D2L Accessibility Conformance Report - Revised Section 508 Edition

(Based on VPAT[®] Version 2.4)

Name of Product/Version: Brightspace CORE 20.22.x

Product Description: Learning Management System

Date: March, 31, 2022

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Notes: This version of our Accessibility Conformance Report (ACR) dated March, 31, 2022 reports our conformance with WCAG 2.1 at Levels A, AA, and AAA, and our compliance with Section 508 of the Rehabilitation Act, 1973 revised in 2017, for Brightspace Core and allied mobile apps based on the <u>VPAT® Version 2.4 Section 508</u> template published by the Information Technology Industry Council (ITIC) in February 2020. This report supercedes our VPAT of September 30, 2021

Introduction:

We <u>report publicly</u> on how the accessibility level of our products and processes align with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1 Level AAA standards while regulatory requirements are met at the AA level. For us, accessibility is not a checklist; it is a commitment to empower and engage individuals in their learning goals. It is about providing an equitable user experience to users with disabilities by including considerations at every stage of development. We work closely with our clients to develop comprehensive solutions that are flexible to the individual needs of institutions, instructors and learners. We offer products that make it easy for users to navigate, understand, and respond to learning materials and activities using the assistive technologies that support their needs.

Accessibility best practices are built into our design and development processes. As part of quality assurance, our products are checked for compliance with the most up-to-date accessibility standards based on the Web Content Accessibility Guidelines (WCAG) 2.1 Levels A, AA and AAA). Points of non-compliance are transparently reported as exceptions in our WCAG checklist. These exceptions are raised as high priority software defects in our backlog and scheduled/remediated as such. Our public WCAG checklist is updated periodically to reflect the latest position.

[&]quot;Voluntary Product Accessibility Template" and "VPAT" are registered service marks of the Information Technology Industry Council (ITI)

Evaluation Methods Used:

Our designers build and maintain design patterns and components with accessibility and consistency in mind. Our developers build accessibility into the web components they create as building blocks for product development. 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. We have a user experience tester who is blind and uses a screen reader. She works with UI researchers and designers in the initial stages of design and also checks the products for user experience before release.

We also partner with a third-party accessibility testing company for our accessibility research, design consultation and user testing to recruit users via their cloud-based platform from their community of people with disabilities using a variety of assistive technologies such as multiple screen readers, screen magnifiers, speech input, and switch access devices. Key test methods used are listed below, with acronym legends. These acronyms are referenced in the Remarks and Explanations column to indicate how we tested for each of the WCAG 2.1 success criteria and are repeated in the page footer for easy reference. Version numbers indicate the limits within which we have tested and not the only versions tested.

- TBT Tool-Based Testing: aXe DevTools 4.24.4 Crx / Lighthouse v9.5.0; WebAIM WAVE 3.1.6; Totally; HTML CodeSniffer; A11y Bookmarklets
- CCT Color Contrast Testing: WebAIM Color contrast checker; TPG Color contrast checker; Online contrast checker; Grayscale bookmarklet
- SRT Screen Reader Testing: JAWS[®] 2021.2111.13/ Edge 94.0.992.31, Firefox 97.0.1 & Chrome 99.0.4844; NVDA 2021.3.3/Firefox 97.0.1 & Chrome 99.0.4844; MacOS Monterey Voiceover/Safari 15.4; Voiceover/iOS 15.3.1, iPadOS 15.3.1; Talkback/Android 12
- SMT Screen Magnifier Testing OS tools on Windows 10 and MacOS Monterey, ZoomText® 2021.2111.4; Fusion 2021.2111.3
- MAT Manual Accessibility Testing: Keyboard testing with visual focus; Videos; Speech input using Dragon 16; Inspection
- UBT User-Based Testing: Testing with Users with Disabilities in-house and through partnership with a third-party company.

TBT – Tool-Based Testing;



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 2.1	Level A (Yes)
	Level AA (Yes)
	Level AAA (Yes)
Revised Section 508 standards published January 18, 2017 and corrected January22, 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 2.1 Level AAA.

