

D2L Accessibility Conformance Report – WCAG 2.1 AAA – March 2020

(Based on VPAT® Version 2.4)

Name of Product/Version: Brightspace CORE 20.20.x

Product Description: Learning Management System

Date: March 31, 2020

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Notes: This version of our Accessibility Conformance Report (ACR) as of March 31, 2020 reports our conformance with WCAG 2.1 at Levels A and AA based on the [VPAT® Version 2.4 WCAG](#) template published by the Information Technology Industry Council (ITIC) in February 2020. This report supersedes our ACR of September 2019.

Introduction: We [report publicly](#) on how the accessibility level of our products and processes align with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards. Internally, we commit ourselves to align with Level AAA of WCAG 2.1 standards. Accessibility is not a checklist at D2L; it is a commitment to empower and engage individuals in their learning goals. It is about providing an equitable user experience to users with disabilities by including considerations at every stage of development. We work closely with our clients to develop comprehensive solutions that are flexible to the individual needs of institutions, instructors and learners. We offer products that make it easy for users to navigate, understand, and respond to learning materials and activities using the assistive technologies that support their needs. Accessibility best practices are built into our design and development processes. As part of quality assurance, our products are checked for compliance with the most up-to-date accessibility standards based on the Web Content Accessibility Guidelines (WCAG) 2.1 Levels A, AA and AAA). Points of non-compliance are transparently reported as exceptions in our WCAG checklist. These exceptions are raised as high priority software defects and scheduled/remediated as such in our backlog. Our public WCAG checklist is updated periodically to reflect the latest position.

Evaluation Methods: 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 to test with a variety of assistive technologies such as multiple screen readers, screen magnifiers, speech input, and switch access. Key test methods used are listed below, with acronym legends. These acronyms are referenced in the Remarks and Explanations column to indicate how we tested for each of the WCAG 2.1 success criteria and are repeated in the page footer for easy reference.

- **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, Firefox & Chrome; NVDA/Firefox & 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; Inspection
- **UBT** – User-Based Testing: Testing with Users with Disabilities in-house and through partnership with a third-party company.

Applicable Standards/Guidelines

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

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes)

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

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A)</p>	<p>Partially Supports</p>	<p>Test methods: TBT; SRT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • Text alternatives are provided for non-text content that is used as part of the LMS such as images and icons. • 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. • Controls and input fields have descriptive, contextual labels or title attributes. <p>Exceptions:</p> <ul style="list-style-type: none"> • 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. • 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.
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A)</p>	<p>Not applicable</p>	<ul style="list-style-type: none"> • Time-based media are not a part of the LMS. • Users control the content they produce.

Criteria	Conformance Level	Remarks and Explanations
<u>1.2.2 Captions (Prerecorded)</u> (Level A)	Not applicable	<ul style="list-style-type: none"> Time-based media are not a part of the LMS. However, authoring support is provided as described below. Users control the content they produce. <p>Authoring Support Features:</p> <ul style="list-style-type: none"> Upload of captions with videos by instructors is supported. When users upload video files to the Content tool, video topics render using a fully accessible video player. This video player supports the ability to upload SRT files that play as closed captions. The Video Note™ feature supports captions, audio descriptions and transcripts. Captions are generated automatically and can be edited by the owner. <p>Exceptions in authoring support:</p> <ul style="list-style-type: none"> In ePortfolio, video upload through “quick reflect” does not prompt users for captions. In the Pulse learner app, the video player does not offer the option to enable captions.
<u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)	Not applicable	<ul style="list-style-type: none"> Time-based media are not a part of the LMS. Users control the content they produce.
<u>1.3.1 Info and Relationships</u> (Level A)	Partially Supports	<p>Test Methods: TBT; SRT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways. Assistive technologies can programmatically determine the information, structure and relationships conveyed through presentation. Headings and ARIA landmarks are used to help convey presentation. Links and images are unique and contextual making it easy for users to navigate options. Tables mostly use row and column headers. Table headers use scope attribute where appropriate.

