

# 2018 ACCESSIBILITY PLAN

## OVERVIEW

In July 2016, Pursuant Health agreed to an Accessibility Plan for making its Kiosks<sup>1</sup> and Website Accessible for Blind users. Portions of this Plan related to remote support for Kiosk users and the Accessibility of Pursuant's Website have already been completed pursuant to that Plan. The strategy and timeline for making the Kiosks Accessible has changed though. In 2017 Pursuant Health engaged visual accessibility consultants "Tech For All" (TFA) to get assistance in achieving Accessibility of its Kiosks under the previously agreed to Accessibility Plan. TFA performed an Accessibility Gap Assessment of the Kiosk hardware and software and subsequently provided a design for making the Kiosks Accessible. Discussions with the National Federation of the Blind (NFB) in December of 2017 regarding this plan were well received and the impetus for this new Accessibility Plan. The plan that follows is a high-level overview for how Pursuant Health will achieve Accessibility for its next generation of Kiosks.

## PROJECT SCOPE

This plan covers how the Kiosks will be made Accessible through a combination of additional accessibility hardware and software changes to make use of this new accessibility hardware. As such the project will involve two separate tracks.

1. Kiosk Manufacturing
2. Software Engineering

### **Kiosk Manufacturing**

Pursuant Health has already completed Kiosk design changes and UL approval to incorporate the Storm Assistive Technologies Audio-Nav Keypad into its next manufacturing run of Kiosks. Pursuant Health is actively seeking funding from equity investors and sources of debt to manufacture such Kiosks (the "Financing"). Upon closing of the Financing (the "Closing Date"), Pursuant Health will promptly commence the manufacturing process which is expected to take approximately 56 weeks from build to deployment.

### **Software Engineering**

The software engineering effort will commence shortly after the manufacturing process begins and is expected to take approximately 64 weeks to be followed by about 32 weeks of formal Accessibility Testing with TFA, Internal Solution Testing and final software deployment. A detailed schedule and estimated dates are included in the Implementation Plan contained within this document.

The Kiosk software will be modified according the general design principals outlined in the confidential design documents produced by TFA. At a high level, the new user interface software will include support for the Audio-Nav Keypad for navigation and will utilize Text-to-Speech technology to produce audio feedback during Kiosk usage. This mode will be implemented when a user connects a headset into the Audio-Nav device which will trigger the Kiosk Accessibility Mode (KAM). While the Kiosk is in Accessibility Mode, it will provide audio instructions to guide the user through the entire Kiosk experience. This

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<sup>1</sup> Capitalized terms are defined in the July 22, 2016 Accessibility Agreement.

includes a completely new audio-based help system. In addition, the Kiosk will also allow the user to implement a “Privacy Screen” to effectively blank the screen to help further improve the user’s privacy while using the Kiosk in Accessibility Mode.

The Kiosk experience will include the ability for the user to identify themselves to the Kiosk by utilizing audio-based keyboard navigation using the Audio-Nav device. Once the user has logged in or accessed the experience as a Guest, they will be taken to the Home screen where they will be instructed on how to perform various activities on the Kiosk, including but not limited to taking a particular assessment and modifying their profile information. The Kiosk software will be modified to create a generalized software framework to permit the use of the Audio-Nave keypad and Text-To-Speech technologies. This approach will remove custom coding required to make any future assessments Accessible and help ensure that any future changes made to the Kiosk will be implemented within this Accessible framework by default.

## SECURITY, COMPLIANCE AND REGULATORY

All changes to the system proposed must meet the following:

1. FDA Quality requirements as defined by the Pursuant Health Quality Management System
2. All changes must comply with the Children’s Online Privacy Protection Act (COPPA) requirements
3. All changes must comply with all Information Security and Privacy Policies and Procedures

## AFFECTED BUSINESS PROCESSES OR SYSTEMS

The changes proposed affect the Pursuant Health and Wellness Kiosk (“HAWK”) application stack.

## PROJECT IMPLEMENTATION PLAN OVERVIEW (PROPOSED)

Based on the high-level design described above and Pursuant’s understanding of what is required to implement TFA’s detailed designs, Pursuant will follow the below timeline for achieving Kiosk Accessibility.

PHASE / TASK	% DONE	TARGET DATE	NOTES
Remote Support	100%	9/30/2016	Complete.
Websites	100%	3/31/2017	Complete.
Accessibility Gap Assessment & Accessibility Design	100%	10/2017	Complete.
Technical High-Level Design & Effort Estimates	100%	11/2017	Complete.
Kiosk Funding Received	-	Closing Date	Seeking funding from multiple investors and partners.
Kiosk Manufacturing, Assembly & Installation	-	Earlier of December 31, 2019 and 1 <sup>st</sup> anniversary of Closing Date (the “Installation Deadline”)	Parts procurement & manufacturing, assembly and installation in stores.*

Software Engineering	-	Installation Deadline	Engineering changes required for Accessibility and use of Accessible keypad. TFA to provide Accessibility advisory support during this phase.
Accessibility Testing	-	4 month anniversary of Installation Deadline	TFA to conduct Heuristic testing and Accessibility end-user field testing that will include Blind users. Includes minor software development cycles to resolve any issues.
Solution Testing	-	6 month anniversary of Installation Deadline	Pursuant Health internal full solution testing including full regression, User Acceptance Testing (UAT), FDA compliance activities.
Software Deployment	-	8 month anniversary of Installation Deadline	Deployment process to release software to Kiosk Fleet

\* Nothing herein shall be deemed to alter or amend the prohibition against Pursuant Health from installing any Kiosks in stores located in the Commonwealth of Massachusetts until such time as Pursuant Health has made the payments required under Article V.A.(iv). of the July 22, 2016 Accessibility Agreement and such Kiosks are Accessible. Pursuant Health anticipates this will occur after final software deployment and each of the parties has confirmed the Kiosks to be installed are Accessible.