WCAG 2.1 Report

Tables 1, 2, and 3 also document conformance with:

• Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.1 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the <u>Web Content Accessibility Guidelines 2.1</u>.

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
 1.1.1 Non-text Content (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	 Test methods: TBT; SRT; UBT Features Images and icons are provided with text alternative to inform users with visual impairments, in audio or braille, 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. Exceptions: In Content, including the New Content Experience, while creating a new topic by uploading a file, if you upload an image file, you are not prompted to include alt text. As a workaround you can create a file topic and use the HTML Editor to include the image with alt text.

TBT - Tool-Based Testing;

- **CCT** Color Contrast Testing;
- **SMT** Screen Magnifier Testing;

SRT – Screen Reader Testing;
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Criteria	Conformance Level	Remarks and Explanations
		 In Annotations, the ability to add freehand annotated material does not have an alt-text equivalent. As a workaround, instructors may choose to provide feedback in a different format such as an audio note or text. In Quizzes, when inserting an image into the quiz question component of the system, the alt text functionality is not retained when using the "insert image" option. Alt text works fine for "Insert Stuff", which may be used instead. (not WCAG) 504.2 (Authoring tool): When screen reader users apply text styles in the Brightspace Editor, it does not provide them a non-visual indication of the style applied. As a workaround, they can view the source code to get the information.
 1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT Not applicable. Time-based media are not a part of the LMS. Users control the content they produce.
 1.2.2 Captions (Prerecorded) (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not applicable for software.	 Test Methods: MAT Not applicable. Time-based media are not a part of the LMS. Users control the content they produce. 504.2: When users upload video files to the Content tool, video topics render using a fully accessible video player. This video player supports the ability to upload SRT files that play as closed captions. The Video Note™ feature generates automated captions that can be edited by the owner. Note:

SRT – Screen Reader Testing;

CCT – Color Contrast Testing;

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Criteria	Conformance Level	Remarks and Explanations
		 (Authoring): New Content Experience - the Manage Captions interfaces is present for video and audio files added to Lessons when opted into the new Lessons Create Experience,
 1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not applicable	 Test Methods: MAT Not applicable. Time-based media are not a part of the LMS. Users control the content they produce.
 1.3.1 Info and Relationships (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	 Test Methods: TBT; SRT; MAT; UBT Features The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways. Assistive technologies can programmatically determine the information, structure and relationships conveyed through presentation. Headings and ARIA landmarks are 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. ARIA is used to communicate context menus, dynamic page changes and alerts. When pop-up window option is selected instead of modal dialogs, pages are rendered linear and read clearly without style sheets. ARIA expanded/collapsed markup is not used to indicate menu states. This state is communicated through link names instead. Image maps are not used. Exceptions: In Quizzes, the matching question type is challenging to use for a blind learner. The learner must independently remember the numbering

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Criteria	Conformance Level	Remarks and Explanations
		 methodology and options and apply an answer accordingly. As a workaround, instructors could give an alternative question type for them using special access. In Annotations, the ability to add freehand annotated material is only visually related to the underlying content. As a workaround, instructors may choose to provide feedback in a different format such as an audio note or text. The Quiz Builder functionality to "Move To" items to the Top, Bottom or Sections does not announce changes with Screen Readers.
 1.3.2 Meaningful Sequence (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: SRT; UBT Features The content on our LMS is created to be understood by assistive technologies and to be presented in different ways. Headings and ARIA landmarks are 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: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT Features Any concepts suggested through shape, size, visual location, orientation, or sound is also communicated through language. Textual equivalents may be visible or hidden (alt text, titles, ARIA alerts, etc.).
 1.4.1 Use of Color (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: CCT: Grayscale bookmarklet Features Information conveyed through font styling or color is also communicated through language. Electronic forms use standard HTML mark-up and item labeling. ePortfolio themes provide several color options.

