

# D2L Accessibility Conformance Report – WCAG 2.2 – October 5, 2023

(Based on VPAT® Version 2.4)

**Name of Product/Version:** Brightspace CORE 20.23.x

**Product Description:** Learning Management System

**Date:** October 5, 2023

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**Notes:** This version of D2L's Accessibility Conformance Report (ACR) dated October 5, 2023 reports conformance with WCAG 2.2, the latest version of Web Content Accessibility Guidelines published by the World Wide Web Consortium (W3C) on October 5, 2023, at levels A, AA, and AAA for Brightspace Core and allied mobile apps based on the VPAT® Version 2.4 WCAG template published by the Information Technology Industry Council (ITIC) in March 2022. This template is selected because the regulatory requirements under Section 508 and EU EN 320 549 do not yet require WCAG 2.2. This report coexists with our Brightspace Core Accessibility Conformance Report (International) covering WCAG 2.1, Section 508 and EN 301 549 as of March 31, 2023.

## Introduction:

We report publicly on how the accessibility level of our products align with the W3C's Web Content Accessibility Guidelines (WCAG) 2.2 Level AAA standards while regulatory requirements expect compliance limited to the A and AA levels. For us, accessibility is not a checklist; it is a commitment to empower and engage individuals in their learning goals. It is about providing an equitable user experience to users with disabilities by including considerations at every stage of development. We work closely with our clients to develop comprehensive solutions that are flexible to the individual needs of institutions, instructors and learners. We offer products that make it easy for users to navigate, understand, and respond to learning materials and activities using the assistive technologies that support their needs.

Accessibility best practices are built into our design and development processes. As part of quality assurance, our products are checked for conformance with the most up-to-date accessibility standards, currently the Web Content Accessibility Guidelines (WCAG) 2.2 Levels A, AA and AAA. Points of non-compliance are transparently reported as exceptions in our WCAG checklist. These exceptions are raised as high priority software defects in backlog and scheduled/remediated as such. Updated versions of Accessibility Conformance Reports are published periodically.

## Evaluation Methods Used:

D2L’s designers build and maintain design patterns and component specifications with accessibility and consistency in mind. Engineers 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 engineers. 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. D2L’s in-house user experience tester who is blind and uses a screen reader works with UI researchers and designers in the initial stages of design and checks the products for user experience before release.

We also partner with a third-party accessibility testing company for our accessibility research, design consultation and user testing to recruit users via their cloud-based platform from their community of people with disabilities using a variety of assistive technologies such as multiple screen readers, screen magnifiers, speech input, and switch access devices. Key test methods used are listed below, with acronym legends. These acronyms are referenced in the Remarks and Explanations column to indicate how we tested for each of the WCAG 2.2 success criteria and are repeated in the page footer for easy reference. Version numbers indicate the limits within which we have tested and not the only versions tested.

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

## Applicable Standards/Guidelines

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

| Standard/Guideline                              | Included In Report                                 |
|---|--|
| <u>Web Content Accessibility Guidelines 2.2</u> | Level A (Yes)<br>Level AA (Yes)<br>Level AAA (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 2.2 Level AAA.

## WCAG 2.2 Report

Note: When reporting on conformance with the WCAG 2.2 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 2.2](#).

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

Notes:

| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
| <p><b>1.1.1 Non-text Content</b> (Level A)</p>                        | <p>Supports</p>   | <p><b>Test methods: TBT; SRT; UBT</b><br/> <b>Features:</b></p> <ul style="list-style-type: none"> <li>• Images and icons are provided with text alternative to inform users with visual impairments, in audio or braille, of the intent and purpose of such non-text elements through their screen readers or similar assistive technologies.</li> <li>• Controls and input fields have descriptive, contextual labels or title attributes.</li> <li>• Infographics and other large image files are included inside an HTML file with appropriate alternative description.</li> <li>• The HTML editor’s “Insert Stuff” option is used to insert images into quiz questions and provide alt text.</li> <li>• Screen reader users can view the source code editor to get information about text styles applied in the Brightspace Editor.</li> <li>• Instructors are provided choices for providing assessment feedback in different modalities such as visual, audio, video, text, etc. Those who want to use visual modality can use the Annotations tool, which can be enabled or disabled at the course level.</li> </ul> |
| <p><b>1.2.1 Audio-only and Video-only (Prerecorded)</b> (Level A)</p> | <p>Supports</p>   | <p><b>Test Methods: MAT</b><br/> <b>Not applicable.</b></p>  |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--------------------|--|
|   |                    | <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>   |
| <b>1.2.2 Captions (Prerecorded)</b> (Level A)                               |                    | <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>When users upload video files to the Media Library, closed captions can be generated automatically or uploaded or entered. Owners can edit the captions.</li> <li>Video topics render using a fully accessible video player which supports the ability to download the transcript and captions.</li> <li>The Video Note™ feature in the HTML editor enables recording of videos and generates automated captions that can be edited by the owner.</li> <li>The new Lessons Create Experience within the New Content Experience provides a Manage Captions interface for video and audio files added to Lessons.</li> </ul> |
| <b>1.2.3 Audio Description or Media Alternative (Prerecorded)</b> (Level A) | Not applicable     | <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>  |
| <b>1.3.1 Info and Relationships</b> (Level A)                               | Partially Supports | <p><b>Test Methods: TBT; SRT; MAT; UBT</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> </ul>  |

| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
|   |                   | <ul style="list-style-type: none"> <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>• Image maps are not used.</li> </ul> |
| <p><b>1.3.2 Meaningful Sequence</b> (Level A)</p>     | <p>Supports</p>   | <p><b>Test Methods: SRT; UBT</b></p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>• The content on our LMS is created 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>1.3.3 Sensory Characteristics</b> (Level A)</p> | <p>Supports</p>   | <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.</li> <li>• Textual equivalents may be visible or hidden (alt text, titles, ARIA alerts, etc.).</li> </ul>   |
| <p><b>1.4.1 Use of Color</b> (Level A)</p>            | <p>Supports</p>   | <p><b>Test Methods: CCT: Grayscale bookmarklet</b></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> </ul>  |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
|   |                   | <ul style="list-style-type: none"> <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> <li>Users control their own content.</li> </ul>  |
| <b>1.4.2 Audio Control</b> (Level A)                    | Not Applicable    | <b>Test Methods: MAT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>Brightspace does not use audio alerts.</li> <li>Users control their own content.</li> </ul>   |
| <b>2.1.1 Keyboard</b> (Level A)                         | Supports          | <b>Test Methods: MAT: Keyboard + visual focus; SRT; UBT</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 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>2.1.2 No Keyboard Trap</b> (Level A)                 | Supports          | <b>Test Methods: MAT: Keyboard; SRT; UBT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>No keyboard traps.</li> </ul>   |
| <b>2.1.4 Character Key Shortcuts</b> (WCAG 2.1 Level A) | Supports          | <b>Test Methods: TBT; MAT; UBT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>Single character shortcut keys are not used and shortcut keys are active only on focus.</li> </ul>  |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
|   |                   | <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> </ul>  |
| <b>2.2.1 Timing Adjustable</b> (Level A)                | Supports          | <p><b>Test Methods: MAT</b></p> <p><b>Features:</b></p> <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>2.2.2 Pause, Stop, Hide</b> (Level A)                | Supports          | <p><b>Test Methods: MAT</b></p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Essential animations are provided to give feedback about loading progress.</li> <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> </ul> |
| <b>2.3.1 Three Flashes or Below Threshold</b> (Level A) | Supports          | <p><b>Test Methods: MAT</b></p> <p>Yes. We adhere to this criterion.</p>  |
| <b>2.4.1 Bypass Blocks</b> (Level A)                    | 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> </ul>   |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
|  |                   | <ul style="list-style-type: none"> <li>Users control their own content.</li> </ul>  |
| <b>2.4.2 Page Titled</b> (Level A)                   | Supports          | <b>Test Methods: MAT; TBT: Landmarks bookmarklet</b><br><b>Features:</b> <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>   |
| <b>2.4.3 Focus Order</b> (Level A)                   | Supports          | <b>Test Methods: MAT: Keyboard &amp; visual focus</b><br><b>Features:</b> <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>  |
| <b>2.4.4 Link Purpose (In Context)</b> (Level A)     | Supports          | <b>Test Methods: MAT; SRT</b><br><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><br><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><br><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)        | Supports          | <b>Test Methods: TBT; MAT; UBT</b><br><b>Features:</b> <p>Programmatic labels provided to user interface components include all or part of the text that is presented as visual label (or the meaning represented by the icon) at the start to work well with voice input tools.</p>  |
| <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>   |
| <u><b>3.1.1 Language of Page</b></u> (Level A)           | Supports          | <b>Test Methods: TBT; SRT</b><br><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>  |
| <u><b>3.2.1 On Focus</b></u> (Level A)                   | Supports          | <b>Test Methods: MAT; SRT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>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.</li> </ul>                                     |
| <u><b>3.2.2 On Input</b></u> (Level A)                   | Supports          | <b>Test Methods: MAT; SRT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>Changing the setting of any UI component does not cause an unexpected change in the context automatically.</li> </ul>  |
| <u><b>3.2.6 Consistent Help</b></u> (Level A) [WCAG 2.2] | Supports          | <b>Test Methods: Inspection</b><br><b>Features</b> <ul style="list-style-type: none"> <li>Tool level help, when it's available, is consistently offered in the top-right corner of Brightspace pages.</li> <li>Other help links can be added to the navigation bar by permitted users, and the location is up to the user.</li> </ul> |
| <u><b>3.3.1 Error Identification</b></u> (Level A)       | Supports          | <b>Test Methods: TBT; SRT</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.</li> <li>Where possible, error messages describe each error and link to the appropriate field for resolving the error.</li> </ul>    |
| <u><b>3.3.2 Labels or Instructions</b></u> (Level A)     | Supports          | <b>Test Methods: TBT; SRT</b><br><b>Features:</b>   |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--------------------|--|
|   |                    | <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>  |
| <b>3.3.7 Redundant Entry</b> (Level A) [WCAG 2.2] | Supports           | <b>Test Methods: Inspection</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>System does not require re-entry of redundant information.</li> </ul>   |
| <b>4.1.1 Parsing</b> (Level A)                    | Supports           | <b>Test Methods: TBT: HTML CodeSniffer</b><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>  |
| <b>4.1.2 Name, Role, Value</b> (Level A)          | Supports           | <b>Test Methods: 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>4.1.3 Status Messages</b> (WCAG 2.1 Level A)   | Partially Supports | <b>Test Methods: TBT; MAT; UBT</b><br><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> <b>Exception:</b> <ul style="list-style-type: none"> <li>The Quiz Builder functionality to "Move To" items to the Top, Bottom or Sections does not announce changes with Screen Readers.</li> </ul> |

