



AINS Accessibility Conformance Report

VPAT® Version 2.4

Name of Product/Version: PAL (Public Access Link) 11.10.x

Report Date: 12/20/2024

Product Description: Integrated directly with FOIAXpress, PAL offers a centralized location for receiving online FOIA requests, delivering responsive records, communicating with requesters, collecting fees, and providing access to released documents in a public reading room in accordance with agency proactive disclosure guidelines.

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Evaluation Methods Used: Accessibility tests are integrated into the unit testing and integration testing protocols of developers. For this, they are trained and equipped with state-of-the-art automated accessibility testing tools. Success criteria not covered by the automated tests are covered by the manual testing protocols of our quality assurance testers, which include testing with assistive technologies. Key test methods used listed below.

Tool Based Testing: SortSite 6.x and Web Accessibility Tool bar

Color Contrast Testing: Web Accessibility Tool bar

Screen Reader Testing: JAWS 2023 & Chrome

Screen Magnifier Testing: OS tools on Windows

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Manual Accessibility Testing: Keyboard testing with visual focus.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- Partially Supports: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- Not Applicable: The criterion is not relevant to the product.
- Not Evaluated: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:



- Chapter 5 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 602.3 Electronic Support Documentation



Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Text alternatives provided for non-text content for images and icons. Images and icons are associated with text alternative to inform users with visual impairments of the intent and purpose of such non-text elements through their screen readers or similar assistive technologies. Controls and input fields have descriptive, contextual labels or title attributes.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	



Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Assistive technologies can programmatically determine the information, structure and relationships conveyed through presentation. Headings and ARIA landmarks used to help convey presentation. Links and images are unique and contextual making it easy for users to navigate options. Tables mostly use row and column headers. Table headers use scope attribute where appropriate.
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 The content on our PAL application created in such that assistive technologies can understood and presented in different ways. PAL supports navigation through use of tab key and shift + tab key (for backward navigation through the user interface). Headings and ARIA landmarks used to help convey relationships between content. Pages are linear and read clearly without style sheets.
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	PAL application does not have any sensory characteristics.
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 Information conveyed through font styling or color also communicated through language. Electronic forms use standard HTML mark-up and item labeling. Invisible spans added to provide "selected" text to areas. When color used for warning and confirmation messages, the associated text communicates meaning clearly on its



Criteria	Conformance Level	Remarks and Explanations
		 own. Tool menus and tabs use highlighting to indicate current location. This information is also communicated by headings and selected states
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL adequately supports keyboard functionality. Forms are accessible by keyboard and assistive technologies. Some forms use a combination of fields, buttons, inline help, and links. Some menu lists require navigation using the tab key rather than the arrow keys — the more commonly expected keyboard behavior
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL does not have any Keyboard traps.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL users are prompted with warning and having the ability to extent the session.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: Revised Section 508	Not Applicable	PAL application does not have any moving, blinking and scrolling information.



Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.3.1 Three Flashes or Below Threshold (Level A)		
Also applies to:		
Revised Section 508	Not applicable	PAL does not have any flashes.
• 501 (Web)(Software)		FAL does not have any hasnes.
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.4.1 Bypass Blocks (Level A)		
Also applies to:		Skip to main content links, headings and ARIA landmarks
Revised Section 508		help users avoid repetitive and non-essential content.
• 501 (Web)(Software) – Does not apply to non-	Supports	 The expanded/collapsed state of secondary form content clearly indicated and the fields are accessible.
web software		
• 504.2 (Authoring Tool)		
 602.3 (Support Docs) – Does not apply to non- web docs 		
2.4.2 Page Titled (Level A)		
Also applies to: Revised Section 508		DAL application pages have title banding 1 and ADIA main
• 501 (Web)(Software)	Supports	PAL application pages have title, heading 1 and ARIA main landmark.
• 504.2 (Authoring Tool)		lanumark.
• 602.3 (Support Docs)		
2.4.3 Focus Order (Level A)		
Also applies to:		Each page has a logical tab order and visible tab stops.
Revised Section 508		Users control their own content.
• 501 (Web)(Software)	Supports	Exception:
• 504.2 (Authoring Tool)		• The focus is lost when you sort a data grid by column.
• 602.3 (Support Docs)		8
2.4.4 Link Purpose (In Context) (Level A)	Supports	PAL provides tool tips for the all links that will explain the purpose