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Criteria	onformance Level	Remarks and Explanations
		 Invisible spans are added to provide "selected" text to areas. When color is used for warning and confirmation messages, the associated text communicates meaning clearly on its own. Tool menus and tabs use highlighting to indicate current location. This information is also communicated by headings and selected states The Grades tool allows grade ranges to be associated with colors and symbols. Text is also required. Users control their own content.
 1.4.2 Audio Control (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Test Methods: MAT Features Brightspace does not use audio alerts. Users control their own content.
 2.1.1 Keyboard (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Test Methods: MAT: Keyboard + visual focus; SRT; UBT Features 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. The Form Elements administrative tool is challenging to use without a mouse. The Equation Editor is keyboard accessible. It produces standards-compliant equations using MathML. But in editing mode, screen reader users cannot discern the equation structure. Users control their own content. Exception: In Annotations, not all controls and options for creating annotated content can be accessed via the keyboard. As a workaround, instructors may choose to provide feedback in a different format such as an audio note or text.

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Criteria	Conformance Level	Remarks and Explanations
		 In Brightspace Parent & Guardian, using the arrow keys to navigate the calendar in the view-all-work screen causes annoying scrolling. The calendar should only scrolls up or down if focus moves to a date out of view. Quiz Builder: When opening QIBL from quiz builder using keyboard only, the focus remains in the quiz area; tabbing doesn't move the focus into QIBL.
 2.1.2 No Keyboard Trap (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Test Methods: MAT: Keyboard; SRT; UBT Features • No keyboard traps.
2.1.4 Character Key Shortcuts (WCAG 2.1 Level A)	Supports	 Test Methods: TBT; MAT; UBT Features Single character shortcut keys are not used and shortcut keys are active only on focus. Users activating controls using speech input are able to speak single input characters without accidentally activating some control.
 2.2.1 Timing Adjustable (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT Features Users can refresh data in the Chat, Discussions, and Pager tool at their own pace. Some tools, such as Quizzes, support time limits. Users are warned before their time expires. Alternative time limits (Special Access) can be set for specific users. Institutions set time-out limits for inactive users. The system warns users before their session expires.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: 2017 Section 508	Supports	 Test Methods: MAT Features Essential animations are provided to give feedback about loading progress.

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Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Progress animations are used to indicate progress/status of content where users might be confused or mislead if the status wasn't indicated. Short animations are used to help users understand transitions in the interface – such as unpinning a course from the "my courses" widget. Auto-updating is used in some tools, such as the Chat tool, where users need to be aware of new information. Settings are available to turn off auto-refreshes.
 2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Test Methods: MAT Yes. We adhere to this criterion.
 2.4.1 Bypass Blocks (Level A) Also applies to: 2017 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	 Test Methods: MAT: Keyboard; SRT; TBT: Landmarks bookmarklet Features Skip to main content links, headings and ARIA landmarks help users avoid repetitive and non-essential content. The expanded/collapsed state of secondary form content is clearly indicated and the fields are accessible. Users control their own content.
 2.4.2 Page Titled (Level A) Also applies to: 2017 Section 508 501 (Web)(Ssoftware) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT; TBT: Landmarks bookmarklet Features Each page has a title, heading 1 and ARIA main landmark. Users control their own content.
2.4.3 Focus Order (Level A) Also applies to: 2017 Section 508	Partially Supports	 Test Methods: MAT: Keyboard & visual focus Features Each page has a logical tab order and visible tab stops.

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Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Users control their own content. Exception: In Grades, the focus is lost when you sort a data grid by column.
 2.4.4 Link Purpose (In Context) (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT; SRT Features Links are unique and contextual, usually in the format [action] [applicable item]. Users control their own content.
2.5.1 Pointer Gestures (WCAG 2.1 Level A)	Supports	 Test Methods: TBT; MAT; UBT Features Single-point actions can be used to operate any functionality that can be operated with a pointer. Path-based or multi-point gestures are not required to operate any functionality, except for gestures that are standard to the operating system.
2.5.2 Pointer Cancellation (WCAG 2.1 Level A)	Supports	 Test Methods: TBT; MAT; UBT Features Drag-and-drop interactions can be cancelled by clicking outside the drop target.
2.5.3 Label in Name (WCAG 2.1 Level A)	Supports	Test Methods: TBT; MAT; UBT Features Programmatic labels provided to user interface components include all or part of the text that is presented as visual label (or the meaning represented by the icon) at the start to work well with voice input tools.
2.5.4 Motion Actuation (WCAG 2.1 Level A)	Supports	Test Methods: TBT; MAT; UBT Features • No function of our mobile apps relies on motion for actuation.
 3.1.1 Language of Page (Level A) Also applies to: 2017 Section 508 	Supports	Test Methods: TBT; SRT Features

