
502.3.13 Modification of Focus Cursor	Supports	Assistive technology can track focus and focus changes
502.3.14 Event Notification	Supports	Screen content changes are indicated programmatically. Assistive technologies are aware of content changes in real time.
502.4 Platform Accessibility Features	Not Applicable	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Supports	
503.3 Alternative User Interfaces	Supports	
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Not Applicable	
503.4.2 Audio Description Controls	Not Applicable	
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)	See WCAG 2.0 section	See information in WCAG section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
504.2.2 PDF Export	Not Applicable	
504.3 Prompts	Not Applicable	
504.4 Templates	Not Applicable	

Chapter 6: Support Documentation and Services

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. Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5. Documentation shall include accessibility features that are builtin and accessibility features that provide compatibility with assistive technology.	Supports	Product documentation is available online in an accessible format at https://www.lenovo.com/support VPATs are available at https://www.lenovo.com/us/en/compliance/accessibility-conformance
602.3 Electronic Support Documentation. Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).	Supports	The electronic web-based product documentation conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0.
602.4 Alternate Formats for Non-Electronic Support Documentation. Where support documentation is only provided in nonelectronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.	Not Applicable	Documentation is available in electronic format.
603 Support Services	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
603.2 Information on Accessibility and Compatibility Features. ICT support services shall include information on the accessibility and compatibility features required by 602.2.	Supports	Lenovo Support provides information on accessibility and compatibility features. This information is also documented in the product documentation. Accessibility Features page https://www.lenovo.com/us/en/lenovo/accessibility/
603.3 Accommodation of Communication Needs. Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.	Supports	Lenovo Services provides communications in voice, chat, and email. Telecommunications Relay Service (TRS) is supported for customers who are deaf or hard of hearing. For support, contact 1-855-2-LENOVO (1-855-253-6686).

Lenovo Legal Disclaimer

This document is for informational purposes only. THE INFORMATION PROVIDED IN THIS DOCUMENT IS PROVIDED "AS IS" WITHOUT WARRANTIES OF ANY KIND, EXPRESSED OR IMPLIED. Supporting features apply to product families as a whole. The information shall not be construed as product specifications for purposes of any warranty of compliance with product specifications in a given contract or order. For information on third party software and applications please contact the software manufacturer. Lenovo may make changes to the information in this document or to the products described in this document at any time without notice.