

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 20.25.3 (including the Pulse mobile app)
Report Date	March 31, 2025
Product Description	Learning Management System
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Notes

- This version of D2L's Accessibility Conformance Report (ACR) for Brightspace Core dated March 31, 2025 demonstrates
 - o conformance with WCAG 2.2 at Levels A, AA and AAA
 - o compliance with Section 508 of the Rehabilitation Act, 1973 revised in 2017
 - o compliance with EN 301 549 V3.2.1 (2021-03) the Harmonised European Standard
- Compliance with the following regulations is also reflected in this report.
 - ADA Title II new accessibility rule
 - European Accessibility Act

This report is based on an external audit of Brightspace Core performed by a third-party auditor. The <u>auditor's confirmation</u> is available on the last page of this report. The report uses VPAT® Version 2.5 INT template published by the Information Technology Industry Council (ITIC), September 2023. It supersedes D2L's Brightspace WCAG 2.2 Accessibility Conformance Report as of January 1, 2024 posted on <u>D2L's Accessibility Standards</u> page.

[&]quot;Voluntary Product Accessibility Template" and "VPAT" are registered service marks of the Information Technology Industry Council (ITI)



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 AAA 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. Points 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 <u>Accessibility Standards</u> <u>page</u> periodically.

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 to recruit users for our accessibility research, design consultation and user testing. Their community of people with disabilities use 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 the functional criteria of Section 508 and EN 301 549 standards. These acronyms are repeated in the page footer for easy reference.

TBT – Tool-Based Testing using automated accessibility testing tools

CCT – Color Contrast Testing

SRT – Screen Reader Testing

SMT – Screen Magnifier Testing

MAT – Manual Accessibility Testing: Keyboard testing with visual focus; Videos; 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 2.2 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 <u>WCAG 2.2 Conformance Requirements</u>.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content 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 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:	Supports	Test Methods: MAT Features

Criteria	Conformance Level	Remarks and Explanations
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 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)		 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.
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) 11.8.2 (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)	Not applicable	 Time-based media are not a part of the LMS. Users control the content they produce.

TBT – Tool-Based Testing
CCT – Color Contrast Testing
SMT – Screen Magnifier Testing

SRT – Screen Reader Testing

MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
 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) 		
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) 11.8.2 (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.

Criteria	Conformance Level	Remarks and Explanations
		 Image maps are not used. Exceptions Manage Courses page has input fields without labels, which impacts the Administrator role. In the Rubrics tool, there are multiple orphaned labels present in the data table.
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)	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
 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		
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) • 11.8.2 (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)	Supports	Test Methods: MAT Features • Brightspace does not use audio alerts. • Users control their own content.

TBT – Tool-Based Testing **CCT** – Color Contrast Testing **SMT** – Screen Magnifier Testing **SRT** – Screen Reader Testing MAT – Manual Accessibility Testing

UBT – Testing with Users with Disabilities

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Criteria	Conformance Level	Remarks and Explanations
 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) 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)	Partially 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. Exceptions In the Pulse app on Android mobile devices, the ellipses in the header for upcoming courses receives keyboard focus, but the control does not activate. In the Pulse app on Android mobile devices, there is no keyboard access to the select options for "theme" and "starting day of the week".

