brightspace™
by D2L

D2L Learning Repository Extended Voluntary Product Accessibility Template (VPAT)

1/18/2017

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Introduction

At D2L we share your goal of providing equal and inclusive learning opportunities to all individuals. We work closely with our clients to develop comprehensive solutions that are flexible to the individual needs of institutions, instructors and students. Accessibility is not a checklist at D2L; it is a commitment to empower and engage individuals in their learning goals.

The Voluntary Product Accessibility Template (VPAT) is an industry standard template for recording how a product or service conforms to Section 508 of the United States Rehabilitation Act. This VPAT outlines the compliance of Learning Repository 10.6.

Key accessibility features

Keyboard-only navigation

- Logical tab order and visible tab stops.
- Skip to main content links.
- Full keyboard accessibility.

Screen magnification, zooming and color contrast technologies

- Standard page designs so it is easy to find similar functionality across tools.
- Support for browser and assistive technology scaling (zooming), magnifying and contrast options.
- Ability to override system styles with custom style sheets.
- Good color contrast on all system styles.
- System information is not communicated by color alone.

Screen reader technologies

- Focus on standards-compliant designs to improve interoperability with assistive technologies.
- Consistent and unique headings, links, buttons, and image descriptions.

- Table row headings, column headings and summaries.

- Descriptive form field labels, including field sets.

- Minimal use of frames and proper frame titles.

- Good indication of context changes, including new windows, expanded or collapsed content, and dynamic page changes.

- Wide adoption of ARIA alerts.

Other features

- Student/course participant pages focus on lower-secondary or earlier reading level.

Summary Table

Criteria	Supporting Features	Remarks and Explanations
1194.21 – Software Applications and Operating Systems	Supports with exceptions	**Remarks** All interfaces are designed and tested according to HTML5 and WCAG 2 standards. The system uses standard HTML mark-up and CSS. Account settings are available for simplifying page designs, including: changing system dialogs to pop-up windows; using a rich text field instead of our HTML editor; and reducing the amount of information displayed on list pages. These settings are available to all users. They are not meant to limit functionality or provide a split user experience. Most exceptions apply to where users control their own content.

Criteria	Supporting Features	Remarks and Explanations
1194.22 – Web-based Internet Information and Applications	Supports with exceptions	**Remarks** All interfaces are designed and tested according to HTML5 and WCAG 2 standards. Account settings are available for simplifying page designs, including: changing system dialogs to pop-up windows; using a rich text field instead of our HTML editor; and reducing the amount of information displayed on list pages. These settings are available to all users. They are not meant to limit functionality or provide a split user experience. Exceptions apply to where users control their own content.
1194.23 – Telecommunications Products	Not applicable	
1194.24 – Video and Multi-media Products	Not applicable	
1194.25 – Self-Contained Closed Products	Not applicable	
1194.26 – Desktop and Portable Computers	Not applicable	
1194.31 – Functional Performance Criteria	Supports when combined with Compatible Assistive Technology	**Remarks** All interfaces are designed according to HTML5 and accessibility standards. Audio information and user speech are unnecessary to use our system.
1194.41 – Information, Documentation and Support	Supports	**Remarks** The default format of D2L help is accessible.. D2L's support services will accommodate the communication needs of those seeking assistance.

1194.21 – Software Applications and Operating Systems

Criteria	Supporting Features	Remarks and Explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supports with exceptions	**Remarks** Pages are tested to ensure that mouse-specific JavaScript events have keyboard equivalents. The skip to main content link is visible to all users.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supports	**Remarks** Pages are designed and tested to HTML5 and WCAG 2 standards.
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supports with exceptions	Links, and fields have extra highlighting, beyond browser defaults. **Exceptions** The visual indication that buttons have focus is not visible enough.