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> • ARIA is used to communicate context menus, dynamic page changes and alerts. When pop-up window option is selected instead of modal dialogs, pages are rendered linear and read clearly without style sheets. • ARIA expanded/collapsed markup is not used to indicate menu states. This state is communicated through link names instead. • Brightspace does not use image maps. <p>Exceptions:</p> <ul style="list-style-type: none"> • 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. • 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. • In Annotations, the ability to add freehand annotated material is only visually related to the underlying content. As a workaround, instructors may choose to provide feedback in a different format such as an audio note or text. • In Quizzes, the Statistics page uses a layout table to display graphical information that is not accessible to non-visual users.
1.3.2 Meaningful Sequence (Level A)	Supports	<p>Test Methods: SRT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways. • Headings and ARIA landmarks are used to help convey relationships between content. • Pages are linear and read clearly without style sheets.
1.3.3 Sensory Characteristics (Level A)	Supports	<p>Test Methods: MAT</p> <p>Features:</p>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> 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.).
<p>1.4.1 Use of Color (Level A)</p>	<p>Partially Supports</p>	<p>Test Methods: CCT: Grayscale bookmarklet</p> <p>Features:</p> <ul style="list-style-type: none"> Information conveyed through font styling or color is also communicated through language. Electronic forms use standard HTML mark-up and item labeling. ePortfolio themes provide several color options. Invisible spans are added to provide “selected” text to areas. When color is used for warning and confirmation messages, the associated text communicates meaning clearly on its own. Tool menus and tabs use highlighting to indicate current location. This information is also communicated by headings and selected states The Grades tool allows grade ranges to be associated with colors and symbols. Text is also required. Users control their own content. <p>Exceptions:</p> <ul style="list-style-type: none"> In the Pulse learner app, some input fields use color alone to indicate errors.
<p>1.4.2 Audio Control (Level A)</p>	<p>Not Applicable</p>	<ul style="list-style-type: none"> Brightspace does not use audio. Users control their own content.
<p>2.1.1 Keyboard (Level A)</p>	<p>Partially Supports</p>	<p>Test Methods: MAT; SRT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> Forms are accessible by keyboard and assistive technologies. Some forms use a combination of fields, buttons, inline help, and links. Some menu lists require navigation using the tab key rather than the arrow keys – the more commonly expected keyboard behavior. The Form Elements administrative tool is challenging to use without a mouse.

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> 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. The Equation Editor is keyboard accessible. It produces standards-compliant equations using MathML. But in editing mode, screen reader users cannot discern the equation structure. Users control their own content. <p>Exception:</p> <ul style="list-style-type: none"> In Annotations, not all controls and options for creating annotated content can be accessed via the keyboard. As a workaround, instructors may choose to provide feedback in a different format such as an audio note or text.
2.1.2 No Keyboard Trap (Level A)	Supports	<p>Test Methods: MAT; SRT; UBT</p> <p>Features: Keyboard users have a way to exit from all modal dialogues and widgets using only their keyboard.</p>
2.1.4 Character Key Shortcuts (Level A)	Supports	<p>Test Methods: TBT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> Users activating controls using speech input are able to speak single input characters without accidentally activating some control. Single character shortcut keys are not used and shortcut keys are active only on focus.
2.2.1 Timing Adjustable (Level A)	Supports	<p>Test Methods: MAT</p> <p>Features:</p> <ul style="list-style-type: none"> Users can refresh data in the Chat, Discussions, and Pager tool at their own pace. Some tools, such as Quizzes, support time limits. Users are warned before their time expires. Alternative time limits (Special Access) can be set for specific users.

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> Institutions set time-out limits for inactive users. The system warns users before their session expires.
<u>2.2.2 Pause, Stop, Hide</u> (Level A)	Supports	<p>Test Methods: MAT Features:</p> <ul style="list-style-type: none"> Only essential animations are provided such as in examples given below. <ul style="list-style-type: none"> Progress animations are used to indicate progress/status of content where users might be confused or misled if the status wasn't indicated. Short animations are used to help users understand transitions in the interface – such as unpinning a course from the “my courses” widget. Auto-updating is used in some tools, such as the Chat tool, where users need to be aware of new information. Settings are available to turn off auto-refreshes.
<u>2.3.1 Three Flashes or Below Threshold</u> (Level A)	Supports	<p>Test Methods: MAT: Inspection Features:</p> <ul style="list-style-type: none"> No flashing content in the system. Users control their own content.
<u>2.4.1 Bypass Blocks</u> (Level A)	Supports	<p>Test Methods: MAT: Keyboard; SRT; TBT: Landmarks bookmarklet Features:</p> <ul style="list-style-type: none"> Skip to main content links, headings and ARIA landmarks help users avoid repetitive and non-essential content. The expanded/collapsed state of secondary form content is clearly indicated and the fields are accessible. Users control their own content.
<u>2.4.2 Page Titled</u> (Level A)	Supports	<p>Test Methods: MAT Features:</p> <ul style="list-style-type: none"> Each page has a title, heading 1 and ARIA main landmark. Users control their own content.
<u>2.4.3 Focus Order</u> (Level A)	Partially Supports	<p>Test Methods: MAT; UBT Features:</p>

