

# D2L Accessibility Conformance Report

Template: VPAT® 2.2 508

**Name of Product/Version:** Brightspace CORE 20.19.x

**Product Description:** Learning Management System

**Date:** 07-2019

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**Notes:** This version of the VPAT is dated July 2019 and based on [VPAT2.2508](#) template published in July 2018.

**Evaluation Methods Used:** Our key production processes are closely guided by WCAG 2.0 AA standards. Our designers build and maintain design patterns and components with accessibility and consistency in mind. Our developers build in 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. 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 2.0 A and AA success criteria and repeated in the page footer for easy reference.

- **IAT** – Integrated Accessibility Testing [WorldSpace Attest](#)
- **TBT** – Tool-Based Testing: [aXe](#) / [Lighthouse](#); [WAVE](#); [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/Edge; JAWS/IE 11; JAWS/Firefox; NVDA/Firefox; NVDA/Chrome; Voiceover/Safari; Voiceover/iOS; Talkback/Android
- **SMT** – Screen Magnifier Testing – OS tools on Windows and Mac, Zoom Text
- **MAT** – Manual Accessibility Testing: Keyboard testing with visual focus; Videos;

## 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 <a href="http://www.w3.org/TR/2008/REC-WCAG20-20081211/">http://www.w3.org/TR/2008/REC-WCAG20-20081211/</a>   | Level A (Yes)<br>Level AA (Yes)<br>Level AAA (No ) |
| <a href="#">Revised Section 508 standards</a> as published by the U.S. Access Board in the Federal Register on January 18, 2017<br><a href="#">Corrections to the ICT Final Rule</a> 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.

## 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, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

**Table 1: Success Criteria, Level A**

Notes:

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><a href="#">1.1.1 Non-text Content</a> (Level A)</p> <p>Also applies to:<br/>                     2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>                        | <p>Supports</p>   | <p><b>Test methods: IAT;TBT; SRT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>Text alternatives are provided for non-text content that is used as part of the LMS such as images and icons.</li> <li>Images and icons are associated 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.</li> <li>Controls and input fields have descriptive, contextual labels or title attributes.</li> </ul> |
| <p><a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)</p> <p>Also applies to:<br/>                     2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | <p>Supports</p>   | <p><b>Test Methods: MAT</b></p> <p><b>Not applicable.</b></p> <ul style="list-style-type: none"> <li>Time-based media are not a part of the LMS.</li> <li>Users control the content they produce.</li> </ul>   |

