



**NeuroFlow**  
**Product Accessibility Policy**

**June 11, 2024**

# Product Accessibility Policy

*Standards, policies, and procedures related to compliance with web and mobile accessibility for NeuroFlow's products and platforms.*

## 1. Purpose

This document provides NeuroFlow's approach to product accessibility. NeuroFlow's mission is to make a healthier and happier world, and we believe this applies to all people. Our vision is a bridged divide between physical and mental health for all. As such, we want to make our premises, services, products and equipment available to all people respecting their individual needs, dignity, independence and equal opportunity.

## 2. Scope

The policy applies to all of NeuroFlow's software development teams and contractors. NeuroFlow's primary area of focus for product accessibility is all platforms used by individuals (patients, members, servicemen, etc.) with special focus on the web and mobile applications used regularly by these users. However, NeuroFlow aims for high usability standards for all users, including clinical, internal, and enterprise users.

## 3. Definitions

**Individuals** - The end users or consumers of our products and platforms who do not directly contract with us. We are a business to business to consumer (B2B2C) software as a service company, and individuals are any users who represent the "C" in this relationship.

**Accessibility** – Unless otherwise specified, when we refer to Accessibility we refer to accessibility features to WCAG 2.1 AA standards. We also consider the relationship between WCAG 2.1 AA standards and 508 compliance. As of February 2023, 508 regulatory guidance considers WCAG 2.1 AA as the leading principles of accessibility and considers those compliant with WCAG 2.1 AA as compliant with 508 compliance as well.

**User Acceptance Testing** – Testing that ensures that the look, feel, and function of new releases to products and platforms are checked in reference to the agreed scope of work. Does not test all use cases or error states, all browsers or functionality. Usually performed by internal stakeholders such as designers, product managers, clinical experts, and marketers.

**Quality Assurance (QA) Testing** – Testing that ensures that all functionality in a software release meets the quality standards of an organization. Performed by a quality assurance team or specialist.

**Product Management Team** – Product managers are accountable for the success of our software development roadmap. They define software requirements and support the creation of success criteria and perform user acceptance testing.

**Design Team** – Product designers, UI/UX designers, and other members of the Product Design team who create the design standards and design specifications for products, features, and platforms. They also perform user acceptance testing.

**Engineering Team** – Software developers and other technologists who write the code for products and services.

**QA (Quality Assurance) Team** – Analysts and other team members who perform quality assurance testing for new and existing features, products, and platforms.

**Clinical Team** – Behavioral health specialists, clinicians, copywriters and other team members who write and create educational content (videos, documents, activity descriptions, etc.) for the NeuroFlow platform. They can also perform user acceptance testing and leverage clinical expertise to inform product design.

## **4. Policy and Guidelines**

NeuroFlow seeks to make sure our individual-facing web and mobile applications conform to all Level AA success criteria of W3C WAI [WCAG 2.1](#). NeuroFlow also seeks to make all written content understandable at no more than a 6<sup>th</sup> grade reading level. For some areas of the platform, NeuroFlow strives for a 4th grade reading level.

### **4.1 User Interface Style Guide(s)**

The Design Team owns the creation, management, and evolution of the NeuroFlow Style Guide. The style guide for Individual-facing platforms is a set of design rules regarding color, font, component usage, language style, etc. The design team ensures the style guide's colors, fonts, and design standards are sufficient for accessibility according to WCAG 2.1 AA criteria. The Design Team, in collaboration with the Clinical Content Team, ensures that the language style guide also specifies sophistication at no more than a 6<sup>th</sup> grade reading level and at times targets a 4th grade reading level.

Design Team members can add or edit components to the NeuroFlow Style Guide component library over time, and the Design Team has a process including design leadership review to ensure that all new components are WCAG 2.1 AA compliant.

### **4.2 Feature Design**

As the Design Team uses the NeuroFlow style guide and component library to create new user interfaces for Individual-facing platforms, designers leverage the already compliant

components and WCAG 2.1 AA standards. Design leadership reviews all new designs to make sure they are compliant with existing standards.

#### **4.3 Engineering**

Specifications for development include requirements for accessibility, written by Product Managers. During development, the Engineering Team follows standards for screen reader support, and ensures usability of keyboard and voice assistant tools. When code is reviewed by additional members of the Engineering team, these members also evaluate compliance with all specification requirements including accessibility.

#### **4.4 User Acceptance Testing**

As the Engineering Team writes the code for new features, the Design Team reviews progress for colors, fonts, and other stylistic elements to ensure that the features match the ADA compliant specifications. Product managers also check that accessibility best practices were implemented.

#### **4.5 Quality Assurance Testing**

When a feature passes user acceptance testing and code review, the QA Team fully tests all new mobile app features on iOS and Android and tests web features across supported browsers. The QA team uses the voice assistant functionality in IOS and Android (VoiceOver for iOS and Voice Assistant for Android) to ensure everything on the screen is able to be read out in the correct order. QA will also test that tasks can be completed by swiping or using other built-in accessibility features in IOS and Android. Any issues identified are reviewed and prioritized with the Product Management Team, Design Team and Engineering Team for resolution and retesting.

#### **4.6 Content Creation**

The NeuroFlow platform includes a content management system, where content can be created and delivered for Individuals. NeuroFlow also has a set of default content that customers can leverage to deliver to Individuals. This content is primarily created by the Clinical Content Team. When the Content Team creates content, they seek to ensure that all written content is at no more than a 6<sup>th</sup> grade reading level. When creating videos, the Clinical Content Team also seeks to ensure that video captioning is available and enabled. The Clinical Content Team keeps an eye on font sizes in attached PDFs but does not yet have full audio support for all content in the platform.

### **5. Conformance Milestones**

#### **5.1 Current State**

NeuroFlow's platform is currently accessible on our mobile applications (iOS and Android). The individual web version of our product is mostly accessible. All new web pages support

our WCAG AA compliant style guide and are screen reader and keyboard navigation accessible.

## **5.2 Web and Mobile Roadmap**

NeuroFlow's Design Team has released a "North Star" vision for our web and mobile style guides. This new style guide will meet WCAG 2.2 AA best practices and as new features are built will be rolled out on web and mobile properties.

## **5.3. Content roadmap & expectations**

NeuroFlow's content management is not yet fully compliant, as PDFs do not currently have accessibility support. Also many legacy videos or videos added by our customers do not have captioning. As NeuroFlow's platform and experience is upgraded, additional accessibility features will continue to be added.

## **6. Monitoring & Review Processes**

NeuroFlow completed a review by an independent ADA accessibility consultant in the summer of 2019. NeuroFlow's style guide and other WCAG 2.1 AA best practices were reviewed by this auditor.

Some of NeuroFlow's enterprise customers provide ad hoc accessibility reviews to ensure that NeuroFlow is adhering to this policy and expected roadmap.

On an annual basis, NeuroFlow's Chief Product Officer and VP of Technology, jointly representing NeuroFlow's Accessibility Office, review this Accessibility Policy to ensure relevance, accuracy, and compliance.

In 2025, NeuroFlow plans to conduct a full end-to-end accessibility review of all Individual-facing platforms and services to inform prioritization and future work.