Sakai 22 Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.4 INTL – Covers WCAG 2.1, Section 508 and EN 301 549)



Name of Product/Version: Sakai LMS / Sakai 22.x

Report Date: March 2024

Product Description: Open Source Learning Management System which uses the Educational Community License software distribution model.

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Notes:

This product contains an External Tool feature and supports the latest LTI (Learning Tool Interoperability) standards which allows adopting institutions to integrate various third-party tools into the technology. This evaluation does not cover any third-party LTI tools that may be added by institutions or end users. Additionally, end users are responsible for ensuring that any content that they generate or upload is accessible. Accessible content creation is encouraged through the use of alt text fields, descriptive labels for URLs when embedding links, and other standard

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

tools/features. Institutions also have the option of installing a third-party "Accessibility Checker" add-on for CK Editor, so their end users can easily inspect, and make "quick fixes" to content created in the Rich Text Editor. Information about these tools, and similar accessibility best practices are referenced in support documentation.

Evaluation Methods Used:

For the Sakai 22 VPAT we chose to use VPAT® Version 2.4 INTL and WCAG 2.1 A & AA because at the time of this report's publishing, these are predominately being used as the industry standards. Starting with the Sakai 23 VPAT, and for any future releases of Sakai, we will switch to using VPAT® Version 2.5 INTL which incorporates the latest WCAG 2.2 A & AA guidelines.

VPAT and HECVAT (Higher Education Community Vendor Assessment Toolkit) are a partial solution to the problem of determining what competing products show better compliance with standards. They are also good instruments for planning how to equitably roll out an adoption with full understanding of the compliance gaps of the chosen product.

But standard compliance information cannot tell the whole story. It is a snapshot in time that does not speak to the culture of the vendor, where the product has been, and more importantly, where it is going. We have deliberately kept our VPAT succinct and clear to allow you the time to review the supplemental information about our accessibility strategy available on our web site at:

https://www.sakailms.org/accessibility/accessibility-strategy

For the Sakai 22 VPAT, extensive testing was performed across 23 different Sakai tools/features to simulate the types of common use cases experienced by Sakai adopting institutions. A majority of this testing consisted of keyboard/screen reader testing performed by actual individuals with disabilities, including a team of blind/low-vision testers who worked through our accessibility test script using four different screen reader/web browser combinations. All told, a total of 2853 test cases were performed, which is a 185% increase from the user testing that was performed on Sakai 21. In addition, we utilized not one, but two different automated test tools to scan for potential accessibility issues, and in a few cases, leveraged sighted members of the Sakai QA team to perform manual testing on certain WCAG success criteria which were visual in nature.

The specific results of our testing and analysis, including the designated conformance level and any explanation/remarks for each WCAG success criteria, can be found in the table portion of this report.

For detailed information about our community-sourced approach to the Sakai 22 testing/VPAT, visit the "Evaluation Methods Used" section of our "Sakai Accessibility Strategy" page at: https://www.sakailms.org/accessibility/accessibility-strategy

As detailed in the table portion of this report, Sakai 22 either "supports" or "partially supports" all WCAG 2.1 A & AA Success Criteria. There are only a handful of known deficiencies that don't currently have suitable work arounds that could present obstacles to certain individuals with disabilities/users of assistive technology. These include:

- In the Tests & Quizzes tool, "Hot Spot"-type questions are inaccessible for keyboard/screen reader users.
- In the Lessons tool, keyboard/screen reader users are not able to "Reorder" items using the keyboard.
- In the Profile tool, the "Message" option has a recipient/auto suggestion feature that is not screen reader compatible.
- The NVDA screen reader is not able to access the "Character/Word Count" feature in the free version of CK Editor currently being used in Sakai.