| Criteria  | Conformance Level   | Remarks and Explanations   |
|---|---|--|
| <p><a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                               | <p>Not applicable for software.<br/>           Partially supports for authoring tool.</p> | <p><b>Test Methods: MAT</b><br/> <b>Not applicable.</b></p> <ul style="list-style-type: none"> <li>• Time-based media are not a part of the LMS.</li> <li>• Users control the content they produce.</li> <li>• 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.</li> <li>• The Video Note feature supports captions, audio descriptions and transcripts.</li> </ul> <p><b>Exceptions to 504.2:</b></p> <ul style="list-style-type: none"> <li>• Video upload through “quick reflect” in ePortfolio does not prompt users for captions.</li> </ul> |
| <p><a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Not applicable</p>   | <p><b>Test Methods: MAT</b><br/> <b>Not applicable.</b></p> <ul style="list-style-type: none"> <li>• Time-based media are not a part of the LMS.</li> <li>• Users control the content they produce.</li> </ul>   |
| <p><a href="#">1.3.1 Info and Relationships</a> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                               | <p>Supports</p>   | <p><b>Test Methods: IAT; TBT; SRT; MAT</b><br/> <b>Features</b></p> <ul style="list-style-type: none"> <li>• The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways.</li> <li>• Assistive technologies can programmatically determine the information, structure and relationships conveyed through presentation.</li> <li>• Headings and ARIA landmarks are used to help convey presentation.</li> <li>• Links and images are unique and contextual making it easy for users to navigate options.</li> <li>• Tables mostly use row and column headers. Table headers use scope attribute where appropriate.</li> </ul>                    |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
|  |                    | <ul style="list-style-type: none"> <li>• 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.</li> <li>• ARIA expanded/collapsed markup is not used to indicate menu states. This state is communicated through link names instead.</li> <li>• Brightspace does not use image maps.</li> </ul>   |
| <p><b><u>1.3.2 Meaningful Sequence</u></b> (Level A)</p> <p>Also applies to:<br/>                     2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>     | Supports           | <p><b>Test Methods: SRT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways.</li> <li>• Headings and ARIA landmarks are used to help convey relationships between content.</li> <li>• Pages are linear and read clearly without style sheets.</li> </ul>  |
| <p><b><u>1.3.3 Sensory Characteristics</u></b> (Level A)</p> <p>Also applies to:<br/>                     2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Supports           | <p><b>Test Methods: MAT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• 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.).</li> </ul>   |
| <p><b><u>1.4.1 Use of Color</u></b> (Level A)</p> <p>Also applies to:<br/>                     2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>            | Partially Supports | <p><b>Test Methods: CCT:</b> Grayscale bookmarklet</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Information conveyed through font styling or color is also communicated through language.</li> <li>• Electronic forms use standard HTML mark-up and item labeling.</li> <li>• ePortfolio themes provide several color options.</li> <li>• Invisible spans are added to provide “selected” text to areas.</li> <li>• When color is used for warning and confirmation messages, the associated text communicates meaning clearly on its own.</li> <li>• Tool menus and tabs use highlighting to indicate current location. This information is also communicated by headings and selected states</li> </ul> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
|  |                    | <ul style="list-style-type: none"> <li>The Grades tool allows grade ranges to be associated with colors and symbols. Text is also required.</li> <li>Users control their own content.</li> </ul> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>Landing pages in Assignments and Grades have tables using shading alone to indicate new sections or categories.</li> </ul>  |
| <b><a href="#">1.4.2 Audio Control</a></b> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | Not Applicable     | <b>Test Methods: MAT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>However, users control their own content.</li> <li>Brightspace does not use audio.</li> </ul>   |
| <b><a href="#">2.1.1 Keyboard</a></b> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>      | Partially Supports | <b>Test Methods: MAT: Keyboard + visual focus; SRT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>Forms are accessible by keyboard and assistive technologies. Some forms use a combination of fields, buttons, inline help, and links.</li> <li>Some menu lists require navigation using the tab key rather than the arrow keys – the more commonly expected keyboard behavior.</li> <li>The Form Elements administrative tool is challenging to use without a mouse.</li> <li>The HTML Editor is not fully accessible to screen reader users; if you apply a style in the editor view, it lacks a non-visual indication of its presence unless you view the source code. The HTML Editor may be replaced with a simple text field that supports HTML through users’ account settings.</li> <li>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.</li> <li>Users control their own content.</li> </ul> |
| <b><a href="#">2.1.2 No Keyboard Trap</a></b> (Level A)  | Supports           | <b>Test Methods: MAT: Keyboard; SRT</b>  |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
| Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   |                   | <b>Features</b><br>No keyboard traps.   |
| <a href="#">2.2.1 Timing Adjustable</a> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                | Supports          | <b>Test Methods: MAT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>• Users can refresh data in the Chat, Discussions, and Pager tool at their own pace.</li> <li>• 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.</li> <li>• Institutions set time-out limits for inactive users. The system warns users before their session expires</li> </ul>   |
| <a href="#">2.2.2 Pause, Stop, Hide</a> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                | Supports          | <b>Test Methods: MAT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>• Progress animations are used to indicate progress/status of content where users might be confused or mislead if the status wasn't indicated.</li> <li>• Short animations are used to help users understand transitions in the interface – such as unpinning a course from the “my courses” widget.</li> <li>• 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.</li> <li>• Essential animations are provided to give feedback about loading progress.</li> </ul> |
| <a href="#">2.3.1 Three Flashes or Below Threshold</a> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Supports          | <b>Test Methods: MAT</b><br><b>Yes.</b>   |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--------------------|---|
| <p><b><u>2.4.1 Bypass Blocks</u></b> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul> | Supports           | <p><b>Test Methods:</b> IAT; MAT: Keyboard; SRT; TBT: Landmarks bookmarklet</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Skip to main content links, headings and ARIA landmarks help users avoid repetitive and non-essential content.</li> <li>• The expanded/collapsed state of secondary form content is clearly indicated and the fields are accessible.</li> <li>• Users control their own content.</li> </ul> |
| <p><b><u>2.4.2 Page Titled</u></b> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Partially Supports | <p><b>Test Methods:</b> IAT; MAT</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Each page has a title, heading 1 and ARIA main landmark.</li> <li>• Users control their own content.</li> </ul>  |
| <p><b><u>2.4.3 Focus Order</u></b> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Partially Supports | <p><b>Test Methods:</b> MAT: Keyboard &amp; visual focus</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Each page has a logical tab order and visible tab stops.</li> <li>• Users control their own content.</li> </ul> <p><b>Exception:</b></p> <ul style="list-style-type: none"> <li>• The focus is lost when you sort a data grid by column in Assignments and Grade Quiz pages.</li> </ul>                        |
| <p><b><u>2.4.4 Link Purpose (In Context)</u></b> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Supports           | <p><b>Test Methods:</b> IAT; MAT; SRT</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Links are unique and contextual, usually in the format [action] [applicable item].</li> <li>• Users control their own content.</li> </ul>   |
| <p><b><u>3.1.1 Language of Page</u></b> (Level A)</p> <p>Also applies to:<br/>           2017 Section 508</p>  | Supports           | <p><b>Test Methods:</b> IAT; TBT; SRT</p> <p><b>Features</b></p>  |



| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--------------------|---|
| <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>   |                    | <ul style="list-style-type: none"> <li>Language of content is notified at start of page and when changed within page.</li> <li>Users control their own content.</li> </ul>  |
| <p><b>3.2.1 On Focus</b> (Level A)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>               | Supports           | <p><b>Test Methods: MAT; SRT</b></p> <p><b>Features</b></p> <p>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.</p>  |
| <p><b>3.2.2 On Input</b> (Level A)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> </ul>   | Supports           | <p><b>Test Methods: MAT; SRT</b></p>  |
| <p><b>3.3.1 Error Identification</b> (Level A)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>   | Supports           | <p><b>Test Methods: IAT; TBT; SRT</b></p> <p><b>Features</b></p> <p>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.</p>   |
| <p><b>3.3.2 Labels or Instructions</b> (Level A)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | Partially Supports | <p><b>Test Methods: IAT; TBT; SRT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>Forms have clear headings, labels, field sets, and buttons. Inline help is provided as needed.</li> <li>The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible.</li> </ul> <p><b>Exceptions:</b></p> <ul style="list-style-type: none"> <li>The following fields and tabs do not have labels:             <ul style="list-style-type: none"> <li>“read status” and “flag status” dropdowns on the files tab in Assignments.</li> <li>“add grade range” form element in Grades.</li> </ul> </li> </ul> |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--------------------|---|
| <a href="#">4.1.1 Parsing</a> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>           | : Supports         | <b>Test Methods: TBT:</b> HTML CodeSniffer<br><b>Features</b> <ul style="list-style-type: none"> <li>Web pages are written to HTML5 specifications.</li> <li>Users control their own content.</li> </ul>  |
| <a href="#">4.1.2 Name, Role, Value</a> (Level A)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | Partially Supports | <b>Test Methods: IAT; TBT; SRT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>Controls are developed and validated against HTML specifications and standards, including ARIA.</li> </ul> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>Button roles are assigned to links in a few places. These links don't support all button actions (e.g. space bar).</li> <li>In the Learning Repository, the layout relationships for metadata are not communicated non-visually.</li> <li>The edit grades table does not use colgroup attributes with multi-level headers.</li> </ul> |

**Table 2: Success Criteria, Level AA**

Notes:

