

# D2L Accessibility Conformance Report – Section 508 – September 2019

Template: ITIC VPAT® Version 2.3 (Revised) - April 2019

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

**Product Description:** Learning Management System

**Date:** 09-2019

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**Notes:** This version of our Voluntary Product Accessibility Template (VPAT) dated September 2019 reports our conformance with WCAG 2.1 at Levels A and AA and our compliance with Section 508 of the Rehabilitation Act, 1973 based on the [VPAT 2.3Rev 508 template](#) published by the Information Technology Industry Council (ITIC) in April 2019.

## Introduction:

We have updated the accessibility level of our products and processes to align with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards. Although Section 508 requires compliance only with WCAG 2.0, we have also recorded in this report our compliance with the 12 new WCAG 2.1 criteria at levels A and AA. We share your goal of providing equal and inclusive learning opportunities to all individuals. Accessibility is not a checklist at D2L; it is a commitment to empower and engage individuals in their learning goals. 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 your learning materials using the assistive technologies and devices 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 accessibility standards based on the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1 (Levels A and AA). Points of non-compliance are transparently reported as exceptions in our WCAG checklist. These exceptions are raised as high priority software defects and scheduled/remediated as such in our backlog. Our public VPAT of compliance with Section 508 checklist is updated as needed to reflect our latest position.

## Evaluation Methods Used:

Our key production processes are closely guided by WCAG 2.1 AA standards. 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 that offers consultation and user testing services with a community of users with disabilities via a cloud-based platform. 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 A and AA success criteria and repeated in the page footer for easy reference.

- **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, ZoomText®
- **MAT** – Manual Accessibility Testing: Keyboard testing with visual focus; Videos; Speech input using Dragon Naturally Speaking
- **UBT** – Testing with Users with Disabilities in-house and through partnership with third-party company.

## Applicable Standards/Guidelines

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

Standard/Guideline	Included In Report
<a href="#">Web Content Accessibility Guidelines 2.0</a>	Level A (Yes)
<a href="#">Web Content Accessibility Guidelines 2.1</a>	Level AA (Yes)
<a href="#">Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018</a>	Level A (Yes) (7 new criteria) Level AA (Yes) (5 new criteria)
	(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 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 2.1 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [Web Content Accessibility Guidelines 2.1](#).

### 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:                      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>Partially Supports</p>	<p><b>Test methods: TBT; SRT; UBT</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><b>Exceptions:</b></p> <ul style="list-style-type: none"> <li>In Content, including the New Content Experience, when you create a new topic by uploading a file and 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 an image with alt text.</li> </ul>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <li>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.</li> </ul>
<p><b><u>1.2.1 Audio-only and Video-only (Prerecorded)</u></b> (Level A)</p> <p>Also applies to:            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>  <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>1.2.2 Captions (Prerecorded)</u></b> (Level A)</p> <p>Also applies to:            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>	Not applicable for software. Partially supports for authoring tool.	<p><b>Test Methods: MAT</b>  <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>Authoring: In ePortfolio, video upload through “quick reflect” does not prompt users for captions.</li> <li>In the Pulse learner app, the video player does not offer the option to enable captions.</li> </ul>
<p><b><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u></b> (Level A)</p> <p>Also applies to:            2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> </ul>	Not applicable	<p><b>Test Methods: MAT</b>  <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
<ul style="list-style-type: none"> <li>602.3 (Support Docs)</li> </ul> <p><b>1.3.1 Info and Relationships</b> (Level A)</p> <p>Also applies to:                      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: TBT; SRT; MAT; UBT</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>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> <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>Exceptions:</b></p> <ul style="list-style-type: none"> <li>HTML Editor menus don't open on an iOS device with VoiceOver enabled. As a workaround, users can simplify their text editing experience by turning off the HTML Editor in Account Settings.</li> <li>In Quizzes, the matching question type can be challenging to use for a blind learner. The learner must independently remember the numbering methodology and options than apply an answer accordingly. As a workaround, you may wish to advise instructors not to use this question type.</li> <li>In Annotations, the ability to add freehand annotated material is only visually related to the underlying content. As a workaround, instructors may</li> </ul>

