D2L Accessibility Conformance Report
International Edition

(Based on VPAT® Version 2.5 INTL – Covers WCAG 2.2, Section 508 and EN 301 549)

Name of Product/Version: Brightspace CORE 20.24.1

Report Date: January 1, 2024

Product Description: Learning Management System

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Notes: This version of D2L's Accessibility Conformance Report (ACR) dated January 1, 2024 reports

- conformance with [WCAG 2.2](#) at Levels A, AA and AAA.
- compliance with [Section 508](#) of the Rehabilitation Act, 1973 revised in 2017, and
- compliance with [EN 301 549](#) V3.2.1 (2021-03) – the Harmonised European Standard,

for Brightspace Core based on the VPAT® Version 2.5 INT template published by the Information Technology Industry Council (ITIC) in September 2023. This report supersedes D2L's Brightspace WCAG 2.2 Accessibility Conformance Report as of October 5, 2023 posted on [D2L's Accessibility Standards page](#).

Introduction:

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

Accessibility best practices are built into our design and development processes. As part of quality assurance, our products are checked for compliance with the most up-to-date accessibility standards based on the Web Content Accessibility Guidelines (WCAG) 2.2 Levels A and AA. Points

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of non-compliance are transparently reported as exceptions in our WCAG checklist. These exceptions are raised as high priority software defects in our backlog and scheduled/remediated as such. We post updated versions of D2L's Accessibility Conformance Reports on our [Accessibility Standards page](#) periodically. Continuous reporting of issues remediated is done on the D2L Community website.

Evaluation Methods Used:

D2L's designers build and maintain design patterns and component specifications with accessibility and consistency in mind. Our 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. 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 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 success criteria and the functional criteria of Section 508 and EN 301 549 standards. These acronyms 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 4.58.3; Lighthouse v10.4.0; WebAIM WAVE 3.2.3.9; [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® 2023.2306.38/ Edge 115.0.1901.7, Firefox 130.115.15 & Chrome 114.0.5735.119; NVDA 2023.3.4/Firefox 130.115.15 & Chrome 114.0.5735.119; MacOS Ventura 13.2 Voiceover/Safari 16.6; Voiceover/iOS 17.3.1, iPadOS 17.3.1; Talkback/Android 13

SMT – Screen Magnifier Testing – OS tools on Windows 11 and MacOS Ventura, ZoomText® 2023.2306.21; Fusion 2023.2306.8

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
Web Content Accessibility Guidelines 2.2	Level A (Yes)
	Level AA (Yes)
	Level AAA (Yes)
Revised Section 508 standards published January 18, 2017, and corrected January 22, 2018	(Yes)
EN 301 549 Accessibility requirements for ICT products and services - V3.2.1 (2021-03)	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports**: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- **Not Applicable**: The criterion is not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.x Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Sections 10.1-10.4 of Chapter 10 - Non-Web documents, and Sections 11.1-11.4 and 11.8.2 of Chapter 11 - Non-Web Software (open and closed functionality), and Sections 12.1.2 and 12.2.4 of Chapter 12 – Documentation.
- 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.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: EN 301 549 Criteria • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test methods**: TBT; SRT; UBT **Features** • Images and icons are provided with text alternative to inform users with visual impairments, in audio or braille, of the intent and purpose of such non-text elements through their screen readers or similar assistive technologies. • Controls and input fields have descriptive, contextual labels or title attributes. • Infographics and other large image files are included inside an HTML file with appropriate alternative description. • The HTML editor's "Insert Stuff" option is used to insert images into quiz questions and provide alt text. • Screen reader users can view the source code editor to get information about text styles applied in the Brightspace Editor.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria • 9.1.2.1 (Web) • 10.1.2.1 (Non-web document) • 11.1.2.1.1 (Open Functionality Software) • 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508	Supports	**Test Methods: MAT** **Features** • Time-based media are not a part of the LMS. • Users control the content they produce. • Users can create accessible audio/video content using media management tools to use as learning content, discussion post, assessment feedback and such using the HTML editor.

TBT – Tool-Based Testing;   **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing;   **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing;   **UBT** – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
1.2.2 Captions (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria • 9.1.2.2 (Web) • 10.1.2.2 (Non-web document) • 11.1.2.2 (Open Functionality Software) • 11.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT** **Features** • Time-based media are not a part of the LMS. • Users control the content they produce. • When users upload video files to the Media Library, closed captions can be generated automatically or uploaded or entered. Owners can edit the captions. • Video topics render using a fully accessible video player which supports the ability to download the transcript and captions. • The video management tools enable recording of videos and generating automated captions that can be edited by the owner.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria • 9.1.2.3 (Web) • 10.1.2.3 (Non-web document) • 11.1.2.3.1 (Open Functionality Software) • 11.1.2.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.

TBT – Tool-Based Testing;   SRT – Screen Reader Testing;
CCT – Color Contrast Testing;   MAT – Manual Accessibility Testing
SMT – Screen Magnifier Testing;   UBT – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A) Also applies to: EN 301 549 Criteria • 9.1.3.1 (Web) • 10.1.3.1 (Non-web document) • 11.1.3.1.1 (Open Functionality Software) • 11.1.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test methods: TBT; SRT; MAT; UBT** **Features** • The content on our LMS is created such as to be understood by assistive technologies and to be presented in different ways. • Assistive technologies can programmatically determine the information, structure and relationships conveyed through presentation. • Headings and ARIA landmarks are used to help convey presentation. • Links and images are unique and contextual making it easy for users to navigate options. • Tables mostly use row and column headers. Table headers use scope attribute where appropriate. • ARIA is used to communicate context menus, dynamic page changes and alerts. When pop-up window option is selected instead of modal dialogs, pages are rendered linear and read clearly without style sheets. • ARIA expanded/collapsed markup is not used to indicate menu states. This state is communicated through link names instead. • Image maps are not used. **Exceptions** • Manage Courses page has input fields without labels, which impacts the Admin role. • The fieldset for the "pronouns" options in the Account Settings page has a legend but it is empty. • There are multiple orphaned form labels present on the Quiz Stats page.