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
| <a href="#">1.2.4 Captions (Live)</a> (Level AA)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | Supports          | <b>Test Methods: MAT</b><br><b>Not applicable.</b> <ul style="list-style-type: none"> <li>Time-based media are not a part of the LMS.</li> <li>Users control the content they produce.</li> </ul> |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--------------------|--|
| <p><b><u>1.2.5 Audio Description (Prerecorded)</u></b> (Level AA)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | Supports           | <p><b>Test Methods: MAT</b><br/> <b>Not applicable.</b></p> <ul style="list-style-type: none"> <li>• Time-based media are not a part of the LMS.</li> <li>• Users control the content they produce.</li> </ul>   |
| <p><b><u>1.4.3 Contrast (Minimum)</u></b> (Level AA)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>              | Partially Supports | <p><b>Test Methods: IAT; TBT; CCT; SMT</b></p> <ul style="list-style-type: none"> <li>• Foreground to background contrast adheres to standards.</li> <li>• Users control their own content.</li> </ul> <p><b>Exceptions:</b></p> <ul style="list-style-type: none"> <li>• In ePortfolio, the settings page help text, the “drop files here” invitation, and the content area names within ePortfolio presentations do not have sufficient contrast.</li> </ul> |
| <p><b><u>1.4.4 Resize text</u></b> (Level AA)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                     | Supports           | <p><b>Test Methods: IAT; TBT; CCT; SMT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• User account settings are available for adjusting font face and size.</li> <li>• Icons and text resize with browser (and other technology) scaling/zooming options up to 200%.</li> <li>• All product functionalities perform well at this zoom level.</li> <li>• Users control their own content.</li> </ul>                                   |
| <p><b><u>1.4.5 Images of Text</u></b> (Level AA)</p> <p>Also applies to:<br/>           2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                  | Supports           | <p><b>Test Methods: IAT; MAT; SRT</b></p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Images of text are not used.</li> <li>• Equations authored in D2L’s Equation Editor are stored as MathML and output as MathML in browsers where supported.</li> <li>• Users control their own content.</li> </ul>  |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
| <p><a href="#">2.4.5 Multiple Ways</a> (Level AA)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul> | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Headings, ARIA landmarks (such as navigation landmarks) and unique link and button names help users navigate pages quickly.</li> <li>• Pages have consistent navigation areas.</li> <li>• Many pages contain search fields with ARIA search landmarks.</li> <li>• The system works well with search and find features built into assistive technologies.</li> <li>• Users control their own content.</li> </ul> |
| <p><a href="#">2.4.6 Headings and Labels</a> (Level AA)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Pages have descriptive headings and labels. Labels are unique and contextual.</li> <li>• Users control their own content.</li> </ul>  |
| <p><a href="#">2.4.7 Focus Visible</a> (Level AA)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Supports          | <p><b>Test Methods: MAT:</b> Keyboard + visual focus</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• Each page has a logical tab order and visible tab stops.</li> <li>• Links and fields have extra highlighting, beyond browser defaults.</li> </ul>  |
| <p><a href="#">3.1.2 Language of Parts</a> (Level AA)</p> <p>Also applies to:<br/>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>   | Supports          | <p><b>Test Methods: IAT; TBT:</b> Language bookmarkelt</p> <p><b>Features</b></p> <ul style="list-style-type: none"> <li>• While the WYSIWYG 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.</li> <li>• Users control their own content.</li> </ul>   |
| <p><a href="#">3.2.3 Consistent Navigation</a> (Level AA)</p> <p>Also applies to:</p>  | Supports          | <p><b>Test Methods: MAT:</b> Inspection; <b>SRT ; SMT</b></p> <p><b>Features</b></p>  |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software) – Does not apply to non-web software</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>  |                   | <ul style="list-style-type: none"> <li>Navigation models are consistent across tools and use headings and ARIA navigation landmarks to help orient users.</li> </ul>  |
| <b>3.2.4 Consistent Identification</b> (Level AA)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software) – Does not apply to non-web software</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul> | Supports          | <b>Test Methods: SRT ; SMT</b><br><b>Features</b> <ul style="list-style-type: none"> <li>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.</li> </ul>  |
| <b>3.3.3 Error Suggestion</b> (Level AA)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>  | Supports          | <b>Test Methods: MAT: Inspection; SR; SM</b><br><b>Features</b> <ul style="list-style-type: none"> <li>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.</li> </ul> |
| <b>3.3.4 Error Prevention (Legal, Financial, Data)</b> (Level AA)<br>Also applies to:<br>2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>   | Supports          | <b>Test Methods: MAT: Inspection</b><br><b>Not applicable</b>   |

**Table 3: Success Criteria, Level AAA**

Notes: Deleted; Not applicable.