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

Notes:

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <b>1.2.4 Captions (Live)</b> (Level AA)                 | Not applicable    | <b>Test Methods: MAT</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>   |
| <b>1.2.5 Audio Description (Prerecorded)</b> (Level AA) | Not applicable    | <b>Test Methods: MAT</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>   |
| <b>1.3.4 Orientation</b> (WCAG 2.1 Level AA)            | Supports          | <b>Test Methods: TBT; MAT</b><br><b>Features:</b> <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>  |
| <b>1.3.5 Identify Input Purpose</b> (WCAG 2.1 Level AA) | Supports          | <b>Test Methods: TBT; MAT</b><br><b>Features:</b> <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>  |
| <b>1.4.3 Contrast (Minimum)</b> (WCAG 2.1 Level AA)     | Supports          | <b>Test Methods: TBT; CCT; SMT; UBT</b><br><b>Features:</b> <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>   |
| <b>1.4.4 Resize text</b> (WCAG 2.1 Level AA)            | Supports          | <b>Test Methods: TBT; CCT; SMT; UBT</b><br><b>Features:</b> <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 scaling/zooming options of browser (and other technology) up to 200%.</li> <li>All product functionalities perform well at this zoom level.</li> <li>Users control their own content.</li> </ul> |
| <b>1.4.5 Images of Text</b> (Level AA)                  | Supports          |   |