Criteria	Conformance Level	Remarks and Explanations
		• There is an empty table header in the Grades Schemes page. • There is an empty H2 present in the Survey page.
1.3.2 Meaningful Sequence (Level A) Also applies to: EN 301 549 Criteria • 9.1.3.2 (Web) • 10.1.3.2 (Non-web document) • 11.1.3.2.1 (Open Functionality Software) • 11.1.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: SRT; UBT** **Features** • The content on our LMS is created to be understood by assistive technologies and to be presented in different ways. • Headings and ARIA landmarks are used to help convey relationships between content. • Pages are linear and read clearly without style sheets.
1.3.3 Sensory Characteristics (Level A) Also applies to: EN 301 549 Criteria • 9.1.3.3 (Web) • 10.1.3.3 (Non-web document) • 11.1.3.3 (Open Functionality Software) • 11.1.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT** **Features** • Any concepts suggested through shape, size, visual location, orientation, or sound is also communicated through language. • Textual equivalents may be visible or hidden (alt text, titles, ARIA alerts, etc.).

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A) Also applies to: EN 301 549 Criteria • 9.1.4.1 (Web) • 10.1.4.1 (Non-web document) • 11.1.4.1 (Open Functionality Software) • 11.1.4.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: CCT:** Grayscale bookmarklet **Features** • Information conveyed through font styling or color is also communicated through language. • Electronic forms use standard HTML mark-up and item labeling. • 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. However, text is also required to help users with color recognition constraints. • Users control their own content.
1.4.2 Audio Control (Level A) Also applies to: EN 301 549 Criteria • 9.1.4.2 (Web) • 10.1.4.2 (Non-web document) • 11.1.4.2 (Open Functionality Software) • 11.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software)	Supports	**Test Methods: MAT** **Features** • Brightspace does not use audio alerts. • Users control their own content.

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool) • 602.3 (Support Docs)		
2.1.1 Keyboard (Level A) Also applies to: EN 301 549 Criteria • 9.2.1.1 (Web) • 10.2.1.1 (Non-web document) • 11.2.1.1.1 (Open Functionality Software) • 11.2.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT:** Keyboard + visual focus**; SRT; UBT** **Features** • Forms are accessible by keyboard and assistive technologies. Some forms use a combination of fields, buttons, inline help, and links. • Some menu lists require navigation using the tab key rather than the arrow keys – the more commonly expected keyboard behavior. • Users control their own content.
2.1.2 No Keyboard Trap (Level A) Also applies to: EN 301 549 Criteria • 9.2.1.2 (Web) • 10.2.1.2 (Non-web document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT:** Keyboard**; SRT; UBT** **Features** • No keyboard traps

Criteria	Conformance Level	Remarks and Explanations
2.1.4 Character Key Shortcuts (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.1.4 (Web) • 10.2.1.4 (Non-web document) • 11.2.1.4.1 (Open Functionality Software) • 11.2.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Single character shortcut keys are not used, and shortcut keys are active only on focus. • Users activating controls using speech input are able to speak single input characters without accidentally activating some control.
2.2.1 Timing Adjustable (Level A) Also applies to: EN 301 549 Criteria • 9.2.2.1 (Web) • 10.2.2.1 (Non-web document) • 11.2.2.1 (Open Functionality Software) • 11.2.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT** **Features** • Users can refresh data in the Chat, Discussions, and Pager tool at their own pace. • Some tools, such as Quizzes, support time limits. Users are warned before their time expires. Alternative time limits (Special Access) can be set for specific users. • Institutions set time-out limits for inactive users. The system warns users before their session expires.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: EN 301 549 Criteria • 9.2.2.2 (Web) • 10.2.2.2 (Non-web document) • 11.2.2.2 (Open Functionality Software)	Supports	**Test Methods: MAT** **Features** • Essential animations are provided to give feedback about loading progress.

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CCT – Color Contrast Testing; **MAT** – Manual Accessibility Testing
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Criteria	Conformance Level	Remarks and Explanations
• 11.2.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		• Progress animations are used to indicate progress/status of content where users might be confused or mislead if the status wasn't indicated. • Short animations are used to help users understand transitions in the interface – such as unpinning a course from the "my courses" widget. • Auto-updating is used in some tools, such as the Chat tool, where users need to be aware of new information. Settings are available to turn off auto- refreshes.
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: EN 301 549 Criteria • 9.2.3.1 (Web) • 10.2.3.1 (Non-web document) • 11.2.3.1 (Open Functionality Software) • 11.2.3.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT** • Yes. We adhere to this criterion.
2.4.1 Bypass Blocks (Level A) Also applies to: EN 301 549 Criteria • 9.2.4.1 (Web) • 10.2.4.1 (Non-web document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply	Partially Supports	**Test Methods: MAT:** Keyboard**; SRT; TBT: Landmarks bookmarklet Features** • Skip to main content links, headings and ARIA landmarks help users avoid repetitive and non-essential content.

Criteria	Conformance Level	Remarks and Explanations
• 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs		• The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible. • Users control their own content. **Exception** • The Learner Experience component does not have a skip nav link.
2.4.2 Page Titled (Level A) Also applies to: EN 301 549 Criteria • 9.2.4.2 (Web) • 10.2.4.2 (Non-web document) • 11.2.4.2 (Open Functionality Software) - Does not apply • 11.2.4.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test Methods: MAT; TBT: Landmarks bookmarklet Features** • Each page has a title, heading 1 and ARIA main landmark. • Users control their own content. **Exception** • Page title is not unique in the tabs in Survey and Reports Set up pages.
2.4.3 Focus Order (Level A) Also applies to: EN 301 549 Criteria • 9.2.4.3 (Web) • 10.2.4.3 (Non-web document) • 11.2.4.3 (Open Functionality Software) • 11.2.4.3 (Closed Software) • 11.8.2 (Authoring Tool)	Supports	**Test Methods: MAT:** Keyboard & visual focus **Features** • Each page has a logical tab order and visible tab stops. • Users control their own content.