Criteria	Conformance Level	Remarks and Explanations
		<ul style="list-style-type: none"> Each page has a logical tab order and visible tab stops. Users control their own content. <p>Exception:</p> <ul style="list-style-type: none"> In Assignments and Grades, the focus is lost when you sort a data grid by column.
<p>2.4.4 Link Purpose (In Context) (Level A)</p>	<p>Supports</p>	<p>Test Methods: MAT; SRT</p> <p>Features:</p> <ul style="list-style-type: none"> Links are unique and contextual, usually in the format [action] [applicable item]. Users control their own content.
<p>2.5.1 Pointer Gestures (Level A)</p>	<p>Supports</p>	<p>Test Methods: TBT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> Single-point actions can be used to operate any functionality that can be operated with a pointer. Path-based or multi-point gestures are not required to operate any functionality, except for gestures that are standard to the operating system.
<p>2.5.2 Pointer Cancellation (Level A)</p>	<p>Supports</p>	<p>Test Methods: TBT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> Drag-and-drop interactions can be cancelled by clicking outside the drop target.
<p>2.5.3 Label in Name (Level A)</p>	<p>Partially Supports</p>	<p>Test Methods: TBT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> All icons used in the LMS are assigned labels that clearly indicate their functionality to non-visual users. Visible labels fully or partially match hidden system labels to facilitate access by speech input users. <p>Exception:</p> <ul style="list-style-type: none"> In the HTML Editor, the resize button at the bottom right of the editor does not have a label.

Criteria	Conformance Level	Remarks and Explanations
2.5.4 Motion Actuation (Level A)	Supports	Test Methods: TBT; MAT; UBT Features: <ul style="list-style-type: none"> No function of our mobile apps relies on motion for actuation.
3.1.1 Language of Page (Level A)	Supports	Test Methods: TBT; SRT Features: <ul style="list-style-type: none"> Language of content is notified at start of page and when changed within page. Users control their own content.
3.2.1 On Focus (Level A)	Supports	Test Methods: MAT; SRT Features: <ul style="list-style-type: none"> Visible on-focus states are used with a combination of colour and border effect to highlight the focused elements. These are built into our controls and defined into our design patterns. Focus states are designed both for keyboard operation and for mouse operation. Exception: <ul style="list-style-type: none"> In the New Learner Experience, focus is not visible when navigating the items using a keyboard on the End of Unit page.
3.2.2 On Input (Level A)	Supports	Test Methods: MAT; SRT Features: <ul style="list-style-type: none"> Users are made aware when link target opens in a new window. Action is not initiated after user enters data or selects form controls until user clicks the appropriate button.
3.3.1 Error Identification (Level A)	Supports	Test Methods: TBT; SRT Features: <ul style="list-style-type: none"> 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.

Criteria	Conformance Level	Remarks and Explanations
3.3.2 Labels or Instructions (Level A)	Supports	Test Methods: TBT; SRT Features: <ul style="list-style-type: none"> Forms have clear headings, labels, field sets, and buttons. Inline help is provided as needed. The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible.
4.1.1 Parsing (Level A)	Supports	Test Methods: TBT Features: <ul style="list-style-type: none"> Web pages are written to HTML5 specifications. Users control their own content.
4.1.2 Name, Role, Value (Level A)	Partially Supports	Test Methods: TBT; SRT Features: <ul style="list-style-type: none"> Controls are developed and validated against HTML specifications and standards, including ARIA.
4.1.3 Status Messages (Level A)	Supports	Test Methods: TBT; MAT; UBT Features: <ul style="list-style-type: none"> Users are made aware of important changes in content that are not given focus through inline or toast alerts. These alerts do not interrupt users' work. Screen reader users get audio alerts.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not applicable	<ul style="list-style-type: none"> Time-based media are not a part of the LMS. Users control the content they produce.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not applicable	<ul style="list-style-type: none"> Time-based media are not a part of the LMS. Users control the content they produce.
1.3.4 Orientation (Level AA)	Supports	Test Methods: TBT; MAT