Criteria	Supporting Features	Remarks and Explanations
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.	Supports with exceptions	**Remarks** The system follows WCAG 2 conventions for identifying web elements. • Controls/inputs have descriptive, contextual labels or title attributes. • Links and images are unique and contextual making it easy for users to navigate options. • Tables use row headers, column headers and summaries. • Non-text content has a text alternative. Decorative content uses alt="". Headings are used to help convey presentation. ARIA is used to communicate context menus, dynamic page changes and alerts. Pages are linear and read clearly without style sheets (if the account setting to use pop-up windows instead of modal dialogs is selected). **Exceptions** The navigation bar includes listitems that are not contained within a list. In multiple locations, button roles are assigned to links. These links don't support all button actions (e.g. space bar). Layout tables do not use "role=presentation." A number of tables are used both for presentation purposes and tabular data. The grab handle for the WYSIWYG editor does not have alt text. The HTML Editor is not fully accessible to screen reader users; if you apply a style in the editor view, it lacks a non-visual indication of its presence unless you view the source code. The HTML Editor may be replaced with a simple text field that supports HTML through users' account settings.

Criteria	Supporting Features	Remarks and Explanations
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supports	**Remarks** Standard actions use the same icon in all tools. Icons use an icon grammar to facilitate learning. Users may combine concepts they already understand to interpret new icons.
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supports	**Remarks** HTML mark-up is used for the majority of system components. Equations authored in D2L's Equation Editor are stored as MathML and output as MathML where supported.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	**Remarks** All styles can be overridden with a user style sheet (due to the inherent properties of CSS).
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supports	**Remarks** Essential animations (per WCAG 2 – 2.2.2) are provided to give feedback about loading progress.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supports with exceptions	**Remarks** Invisible spans are added to provide "selected" text to areas. Color is used for warning and confirmation messages. The 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.

Criteria	Supporting Features	Remarks and Explanations
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Supports with exceptions	**Remarks**
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supports with exceptions	**Remarks** The user interface does not contain content that flickers. Essential animations (per WCAG 2 – 2.2.2) are provided to give feedback about loading progress. **Exceptions** Users control their own content.
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supports	**Remarks** Electronic forms use standard HTML mark-up and item labeling.

1194.22 – Web-based Internet Information and Applications

Criteria	Supporting Features	Remarks and Explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports with exceptions	**Remarks** Non-text content has a text alternative. Decorative content uses alt="". The HTML Editor requests alt text when users insert images. Alt text for icons is unique and identifies which object the action applies to. **Exceptions** Users control their own content.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports with exceptions	**Remarks** The interface does not use multimedia. **Exceptions** The video note feature does not support captions or transcripts. The video upload through "quick reflect" does not prompt users for captions. Users control their own content.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports with exceptions	**Remarks** Invisible spans are added to provide "selected" text to areas. Color is used for warning and confirmation messages. The 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. **Exceptions** A few tables use shading alone to indicate new sections or categories.

Criteria	Supporting Features	Remarks and Explanations
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	**Remarks** Style sheets are only used for visual design. If style sheets are disabled, users should select the account setting to view secondary windows as pop-ups instead of dialogs. Pages use logical HTML structures to ensure optimal navigability when style sheets are disabled, such as: headings; contextualized, unique links; table headings and summaries; and logical tab order and focus. Custom style sheets may be applied to pages.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Supports	**Remarks** Learning Repository does not use image maps.
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Supports with exceptions	**Remarks** Learning Repository does not use image maps. **Exceptions** Users control their own content.
(g) Row and column headers shall be identified for data tables.	Supports with exceptions	**Remarks** Table summaries are used to explain table contents and actions. Table summaries are not role specific. Tables use row and column headers. **Exceptions** Some tables use blank cells for layout.
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	Supports with exceptions	**Remarks** Table headers use scope attribute where appropriate. **Exceptions** When there are two levels of column headers, cells do not reference the headers correctly.