Criteria	Conformance Level	Remarks and Explanations
• 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
2.4.4 Link Purpose (In Context) (Level A) Also applies to: EN 301 549 Criteria • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test Methods: MAT; SRT** **Features** • Links are unique and contextual, usually in the format [action] [applicable item]. • Users control their own content. **Exception** • ¸ There is an empty link next to the "Achievements" in the My Awards page.
2.5.1 Pointer Gestures (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.5.1 (Web) • 10.2.5.1 (Non-web document) • 11.2.5.1 (Open Functionality Software) • 11.2.5.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Single-point actions can be used to operate any functionality that can be operated with a pointer. • Path-based or multi-point gestures are not required to operate any functionality, except for gestures that are standard to the operating system.

Criteria	Conformance Level	Remarks and Explanations
2.5.2 Pointer Cancellation (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.5.2 (Web) • 10.2.5.2 (Non-web document) • 11.2.5.2 (Open Functionality Software) • 11.2.5.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Drag-and-drop interactions can be cancelled by clicking outside the drop target.
2.5.3 Label in Name (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.5.3 (Web) • 10.2.5.3 (Non-web document) • 11.2.5.3.1 (Open Functionality Software) • 11.2.5.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Programmatic labels provided to user interface components include all or part of the text that is presented as visual label (or the meaning represented by the icon) at the start to work well with voice input tools.
2.5.4 Motion Actuation (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.5.4 (Web) • 10.2.5.4 (Non-web document) • 11.2.5.4 (Open Functionality Software) • 11.2.5.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs)	Supports	**Test Methods: TBT; MAT; UBT** **Features** • No function of our mobile apps relies on motion for actuation.

Criteria	Conformance Level	Remarks and Explanations
• 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
3.1.1 Language of Page (Level A) Also applies to: EN 301 549 Criteria • 9.3.1.1 (Web) • 10.3.1.1 (Non-web document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test Methods: TBT; SRT** **Features** • Language of content is notified at start of page and when changed within page. • Users control their own content. **Exception** • In the Manage Courses page, the \<iframe\> with id="ctl_2" does not have language attribute.
3.2.1 On Focus (Level A) Also applies to: EN 301 549 Criteria • 9.3.2.1 (Web) • 10.3.2.1 (Non-web document) • 11.3.2.1 (Open Functionality Software) • 11.3.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT; SRT** **Features** • We have visible on-focus states that use a combination of colour and border effect to highlight the focused elements. These are built into our controls and defined into our design patterns.

Criteria	Conformance Level	Remarks and Explanations
3.2.2 On Input (Level A) Also applies to: EN 301 549 Criteria • 9.3.2.2 (Web) • 10.3.2.2 (Non-web document) • 11.3.2.2 (Open Functionality Software) • 11.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT; SRT** **Features** • Changing the setting of any UI component does not cause an unexpected change in the context automatically.
3.2.6 Consistent Help (Level A WCAG 2.2 only) • EN 301 549 Criteria – Does not apply • Revised Section 508 – Does not apply	Supports	**Test Methods: Inspection** **Features** • Tool level help, when it's available, is consistently offered in the top-right corner of Brightspace pages. • Other help links can be added to the navigation bar by permitted users, and the location is up to the user.
3.3.1 Error Identification (Level A) Also applies to: EN 301 549 Criteria • 9.3.3.1 (Web) • 10.3.3.1 (Non-web document) • 11.3.3.1.1 (Open Functionality Software) • 11.3.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508	Supports	**Test Methods: TBT; SRT** **Features** • Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. • Where possible, error messages describe each error and link to the appropriate field for resolving the error.

Criteria	Conformance Level	Remarks and Explanations
501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)		
3.3.2 Labels or Instructions (Level A) Also applies to: EN 301 549 Criteria 9.3.3.2 (Web) 10.3.3.2 (Non-web document) 11.3.3.2 (Open Functionality Software) 11.3.3.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	**Test Methods: TBT; SRT** **Features** - Forms have clear headings, labels, field sets, and buttons. Inline help is provided as needed. - The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible.
3.3.7 Redundant Entry (Level A WCAG 2.2 only) - EN 301 549 Criteria – Does not apply - Revised Section 508 – Does not apply	Supports	**Test Methods: Inspection** **Features:** System does not require re-entry of redundant information.
4.1.2 Name, Role, Value (Level A) Also applies to: EN 301 549 Criteria 9.4.1.2 (Web) 10.4.1.2 (Non-web document) 11.4.1.2.1 (Open Functionality Software) 11.4.1.2.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs)	Partially Supports	**Test Methods: TBT; SRT** **Features** - Controls are developed and validated against HTML specifications and standards, including ARIA. **Exception** - Manage Courses page has input fields without labels, which impacts the Admin role. - The fieldset for the "pronouns" options in the Account Settings page has a legend but it is empty.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		• There are multiple orphaned form labels present on the Quiz Stats page. • There is an empty table header in the Grades Schemes page. • There is an empty H2 present in the Survey page. • The expanded/collapsed states of modules in the Content Reports page are not announced.
4.1.3 Status Messages (Level AA 2.1 only) Also applies to: EN 301 549 Criteria • 9.4.1.3 (Web) • 10.4.1.3 (Non-web document) • 11.4.1.3 (Open Functionality Software) • 11.4.1.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Users are made aware of important changes in content that are not given focus through inline or toast alerts. These alerts do not interrupt users' work. • Screen reader users get audio alerts.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: EN 301 549 Criteria • 9.1.2.4 (Web) • 10.1.2.4 (Non-web document) • 11.1.2.4 (Open Functionality Software) • 11.1.2.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: EN 301 549 Criteria • 9.1.2.5 (Web) • 10.1.2.5 (Non-web document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.3.4 Orientation (Level AA 2.1 only) Also applies to: EN 301 549 Criteria • 9.1.3.4 (Web)	Supports	**Test Methods: TBT; MAT** **Features**