## 2017 Section 508 Report

Notes:

### Chapter 3: Functional Performance Criteria (FPC)

Notes:

| Criteria             | Conformance Level  | Remarks and Explanations   |
|----------------------|--------------------|--|
| 302.1 Without Vision | Partially Supports | Supports when combined with Compatible Assistive Technology<br><b>Features</b> <ul style="list-style-type: none"> <li>• All interfaces are designed according to HTML5 standards.</li> <li>• Images and icons are assigned contextual and meaningful text alternatives that can be announced by a screen reader.</li> <li>• Images of text are not used in place of text.</li> <li>• Controls such as buttons are labeled to indicate their function.</li> <li>• Form fields are labeled to perceive their intent.</li> <li>• Links are assigned meaningful texts that clearly indicate the link destination.</li> <li>• Controls are assigned appropriate labels that allow perception of their function.</li> <li>• ARIA attributes are used to make alert messages and states of dynamic elements such as radio buttons perceivable.</li> <li>• Standard interface elements are made evident through proper HTML mark up.</li> <li>• Math equation coded in MathML can be read by the screen reader if the browser is compatible with that.</li> </ul> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>• The focus is lost when you sort a data grid by column in Assignments and Grade Quiz pages.</li> <li>• The following fields and tabs do not have labels:</li> </ul> |

| Criteria                          | Conformance Level  | Remarks and Explanations  |
|-----------------------------------|--------------------|---|
|                                   |                    | <ul style="list-style-type: none"> <li>○ “read status” and “flag status” dropdowns on the files tab in assignments.</li> <li>○ “add grade range” form element in grades.</li> <li>● Button roles are assigned to links in a few places. These links don’t support all button actions (e.g. space bar).</li> <li>● In the Learning Repository, the layout relationships for metadata are not communicated non-visually.</li> <li>● The edit grades table does not use colgroup attributes with multi-level headers.</li> </ul>   |
| 302.2 With Limited Vision         | Supports           | Supports when combined with Compatible Assistive Technology<br><b>Features</b> <ul style="list-style-type: none"> <li>● All product functionalities perform well at 200% zoom level.</li> <li>● All pages are designed to wrap well when zoomed to 200%.</li> <li>● User account settings are available for adjusting font size.</li> <li>● Icons and text resize with browser (and other technology) scaling/zooming options.</li> <li>● Most pages have relative column widths.</li> <li>● System text does not use full justification.</li> <li>● Colour contrast of foreground text with background is maintained according to standard specifications.</li> <li>● SVG images are used to prevent pixelation upon magnification.</li> </ul> |
| 302.3 Without Perception of Color | Partially Supports | <b>Features</b> <ul style="list-style-type: none"> <li>● Colour alone is not used to convey information.</li> </ul> <b>Exceptions</b> <ul style="list-style-type: none"> <li>● Landing pages in Assignments and Grades have tables using shading alone to indicate new sections or categories.</li> <li>● In ePortfolio, the settings page help text, the “drop files here” invitation, and the content area names within ePortfolio presentations do not have sufficient contrast.</li> </ul>  |
| 302.4 Without Hearing             | Supports           | <b>Features</b> <ul style="list-style-type: none"> <li>● No auditory alerts are used.</li> </ul>  |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
| 302.5 With Limited Hearing                                     | Supports          | <b>Features</b> <ul style="list-style-type: none"> <li>No auditory alerts are used.</li> </ul>  |
| 302.6 Without Speech   | Not applicable    | <b>Not applicable</b> <ul style="list-style-type: none"> <li>Speech input is not required.</li> </ul>   |
| 302.7 With Limited Manipulation                                | Supports          | Supports when combined with Compatible Assistive Technology<br><b>Features</b> <ul style="list-style-type: none"> <li>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.</li> <li>Keyboard-accessible alternatives are provided for tools that support drag-and-drop, upload, or reordering.</li> <li>Current tab location is made clearly visible.</li> <li>Users can make their click target size larger if needed via these two mechanisms:               <ul style="list-style-type: none"> <li>By controlling text sizes through user preferences.</li> <li>By controlling icon sizes through browser zoom preferences.</li> </ul> </li> <li>While time limits can be set on some tools, such as Quizzes, alternative time limits or evaluations can be provided for select users.</li> <li>Institutions can set time-out limits for inactive users. The system warns users before their session expires.</li> </ul> |
| 302.8 With Limited Reach and Strength                          | Supports          | <b>Features</b> <ul style="list-style-type: none"> <li>Large target sizes, adequate timeout times, and error-tolerant routines help reduce unintended or incomplete interactions.</li> </ul>  |
| 302.9 With Limited Language, Cognitive, and Learning Abilities | Supports          | <b>Features</b> <ul style="list-style-type: none"> <li>Simple language is used for text content.</li> <li>Visual illustrations are used along with text.</li> <li>Interface navigation is made simple through use of hierarchical headings.</li> <li>Third party tools are integrated to provide the option of using spoken version of text content.</li> </ul>   |