Criteria	Conformance Level	Remarks and Explanations	
Also applies to:		and they are unique and contextual.	
Revised Section 508			
 501 (Web)(Software) 			
 504.2 (Authoring Tool) 			
• 602.3 (Support Docs)			
3.1.1 Language of Page (Level A)			
Also applies to:			
Revised Section 508	Supports	Language of content is notified at start of page and when changed	
• 501 (Web)(Software)	Supports	within page.	
• 504.2 (Authoring Tool)			
602.3 (Support Docs)			
3.2.1 On Focus (Level A)			
Also applies to:			
Revised Section 508	Supports	In PAL, we have visible on-focus states that use a combination of	
• 501 (Web)(Software)	Supports	color and border effect to highlight the focused elements.	
• 504.2 (Authoring Tool)			
602.3 (Support Docs)			
3.2.2 On Input (Level A)			
Also applies to:			
Revised Section 508	Supports	PAL does not change any context when inputting a data.	
• 501 (Web)(Software)	Supports	The does not change any context when inputting a data.	
• 504.2 (Authoring Tool)			
602.3 (Support Docs)			
3.3.1 Error Identification (Level A)			
Also applies to:		Error messages communicated using a combination of alerts,	
Revised Section 508	Supports	landmarks, headings and links. Where possible, error messages	
• 501 (Web)(Software)	Supports	describe each error and link to the appropriate field for resolving	
• 504.2 (Authoring Tool)		the error.	
602.3 (Support Docs)			
3.3.2 Labels or Instructions (Level A)	Supports	Forms/Pages have clear headings, labels, field sets, and buttons.	



Criteria	Conformance Level	Remarks and Explanations
Also applies to:		Inline help provided as needed.
Revised Section 508		
501 (Web)(Software)		The expanded/collapsed state of secondary form content is clearly
 504.2 (Authoring Tool) 		Indicated, and the fields are accessible.
• 602.3 (Support Docs)		
4.1.1 Parsing (Level A)		
Also applies to:		
Revised Section 508	Supports	PAL Web pages written as per W3C specifications.
501 (Web)(Software)		
 504.2 (Authoring Tool) 		
 602.3 (Support Docs) 		
4.1.2 Name, Role, Value (Level A)		
Also applies to:		
Revised Section 508	Supports	In PAL, all the user interface components can be programmatical determined.
501 (Web)(Software)		
 504.2 (Authoring Tool) 		
602.3 (Support Docs)		



Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	PAL does not have any real time presentations or audio.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL controls, Text and images contrast ratio 4:5:1 maintained across the application with 508 supported themes.
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	 User account settings are available for adjusting font face and size. Icons and text resize with browser (and other technology) scaling/zooming options up to 200%. All product functionalities perform well at this zoom level.
1.4.5 Images of Text (Level AA)	Supports	In PAL, text of the images can be customized using



Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		localization feature.
 2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	 Headings, ARIA landmarks (such as navigation landmarks) and unique link and button names help users navigate pages quickly. Pages have consistent navigation areas. Many pages contain search fields with ARIA search landmarks. The system works well with search and find features built into assistive technologies.
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL application pages, controls are having proper headings and labels. Labels are unique and contextual.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	PAL application supports keyboard focus indication on the pages.
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Supports	All the HTML pages in the PAL application will have the language tag, which is default to English.



Criteria	Conformance Level	Remarks and Explanations	
602.3 (Support Docs)			
3.2.3 Consistent Navigation (Level AA)			
Also applies to:			
Revised Section 508	Supports	All the menus in the PAL application follows the	
 501 (Web)(Software) – Does not apply to non-web software 	Supports	consistent and standard navigation order.	
• 504.2 (Authoring Tool)			
 602.3 (Support Docs) – Does not apply to non-web docs 			
3.2.4 Consistent Identification (Level AA)			
Also applies to:		Icons use an icon grammar to facilitate learning. The	
Revised Section 508	Supports	same icon used for the same action across all pages.	
• 501 (Web)(Software) – Does not apply to non-web software	Зарропа	Users may combine concepts they already understand	
• 504.2 (Authoring Tool)		to interpret new icons.	
602.3 (Support Docs) – Does not apply to non-web docs			
3.3.3 Error Suggestion (Level AA)			
Also applies to:		Error messages communicated using a combination of	
Revised Section 508	Supports	alerts, landmarks, headings and links. Where possible, error	
• 501 (Web)(Software)		messages describe each error and link to the appropriate	
• 504.2 (Authoring Tool)		field for resolving the error.	
• 602.3 (Support Docs)			
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)			
Also applies to:			
Revised Section 508	Not Applicable	PAL application does not have any Legal or financial data	
• 501 (Web)(Software)		but still in our data can checked before submitting.	
• 504.2 (Authoring Tool)			
602.3 (Support Docs)			





Table 3: Success Criteria, Level AAA

Notes: Deleted; Not Evaluated



Revised Section 508 Report

Notes:

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	 Supports when combined with Assistive Technology. All interfaces designed according to HTML5 standards. A screen reader can announce images and icons assigned on textual and meaningful text alternatives. Images of text not used in place of text. Controls like buttons labeled to indicate their function. Form fields labeled to perceive their intent. Links assigned meaningful texts that clearly indicate the link destination. Controls assigned appropriate labels that allow perception of their function. Standard interface elements made