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Criteria	Conformance Level	Remarks and Explanations
• 10.1.3.4 (Non-web document) • 11.1.3.4 (Open Functionality Software) • 11.1.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		• When a page or app is opened on a mobile device, it is presented in the device's current display orientation. • When the device is rotated, the content adjusts to the new display orientation.
1.3.5 Identify Input Purpose (Level AA 2.1 only) Also applies to: EN 301 549 Criteria • 9.1.3.5 (Web) • 10.1.3.5 (Non-web document) • 11.1.3.5.1 (Open Functionality Software) • 11.1.3.5.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT** **Features** • Auto complete is supported for input components in forms involving users' personal information to enable them to identify the input purpose.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: EN 301 549 Criteria • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test Methods: TBT; CCT; SMT; UBT** **Features** • Foreground to background contrast adheres to standards. • Users control their own content. **Exception** • Inadequate text-to-background colour contrast in the form field placeholder in the Lesson Content My Awards page, Table of Contents page, Build your Course Landing page, Media Library page, Edit Quiz page, Class Progress page, Grades/Grade Schemes page, Manage course Exclusions page,

Criteria	Conformance Level	Remarks and Explanations
		Calendar page, All Grades page, Search User page, and Homepages page.
1.4.4 Resize text (Level AA) Also applies to: EN 301 549 Criteria • 9.1.4.4 (Web) • 10.1.4.4 (Non-web document) • 11.1.4.4.1 (Open Functionality Software) • 11.1.4.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: TBT; CCT; SMT; UBT** **Features** • User account settings are available for adjusting font face and size. • Icons and text resize with scaling/zooming options of browser (and other technology) up to 200%. • All product functionalities perform well at this zoom level. • Users control their own content.
1.4.5 Images of Text (Level AA) Also applies to: EN 301 549 Criteria • 9.1.4.5 (Web) • 10.1.4.5 (Non-web document) • 11.1.4.5.1 (Open Functionality Software) • 11.1.4.5.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT; SRT** **Features** • Images of text are not used. • Equations authored in D2L's Equation Editor are stored as MathML and output as MathML in browsers where supported. • Users control their own content.

Criteria	Conformance Level	Remarks and Explanations
1.4.10 Reflow (Level AA 2.1) Also applies to: EN 301 549 Criteria • 9.1.4.10 (Web) • 10.1.4.10 (Non-web document) • 11.1.4.10 (Open Functionality Software) • 11.1.4.10 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Partially Supports	**Test Methods: TBT; MAT; UBT** **Features** • Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind. • We have a best-in-class responsive solution for Brightspace web and award-winning mobile apps. • Pages mostly reflow when the viewport is set to smaller phone sizes. **Exception** • The Welcome Centre widget is unusable at 400% zoom • The calendar tool does not reflow as per mobile responsive design dictates when the browser zoom is zoomed to 400%. • In the Manage Courses page, iframe shows horizontal scroll bar when zoomed to 400% • At 400% all content from "Add learning object" is hidden from the user in the Files page, including the data table • We have prioritized our responsive design updates based on usage and persona (learners and instructors first). There are infrequently used tools and administrative workflows that are not yet fully responsive.
1.4.11 Non-text Contrast (Level AA 2.1) Also applies to: EN 301 549 Criteria • 9.1.4.11 (Web) • 10.1.4.11 (Non-web document) • 11.1.4.11 (Open Functionality Software) • 11.1.4.11 (Closed Software) • 11.8.2 (Authoring Tool)	Partially Supports	**Test Methods: TBT; MAT; UBT** **Features** • Active user interface components have a contrast ratio of 3:1 with the background. **Exception** • Inadequate non-text colour contrast in the Calendar page.

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Criteria	Conformance Level	Remarks and Explanations
• 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		
1.4.12 Text Spacing (Level AA 2.1) Also applies to: EN 301 549 Criteria • 9.1.4.12 (Web) • 10.1.4.12 (Non-web document) • 11.1.4.12 (Open Functionality Software) • 11.1.4.12 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Partially Supports	**Test Methods: TBT; MAT; UBT** **Features** • Brightspace and the Daylight Design System it is built upon are designed with responsive design and reflow in mind to accommodate changes in content size due to text spacing changes made by the user. • When text spacing is adjusted, content does not get cut off or overlap on most pages. **Exception** • We have prioritized our responsive design updates based on usage and persona (learners and instructors first). There are infrequently used tools and administrative workflows that are not yet fully responsive where changes in text spacing could result in content overlapping or being cut off.
1.4.13 Content on Hover or Focus (Level AA 2.1) Also applies to: EN 301 549 Criteria • 9.1.4.13 (Web) • 10.1.4.13 (Non-web document) • 11.1.4.13 (Open Functionality Software) • 11.1.4.13 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	**Test Methods: TBT; MAT; UBT** **Features** • Custom tooltips, user profile badges, and edit nav bar links that appear on hover or focus are visible until dismissed and can be dismissed without moving pointer hover or keyboard focus.

TBT – Tool-Based Testing; **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing; **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing; **UBT** – Testing with Users with Disabilities   Page **23** of **49**

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Criteria	Conformance Level	Remarks and Explanations
2.4.5 Multiple Ways (Level AA) Also applies to: EN 301 549 Criteria • 9.2.4.5 (Web) • 10.2.4.5 (Non-web document) – Does not apply • 11.2.4.5 (Open Functionality Software) – Does not apply • 11.2.4.5 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Supports	**Test Methods: MAT:** Inspection **Features** • Headings, ARIA landmarks (such as navigation landmarks) and unique link and button names help users navigate pages quickly. • Pages have consistent navigation areas. • Many pages contain search fields with ARIA search landmarks. • The system works well with search and find features built into assistive technologies. • Users control their own content.
2.4.6 Headings and Labels (Level AA) Also applies to: EN 301 549 Criteria • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	**Test Methods: MAT:** Inspection; **UBT** **Features** • Pages have descriptive headings and labels. Labels are unique and contextual. • Users control their own content.
2.4.7 Focus Visible (Level AA)	Supports	**Test Methods: MAT:** Keyboard + visual focus