Criteria	Conformance Level	Remarks and Explanations
		In the Pulse app on iOS mobile devices, there is no keyboard access to the ellipses action button, pinned button, or the "Discussion notifications (14) button.
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) 		Test Methods: MAT: Keyboard; SRT; UBT
• 11.2.1.2 (Closed Software)	Supports	Features
• 11.8.2 (Authoring Tool)	Supports	No keyboard traps
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.1.4 Character Key Shortcuts (Level A 2.1 only)		Total Markhada, TDT: MAAT: LIDT
Also applies to:		Test Methods: TBT; MAT; UBT Features
EN 301 549 Criteria		Single character shortcut keys are not used, and shortcut keys
• 9.2.1.4 (Web)		
• 10.2.1.4 (Non-web document)	Supports	are active only on focus.
11.2.1.4.1 (Open Functionality Software)11.2.1.4.2 (Closed Software)		Users activating controls using speech input are able to speak
		single input characters without accidentally activating some
11.8.2 (Authoring Tool)12.1.2 (Product Docs)		control.
• 12.1.2 (Froduct Bocs) • 12.2.4 (Support Docs)		
Revised Section 508 – Does not apply		
2.2.1 Timing Adjustable (Level A)	Supports	Test Methods: MAT
Z.Z.I Tilling Aujustable (Level A)	Supports	I est Ivietilous. IVIA I

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Criteria	Conformance Level	Remarks and Explanations
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)		 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) • 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)	Supports	 Test Methods: MAT Features Essential animations are provided to give feedback about loading progress. 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	Supports	Test Methods: MAT • Yes. We adhere to this criterion.

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Criteria	Conformance Level	Remarks and Explanations
 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) 		
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 • 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		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. The expanded/collapsed state of secondary form content is clearly indicated, and the fields are accessible. Users control their own content.
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	Supports	Test Methods: MAT; TBT: Landmarks bookmarklet Features Each page has a title, heading 1 and ARIA main landmark. Users control their own content.

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Criteria	Conformance Level	Remarks and Explanations
 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) 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) 12.1.2 (Product Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Test Methods: MAT: Keyboard & visual focus Features Each page has a logical tab order and visible tab stops. Users control their own content. Exception When tabbing using a keyboard on iOS mobile devices, only the hero banner from each Call-to-action blocks receive focus, but all options are combined and read by assistive technology
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) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs)	Supports	Test Methods: MAT; SRT Features Links are unique and contextual, usually in the format [action] [applicable item]. Users control their own content.

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MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		
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.
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) 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)	Supports	Test Methods: TBT; MAT; UBT Features

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Criteria	Conformance Level	Remarks and Explanations
 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 		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) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply		Test Methods: TBT; MAT; UBT Features No function of our mobile apps relies on motion for actuation.
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)		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.</iframe>

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MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
• 602.3 (Support Docs)		
3.2.1 On Focus (Level A)		
Also applies to:		
EN 301 549 Criteria		
• 9.3.2.1 (Web)		Test Methods: MAT; SRT
• 10.3.2.1 (Non-web document)		Features
• 11.3.2.1 (Open Functionality Software)		We have visible on-focus states that use a combination of colour
• 11.3.2.1 (Closed Software)	Supports	and border effect to highlight the focused elements. These are
• 11.8.2 (Authoring Tool)	Supports	built into our controls and defined into our design patterns.
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
3.2.2 On Input (Level A)		
Also applies to:		Test Methods: MAT; SRT Features
EN 301 549 Criteria		
• 9.3.2.2 (Web)		
• 10.3.2.2 (Non-web document)		
• 11.3.2.2 (Open Functionality Software)		Changing the setting of any UI component does not cause an
• 11.3.2.2 (Closed Software)	Supports	unexpected change in the context automatically.
• 11.8.2 (Authoring Tool)		difexpected change in the context automatically.
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
3.2.6 Consistent Help (Level A WCAG 2.2 only)	Supports	Test Methods: Inspection

Criteria	Conformance Level	Remarks and Explanations
 EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply 		 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) 11.8.2 (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 Error messages are communicated using a combination of ARIA alerts, ARIA landmarks, headings and links. Where possible, error messages describe each error and link to the appropriate field for resolving the error.
3.3.2 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)	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.