| Criteria   | Conformance Level         | Remarks and Explanations   |
|--|---------------------------|--|
|  |                           | <p><b>Test Methods:</b> MAT; SRT</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>  |
| <p><b>1.4.10 Reflow</b> (WCAG 2.1 Level AA)</p>            | <p>Partially Supports</p> | <p><b>Test Methods:</b> TBT; MAT; UBT</p> <p><b>Features:</b></p> <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> <p><b>Exception:</b></p> <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> </ul> |
| <p><b>1.4.11 Non-text Contrast</b> (WCAG 2.1 Level AA)</p> | <p>Supports</p>           | <p><b>Test Methods:</b> TBT; MAT; UBT</p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>• Active user interface components have a contrast ratio of 3:1 with the background.</li> </ul>   |
| <p><b>1.4.12 Text Spacing</b> (WCAG 2.1 Level AA)</p>      | <p>Partially Supports</p> | <p><b>Test Methods:</b> TBT; MAT; UBT</p> <p><b>Features:</b></p> <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 to accommodate changes in content size due to text spacing changes made by the user.</li> <li>• When text spacing is adjusted, content does not get cut off or overlap on most pages.</li> </ul> <p><b>Exception:</b></p>  |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
|  |                   | <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          | <p><b>Test Methods:</b> TBT; MAT; UBT</p> <p><b>Features:</b></p> <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)                            | Supports          | <p><b>Test Methods:</b> MAT: 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> |
| <b>2.4.6 Headings and Labels</b> (Level AA)                      | Supports          | <p><b>Test Methods:</b> MAT: Inspection; UBT</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>   |
| <b>2.4.7 Focus Visible</b> (Level AA)                            | Supports          | <p><b>Test Methods:</b> MAT: 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>  |
| <b>2.4.11 Focus Not Obscured (Minimum)</b> (Level AA) [WCAG 2.2] | Supports          | <p><b>Test Methods:</b> Inspection</p> <p><b>Features:</b></p>   |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
|  |                   | <ul style="list-style-type: none"> <li>Focus indicators are not obscured.</li> </ul>   |
| <b>2.5.7 Dragging Movements</b> Level (AA) [WCAG 2.2]    | Supports          | <b>Test Methods: SRT, KBT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>Workflows that require drag-and-drop with a mouse can also be completed using a keyboard.</li> </ul>  |
| <b>2.5.8 Target Size (Minimum)</b> Level (AA) [WCAG 2.2] | Supports          | <b>Test Methods: Inspection</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>All targets meet the minimum size requirements.</li> </ul>  |
| <b>3.1.2 Language of Parts</b> (Level AA)                | Supports          | <b>Test Methods: TBT: Language bookmarklet</b><br><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)            | Supports          | <b>Test Methods: MAT: Inspection; SRT; SMT</b><br><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)        | 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.</li> <li>The same icon is used for the same action across all tools.</li> <li>Users may combine concepts they already understand to interpret new icons.</li> </ul>   |
| <b>3.3.3 Error Suggestion</b> (Level AA)                 | 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.</li> </ul>  |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
|  |                   | <ul style="list-style-type: none"> <li>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)      | Not applicable    | <b>Features</b> <ul style="list-style-type: none"> <li>No legal commitments or financial transactions for the user.</li> </ul>  |
| <b>3.3.8 Accessible Authentication (Minimum)</b> Level (AA) [WCAG 2.2] | Supports          | <b>Test Methods:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>Authentication workflows do not cause cognitive load to the user.</li> </ul> |

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

Notes:

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <b>1.2.6 Sign Language (Prerecorded)</b> (Level AAA)              | Not applicable    | <b>Features:</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> |
| <b>1.2.7 Extended Audio Description (Prerecorded)</b> (Level AAA) | Not applicable    | <b>Features:</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> |
| <b>1.2.8 Media Alternative (Prerecorded)</b> (Level AAA)          | Not applicable    | <b>Features:</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> |
| <b>1.2.9 Audio-only (Live)</b> (Level AAA)                        | Not applicable    | <b>Features:</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> |
| <b>1.3.6 Identify Purpose</b> (Level AAA)                         | Supports          | <b>Testing Methods: Test Methods: MAT:</b> Inspection<br><b>Features:</b>   |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
|  |                   | <ul style="list-style-type: none"> <li>All icons are labeled so that users can perceive the functionality of each icon. Example: The envelope icon is labeled “Message alerts” (and not Envelope).</li> <li>ARIA landmarks are used to mark different regions in a page. This information is available to screen readers for conveying to users who cannot see the screen.</li> </ul>   |
| <b>1.4.6 Contrast Enhanced</b> (Level AAA)                     | Supports          | <p><b>Test Methods: CCT</b></p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Our standard text elements in the Brightspace Daylight design system have a contrast greater than 7:1 on a white background.</li> <li>Users control their own content.</li> </ul>  |
| <b>1.4.7 Low or No Background Audio</b> (Level AAA)            | Not applicable    | <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Brightspace does not use any audio background.</li> <li>Users control the content they produce.</li> </ul>   |
| <b>1.4.8 Visual Presentation</b> (Level AAA)                   | Supports          | <p><b>Test Methods: MAT: Inspection</b></p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Brightspace is compatible with most popular browser extensions to allow users to set their choice of foreground/background colors and text spacing.</li> <li>Icons and text resize with the scaling/zooming options of browser (and other technology) up to 200%.</li> <li>The default font size for all clients has been standardized to our "Medium" font setting. As part of personalized account settings, users can choose another default relative font size.</li> <li>Most pages have relative column widths.</li> <li>System text does not use full justification.</li> <li>System font sizes are adjustable.</li> <li>Users control their own content.</li> </ul> |
| <b>1.4.9 Images of Text (No Exception) Control</b> (Level AAA) | Supports          | <p><b>Test Methods: MAT: Inspection</b></p> <p><b>Features:</b></p>   |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--------------------|--|
|   |                    | <ul style="list-style-type: none"> <li>• Images of text are not used.</li> <li>• Users control their own content.</li> </ul>   |
| <b><u>2.1.3 Keyboard (No Exception)</u></b> (Level AAA) | Partially supports | <b>Test Methods: Manual: KBT</b><br><b>Exception:</b> <ul style="list-style-type: none"> <li>• All controls in key workflows are reachable using the keyboard. There could be some exceptions in infrequently used tools and administrative workflows.</li> </ul>  |
| <b><u>2.2.3 No Timing</u></b> (Level AAA)               | Supports           | <b>Test Methods: MAT: Inspection</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>• The Quizzes tool supports time-based assessments with the ability to define alternative access, such as alternative timing or no time, for users as needed.</li> <li>• Institutions have an option to set a time-out period. Users are warned before their session times-out.</li> <li>• Users control their own content.</li> </ul>   |
| <b><u>2.2.4 Interruptions</u></b> (Level AAA)           | Supports           | <b>Test Methods: MAT: Inspection</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>• Interruptions are designed only if and when applicable and meaningful to the activity in hand.</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>• The system uses ARIA alerts to indicate dynamic page changes so that users can choose the level of interruption they want.</li> <li>• Users control their own content.</li> </ul> |
| <b><u>2.2.5 Re-authenticating</u></b> (Level AAA)       | Supports           | <b>Test Methods: MAT: Inspection</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>• Users are prompted to reauthenticate before a session expires. Upon logging back in, the user lands at the same spot and can or cannot access what was previously available depending on the context and type of data.</li> </ul>  |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <b>2.2.6 Timeouts</b> (Level AAA)                    | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Controlled timeouts are implemented for timed assessments which allow auto-submission of quiz data at pre-determined time limits. Time limits are communicated to learners at the start of the assessment.</li> <li>Time limits are communicated to learners at the start of the assessment.</li> <li>Unsaved data is mostly retrievable after session expiry but there could be exceptions depending on the system.</li> </ul>   |
| <b>2.3.2 Three Flashes</b> (Level AAA)               | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>No flashing content in the system.</li> <li>Users control their own content.</li> </ul>   |
| <b>2.3.3 Animation from Interactions</b> (Level AAA) | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>If a user sets ‘reduced motion’ accessibility setting at the operating system level, then the software respects it.</li> <li>No non-essential animation is used.</li> <li>Essential animations are used sparingly in contexts where it would be helpful to some users. For example, subtle communication about the state of the page (such as loading indicators) or to help indicate where an item was placed on or removed from a page (such as an animation showing items reordering or being added to the bottom of a page).</li> <li>Nonvisual cues such as ARIA alerts are also available.</li> </ul> |
| <b>2.4.8 Location</b> (Level AAA)                    | Supports          | <p><b>Test Methods: MAT:</b> Inspection</p> <p><b>Features:</b></p> <ul style="list-style-type: none"> <li>Breadcrumb trails or ‘Back to’ buttons are used to inform users of their current location.</li> <li>Users control their own content.</li> </ul>   |