Accessibility Roadmap: Ongoing Support & Planned Enhancements

The Sakai community is committed to ensuring all core features of the Sakai project are accessible and usable by the greatest number of potential users, including individuals with disabilities. As part of our commitment to continuous improvement, Sakai has implemented a technical roadmap that will aim to:

- Continue to perform routine tests to check for regressions, including use of automated test tools to identify defects in the code and leveraging individuals with disabilities to conduct accessibility-specific user testing.
- For any accessibility-specific bugs that are identified/reported, these issues will continue to be given priority status and escalated like other "blocker"-level issues in the cue to ensure prompt attention/resolution.
- As for any updates/enhancements/new features introduced into future releases—these changes will be back-ported/merged back into Sakai 22 whenever it is possible to do so.
- Sakai 23 (our next major release) will feature a completely redesigned, new and improved user interface.
- This cleaner, more modern UI is a result of a large-scale effort to update to the Bootstrap 5 CSS library & component framework.
- Specifically, the Sakai developers have continued to refer to the Bootstrap documentation when coding the new UI, since it contains examples that help to demonstrate best practices with regards to the use of aria attributes.
- Also, Sakai 23 represents the heaviest usage of the Bootstrap interactive components to date, which should continue to pay dividends from
 an accessibility standpoint, since these components have been designed to work with multiple different types of interfaces, and rely on
 relevant WAI-ARIA roles and attributes to ensure they are rendered understandable and operable for different types of assistive
 technologies such as screen readers.

- In terms of the accessibility testing for Sakai 23, the Sakai Accessibility Team will perform extensive user testing on Sakai Plus, a new tool available in Sakai 23 that uses LTI (Learning Tool Interoperability) standards, allowing institutions to run an instance of Sakai over top of their enterprise LMS.
- There are also plans to perform extensive keyboard/screen reader testing on the Announcements, Dashboard, Roster, Section Info, and Search tools, bringing our total to 29 different tools/features that are tested.
- For Sakai 23, we will once again test using four different screen reader and web browser combinations, including testing with Voiceover+Safari for the first time.

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 2.0	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)
EN 301 549 Accessibility requirements for ICT products and services - V3.1.1 (2019-11) AND 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.

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Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 Web, Sections 10.1-10.4 of Chapter 10 Non-Web documents, and Sections 11.1-11.4 and 11.8.2 of Chapter 11 Non-Web Software (open and closed functionality), and Sections 12.1.2 and 12.2.4 of Chapter 12 Documentation
- Revised Section 508: Chapter 5 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	This criterion is mostly supported, except for a few isolated
Also applies to:		cases where there are images with missing alternative text.
EN 301 549 Criteria		
• 9.1.1.1 (Web)		Some examples of the tools/features where this affects
• 10.1.1.1 (Non-web document)		instructors include:
• 11.1.1.1 (Open Functionality Software)		
• 11.1.1.2 (Closed Functionality Software)		Gradebook
• 11.8.2 (Authoring Tool)		Statistics
• 12.1.2 (Product Docs)		Test & Quizzes
• 12.2.4 (Support Docs)		
Revised Section 508		One example of a Student facing instance is the Profile tool. It is
• 501 (Web)(Software)		up to the student to provide meaningful alternative text for
• 504.2 (Authoring Tool)		their profile photos.
• 602.3 (Support Docs)		
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	This criterion is not applicable. There are no instances of audio
Also applies to:		only and video only content, unless added by specific users.
EN 301 549 Criteria		
• 9.1.2.1 (Web)		For user-generated content, the Sakai User Guide provides
• 10.1.2.1 (Non-web document)		numerous accessibility help topics, including "How can I make
• 11.1.2.1.1 (Open Functionality Software)		videos and audio files more accessible?"
• 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)		
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	This criterion is not applicable. There are no instances of
Also applies to:		synchronized media content, unless added by specific users.
EN 301 549 Criteria		

Criteria	Conformance Level	Remarks and Explanations
• 9.1.2.2 (Web)		For user-generated content, the Sakai User Guide provides
 10.1.2.2 (Non-web document) 		numerous accessibility help topics, including "How can I make
• 11.1.2.2 (Open Functionality Software)		videos and audio files more accessible?"
• 11.1.2.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
 504.2 (Authoring Tool) 		
602.3 (Support Docs)		
1.2.3 Audio Description or Media Alternative (Prerecorded)	Not Applicable	This criterion is not applicable. There are no instances of
(Level A)		synchronized media content, unless added by specific users.
Also applies to:		
EN 301 549 Criteria		For user-generated content, the Sakai User Guide provides
• 9.1.2.3 (Web)		numerous accessibility help topics, including "How can I make
 10.1.2.3 (Non-web document) 		videos and audio files more accessible?"
• 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)	Partially Supports	This criterion is mostly supported, except for a limited number
Also applies to:		of instances where the user's ability to discern info and
EN 301 549 Criteria		relationships is being somewhat impacted. These include some
• 9.1.3.1 (Web)		pages with illogical heading structure/mark-up, some tables
 10.1.3.1 (Non-web document) 		with missing captions or lacking heading/row association, and
• 11.1.3.1.1 (Open Functionality Software)		labels that are not programmatically being associated with their
• 11.1.3.1.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		respective form fields/controls.