TBT – Tool-Based Testing **CCT** – Color Contrast Testing

SMT – Screen Magnifier Testing

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MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
 504.2 (Authoring Tool) 602.3 (Support Docs) 		
 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) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	 Test Methods: TBT; SRT Features Controls are developed and validated against HTML specifications and standards, including ARIA. Exceptions Manage Courses page has input fields without labels, which impacts the Administrator role. The expanded/collapsed states of modules in the Content Reports page are not announced. In the Rubrics tool, there are multiple orphaned labels present in the data table.
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) 11.8.2 (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) • 11.8.2 (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
CCT – Color Contrast Testing
SMT – Screen Magnifier Testing

SRT – Screen Reader Testing

MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
1.3.4 Orientation (Level AA 2.1 only) Also applies to: EN 301 549 Criteria • 9.1.3.4 (Web) • 10.1.3.4 (Non-web document) • 11.1.3.4 (Open Functionality 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 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) • 11.8.2 (Closed Software) • 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)	Supports	Test Methods: TBT; CCT; SMT; UBT Features • Foreground to background contrast adheres to standards. • Users control their own content.

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CCT – Color Contrast Testing
SMT – Screen Magnifier Testing

SRT – Screen Reader Testing
MAT – Manual Accessibility Testing

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 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) • 11.8.2 (Authoring Tool)	Partially 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.
 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		 Exceptions In the Calendar Settings, when zoomed to 200% some of the options at the bottom of the modal are cut off. In the administrator's Manage files feature, half of the page cannot be accessed when zoomed to 200%.
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)	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
504.2 (Authoring Tool)602.3 (Support Docs)		
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) 11.4.10 (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. Exceptions 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. In the administrator's Manage files feature, the content is lost due to the container being fixed and overflow set to hidden when zoomed to 400%. In the Add Syllabus feature, the "Actions for Navbar" button is not available when zoomed to 400%.

Criteria	Conformance Level	Remarks and Explanations
		 In the Webcam Modal, the video content is heavily cropped due to the container being fixed and overflow set to hidden when zoomed to 400%. In the administrator's Manage files feature, most of the page cannot be accessed when zoomed to 400%. The page does not reflow and the modal content is cut off when the device is in landscape orientation.
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) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Partially Supports	 Test Methods: TBT; MAT; UBT Features Active user interface components have a contrast ratio of 3:1 with the background. Exceptions Inadequate non-text colour contrast in the Calendar page. In the Pulse app on Android mobile devices, the visible focus for the "unpin course" and messages is barely visible and does not have a contrast ratio of at least 3:1
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) 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

Criteria	Conformance Level	Remarks and Explanations
		 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) • 11.8.2 (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.
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	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.

Criteria	Conformance Level	Remarks and Explanations
 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 		
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) 		Test Methods: MAT: Inspection; UBT
 11.2.4.6 (Open Functionality Software) 		Features
• 11.2.4.6 (Closed Software)	Supports	Pages have descriptive headings and labels. Labels are unique
• 11.8.2 (Authoring Tool)	заррого	and contextual.
• 12.1.2 (Product Docs)		Users control their own content.
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.4.7 Focus Visible (Level AA)		
Also applies to:		
EN 301 549 Criteria • 9.2.4.7 (Web)		
10.2.4.7 (Web)10.2.4.7 (Non-web document)		Test Methods: MAT: Keyboard + visual focus
 11.2.4.7 (Non-web document) 11.2.4.7 (Open Functionality Software) 		Features
• 11.2.4.7 (Open Functionality Software)		• Each page has a logical tab order and visible tab stops.
• 11.8.2 (Authoring Tool)	Supports	 Links and fields have extra highlighting, beyond browser
• 12.1.2 (Product Docs)		defaults.
• 12.2.4 (Support Docs)		delauits.
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		

Criteria	Conformance Level	Remarks and Explanations
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)		Test Methods: Inspection
 EN 301 549 Criteria – Does not apply 	Supports	Features:
 Revised Section 508 – Does not apply 		Focus indicators are not obscured.
		Test Methods: SRT, KBT
2.5.7 Dragging Movements (Level AA 2.2 only)		Features:
 EN 301 549 Criteria – Does not apply 	Supports	Workflows that require drag-and-drop with a mouse can also
 Revised Section 508 – Does not apply 		be completed using a keyboard.
2.5.8 Target Size (Minimum) (Level AA 2.2 only)		Test Methods: Inspection
 EN 301 549 Criteria – Does not apply 	Supports	Features:
 Revised Section 508 – Does not apply 		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 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) 	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. Exception • In the Webcam Modal, the options in the language select for closed captions lacks appropriate language attributes.
 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 	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.