| Criteria   | Conformance Level | Remarks and Explanations  |
|--|-------------------|---|
| <b>2.4.9 Link Purpose (Link Only)</b> (Level AAA)                  | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>All links have associated text that is unique and contextual, usually in the format [action] [applicable item].</li> </ul>  |
| <b>2.4.10 Section Headings</b> (Level AAA)                         | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>Content and sections in a page are organized by a hierarchy of headings to enable screen reader users to meaningfully navigate and understand the content.</li> <li>Titles, headings, ARIA landmarks and labels are used to organize system content.</li> <li>Users control their own content.</li> </ul> |
| <b>2.4.12 Focus Not Obscured (Enhanced)</b> (Level AAA) [WCAG 2.2] | Supports          | <b>Test Methods:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>Focus indicators are not obscured.</li> </ul>  |
| <b>2.4.13 Focus Appearance</b> (Level AAA) [WCAG 2.2]              | Supports          | <b>Test Methods:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>Focus indicators have sufficient size and contrast to include diverse users.</li> </ul>  |
| <b>2.5.5 Target Size</b> (Level AAA)                               | Supports          | <b>Test Methods: MAT:</b> Inspection; <b>UBT</b><br><b>Features:</b> <ul style="list-style-type: none"> <li>While not all our targets are 44x44 CSS pixels in size, we have ensured through user testing that targets in key workflows are accessible to users with fine motor challenges.</li> </ul>   |
| <b>2.5.6 Concurrent Input Mechanisms</b> (Level AAA)               | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>On account of meticulous alignment with the WCAG accessibility standards, our system interoperates well with standards-conforming assistive technologies. Further, our pages are designed to be responsive, meaning</li> </ul>  |

| Criteria                                   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
|  |                   | they adjust to the view port size of different devices used to access Brightspace. Hence users can switch between interaction technologies and use content across devices seamlessly..   |
| <b>3.1.3 Unusual Words</b> (Level AAA)     | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Inline help is provided as needed.</li> <li>• Our system allows institutions to build their own Glossary.</li> </ul>   |
| <b>3.1.4 Abbreviations</b> (Level AAA)     | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Abbreviations are avoided where possible and explained through inline help.</li> <li>• Our system allows institutions to build their own Glossary.</li> </ul>  |
| <b>3.1.5 Reading Level</b> (Level AAA)     | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Language in the system is aimed at lower secondary education level, especially for participant focused tools.</li> <li>• Inline help is provided as necessary.</li> <li>• Institutions may build their own language pack.</li> </ul>   |
| <b>3.1.6 Pronunciation</b> (Level AAA)     | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Users create their own content and related pronunciation symbols.</li> <li>• Our system allows institutions to build their own Glossary.</li> </ul>  |
| <b>3.2.5 Change on Request</b> (Level AAA) | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• No changes such as new content displaying in response to an action, or focus shifts, happen outside the control of the user.</li> <li>• Settings are available to turn off auto-refreshes where auto-updating is used in some tools, such as the Chat tool. Users can manually check new information.</li> </ul> |

| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
| <b>3.3.5 Help</b> (Level AAA)   | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Tooltips and descriptions are provided as needed for submitting information.</li> <li>• Inline help is provided as needed.</li> </ul>  |
| <b>3.3.6 Error Prevention (All)</b> (Level AAA)                           | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Error prevention is implemented as meaningful in the context of an LMS.</li> <li>• Submissions are checked for input error, and errors and opportunities for correction are clearly communicated to the user.</li> <li>• Most forms have either a preview option or wizard format where changes can be reviewed, confirmed and corrected before submitting.</li> <li>• Where error prevention is critical, such as when submitting answer to a quiz question, the user is given an option to confirm. This provision is used sparingly and only where required, so as to maintain an agile user experience. Not all actions are reversible.</li> </ul> |
| <b>3.3.9 Accessible Authentication (Enhanced)</b> Level AAA<br>[WCAG 2.2] | Supports          | <b>Test Methods: MAT:</b> Inspection<br><b>Features:</b> <ul style="list-style-type: none"> <li>• Authentication workflows do not cause cognitive load to the user.</li> </ul>   |

## About D2L

D2L Brightspace is an award-winning, cloud-based learning platform that is currently being used by more than 1000 customers in over 40 countries across K-12, higher education, healthcare, government, associations, and the corporate sector. In over 23 years since inception, our team has grown to include over 1000 employees around the world. D2L operates globally, including presences in Canada, the United States, Europe, United Kingdom, Australia, Singapore, and

Brazil.

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