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Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Language of content is notified at start of page and when changed within page. Users control their own content.
 3.2.1 On Focus (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT; SRT Features We have visible on-focus states that use a combination of colour and border effect to highlight the focused elements. These are built into our controls and defined into our design patterns.
 3.2.2 On Input (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 	Partially Supports	 Test Methods: MAT; SRT Features Changing the setting of any UI component does not cause an unexpected change in the context automatically. Exception: Learning Outcomes- When you deselect a standard after it has been graded it leaves behind a visual artifact that makes it so it is not visually clear that it has been deselected.
 3.3.1 Error Identification (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT; SRT Features Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. Where possible, error messages describe each error and link to the appropriate field for resolving the error.
 3.3.2 Labels or Instructions (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT; SRT Features Forms have clear headings, labels, field sets, and buttons. Inline help is provided as needed. The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible.

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Criteria	Conformance Level	Remarks and Explanations
 4.1.1 Parsing (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT: HTML CodeSniffer Features Web pages are written to HTML5 specifications. Users control their own content.
 4.1.2 Name, Role, Value (Level A) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT; SRT Features Controls are developed and validated against HTML specifications and standards, including ARIA.
4.1.3 <u>Status Messages</u> (WCAG 2.1 Level A)	Partially Supports	 Test Methods: TBT; MAT; UBT Features Users are made aware of important changes in content that are not given focus through inline or toast alerts. These alerts do not interrupt users' work. Screen reader users get audio alerts. Exception: The Quiz Builder functionality to "Move To" items to the Top, Bottom or Sections does not announce changes with Screen Readers.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: 2017 Section 508	Not applicable	 Test Methods: MAT Time-based media are not a part of the LMS.

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Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		Users control the content they produce.
 1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not applicable	 Test Methods: MAT Time-based media are not a part of the LMS. Users control the content they produce.
1.3.4 Orientation (WCAG 2.1 Level AA)	Supports	 Test Methods: TBT; MAT Features When a page or app is opened on a mobile device, it is presented in the device's current display orientation. When the device is rotated, the content adjusts to the new display orientation.
1.3.5 Identify Input Purpose (WCAG 2.1 Level AA)	Supports	 Test Methods: TBT; MAT Features Auto-complete is supported for input components in forms involving users' personal information to enable them to identify the input purpose.
 1.4.3 Contrast (Minimum) (WCAG 2.1 Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT; CCT; SMT; UBT Features Foreground to background contrast adheres to standards. Our standard text elements now have a 7:1 contrast on a white background (level AAA compliance) Users control their own content
 1.4.4 Resize text (WCAG 2.1 Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 	Supports	 Test Methods: TBT; CCT; SMT; UBT Features User account settings are available for adjusting font face and size. Icons and text resize with scaling/zooming options of browser (and other technology) up to 200%.

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Criteria	Conformance Level	Remarks and Explanations
• 602.3 (Support Docs)		All product functionalities perform well at this zoom level.
		Users control their own content.
 1.4.5 Images of Text (Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Test Methods: MAT; SRT Features Images of text are not used. Equations authored in D2L's Equation Editor are stored as MathML and output as MathML in browsers where supported. Users control their own content.
1.4.10 <u>Reflow</u> (WCAG 2.1 Level AA)	Partially Supports	 Test Methods: TBT; MAT; UBT Features Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind. We have a best-in-class responsive solution for Brightspace web and award-winning mobile apps. Pages mostly reflow when the viewport is set to smaller phone sizes. Exception: That said, we have prioritized our responsive design updates based on usage and persona (learners and instructors first). There are infrequently used tools and administrative workflows that are not yet fully responsive.
1.4.11 <u>Non-text Contrast</u> (WCAG 2.1 Level AA)	Supports	 Test Methods: TBT; MAT; UBT Features Active user interface components have a contrast ratio of 3:1 with the background.
1.4.12 Text Spacing (WCAG 2.1 Level AA)		 Test Methods: TBT; MAT; UBT Features Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind to accommodate changes in content size due to text spacing changes made by the user.