Criteria	Conformance Level	Remarks and Explanations
		choose to provide feedback in a different format such as an audio note or text. <ul style="list-style-type: none"> <li>In Quizzes, the Statistics page uses a layout table to display graphical information that is not accessible to non-visual users.</li> </ul>
<a href="#">1.3.2 Meaningful Sequence</a> (Level A) Also applies to: 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: SRT; UBT</b> <b>Features</b> <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>
<a href="#">1.3.3 Sensory Characteristics</a> (Level A) Also applies to: 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> <b>Features</b> <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>
<a href="#">1.4.1 Use of Color</a> (Level A) Also applies to: 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: CCT: Grayscale bookmarklet</b> <b>Features</b> <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> <li>The Grades tool allows grade ranges to be associated with colors and symbols. Text is also required.</li> </ul>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <li>Users control their own content.</li> </ul> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>In Assignments and Grades, landing pages have tables that use shading alone to indicate new sections or categories.</li> <li>In the Pulse learner app, some input fields use color alone to indicate errors.</li> </ul>
<p><a href="#">1.4.2 Audio Control</a> (Level A)</p> <p>Also applies to:            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>	Not Applicable	<b>Test Methods: MAT</b> <b>Features</b> <ul style="list-style-type: none"> <li>However, users control their own content.</li> <li>Brightspace does not use audio alerts.</li> </ul>
<p><a href="#">2.1.1 Keyboard</a> (Level A)</p> <p>Also applies to:            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	<b>Test Methods: MAT: Keyboard + visual focus; SRT; UBT</b> <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>Exception:</b> <ul style="list-style-type: none"> <li>In Annotations, not all controls and options for creating annotated content can be made accessible via the keyboard. As a workaround, instructors may</li> </ul>



Criteria	Conformance Level	Remarks and Explanations
		choose to provide feedback in a different format such as an audio note or text.
<b><u>2.1.2 No Keyboard Trap</u></b> (Level A) Also applies to: 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; Keyboard; SRT; UBT</b> <b>Features</b> No keyboard traps.
<b><u>2.1.4 Character Key Shortcuts</u></b> (WCAG 2.1 Level A)	Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>• Users activating controls using speech input are able to speak single input characters without accidentally activating some control.</li> <li>• Single character shortcut keys are not used and shortcut keys are active only on focus.</li> </ul>
<b><u>2.2.1 Timing Adjustable</u></b> (Level A) Also applies to: 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> <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>
<b><u>2.2.2 Pause, Stop, Hide</u></b> (Level A) Also applies to: 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> <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> </ul>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <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>
<p><b>2.3.1 Three Flashes or Below Threshold</b> (Level A)</p> <p>Also applies to:</p> <p>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 Yes.</b></p>
<p><b>2.4.1 Bypass Blocks</b> (Level A)</p> <p>Also applies to:</p> <p>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: Keyboard; SRT; TBT: Landmarks bookmarklet</b></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>2.4.2 Page Titled</b> (Level A)</p> <p>Also applies to:</p> <p>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>Each page has a title, heading 1 and ARIA main landmark.</li> <li>Users control their own content.</li> </ul>
<p><b>2.4.3 Focus Order</b> (Level A)</p> <p>Also applies to:</p> <p>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: MAT: Keyboard &amp; visual focus</b></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>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <li>In Assignments and Grades, the focus is lost when you sort a data grid by column.</li> </ul>
<b>2.4.4 Link Purpose (In Context)</b> (Level A) Also applies to: 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; SRT</b> <b>Features</b> <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>
<b>2.5.1 Pointer Gestures</b> (WCAG 2.1 Level A)	Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>Single-point actions can be used to operate any functionality that can be operated with a pointer.</li> <li>Path-based or multi-point gestures are not required to operate any functionality, except for gestures that are standard to the operating system.</li> </ul>
<b>2.5.2 Pointer Cancellation</b> (WCAG 2.1 Level A)	Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>Drag-and-drop interactions can be cancelled by clicking outside the drop target.</li> </ul>
<b>2.5.3 Label in Name</b> (WCAG 2.1 Level A)	Partially Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>In the HTML Editor, the resize button at the bottom right of the editor does not have a label.</li> <li>In the Pulse learner app, the button to launch the course home page is incorrectly labeled "iconMore".</li> <li>In Content, the dialog for uploading a video or audio topic has an incorrectly labelled Save button. It reads the button as unavailable even when the form is completed correctly and save is available.</li> </ul>
<b>2.5.4 Motion Actuation</b> (WCAG 2.1 Level A)	Supports	<b>Test Methods: TBT; MAT; UBT</b>