Criteria	Conformance Level	Remarks and Explanations
Also applies to: EN 301 549 Criteria • 9.2.4.7 (Web) • 10.2.4.7 (Non-web document) • 11.2.4.7 (Open Functionality Software) • 11.2.4.7 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		**Features** • Each page has a logical tab order and visible tab stops. • Links and fields have extra highlighting, beyond browser defaults.
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only) • EN 301 549 Criteria – Does not apply • Revised Section 508 – Does not apply	Supports	**Test Methods:** Inspection **Features:** • Focus indicators are not obscured.
2.5.7 Dragging Movements (Level AA 2.2 only) • EN 301 549 Criteria – Does not apply • Revised Section 508 – Does not apply	Supports	**Test Methods: SRT, KBT** **Features:** • Workflows that require drag-and-drop with a mouse can also be completed using a keyboard.
2.5.8 Target Size (Minimum) (Level AA 2.2 only) • EN 301 549 Criteria – Does not apply • Revised Section 508 – Does not apply	Supports	**Test Methods:** Inspection **Features:** • All targets meet the minimum size requirements.
3.1.2 Language of Parts (Level AA) Also applies to: EN 301 549 Criteria • 9.3.1.2 (Web) • 10.3.1.2 (Non-web document) • 11.3.1.2 (Open Functionality Software) – Does not apply	Partially Supports	**Test Methods: TBT:** Language bookmarklet **Features** • While the WSYIWYG editor does not include a button or prompt users to indicate a "lang" attribute for language changes, users can insert a "lang" attribute using the HTML source editor. • Users control their own content.

Criteria	Conformance Level	Remarks and Explanations
• 11.3.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		**Exception** • Some parts of sentences in non-English language do not have appropriate language attributes. • Some non-English course names and menu items have Inappropriate language attributes. We do not have a way to identify what language a particular piece of user-authored content (like a course name) is written in. Hence we do not have control over this. Lang attributes must be provided by the content creators.
3.2.3 Consistent Navigation (Level AA) Also applies to: EN 301 549 Criteria • 9.3.2.3 (Web) • 10.3.2.3 (Non-web document) – Does not apply • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Supports	**Test Methods: MAT:** Inspection**; SRT ; SMT** **Features** • Navigation models are consistent across tools and use headings and ARIA navigation landmarks to help orient users.
3.2.4 Consistent Identification (Level AA) Also applies to: EN 301 549 Criteria • 9.3.2.4 (Web) • 10.3.2.4 (Non-web document) – Does not apply	Supports	**Test Methods: SRT; SMT Features** • Icons use an icon grammar to facilitate learning. • The same icon is used for the same action across all tools.

Criteria	Conformance Level	Remarks and Explanations
• 11.3.2.4 (Open Functionality Software) – Does not apply • 11.3.2.4 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs		• Users may combine concepts they already understand to interpret new icons.
3.3.3 Error Suggestion (Level AA) Also applies to: EN 301 549 Criteria • 9.3.3.3 (Web) • 10.3.3.3 (Non-web document) • 11.3.3.3 (Open Functionality Software) • 11.3.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	**Test Methods: MAT:** Inspection**; SR; SM** **Features** • Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. • Where possible, error messages describe each error and link to the appropriate field for resolving the error. **Exception** • Input errors give visual feedback only in the All Grades page.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: EN 301 549 Criteria • 9.3.3.4 (Web) • 10.3.3.4 (Non-web document) • 11.3.3.4 (Open Functionality Software)	Not applicable	• No legal commitments or financial transactions for the user on the platform.

Criteria	Conformance Level	Remarks and Explanations
• 11.3.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Our platform does not use biometric technologies for authentication.

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.2.8 Media Alternative (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.

Criteria	Conformance Level	Remarks and Explanations
1.2.9 Audio-only (Live) (Level AAA) EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply	Not applicable	• Time-based media are not a part of the LMS. • Users control the content they produce.
1.3.6 Identify Purpose (Level AAA 2.1 and 2.2) EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply	Supports	**Testing Methods: Test Methods: MAT:** Inspection **Features:** • All icons are labeled so that users can perceive the functionality of each icon. Example: The envelope icon is labeled "Message alerts" (and not Envelope). • ARIA landmarks are used to mark different regions in a page. This information is available to screen readers for conveying to users who cannot see the screen.
1.4.6 Contrast (Enhanced) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: CCT** **Features** • Our standard text elements in the Brightspace Daylight design system have a contrast greater than 7:1 on a white background. • Users control their own content.
1.4.7 Low or No Background Audio (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	• Brightspace does not use any audio background. • Users control the content they produce.
1.4.8 Visual Presentation (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Brightspace is compatible with most popular browser extensions to allow users to set their choice of foreground/background colors and text spacing. • Icons and text resize with the scaling/zooming options of browser (and other technology up to 200%.)

Criteria	Conformance Level	Remarks and Explanations
		- The default font size for all clients has been standardized to our "Medium" font setting. As part of personalized account settings, users can choose another default relative font size. - Most pages have relative column widths. - System text does not use full justification. - System font sizes are adjustable. - Users control their own content.
1.4.9 Images of Text (No Exception) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** - Images of text are not used. - Users control their own content.
2.1.3 Keyboard (No Exception) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	All controls are reachable using the keyboard. Alternative ways are provided to accomplish tasks in situations where a tool is not optimal for one modality.
2.2.3 No Timing (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** - The Quizzes tool supports time-based assessments with the ability to define alternative access, such as alternative timing or no time, for users as needed. - Institutions have an option to set a time-out period. Users are warned before their session times-out. - Users control their own content.
2.2.4 Interruptions (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:**

Criteria	Conformance Level	Remarks and Explanations
		• Interruptions are designed only if and when applicable and meaningful to the activity in hand. • Auto-updating is used in some tools, such as the Chat tool, where users need to be aware of new information. Settings are available to turn off auto- refreshes. • The system uses ARIA alerts to indicate dynamic page changes so that users can choose the level of interruption they want. • Users control their own content.
2.2.5 Re-authenticating (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • 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.
2.2.6 Timeouts (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Controlled timeouts are implemented for timed assessments which allow auto-submission of quiz data at pre-determined time limits. • Time limits are communicated to learners at the start of the assessment. • Unsaved data is mostly retrievable after session expiry but there could be exceptions depending on the system.
2.3.2 Three Flashes (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • No flashing content in the system.