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Criteria	Conformance Level	Remarks and Explanations
1.4.13 Content on Hover or Focus (WCAG 2.1 Level AA)	Supports	 When text spacing is adjusted, content does not get cut off or overlap on most pages. Exception: We have prioritized our responsive design updates based on usage and persona (learners and instructors first). There are infrequently used tools and administrative workflows that are not yet fully responsive where changes in text spacing could result in content overlapping or being cut off. Test Methods: TBT; MAT; UBT Features Custom tooltips, user profile badges, and edit nav bar links that appear on hover or focus are visible until dismissed and can be dismissed without moving pointer hover or keyboard focus.
 2.4.5 Multiple Ways (Level AA) Also applies to: 2017 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	 Test Methods: MAT: Inspection Features 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. Users control their own content.
 2.4.6 Headings and Labels (Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: MAT: Inspection; UBT Features Pages have descriptive headings and labels. Labels are unique and contextual. Users control their own content.
2.4.7 Focus Visible (Level AA) Also applies to:	Supports	Test Methods: MAT: Keyboard + visual focus Features

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Criteria	Conformance Level	Remarks and Explanations
2017 Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		 Each page has a logical tab order and visible tab stops. Links and fields have extra highlighting, beyond browser defaults.
 3.1.2 Language of Parts (Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	 Test Methods: TBT: Language bookmarkelt Features While the WSYIWYG editor does not include a button or prompt users to indicate a "lang" attribute for language changes, users can insert a "lang" attribute using the HTML source editor. Users control their own content.
 3.2.3 Consistent Navigation (Level AA) Also applies to: 2017 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	 Test Methods: MAT: Inspection; SRT ; SMT Features Navigation models are consistent across tools and use headings and ARIA navigation landmarks to help orient users. Exception: [iOS] "Add Rubric > Create New" opens the rubric editor within the right panel instead of in a fullscreen modal.
 3.2.4 Consistent Identification (Level AA) Also applies to: 2017 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	 Test Methods: SRT ; SMT Features Icons use an icon grammar to facilitate learning. The same icon is used for the same action across all tools. Users may combine concepts they already understand to interpret new icons.
 3.3.3 Error Suggestion (Level AA) Also applies to: 2017 Section 508 501 (Web)(Software) 	Supports	 Test Methods: MAT: Inspection; SR; SM Features Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links.

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Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool)		Where possible, error messages describe each error and link to the
602.3 (Support Docs)		appropriate field for resolving the error.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)		
Also applies to:		
2017 Section 508	Not applicable	Features
• 501 (Web)(Software)		No legal commitments or financial transactions for the user.
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Not applicable	Features:
		 Time-based media are not a part of the LMS.
		 Users control the content they produce.
	Not applicable	Features:
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)		 Time-based media are not a part of the LMS.
		Users control the content they produce.
	Net en altradale	Features:
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Not applicable	 Time-based media are not a part of the LMS.
		Users control the content they produce.
		Features:
1.2.9 Audio-only (Live) (Level AAA)	Not applicable	 Time-based media are not a part of the LMS.
		Users control the content they produce.