Criteria	Conformance Level	Remarks and Explanations
		<b>Features</b> <ul style="list-style-type: none"> <li>No function of our mobile apps relies on motion for actuation.</li> </ul>
<b>3.1.1 Language of Page</b> (Level A) Also applies to: 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; SRT</b> <b>Features</b> <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>
<b>3.2.1 On Focus</b> (Level A) Also applies to: 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; SRT</b> <b>Features</b> 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.
<b>3.2.2 On Input</b> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> </ul>	Supports	<b>Test Methods: MAT; SRT</b>
<b>3.3.1 Error Identification</b> (Level A) Also applies to: 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; SRT</b> <b>Features</b> 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.
<b>3.3.2 Labels or Instructions</b> (Level A) Also applies to: 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; SRT</b> <b>Features</b> <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>

Criteria	Conformance Level	Remarks and Explanations
<b>4.1.1 Parsing</b> (Level A) Also applies to: 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 <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>
<b>4.1.2 Name, Role, Value</b> (Level A) Also applies to: 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: TBT; SRT</b> <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>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>
<b>4.1.3 Status Messages</b> (WCAG 2.1 Level A)	Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>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.</li> <li>Screen reader users get audio alerts.</li> </ul>

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

Notes:

Criteria	Conformance Level	Remarks and Explanations
<b>1.2.4 Captions (Live)</b> (Level AA) Also applies to: 2017 Section 508	Supports	<b>Test Methods: MAT</b> <b>Not applicable.</b> <ul style="list-style-type: none"> <li>Time-based media are not a part of the LMS.</li> </ul>

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>• Users control the content they produce.</li> </ul>
<p><b><u>1.2.5 Audio Description (Prerecorded)</u></b> (Level AA)</p> <p>Also applies to: 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> <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>1.3.4 Orientation</u></b> (WCAG 2.1 Level AA)</p>	Supports	<p><b>Test Methods: TBT; MAT</b> <b>Features</b></p> <ul style="list-style-type: none"> <li>• When a page or app is opened on a mobile device, it is presented in the device’s current display orientation.</li> <li>• When the device is rotated, the content adjusts to the new display orientation.</li> </ul>
<p><b><u>1.3.5 Identify Input Purpose</u></b> (WCAG 2.1 Level AA)</p>	Supports	<p><b>Test Methods: TBT; MAT</b> <b>Features</b></p> <ul style="list-style-type: none"> <li>• Auto-complete is supported for input components in forms involving users’ personal information to enable them to identify the input purpose.</li> </ul>
<p><b><u>1.4.3 Contrast (Minimum)</u></b> (WCAG 2.1 Level AA)</p> <p>Also applies to: 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>Methods: TBT; CCT; SMT; UBT</b></p> <ul style="list-style-type: none"> <li>• Foreground to background contrast adheres to standards.</li> <li>• Our standard text elements now have a 7:1 contrast on a white background (level AAA compliance)</li> <li>• Users control their own content</li> </ul>
<p><b><u>1.4.4 Resize text</u></b> (WCAG 2.1 Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> </ul>	Supports	<p><b>Test Methods: TBT; CCT; SMT; UBT</b> <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> </ul>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> <li>602.3 (Support Docs)</li> </ul>		<ul style="list-style-type: none"> <li>All product functionalities perform well at this zoom level.</li> <li>Users control their own content.</li> </ul> <b>Exception:</b> <ul style="list-style-type: none"> <li>The new Portfolio tool does not respect Account Setting preferences for font size. As a workaround you may use third-party plugins or zooming to adjust font size.</li> </ul>
<p><a href="#">1.4.5 Images of Text</a> (Level AA)        Also applies to:        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	<b>Test Methods: MAT; SRT</b> <b>Features</b> <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>
<p><a href="#">1.4.10 Reflow</a> (WCAG 2.1 Level AA)</p>	Partially Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind.</li> <li>We have a best-in-class responsive solution for Brightspace web and award-winning mobile apps.</li> <li>Pages mostly reflow when the viewport is set to smaller phone sizes.</li> </ul> <b>Exceptions:</b> <ul style="list-style-type: none"> <li>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.</li> <li>In Assignments, the page for viewing and grading assignment submissions does not resize down to mobile portrait sizes. As a workaround use landscape mode if possible.</li> </ul>
<p><a href="#">1.4.11 Non-text Contrast</a> (WCAG 2.1 Level AA)</p>	Partially Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <li>Active user interface components have a contrast ratio of 3:1 with the background.</li> </ul> <b>Exception:</b> <ul style="list-style-type: none"> <li>In Manager Dashboard, the calendar picker for selecting dates does not have sufficient contrast between non-text elements.</li> </ul>
<b>1.4.12 Text Spacing</b> (WCAG 2.1 Level AA)	Partially Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind.</li> <li>When text spacing is adjusted, content does not get cut off or overlap on most pages.</li> </ul> <b>Exception:</b> <ul style="list-style-type: none"> <li>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.</li> </ul>
<b>1.4.13 Content on Hover or Focus</b> (WCAG 2.1 Level AA)	Supports	<b>Test Methods: TBT; MAT; UBT</b> <b>Features</b> <ul style="list-style-type: none"> <li>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.</li> </ul>
<b>2.4.5 Multiple Ways</b> (Level AA) Also applies to: 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: MAT: Inspection</b> <b>Features</b> <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> </ul>



Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <li>Users control their own content.</li> </ul>
<b>2.4.6 Headings and Labels</b> (Level AA) Also applies to: 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; UBT</b> <b>Features</b> <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>
<b>2.4.7 Focus Visible</b> (Level AA) Also applies to: 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: Keyboard + visual focus</b> <b>Features</b> <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>
<b>3.1.2 Language of Parts</b> (Level AA) Also applies to: 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: Language bookmarkelt</b> <b>Features</b> <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>
<b>3.2.3 Consistent Navigation</b> (Level AA) Also applies to: 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: MAT: Inspection; SRT ; SMT</b> <b>Features</b> <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) Also applies to: 2017 Section 508	Supports	<b>Test Methods: SRT ; SMT</b> <b>Features</b>

Criteria	Conformance Level	Remarks and Explanations
<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>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>
<p><b>3.3.3 Error Suggestion</b> (Level AA)</p> <p>Also applies to: 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: Inspection; SR; SM</b></p> <p><b>Features</b></p> <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>
<p><b>3.3.4 Error Prevention (Legal, Financial, Data)</b> (Level AA)</p> <p>Also applies to: 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: Inspection</b></p> <p><b>Not applicable</b></p>

### 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 <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>• In Assginments and Grades, the focus is lost when you sort a data grid by column.</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 <b>Features</b> <ul style="list-style-type: none"> <li>• All product functionalities perform well at 200% zoom level.</li> </ul>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <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	<p><b>Features</b></p> <ul style="list-style-type: none"> <li>Colour alone is not used to convey information.</li> </ul> <p><b>Exceptions</b></p> <ul style="list-style-type: none"> <li>In Assignments and Grades, landing pages have tables that use shading alone to indicate new sections or categories.</li> <li>In the Pulse learner app, some input fields use color alone to indicate errors.</li> </ul>
302.4 Without Hearing	Supports	<p><b>Features</b></p> <ul style="list-style-type: none"> <li>No auditory alerts are used.</li> </ul>
302.5 With Limited Hearing	Supports	<p><b>Features</b></p> <ul style="list-style-type: none"> <li>No auditory alerts are used.</li> </ul>
302.6 Without Speech	Not applicable	<p><b>Not applicable</b></p> <ul style="list-style-type: none"> <li>Speech input is not required.</li> </ul>
302.7 With Limited Manipulation	Supports	<p>Supports when combined with Compatible Assistive Technology</p> <p><b>Features</b></p> <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> </ul>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> <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>

## Chapter 4: Hardware

Notes: Deleted. Not applicable.

## Chapter 5: Software

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
<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.

Criteria	Conformance Level	Remarks and Explanations
		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.
<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	
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.

Criteria	Conformance Level	Remarks and Explanations
		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 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.
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 <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

Criteria	Conformance Level	Remarks and Explanations
<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 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.
<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, are available on D2L’s public website <a href="https://documentation.brightspace.com">https://documentation.brightspace.com</a> .
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’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.



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