| Criteria | Conformance Level | Remarks and Explanations |
|----------|-------------------|--------------------------|
|----------|-------------------|--------------------------|

## Chapter 4: Hardware

Notes: Deleted. Not applicable.

## Chapter 5: Software

| Criteria  | Conformance Level                    | Remarks and Explanations  |
|---|--------------------------------------|---|
| 501.1 Scope – Incorporation of WCAG 2.0 AA            | See <a href="#">WCAG 2.0</a> section | See information in WCAG section   |
| <b>502 Interoperability with Assistive Technology</b> | 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.<br>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.<br><br>The same testing method described above helps with managing disruption as well.   |
| <b>502.3 Accessibility Services</b>                   | 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                       |   |
| 502.3.5 Modification of Values                        | Not applicable                       |   |

| Criteria  | Conformance Level                    | Remarks and Explanations   |
|---|--------------------------------------|--|
| 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                       |  |
| <b>503 Applications</b>   | 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.   |
| <b>503.4 User Controls for Captions and Audio Description</b>                       | 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.  |
| <b>504 Authoring Tools</b>  | Heading cell – no response required  | Heading cell – no response required  |
| 504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)   | See <a href="#">WCAG 2.0</a> section | See information in WCAG 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.   |
| 504.3 Prompts   | Supports                             | HTML editor prompts users to create accessible content.  |

| Criteria        | Conformance Level | Remarks and Explanations  |
|-----------------|-------------------|---|
|                 |                   | 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 <a href="https://community.brightspace.com/">https://community.brightspace.com/</a> to instructors for creating accessible content in HTML. |

## Chapter 6: Support Documentation and Services

| Criteria   | Conformance Level                    | Remarks and Explanations   |
|--|--------------------------------------|--|
| <b>601.1 Scope</b>   | Heading cell – no response required  | Heading cell – no response required  |
| <b>602 Support Documentation</b>                                 | Heading cell – no response required  | Heading cell – no response required  |
| 602.2 Accessibility and Compatibility Features                   | Supports                             | D2L provides extensive <a href="https://documentation.brightspace.com/EN/-/-/welcome_page.htm">documentation about accessibility features</a> and how to use them on the documentation website <a href="https://documentation.brightspace.com/EN/-/-/welcome_page.htm">https://documentation.brightspace.com/EN/-/-/welcome_page.htm</a> ), which is accessible.   |
| 602.3 Electronic Support Documentation                           | See <a href="#">WCAG 2.0</a> section | See information in WCAG section  |
| 602.4 Alternate Formats for Non-Electronic Support Documentation | Not applicable                       | Support documentation is provided electronically.  |
| <b>603 Support Services</b>                                      | 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 <a href="https://www.d2l.com/accessibility/">https://www.d2l.com/accessibility/</a> . 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 such accessibility and compatibility features, are available on D2L’s public website <a href="https://documentation.brightspace.com">https://documentation.brightspace.com</a> . |

| 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.<br>We support end user TTY Relay service. The direct number is 5195794350 and the toll free number is 1-800-982-4315.<br>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’s technology is currently being used by customers in [K-12](#), [higher education](#), healthcare, government, and the [enterprise](#) sector. In nineteen years, our team has grown to include over 750 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 [D2L.com/trademarks](https://d2l.com/trademarks) for a list of D2L marks.*

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