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Criteria	Conformance Level	Remarks and Explanations
<u>1.3.6 Identify Purpose</u> (Level AAA)	Supports	 Testing Methods: Test Methods: MAT: Inspection Features: All icons are labeled so that users can perceive the functionality of each icon. Example: The envelope icon is labeled "Message alerts" (and not Envelope). ARIA landmarks are used to mark different regions in a page. This information is available to screen readers for conveying to users who cannot see the screen.
1.4.6 Contrast Enhanced (Level AAA)	Supports	 Test Methods: CCT Features: Our standard text elements in the Brightspace Daylight design system have a contrast greater than 7:1 on a white background. Users control their own content.
1.4.7 Low or No Background Audio (Level AAA)	Not applicable	 Features: Brightspace does not use any audio background. Users control the content they produce.
1.4.8 Visual Presentation (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Brightspace is compatible with most popular browser extensions to allow users to set their choice of foreground/background colors and text spacing. Icons and text resize with the scaling/zooming options of browser (and other technology) up to 200%. The default font size for all clients has been standardized to our "Medium" font setting. As part of personalized account settings, users can choose another default relative font size. Most pages have relative column widths. System text does not use full justification. System font sizes are adjustable. Users control their own content.

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Criteria	Conformance Level	Remarks and Explanations
1.4.9 Images of Text (No Exception) Control (Level AAA)	Supports	Test Methods: MAT: Inspection Features: Images of text are not used. Users control their own content.
2.1.3 Keyboard (No Exception) (Level AAA)	Partially supports	 Test Methods: Manual: KBT Features: All controls are reachable using the keyboard with exceptions as reported under 2.1.1. In Annotations, we are working with the third-party tool owners.
2.2.3 No Timing (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: The Quizzes tool supports time-based assessments with the ability to define alternative access, such as alternative timing or no time, for users as needed. Institutions have an option to set a time-out period. Users are warned before their session times-out. Users control their own content.
2.2.4 Interruptions (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Interruptions are designed only if and when applicable and meaningful to the activity in hand. Auto-updating is used in some tools, such as the Chat tool, where users need to be aware of new information. Settings are available to turn off autorefreshes. The system uses ARIA alerts to indicate dynamic page changes so that users can choose the level of interruption they want. Users control their own content.
2.2.5 Re-authenticating (Level AAA)	Supports	Test Methods: MAT: Inspection Features:

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Criteria	Conformance Level	Remarks and Explanations
		 Users are prompted to reauthenticate before a session expires. Upon logging back in, the user lands at the same spot and can or cannot access what was previously available depending on the context and type of data.
<u>2.2.6 Timeouts</u> (Level AAA)	Partially supports	 Test Methods: MAT: Inspection Features: Controlled timeouts are implemented for timed assessments which allow auto-submission of quiz data at pre-determined time limits. Time limits are communicated to learners at the start of the assessment. Exception: System timeouts are defined by the site administrator. Users are not informed of the session duration, but they are prompted before logout. In some cases, it is not possible to retrieve unsaved data after session expiry.
2.3.2 Three Flashes (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: No flashing content in the system. Users control their own content.
2.3.3 Animation from Interactions (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: If a user sets 'reduced motion' accessibility setting at the operating system level, then the software respects it. No non-essential animation is used. Essential animations are used sparingly in contexts where it would be helpful to some users. For example, subtle communication about the state of the page (such as loading indicators) or to help indicate where an item was placed on or removed from a page (such as an animation showing items reordering or being added to the bottom of a page. Nonvisual cues such as ARIA alerts are also available.
2.4.8 Location (Level AAA)	Supports	Test Methods: MAT: Inspection Features:

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Criteria	Conformance Level	Remarks and Explanations
		 Breadcrumb trails or 'Back to' buttons are used to inform users of their current location. Users control their own content.
<mark>2.4.9 Link Purpose (Link Only)</mark> (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: All links have associated text that is unique and contextual, usually in the format [action] [applicable item].
2.4.10 Section Headings (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Content and sections in a page are organized by a hierarchy of headings to enable screen reader users to meaningfully navigate and understand the content. Titles, headings, ARIA landmarks and labels are used to organize system content. Users control their own content.
2.5.5 Target Size (Level AAA)	Partially supports	 Test Methods: MAT: Inspection; UBT Features: While not all our targets are 44x44 CSS pixels in size, we have ensured through user testing that targets in key workflows are accessible to users with fine motor challenges.
2.5.6 Concurrent Input Mechanisms (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: On account of meticulous alignment with the WCAG accessibility standards, our system interoperates well with standards-conforming assistive technologies. Further, our pages are designed to be responsive, meaning they adjust to the view port size of different devices used to access Brightspace. Hence users can switch between interaction technologies and use content across devices seamlessly