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) 		Some examples of tools/features where this affects instructors include: • the Assessment Builder in Tests & Quizzes • The Template Settings page in Discussions
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)	Partially Supports	This criterion is supported with the exception of very few instances where the sequence of navigation is not in order. These include some pages where reading order is not moving in sequence while navigating using arrow keys. Some examples of tools/features where this affects instructors include: • The overview page in statistics • The Settings page in Tests & Quizzes
Also applies to: EN 301 549 Criteria 9.1.3.3 (Web) 10.1.3.3 (Non-web document) 11.1.3.3 (Open Functionality Software) 11.1.3.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	This criterion is supported. There are no instances of instructions being conveyed using color, direction, sound, shape and size. For user-generated content, the Sakai User Guide provides numerous accessibility help topics, including, "What are some guidelines for making content accessible?"

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Supports	This criterion is supported. There are no instances where
Also applies to:		insufficient color contrast is preventing users from
EN 301 549 Criteria		distinguishing links from the surrounding text.
• 9.1.4.1 (Web)		
10.1.4.1 (Non-web document)		For user-generated content, the Sakai User Guide provides
• 11.1.4.1 (Open Functionality Software)		numerous accessibility help topics, including "How can choices
• 11.1.4.1 (Closed Software)		in background and text color affect accessibility?"
• 11.8.2 (Authoring Tool)		and the control of th
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
 504.2 (Authoring Tool) 		
• 602.3 (Support Docs)		
1.4.2 Audio Control (Level A)	Supports	This criterion is supported. There are no instances of audio
Also applies to:		being played automatically on page load.
EN 301 549 Criteria		
• 9.1.4.2 (Web)		
• 10.1.4.2 (Non-web document)		
• 11.1.4.2 (Open Functionality Software)		
• 11.1.4.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.1.1 Keyboard (Level A)	Partially Supports	This criterion is supported, except for a limited number of
Also applies to:		instances where the user's ability to navigate with the keyboard
EN 301 549 Criteria		is being impacted.
• 9.2.1.1 (Web)		
• 10.2.1.1 (Non-web document)		
• 11.2.1.1.1 (Open Functionality Software)		

Criteria	Conformance Level	Remarks and Explanations
 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) 2.1.2 No Keyboard Trap (Level A) Also applies to: EN 301 549 Criteria 9.2.1.2 (Web) 10.2.1.2 (Non-web document) 11.2.1.2 (Open Functionality Software) 11.2.1.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Partially Supports	Some examples of tools/features where this affects both instructors and students include: Discussions Gradebook Tests & Quizzes This criterion is supported, except for one instance where keyboard focus is getting trapped. The one example of a tool/feature where this affects both instructors and students is Gradebook.
2.1.4 Character Key Shortcuts (Level A 2.1 only) Also applies to: EN 301 549 Criteria • 9.2.1.4 (Web) • 10.2.1.4 (Non-web document) • 11.2.1.4.1 (Open Functionality Software) • 11.2.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	This criterion is supported. There are no instances of single character being used in the application. All Sakai shortcuts use modifier keys. Very few of these conflict with standard browser/operating system keys, and they are not the sole means for performing a particular operation/task.