Criteria	Conformance Level	Remarks and Explanations
		evident through proper HTML mark up.
302.2 With Limited Vision	Supports	 Supports when combined with Assistive Technology. All product functionalities perform well at 200% zoom level. All pages designed to wrap well when zoomed to 200%. User account settings are available for adjusting font size. Icons and text resize with browser (and other technology) Scaling/zooming options. Most pages have relative column widths. System text does not use full justification. Color contrast of foreground text with background maintained according to standard specifications.
302.3 Without Perception of Color	Supports	Color alone is not used to convey the information
302.4 Without Hearing	Supports	No Auditory alerts are used.
302.5 With Limited Hearing	Supports	No Auditory alerts are used.
302.6 Without Speech	Not Applicable	Speech Input is not required.
302.7 With Limited Manipulation	Supports	Supports when combined with Assistive Technology. • Keyboard-accessible alternatives



Criteria	Conformance Level	Remarks and Explanations
		provided for tools that support drag-and-drop, upload, or reordering. Current tab location is clearly visible. Users can make their click target size larger if needed via these two mechanisms: By controlling text sizes through user preferences. By controlling icon sizes through browser zoom preferences.
302.8 With Limited Reach and Strength	Supports	
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	Simple language is used for text content

Chapter 4: Hardware

Notes: Not Applicable

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen	Not Applicable	
402.2.2 Transactional Outputs	Not Applicable	
402.2.3 Speech Delivery Type and Coordination	Not Applicable	
402.2.4 User Control	Not Applicable	
402.2.5 Braille Instructions	Not Applicable	





Criteria	Conformance Level	Remarks and Explanations
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Not Applicable	
402.3.2 Non-private Listening	Not Applicable	
402.4 Characters on Display Screens	Not Applicable	
402.5 Characters on Variable Message Signs	Not Applicable	İ
403 Biometrics	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required
404.1 General	Not Applicable	
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	
407.3.2 Alphabetic Keys	Not Applicable	
407.3.3 Numeric Keys	Not Applicable	
407.4 Key Repeat	Not Applicable	İ
407.5 Timed Response	Not Applicable	
407.6 Operation	Not Applicable	
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	
407.8.2 Side Reach	Not Applicable	



Criteria	Conformance Level	Remarks and Explanations
407.8.2.1 Unobstructed Side Reach	Not Applicable	
407.8.2.2 Obstructed Side Reach	Not Applicable	
407.8.3 Forward Reach	Not Applicable	
407.8.3.1 Unobstructed Forward Reach	Not Applicable	
407.8.3.2 Obstructed Forward Reach	Not Applicable	
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	
408.3 Flashing	Not Applicable	
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	
412 ICT with Two-Way Voice Communication	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	
412.3.2 Wireline Handsets	Not Applicable	
412.4 Digital Encoding of Speech	Not Applicable	
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Not Applicable	
412.7 Video Communication	Not Applicable	
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required



Criteria	Conformance Level	Remarks and Explanations
412.8.1 TTY Connectability	Not Applicable	
412.8.2 Voice and Hearing Carry Over	Not Applicable	
412.8.3 Signal Compatibility	Not Applicable	
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	
414.1.2 Other ICT	Not Applicable	
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not Applicable	
415.1.2 Audio Description Controls	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 2.0 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	Accessibility features native to the browser or operating system used with PAL application. When major version changes happen on windows and IE, PAL tested with OS and browser accessibility features.
502.2.2 No Disruption of Accessibility Features	Supports	PAL does not disrupt any browser or OS accessibility features.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required



Criteria	Conformance Level	Remarks and Explanations
502.3.1 Object Information	Not Applicable	Not a platform software or tool.
502.3.2 Modification of Object Information	Not Applicable	
502.3.3 Row, Column, and Headers	Not Applicable	
502.3.4 Values	Not Applicable	
502.3.5 Modification of Values	Not Applicable	
502.3.6 Label Relationships	Not Applicable	
502.3.7 Hierarchical Relationships	Not Applicable	
502.3.8 Text	Not Applicable	
502.3.9 Modification of Text	Not Applicable	
502.3.10 List of Actions	Not Applicable	
502.3.11 Actions on Objects	Not Applicable	
502.3.12 Focus Cursor	Not Applicable	
502.3.13 Modification of Focus Cursor	Not Applicable	
502.3.14 Event Notification	Not Applicable	
502.4 Platform Accessibility Features	Not Applicable	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	PAL being a web application is not required to conform to 503.2.
503.3 Alternative User Interfaces	Not Applicable	Alternative user interface not provided
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	PAL does not have cations and audio descriptions
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 2.0 section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	HTML editor provided for creating content and discussion posts
504.2.2 PDF Export	Supports	PAL application supports export of





Criteria	Conformance Level	Remarks and Explanations
		documents in PDF format.
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	Supports	PAL manuals are compatible with accessibility features.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	Support documentation provided electronically.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	
603.3 Accommodation of Communication Needs	Supports	Accessible support services provided via phone and email.



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