		<p>Features:</p> <ul style="list-style-type: none"> • When a page or app is opened on a mobile device, it is presented in the device’s current display orientation. • When the device is rotated, the content adjusts to the new display orientation.
<u>1.3.5 Identify Input Purpose</u> (Level AA)	Supports	<p>Test Methods: TBT; MAT</p> <p>Features:</p> <ul style="list-style-type: none"> • Auto-complete is supported for input components in forms involving users’ personal information to enable them to identify the input purpose.
<u>1.4.3 Contrast (Minimum)</u> (Level AA)	Supports	<p>Test Methods: TBT; CCT; SMT; UBT</p> <ul style="list-style-type: none"> • Foreground to background contrast adheres to standards. • Our standard text elements now have a 7:1 contrast on a white background at level AAA compliance. • Users control their own content.
<u>1.4.4 Resize text</u> (Level AA)	Partially Supports	<p>Test Methods: TBT; CCT; SMT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • User account settings are available for adjusting font face and size. • Icons and text resize with browser (and other technology) scaling/zooming options up to 200%. • All product functionalities perform well at this zoom level. • Users control their own content. <p>Exception:</p> <ul style="list-style-type: none"> • 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.
<u>1.4.5 Images of Text</u> (Level AA)	Supports	<p>Test Methods: MAT; SRT</p> <p>Features:</p> <ul style="list-style-type: none"> • Images of text are not used. • Equations authored in D2L’s Equation Editor are stored as MathML and output as MathML in browsers where supported. • Users control their own content.

<p>1.4.10 Reflow (Level AA)</p>	<p>Partially Supports</p>	<p>Test Methods: TBT; MAT; UBT Features:</p> <ul style="list-style-type: none"> • Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind. • We have a best-in-class responsive solution for Brightspace web and award-winning mobile apps. • Pages mostly reflow when the viewport is set to smaller phone sizes. <p>Exceptions:</p> <ul style="list-style-type: none"> • We have prioritized our responsive design updates based on usage and persona (learners and instructors first). There are infrequently used tools and administrative workflows where content might not reflow automatically.. • 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.
<p>1.4.11 Non-text Contrast (Level AA)</p>	<p>Partially Supports</p>	<p>Test Methods: TBT; MAT; UBT Features:</p> <ul style="list-style-type: none"> • Active user interface components have a contrast ratio of 3:1 with the background. <p>Exception:</p> <ul style="list-style-type: none"> • In Manager Dashboard, the calendar picker for selecting dates does not have sufficient contrast between non-text elements.
<p>1.4.12 Text Spacing (Level AA)</p>	<p>Partially Supports</p>	<p>Test Methods: TBT; MAT; UBT Features:</p> <ul style="list-style-type: none"> • Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind. • When text spacing is adjusted, content does not get cut off or overlap on most pages. <p>Exception:</p> <ul style="list-style-type: none"> • 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.
<u>1.4.13 Content on Hover or Focus</u> (Level AA)	Supports	<p>Test Methods: TBT; MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • 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.
<u>2.4.5 Multiple Ways</u> (Level AA)	Supports	<p>Test Methods: MAT</p> <p>Features:</p> <ul style="list-style-type: none"> • Headings, ARIA landmarks (such as navigation landmarks) and unique link and button names help users navigate pages quickly. • Pages have consistent navigation areas. • Many pages contain search fields with ARIA search landmarks. • The system works well with search and find features built into assistive technologies. • Users control their own content.
<u>2.4.6 Headings and Labels</u> (Level AA)	Supports	<p>Test Methods: MAT; SRT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • Pages have descriptive headings and labels. Labels are unique and contextual. • Users control their own content.
<u>2.4.7 Focus Visible</u> (Level AA)	Supports	<p>Test Methods: MAT; UBT</p> <p>Features:</p> <ul style="list-style-type: none"> • Each page has a logical tab order and visible tab stops. • Links and fields have extra highlighting, beyond browser defaults.
<u>3.1.2 Language of Parts</u> (Level AA)	Supports	<p>Test Methods: TBT</p> <p>Features:</p> <ul style="list-style-type: none"> • 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.

		<ul style="list-style-type: none"> Users control their own content.
3.2.3 Consistent Navigation (Level AA)	Supports	Test Methods: MAT: Inspection; SRT; SMT; UBT Features: <ul style="list-style-type: none"> Navigation models are consistent across tools and use headings and ARIA navigation landmarks to help orient users.
3.2.4 Consistent Identification (Level AA)	Supports	Test Methods: SRT; SMT; UBT Features: <ul style="list-style-type: none"> Icons use an icon grammar to facilitate learning. The same icon is used for the same action across all tools. Users may combine concepts they already understand to interpret new icons.
3.3.3 Error Suggestion (Level AA)	Supports	Test Methods: MAT: Inspection; SR; SM Features: <ul style="list-style-type: none"> Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. Where possible, error messages describe each error and link to the appropriate field for resolving the error.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not applicable	<ul style="list-style-type: none"> No legal or financial data is used.

About D2L

D2L’s technology is currently being used by customers in [K-12](#), [higher education](#), healthcare, government, and the [enterprise](#) sector. In 21 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. All other trademarks are property of their respective owners.*

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