Criteria	Conformance Level	Remarks and Explanations
2.2.1 Timing Adjustable (Level A)	Supports	This criterion is supported. Users are presented with an option
Also applies to:		to extend their session, in the event prolonged inactivity during
EN 301 549 Criteria		their browsing session causes a time out message to appear.
• 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)		
2.2.2 Pause, Stop, Hide (Level A)	Supports	This criterion is supported. There are no instances of moving,
Also applies to:		blinking or auto updating content, unless added by a specific
EN 301 549 Criteria		user.
• 9.2.2.2 (Web)		
 10.2.2.2 (Non-web document) 		For user-generated content, the Sakai User Guide provides
 11.2.2.2 (Open Functionality Software) 		numerous accessibility help topics, including, "What are some
• 11.2.2.2 (Closed Software)		guidelines for making content accessible?"
• 11.8.2 (Authoring Tool)		gardennes for menning sometime decessions.
• 12.1.2 (Product Docs)		
 12.2.4 (Support Docs) 		
Revised Section 508		
• 501 (Web)(Software)		
 504.2 (Authoring Tool) 		
• 602.3 (Support Docs)		
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	This criterion is supported. There are no instances of flashing
Also applies to:		content, unless added by a specific user.
EN 301 549 Criteria		
• 9.2.3.1 (Web)		
 10.2.3.1 (Non-web document) 		
 11.2.3.1 (Open Functionality Software) 		

Criteria	Conformance Level	Remarks and Explanations
 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: 	Supports	For user-generated content, the Sakai User Guide provides numerous accessibility help topics, including, "What are some guidelines for making content accessible?" This criterion is supported. Sakai contains multiple bypass links with multiple methods of activation, allowing users to easily
 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 		skip over repetitive 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 11.2.4.2 (Closed Software) - Does not apply 11.8.2 (Authoring Tool)	Supports	This criterion is supported. Web pages contain titles that describe topic or purpose. Sakai utilizes an easy-to-understand naming convention for its pages that includes the current Site and Tool to help orient users while navigating around the application.

Criteria	Conformance Level	Remarks and Explanations
Criteria • 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) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Partially Supports	This criterion is mostly supported, except for a few instances where focus order is not consistent. These include examples of focus not moving to the next interactive element after selecting/activating a control, inappropriate focus management when opening and closing overlays/modals, and non-interactive headers receiving tab focus or the same interactive element receiving tab focus twice. Some examples of tools/features where focus is unexpectedly jumping to the top of the page instead of moving to the next interactive element that affects instructors include: Activating the "Question Type" combo box when using the Assessment Builder in Tests & Quizzes The combo boxes for selecting the "Subject" and "Course" options during the Site creation process in Administration Workspace
		One example of a tool/feature where focus management could be improved when opening/closing modals/overlays that affects both instructors and students is Gradebook. Some examples of tools/features where relatively minor issues with keyboard focus, some of which impact tab order, that affects both instructors and students include: • Calendar

Criteria	Conformance Level	Remarks and Explanations
		• Lessons
		Resources
		• Rubrics
2.4.4 Link Purpose (In Context) (Level A) Also applies to: EN 301 549 Criteria • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs)	Supports	This criterion is supported. Users can consistently infer the purpose of links since there is always a programmatically determined link context.
 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)	Partially Supports	This criterion is mostly supported. Of the tools/features in Sakai that include "drag and drop" functionality, one or more forms of Pointer Gesture are working as intended. If you use the mouse to click an item and drag it to a new position, then release the mouse, the item is in the new position. However, there are some instances where users are not able to use the keyboard to reorder items, or use a single click to reorder items, without using drag and drop.
 12.2.4 (Support Docs) Revised Section 508 – Does not apply 		Some examples of tools/features where users are not able to use the keyboard to reorder items and/or use a single click to reorder items without drag and drop, that affects both instructors and students include: • Announcements reorder

Criteria	Conformance Level	Remarks and Explanations
		 Drop Box folder reorder Gradebook reordering Categories Lessons reorder Resources folder reorder Rubrics Criterion & Rating reorder Site Info tool reorder Syllabus reorder
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) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	This criterion is supported. The down-event of the pointer is not used to execute any part of the function. When the down event is used, as in "drag and drop" situations, there is a mechanism available to abort the function before completion, or to undo the function after completion.
2.5.3 Label in Name (Level A 2.1 only) Also applies to: EN 301 549 Criteria 9.2.5.3 (Web) 10.2.5.3 (Non-web document) 11.2.5.3.1 (Open Functionality Software) 11.2.5.3.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	This criterion is supported. Wherever applicable, the visible label matches the accessible name, or its part of the accessible name.
2.5.4 Motion Actuation (Level A 2.1 only) Also applies to: EN 301 549 Criteria 9.2.5.4 (Web)	Not Applicable	This criterion is not applicable. Sakai does not rely on motion actuation features.