Criteria	Conformance Level	Remarks and Explanations
		• Users control their own content.
2.3.3 Animation from Interactions (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • If a user sets 'reduced motion' accessibility setting at the operating system level, then the software respects it. • No non-essential animation is used. • Essential animations are used sparingly in contexts where it would be helpful to some users. For example, subtle communication about the state of the page (such as loading indicators) or to help indicate where an item was placed on or removed from a page (such as an animation showing items reordering or being added to the bottom of a page. • Nonvisual cues such as ARIA alerts are also available.
2.4.8 Location (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Breadcrumb trails or 'Back to' buttons are used to inform users of their current location. • Users control their own content.
2.4.9 Link Purpose (Link Only) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • All links have associated text that is unique and contextual, usually in the format [action] [applicable item].
2.4.10 Section Headings (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:**

TBT – Tool-Based Testing; **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing; **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing; **UBT** – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
		• Content and sections in a page are organized by a hierarchy of headings to enable screen reader users to meaningfully navigate and understand the content. • Titles, headings, ARIA landmarks and labels are used to organize system content. • Users control their own content.
2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports:	**Test Methods: MAT:** Inspection **Features:** • No part of any focus indicator is obscured.
2.4.13 Focus Appearance (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Focus indicator is at least equal to 2 CSS pixel thick perimeter..
2.5.5 Target Size (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection; **UBT** **Features:** • While not all our targets are 44x44 CSS pixels in size, we have ensured through user testing that targets in key workflows are accessible to users with fine motor challenges.
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • On account of meticulous alignment with the WCAG accessibility standards, our system interoperates well with standards-conforming assistive technologies. Further, our pages are designed to be responsive, meaning they adjust to the view port size of different

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TBT – Tool-Based Testing;   **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing;   **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing;   **UBT** – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
		devices used to access Brightspace. Hence users can switch between interaction technologies and use content across devices seamlessly.
3.1.3 Unusual Words (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Inline help is provided as needed. • Our system allows institutions to build their own Glossary.
3.1.4 Abbreviations (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Abbreviations are avoided where possible and explained through inline help. • Our system allows institutions to build their own Glossary
3.1.5 Reading Level (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • Language in the system is aimed at lower secondary education level, especially for participant focused tools. • Inline help is provided as necessary. • Institutions may build their own language pack.
3.1.6 Pronunciation (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features** • Users create their own content and related pronunciation symbols. • Our system allows institutions to build their own Glossary.
3.2.5 Change on Request (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	**Test Methods: MAT:** Inspection **Features:** • No changes such as new content displaying in response to an action, or focus shifts, happen outside the control of the user. • Settings are available to turn off auto-refreshes where auto-updating

Criteria	Conformance Level	Remarks and Explanations
		is used in some tools, such as the Chat tool. Users can manually check new information.

3.3.5 Help (Level AAA)
  EN 301 549 Criteria – Does not apply
  Revised Section 508 – Does not apply
	Supports	**Test Methods: MAT:** Inspection
		Features:
		• Tooltips and descriptions are provided as needed for submitting information.
		• Inline help is provided as needed.

3.3.6 Error Prevention (All) (Level AAA)
  EN 301 549 Criteria – Does not apply
  Revised Section 508 – Does not apply
	Supports	**Test Methods: MAT:** Inspection
		Features:
		• Error prevention is implemented as meaningful in the context of an LMS.
		• Submissions are checked for input error, and errors and opportunities for correction are clearly communicated to the user.
		• Most forms have either a preview option or wizard format where changes can be reviewed, confirmed and corrected before submitting.
		• Where error prevention is critical, such as when submitting answer to a quiz question, the user is given an option to confirm. This provision is used sparingly and only where required, so as to maintain an agile user experience. Not all actions are reversible.

3.3.9 Accessible Authentication (Enhanced) (Level AAA 2.2 only)
  EN 301 549 Criteria – Does not apply
  Revised Section 508 – Does not apply
	Supports	**Test Methods: MAT:** Inspection
		Features:
		• Our platform does not use biometric technologies for authentication.

Revised Section 508 Report

Notes:

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

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partial Supports	Supports when combined with Compatible Assistive Technology **Features** - All interfaces are designed according to HTML5 standards. - Images and icons are assigned contextual and meaningful text alternatives that can be announced by a screen reader. - Images of text are not used in place of text. - Controls such as buttons are labeled to indicate their function. - Form fields are labeled to perceive their intent. - Links are assigned meaningful texts that clearly indicate the link destination. - Controls are assigned appropriate labels that allow perception of their function. - ARIA attributes are used to make alert messages and states of dynamic elements such as radio buttons perceivable. - Standard interface elements are made evident through proper HTML mark up. - Math equation coded in MathML can be read by the screen reader subject to browser compatibility. **Exception** - Most input fields don't have labels in the Manage Courses page in the Admin role. - The Learner Experience component does not have a skip nav link. - There is no page title in the End Module page.