Criteria	Conformance Level	Remarks and Explanations
 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 		
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 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	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. 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	Partially Supports	Test Methods: MAT: Inspection; SR; SM Features

Criteria	Conformance Level	Remarks and Explanations
 9.3.3.3 (Web) 10.3.3.3 (Non-web document) 11.3.3.3 (Open 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) 		 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) • 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	No legal commitments or financial transactions for the user on the platform.
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.
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

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Criteria	Conformance Level	Remarks and Explanations
		 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	 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%.) 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.

Criteria	Conformance Level	Remarks and Explanations
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: 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

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Criteria	Conformance Level	Remarks and Explanations
		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. 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.

Criteria	Conformance Level	Remarks and Explanations
		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: 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:

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Criteria	Conformance Level	Remarks and Explanations
		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 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

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SRT – Screen Reader TestingMAT – Manual Accessibility TestingUBT – Testing with Users with Disabilities

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Criteria	Conformance Level	Remarks and Explanations
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 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

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Criteria	Conformance Level	Remarks and Explanations
		 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

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partial Supports	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. Exceptions Most input fields don't have labels in the Manage Courses page in the Adminad role. The Learner Experience component does not have a skip nav link. 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.</iframe>

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Some non-English course names and menu items do not have appropriate language attributes. Supports who 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 Partially Supports The dequate text-to-background colour contrast in the My Awards page, Table of Contents 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 400%. In the Manage Courses page, iframe shows horizontal scroll bar when zoomed to 400%.	Criteria	Conformance Level	Remarks and Explanations
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. I cons 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 Partially Supports 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%			
	302.2 With Limited Vision	Partially Supports	 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 400%. In the Manage Courses page, iframe shows horizontal scroll

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Criteria	Conformance Level	Remarks and Explanations
		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
302.3 Without Ferception of Color	Supports	Colour alone is not used to convey information.
302.4 Without Hearing	Supports	Features
South William Hearing		No auditory alerts are used.
302.5 With Limited Hearing	Supports	Features
		No auditory alerts are used. Not applied by
302.6 Without Speech	Supports	Not applicableSpeech 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: By controlling text sizes through user preferences. 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 users. Institutions can set time-out limits for inactive users. The system warns users before their session expires. Exceptions



Criteria	Conformance Level	Remarks and Explanations
		 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		 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.

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

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 <u>documentation about accessibility</u> <u>features</u> 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 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 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

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Criteria	Conformance Level	Remarks and Explanations
		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.

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.</iframe> 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

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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	FeaturesColour alone is not used to convey information.
4.2.4 Usage without hearing	Supports	FeaturesThe 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	FeaturesThe 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: By controlling text sizes through user preferences. 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	 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

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/).
12.2.3 Effective communication	Supports	Accessible support services are provided via phone, email and through accessible documentation, as required. We support

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Criteria	Conformance Level	Remarks and Explanations
		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 1300 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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Auditor Confirmation

D2L created this Accessibility Conformance Report based on accessibility testing by GrackleDocs Inc.

GrackleDocs Inc. confirms that based on GrackleDocs' testing, D2L has provided a comprehensive Accessibility Conformance Report for their Brightspace Core product including the Pulse mobile app as of March 31, 2025.



Authorized Signatory, GrackleDocs

Amanda Mace

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May 11, 2025 | 7:26 PM EDT