Criteria	Conformance Level	Remarks and Explanations
• 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		
3.1.1 Language of Page (Level A)	Supports	This criterion is supported. Language of each page can be
Also applies to:		programmatically determined.
EN 301 549 Criteria		
• 9.3.1.1 (Web)		
• 10.3.1.1 (Non-web document)		
• 11.3.1.1.1 (Open Functionality Software)		
• 11.3.1.1.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
3.2.1 On Focus (Level A)	Supports	This criterion is supported. Context change happens only on
Also applies to:		taking action on interactive components, and not as a result of
EN 301 549 Criteria		them taking focus.
• 9.3.2.1 (Web)		
• 10.3.2.1 (Non-web document)		
• 11.3.2.1 (Open Functionality Software)		
• 11.3.2.1 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		

Criteria	Conformance Level	Remarks and Explanations
602.3 (Support Docs)		
3.2.2 On Input (Level A)	Supports	This criterion is supported. Context change happens only after
Also applies to:		completed forms have been submitted, and not as inputs to
EN 301 549 Criteria		individual form fields are done.
• 9.3.2.2 (Web)		
 10.3.2.2 (Non-web document) 		
• 11.3.2.2 (Open Functionality Software)		
• 11.3.2.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
 504.2 (Authoring Tool) 		
602.3 (Support Docs)		
3.3.1 Error Identification (Level A)	Supports	This criterion is supported. If an input error is detected when
Also applies to:		submitting a form, the item that is in error is identified and the
EN 301 549 Criteria		error is described to the user in text.
• 9.3.3.1 (Web)		
• 10.3.3.1 (Non-web document)		
• 11.3.3.1.1 (Open Functionality Software)		
• 11.3.3.1.2 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
3.3.2 Labels or Instructions (Level A)	Partially Supports	This criterion is mostly supported, except for a few instances
Also applies to:		where the user's ability to understand form fields and/or input
EN 301 549 Criteria		format requirements is being impacted. These include missing
• 9.3.3.2 (Web)		
• 10.3.3.2 (Non-web document)		

Criteria	Conformance Level	Remarks and Explanations
• 11.3.3.2 (Open Functionality Software)		instructions for required fields, missing instructions with
• 11.3.3.2 (Closed Software)		respect to input format, and some missing visual labels.
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		One example of a tool/feature which affects both instructors
• 12.2.4 (Support Docs)		and students are the editable fields that are used throughout
Revised Section 508		Sakai to manually enter date/time values. Users may not know
• 501 (Web)(Software)		to use the "MM/DD/YYYY HH:MM (AM or PM)" expected
• 504.2 (Authoring Tool)		format, since there are no instructions or helper text for how to
• 602.3 (Support Docs)		correctly input/format the information for these fields.
4.1.1 Parsing (Level A)	Partially Supports	This criterion is mostly supported, except for a handful of places
Also applies to:		where duplicate IDs can be found in the code.
EN 301 549 Criteria		
• 9.4.1.1 (Web)		Some examples of tools/features with pages that include
• 10.4.1.1 (Non-web document)		documents containing multiple static elements with the same id
• 11.4.1.1.1 (Open Functionality Software)		attributes which affects both instructors and students include:
• 11.4.1.1.2 (Closed Software) – Does not apply		
• 11.8.2 (Authoring Tool)		Conversations
• 12.1.2 (Product Docs)		Drop box
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
4.1.2 Name, Role, Value (Level A)	Partially Supports	This criterion is supported, except for a few instances where
Also applies to:		the user's ability to understand a control is being impacted,
EN 301 549 Criteria		because its name, provided element role, and/or state isn't
• 9.4.1.2 (Web)		clear. These include a few instances where there are dual roles
• 10.4.1.2 (Non-web document)		for the same control, and a few buttons that are missing
• 11.4.1.2.1 (Open Functionality Software)		accessible names.
• 11.4.1.2.2 (Closed Software) – Does not apply		accessione mannes.
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		Some examples of tools/features that use accordions with controls that have dual roles as links or tabs which affects both instructors and students include: • Gradebook • Statistics • Tests & Quizzes