Criteria	Supporting Features	Remarks and Explanations
(i) Frames shall be titled with text that facilitates frame identification and navigation	Supports	**Remarks**
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports with exceptions	**Remarks** The user interface does not contain content that flickers. **Exceptions** Users control their own content.
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Not applicable	**Remarks** Accessibility features are integrated into the standard Learning Repository. Text-only pages are not used.
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Supports with exceptions	**Remarks** Drop-down lists are used, but most do not initiate change when manipulated. Confirmation messages, error messages, and alerts are communicated to non-visual users using ARIA alerts. Some browser/assistive technology combinations do not reliably communicate ARIA alerts. **Exceptions** The following drop-down lists initiate change when manipulated: "sort by" in "My Items". The HTML 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 Editor's source editor.

Criteria	Supporting Features	Remarks and Explanations
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).	Supports	**Remarks** Links to plugins are provided through standard browser behavior.
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supports with exceptions	**Remarks** The expanded/collapsed state of secondary form content is clearly indicated and the fields are accessible.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	**Remarks** Headings and unique link and button names help users navigate pages quickly. Pages have consistent navigation areas. The system works well with search and find features built into assistive technologies.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	**Remarks** Organizations can set time-out periods for Learning Repository. Users are warned before their session expires.

1194.23 – Telecommunications Products

Criteria	Supporting Features	Remarks and Explanations
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.	Not applicable	
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Not applicable	
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not applicable	
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Not applicable	
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.	Not applicable	
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.	Not applicable	
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.	Not applicable	
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.	Not applicable	
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.	Not applicable	
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.	Not applicable	
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.	Not applicable	

1194.24 – Video and Multi-media Products

Criteria	Supporting Features	Remarks and Explanations
a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.	Not applicable	
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	Not applicable	
(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.	Not applicable	
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Not applicable	

1194.25 – Self-Contained Closed Products

Criteria	Supporting Features	Remarks and Explanations
(a) Self-contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	Not applicable	
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not applicable	
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not applicable	
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	Not applicable	
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	Not applicable	
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Not applicable	
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.	Not applicable	
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.	Not applicable	
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.	Not applicable	
(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.	Not applicable	

Criteria	Supporting Features	Remarks and Explanations
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.	Not applicable	

1194.26 – Desktop and Portable Computers

Criteria	Supporting Features	Remarks and Explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Not applicable	
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not applicable	
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not applicable	
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not applicable	

1194.31 – Functional Performance Criteria

Criteria	Supporting Features	Remarks and Explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supports when combined with Compatible Assistive Technology	**Remarks** All interfaces are designed according to HTML5 standards. Careful attention has been paid to ensure that pages are intuitive to people who use screen readers. For instance, the system uses consistent terminology, descriptive labels and carefully designed feedback. **Exceptions** Users control their own content.
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Supports when combined with Compatible Assistive Technology	**Remarks** All pages are designed to wrap well when zoomed by the browser by 200%. User account settings are available for adjusting font face and 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. System font faces and sizes are adjustable. There is minimal use of font styles and usage follows conventions.

Criteria	Supporting Features	Remarks and Explanations
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Supports with exceptions	**Remarks** No auditory alerts are used. **Exceptions** The video note feature does not support captions or transcripts. The video upload through "quick reflect" does not prompt users for captions.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Supports with exceptions	**Exceptions** The video note feature does not support captions or transcripts. The video upload through "quick reflect" does not prompt users for captions.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Not applicable	**Remarks** Learning Repository does not require speech input.
(f) At least one mode of operation and information retrieval that does not require fine control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Supports when combined with Compatible Assistive Technology	**Remarks** Through user preferences, users may control text sizes. Through browser zoom preferences, users may control icon sizes. Via these two mechanisms, users may make their click targets larger if needed. Institutions set time-out limits for inactive users. The system warns users before their session expires.

1194.41 – Information, Documentation and Support

Criteria	Supporting Features	Remarks and Explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	**Remarks** D2L provides documentation in an accessible HTML-based format.
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supports	**Remarks** D2L provides a number of accessibility guides directed at assistive technology users. we have administrator guides explaining our compliance with different laws and standards.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	**Remarks** D2L provides a number of support service options to our clients. D2L does not have TTY, but people who are hard of hearing may contact support using the Support Center portal or email. These issues will be addressed according to their priority. Urgent issues will be addressed promptly.