Criteria	Conformance Level	Remarks and Explanations
		• In the Manage Courses page, the <iframe> with id="ctl_2" does not have language attribute. • Some parts of sentences in non-English language do not have appropriate language attributes. • Some non-English course names and menu items do not have appropriate language attributes.
302.2 With Limited Vision	Partially Supports	Supports when combined with Compatible Assistive Technology **Features** • All product functionalities perform well at 200% zoom level. • All pages are designed to wrap well when zoomed to 200%. • User account settings are available for adjusting font size. • Icons and text resize with browser (and other technology) scaling/zooming options. • Most pages have relative column widths. • System text does not use full justification. • Colour contrast of foreground text with background is maintained according to standard specifications. • SVG images are used to prevent pixelation upon magnification. **Exceptions** • Inadequate text-to-background colour contrast in the My Awards page, Table of Contents page, Build your Course Landing page, Lesson Content page, Media Library page, Edit Quiz page, Class Progress page, Grades/Grade Schemes page, Manage course Exclusions page, Calendar page, All Grades page, Search User page, and Homepages page. • The Welcome Centre widget is unusable at 400% zoom • The calendar tool does not reflow as per mobile responsive design dictates when the browser zoom is zoomed to

Criteria	Conformance Level	Remarks and Explanations
		400%. • In the Manage Courses page, iframe shows horizontal scroll bar when zoomed to 400% • At 400% all content from "Add learning object" is hidden from the user in the Files page, including the data table • Inadequate non-text colour contrast in the Calendar page.
302.3 Without Perception of Color	Supports	**Features** • Colour alone is not used to convey information.
302.4 Without Hearing	Supports	**Features** • No auditory alerts are used.
302.5 With Limited Hearing	Supports	**Features** • No auditory alerts are used.
302.6 Without Speech	Supports	**Not applicable** • Speech input is not required.

302.7 With Limited Manipulation	Supports	Supports when combined with Compatible Assistive Technology
		Features
		• Users with limited manipulation primarily use alternatives to pointing devices such as onscreen keyboards, voice recognition software, visual trackers or adaptive keyboards. For these users, access through keyboard, visibility of current tab location, large target size and longer time limits are important accessibility criteria.
		• Keyboard-accessible alternatives are provided for tools that support drag-and-drop, upload, or reordering.
		• Current tab location is made clearly visible.
		• Users can make their click target size larger if needed via these two mechanisms:
		   o By controlling text sizes through user preferences.
		   o By controlling icon sizes through browser zoom preferences.
		• While time limits can be set on some tools, such as Quizzes, alternative time limits or evaluations can be provided for select

Criteria	Conformance Level	Remarks and Explanations
		users. • Institutions can set time-out limits for inactive users. The system warns users before their session expires. **Exceptions** • Most input fields don't have labels in the Manage Courses page in the Admin role. • The Learner Experience component does not have a skip nav link. • When using the enter key on the row selection checkbox in the Manage Dates page, the accordion that displays the advanced filters is opened. • There is an element that receives keyboard focus but does not have visible focus between the "Updates" chevron and the "Content Navigator" chevron in the Lesson Content page. • A Visually hidden link is present "Show data table for The Content Completion Summary indicator displays the learner's progression through the course content" in the Class Progress page, which is picked up by screen reader and receives focus.
302.8 With Limited Reach and Strength	Supports	**Features** • Large target sizes, adequate timeout times, and error-tolerant routines help reduce unintended or incomplete interactions.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	**Features** • Simple language is used for text content. • Visual illustrations are used along with text. • Interface navigation is made simple through use of hierarchical headings. **Exceptions** • In the D2L Home page, autocomplete="off" has been set for the username input field. • Input errors give visual feedback only in the All Grades page.

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Chapter 4: [Hardware](#)

Notes: This section is not applicable. Platform does not include hardware.

Chapter 5: [Software](#)

Notes: This section is not applicable. Platform is a web app.

Chapter 6: [Support Documentation and Services](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
[***602 Support Documentation***](#)	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	• D2L provides extensive [documentation about accessibility features](#) and how to use them on the documentation website ([https://documentation.brightspace.com/EN/-/-/-/welcome_page.htm](#)), which is accessible.
602.3 Electronic Support Documentation	See [WCAG 2.x](#) section	See information in WCAG 2.x section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	• Support documentation is provided electronically.
[***603 Support Services***](#)	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features		• A statement of D2L's accessibility is made prominently at [https://www.d2l.com/accessibility/.](#) All information about D2L's accessibility support, which includes information on the accessibility and compatibility features that are built-in and accessibility features that provide compatibility with assistive technology supporting our products, are available on D2L's public website

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TBT – Tool-Based Testing;   **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing;   **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing;   **UBT** – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
		https://documentation.brightspace.com.
603.3 Accommodation of Communication Needs		• 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.

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Notes:

Chapter 4: Functional Performance Statements (FPS)

Notes:

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Supports	Supports when combined with Compatible Assistive Technology. **Features** • All interfaces are designed according to HTML5 standards. • Images and icons are assigned contextual and meaningful text alternatives that can be announced by a screen reader. • Images of text are not used in place of text. • Controls such as buttons are labeled to indicate their function. • Form fields are labeled to perceive their intent. • Links are assigned meaningful texts that clearly indicate the link destination. • Controls are assigned appropriate labels that allow perception of their function. • ARIA attributes are used to make alert messages and states of dynamic elements such as radio buttons perceivable. • Standard interface elements are made evident through proper HTML mark up. • Math equation coded in MathML can be read by the screen reader subject to browser compatibility. **Exception** • Most input fields don't have labels in the Manage Courses page in the Admin role. • The Learner Experience component does not have a skip nav link.

TBT – Tool-Based Testing;   **SRT** – Screen Reader Testing**;**
CCT – Color Contrast Testing;   **MAT** – Manual Accessibility Testing
SMT – Screen Magnifier Testing;   **UBT** – Testing with Users with Disabilities

Criteria	Conformance Level	Remarks and Explanations
		• There is no page title in the End Module page. • In the Manage Courses page, the <iframe> with id="ctl_2" does not have language attribute. • Some parts of sentences in non-English language do not have appropriate language attributes. • Some non-English course names and menu items do not have appropriate language attributes.
4.2.2 Usage with limited vision	Supports	Supports when combined with Compatible Assistive Technology. **Features** • All product functionalities perform well at 200% zoom level. • All pages are designed to wrap well when zoomed to 200%. • User account settings are available for adjusting font size. • Icons and text resize with browser (and other technology) scaling/zooming options. • Most pages have relative column widths. • System text does not use full justification. • Colour contrast of foreground text with background is maintained according to standard specifications. • SVG images are used to prevent pixelation upon magnification. **Exceptions** • Inadequate text-to-background colour contrast in the My Awards page, Table of Contents page, Build your Course Landing page, Lesson Content page, Media Library page, Edit Quiz page, Class Progress page, Grades/Grade Schemes page, Manage course Exclusions page, Calendar page, All Grades page, Search User page, and Homepages page. • The Welcome Centre widget is unusable at 400% zoom • The calendar tool does not reflow as per mobile