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Criteria	Conformance Level	Remarks and Explanations
<mark>3.1.3 Unusual Words</mark> (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Inline help is provided as needed. Our system allows institutions to build their own Glossary.
3.1.4 Abbreviations (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Abbreviations are avoided where possible and explained through inline help. Our system allows institutions to build their own Glossary.
<u>3.1.5 Reading Level</u> (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Language in the system is aimed at lower secondary education level, especially for participant focused tools. Inline help is provided as necessary. Institutions may build their own language pack.
3.1.6 Pronunciation (Level AAA)	Does not support	No.Such a mechanism is not implemented.
3.2.5 Change on Request (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: No changes such as new content displaying in response to an action, or focus shifts, happen outside the control of the user. Settings are available to turn off auto-refreshes where auto-updating is used in some tools, such as the Chat tool. Users can manually check new information.
<mark>3.3.5 Help</mark> (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Tooltips and descriptions are provided as needed for submitting information.

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Criteria	Conformance Level	Remarks and Explanations
		Inline help is provided as needed.
<u>3.3.6 Error Prevention (All)</u> (Level AAA)	Supports	 Test Methods: MAT: Inspection Features: Error prevention is implemented as meaningful in the context of an LMS. Submissions are checked for input error, and errors and opportunities for correction are clearly communicated to the user. Most forms have either a preview option or wizard format where changes can be reviewed, confirmed and corrected before submitting. Where error prevention is critical, such as when submitting answer to a quiz question, the user is given an option to confirm. This provision is used sparingly and only where required, so as to maintain an agile user experience. Not all actions are reversible.

Revised Section 508 Report

Notes:

Chapter 3: <u>Functional Performance Criteria</u> (FPC)

Notes:

Criteria	Conformance Level	R	emarks and Explanations
302.1 Without Vision	Partially Supports	Supports when combine Features	ed with Compatible Assistive Technology
TBT – Tool-Based Testing; CCT – Color Contrast Testing; SMT – Screen Magnifier Testing;	 SRT – Screen Reader Testing; MAT – Manual Accessibility Testing UBT – Testing with Users with Disabilities 	Page 24 of 30	© 2022 by D2L Corporation. All rights reserved.

Criteria	Conformance Level	Remarks and Explanations
		 All interfaces are designed according to HTML5 standards. Images and icons are assigned contextual and meaningful text alternatives that can be announced by a screen reader. Images of text are not used in place of text. Controls such as buttons are labeled to indicate their function. Form fields are labeled to perceive their intent. Links are assigned meaningful texts that clearly indicate the link destination. Controls are assigned appropriate labels that allow perception of their function. ARIA attributes are used to make alert messages and states of dynamic elements such as radio buttons perceivable. Standard interface elements are made evident through proper HTML mark up. Math equation coded in MathML can be read by the screen reader subject to browser compatibility.
302.2 With Limited Vision	Supports	 Supports when combined with Compatible Assistive Technology Features All product functionalities perform well at 200% zoom level. All pages are 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. Colour contrast of foreground text with background is maintained according to standard specifications. SVG images are used to prevent pixelation upon magnification.
302.3 Without Perception of Color	Partially Supports	 Features Colour alone is not used to convey information.

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Criteria	Conformance Level	Remarks and Explanations
302.4 Without Hearing	Supports	 Features No auditory alerts are used.
302.5 With Limited Hearing	Supports	 Features No auditory alerts are used.
302.6 Without Speech	Not applicable	 Not applicable Speech input is not required.
302.7 With Limited Manipulation	Supports	 Supports when combined with Compatible Assistive Technology Features Users with limited manipulation primarily use alternatives to pointing devices such as onscreen keyboards, voice recognition software, visual trackers or adaptive keyboards. For these users, access through keyboard, visibility of current tab location, large target size and longer time limits are important accessibility criteria. Keyboard-accessible alternatives are provided for tools that support drag-and-drop, upload, or reordering. Current tab location is made 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. While time limits can be set on some tools, such as Quizzes, alternative time limits or evaluations can be provided for select users. Institutions can set time-out limits for inactive users. The system warns users before their session expires.
302.8 With Limited Reach and Strength	Supports	 Features Large target sizes, adequate timeout times, and error-tolerant routines help reduce unintended or incomplete interactions.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	 Features Simple language is used for text content. Visual illustrations are used along with text. Interface navigation is made simple through use of hierarchical headings.

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Criteria	Conformance Level	Remarks and Explanations
		• Third party tools are integrated to provide the option of using spoken version of text content.

Chapter 4: <u>Hardware</u>

Notes:Deleted. Not applicable.

Chapter 5: <u>Software</u>

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.1 AA	See WCAG 2.1 section	See information in WCAG 2.1 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 can be used with Brightspace. When major version changes happen on Windows, Mac, iOS and Android as well as Firefox, Chrome and Safari, Brightspace is tested with OS and browser accessibility features. More importantly, D2L has a very efficient client accessibility issue response system whereby clients try out a variety of use cases in the normal course of their daily use of Brightspace and they escalate issues if any for our attention and action.
502.2.2 No Disruption of Accessibility Features	Supports	Brightspace does not disrupt any Browser or OS accessibility features. The same testing method described above helps with managing disruption as well.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
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	

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Criteria	Conformance Level	Remarks and Explanations
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	Brightspace being a Web application is not required to conform to 503.2. However, in some cases, user is allowed to select preferences from Browser or OS for color, contrast, font type, font size, and focus cursor.
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	Supports	Capture™ media player within Brightspace provides user controls for closed captions.
503.4.2 Audio Description Controls	Supports	Capture media player within Brightspace provides user controls for audio description.
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 2.1 section	See information in WCAG 2.1 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	Not applicable	PDF export not provided.

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Criteria	Conformance Level	Remarks and Explanations
504.3 Prompts	Supports	HTML editor prompts users to create accessible content. A built-in Accessibility Checker checks uploaded content for accessibility and offers remediation advice.
504.4 Templates	Supports	D2L has created responsive, accessible content templates that are free to use under a Creative Commons license and provided them on <u>https://community.brightspace.com/</u> to instructors to enable the creation of accessible content in HTML.

Chapter 6: <u>Support Documentation and Services</u>

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	D2L provides extensive <u>documentation about accessibility features</u> and how to use them on the documentation website <u>https://documentation.brightspace.com/EN/-/-/welcome_page.htm</u>), which is accessible.
602.3 Electronic Support Documentation	See WCAG 2.1 section	See information in WCAG 2.1 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not applicable	Support documentation is provided electronically.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	A statement of D2L's accessibility is made prominently at https://www.d2l.com/accessibility/. All information about D2L's accessibility support, which includes information on the accessibility and compatibility features that are built-in and accessibility features that provide compatibility with assistive technology supporting our products, are available on D2L's public website <u>https://documentation.brightspace.com</u> .

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Criteria	Conformance Level	Remarks and Explanations
603.3 Accommodation of Communication Needs	Supports	Accessible support services are provided via phone, email and through accessible documentation, as required. We support end user TTY Relay service. The direct number is 5195794350 and the toll free number is 1-800-982-4315. In compliance with the Accessibility for Ontarians with Disabilities Act (AODA) 2005, D2L provides all employees with detailed training on accessible customer service, which includes specific information for each role such as client support and a line of escalation within D2L who can further support these personnel in responding to accessibility queries.

About D2L

D2L Brightspace is an award-winning, cloud-based learning platform that is currently being used by more than 1000 customers in over 40 countries across <u>K-12</u>, <u>higher education</u>, healthcare, government, <u>associations</u> and the <u>corporate</u> sector. In the 22 years since inception, our team has grown to include over 1000 employees around the world. We currently have offices in Canada, the United States, Europe, Australia, Brazil, and Singapore. *All D2L marks are trademarks of D2L Corporation. Please visit <u>D2L.com/trademarks</u> for a list of D2L marks. All other trademarks are property of their respective owners.*

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