Criteria	Conformance Level	Remarks and Explanations
		responsive design dictates when the browser zoom is zoomed to 400%. • In the Manage Courses page, iframe shows horizontal scroll bar when zoomed to 400% • At 400% all content from "Add learning object" is hidden from the user in the Files page, including the data table • Inadequate non-text colour contrast in the Calendar page.
4.2.3 Usage without perception of colour	Supports	**Features** • Colour alone is not used to convey information.
4.2.4 Usage without hearing	Supports	**Features** • The platform does not use any auditory alerts.
4.2.5 Usage with limited hearing	Supports	**Features** • The platform does not use any auditory alerts.
4.2.6 Usage with no or limited vocal capability	Supports	**Features** • The platform does not require any vocal alerts.

4.2.7 Usage with limited manipulation or strength	Supports	Supports when combined with Compatible Assistive Technology.
		Features
		• Users with limited manipulation primarily use alternatives to pointing devices such as onscreen keyboards, voice recognition software, visual trackers or adaptive keyboards. For these users, access through keyboard, visibility of current tab location, large target size and longer time limits are important accessibility criteria.
		• Keyboard-accessible alternatives are provided for tools that support drag-and-drop, upload, or reordering.
		• Current tab location is made clearly visible.
		• Users can make their click target size larger if needed via these two mechanisms:
		  o By controlling text sizes through user preferences.
		  o By controlling icon sizes through browser zoom preferences.

Criteria	Conformance Level	Remarks and Explanations
		• While time limits can be set on some tools, such as Quizzes, alternative time limits or evaluations can be provided for select users. • Institutions can set time-out limits for inactive users. The system warns users before their session expires. **Exceptions** • Most input fields don't have labels in the Manage Courses page in the admin role. • The Learner Experience component does not have a skip nav link. • When using the enter key on the row selection checkbox in the Manage Dates page, the accordion that displays the advanced filters is opened. • There is an element that receives keyboard focus but does not have visible focus between the "Updates" chevron and the "Content Navigator" chevron in the Lesson Content page. • A Visually hidden link is present "Show data table for The Content Completion Summary indicator displays the learner's progression through the course content" in the Class Progress page, which is picked up by screen reader and receives focus
4.2.8 Usage with limited reach	Supports	**Features** • Large target sizes, adequate timeout times, and error-tolerant routines help reduce unintended or incomplete interactions.
4.2.9 Minimize photosensitive seizure triggers	Supports	• No flashing content in the system. • Users control their own content.
4.2.10 Usage with limited cognition, language or learning	Supports	**Features** • Simple language is used for text content. • Visual illustrations are used along with text. • Interface navigation is made simple through use of hierarchical headings. • Third party tools are integrated to provide the option of using spoken version of text content. **Exceptions**

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Criteria	Conformance Level	Remarks and Explanations
		• In the D2L Home page, autocomplete="off" has been set for the username input field. • Input errors give visual feedback only in the All Grades page.

4.2.11 Privacy	Supports	• Our platform does not use biometric technologies for authentication.
		• In the use of platform features, we maintain the privacy of users of assistive technologies at the same level as other users.
		• Examples:
		  • Spoken version is not provided for characters being masked.
		  • Users have control of their personal data.

Chapter 5: Generic Requirements

Notes: This section is not applicable because it is about Closed Functionality. No functionality in the platform is closed such as to preclude users from adding peripherals or software to access it.

Chapter 6: ICT with Two-Way Voice Communication

Notes: This section is not applicable. Platform does not involve two-way voice communication.

Chapter 7: ICT with Video Capabilities

Notes: This section is not applicable. Platform is not a video communication tool.

Chapter 8: Hardware

Notes: This section is not applicable. Platform does not include hardware.

Chapter 9: Web *(see WCAG 2.x section)*

Notes: This section is covered in the WCAG report in Tables 1, 2 and 3.

Chapter 10: Non-Web Documents

Notes: This section is not applicable. Platform is fully web-based.

Chapter 11: Software

Notes: This section is not applicable. Platform is a web app.

Chapter 12: Documentation and Support Services

Notes:

Criteria	Conformance Level	Remarks and Explanations
12.1 Product documentation	Heading cell – no response required	Heading cell – no response required
12.1.1 Accessibility and compatibility features	Supports	• D2L provides a comprehensive and fully searchable library of documentation about accessibility features and how to use them on the D2L Community website (https://community.d2l.com/brightspace/).
12.1.2 Accessible documentation	See WCAG 2.x section	
12.2 Support Services	Heading cell – no response required	Heading cell – no response required
12.2.2 Information on accessibility and compatibility features	Supports	• A statement of D2L's accessibility is made prominently at https://www.d2l.com/accessibility/. All information about D2L's accessibility support, which includes information on the accessibility and compatibility features that are built-in, and accessibility features that provide compatibility with assistive technology supporting our products, is available on the D2L Community website (https://community.d2l.com/brightspace/).

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Criteria	Conformance Level	Remarks and Explanations
12.2.3 Effective communication	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 tollfree 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.
12.2.4 Accessible documentation	See WCAG 2.x section	See information in WCAG 2.x section

Chapter 13: ICT Providing Relay or Emergency Service Access

Notes: This section is not applicable. Platform does not include relay or emergency service.

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 25 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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SMT – Screen Magnifier Testing; **UBT** – Testing with Users with Disabilities

Auditor Confirmation

*D2L created this Accessibility Conformance Report based on accessibility testing by **AbleDocs, a division of GrackleDocs (AbleDocs).***

AbleDocs Inc. confirms that based on AbleDocs' testing, D2L has provided a comprehensive Accessibility Conformance Report for their Brightspace Core product as of January 1, 2024.

DocuSigned by:

Amanda Mace

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Authorized Signatory, AbleDocs, a division of GrackleDocs

Amanda Mace

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March 7, 2024 | 7:55 PM EST