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	This criterion is not applicable. There are no instances of
Also applies to:		synchronized media content, unless added by specific users.
EN 301 549 Criteria		
• 9.1.2.4 (Web)		For user-generated content, the Sakai User Guide provides
• 10.1.2.4 (Non-web document)		numerous accessibility help topics, including "How can I make
• 11.1.2.4 (Open Functionality Software)		videos and audio files more accessible?"
• 11.1.2.4 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	This criterion is not applicable. There are no instances of
Also applies to:		synchronized media content, unless added by specific users.
EN 301 549 Criteria		
• 9.1.2.5 (Web)		For user-generated content, the Sakai User Guide provides
• 10.1.2.5 (Non-web document)		numerous accessibility help topics, including "How can I make
• 11.1.2.5 (Open Functionality Software)		videos and audio files more accessible?"
• 11.1.2.5 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
1.3.4 Orientation (Level AA 2.1 only)	Supports	This criterion is supported. Sakai supports orientation changes
Also applies to:		with no loss of functionality.
EN 301 549 Criteria		

Criteria	Conformance Level	Remarks and Explanations
 9.1.3.4 (Web) 10.1.3.4 (Non-web document) 11.1.3.4 (Open Functionality Software) 11.1.3.4 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 – Does not apply 		
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) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Supports	This criterion is supported, including multiple instances of autocomplete functionality being used in Sakai to require information about users. Of the various Sakai tools/features tested, there were a total of 3 pages/features in particular, Gateway/Welcome page (log-in/password), Users (create account), and Site Info (Add Participants) which were deemed applicable. Of these pages, the purpose of each input field collecting information about the user can be programmatically determined. The rest of the pages did not collect information about the user, so were not evaluated.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: EN 301 549 Criteria • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	This criterion is supported. There are no instances where foreground and background colors lack sufficient color contrast. For user-generated content, the Sakai User Guide provides numerous accessibility help topics, including "How can choices in background and text color affect accessibility?"

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA)	Supports	This criterion is supported, except for one minor issue observed
Also applies to:		with the Drop Box tool. When zooming the page, all columns
EN 301 549 Criteria		from the list of Drop Boxes are getting removed, except for the
• 9.1.4.4 (Web)		title column. There is no horizontal scroll to see the remaining
 10.1.4.4 (Non-web document) 		columns, just a non-descript ellipses. Otherwise, on resizing
 11.1.4.4.1 (Open Functionality Software) 		
• 11.1.4.4.2 (Closed Software)		pages up to 200%, there is no other loss of content, no overlap
• 11.8.2 (Authoring Tool)		or truncation of 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)		
1.4.5 Images of Text (Level AA)	Supports	This criterion is supported. There are no instances of images of
Also applies to:		text being used to convey information.
EN 301 549 Criteria		
• 9.1.4.5 (Web)		
 10.1.4.5 (Non-web document) 		
 11.1.4.5.1 (Open Functionality Software) 		
 11.1.4.5.2 (Closed Software) – Does not apply 		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
1.4.10 Reflow (Level AA 2.1 only)	Supports	This criterion is supported. On resizing pages up to 400%, there
Also applies to:		is no loss of content, no overlap or truncation of content, and
EN 301 549 Criteria		single directional scroll is observed.
• 9.1.4.10 (Web)		
• 10.1.4.10 (Non-web document)		
• 11.1.4.10 (Open Functionality Software)		

Criteria	Conformance Level	Remarks and Explanations
 11.1.4.10 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 – Does not apply 		
1.4.11 Non-text Contrast (Level AA 2.1 only) 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) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Partially Supports	This criterion is supported, except for a couple of instances where non-text elements are lacking sufficient contrast. Some examples of tools/features which affects both instructors and students include: • In Conversations, after selecting the "New Topic" option, clicking on "Question" or "Discussion" only causes the color of the button to change ever so slightly, which might impact the ability of certain users to perceive this new, changed state of the element • The Gradebook tool includes some grey arrow controls that may be difficult for some low-vision users to discern from the white background
1.4.12 Text Spacing (Level AA 2.1 only) 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	Supports	This criterion is supported. There is no loss of content or functionality when line height (line spacing) is set to at least 1.5 times the font size; spacing following paragraphs is set to at least 2 times the font size; letter spacing (tracking) is set to at least 0.12 times the font size; and word spacing is set to at least 0.16 times the font size, and there are no other changes to style properties.
1.4.13 Content on Hover or Focus (Level AA 2.1 only) Also applies to: EN 301 549 Criteria	Supports	This criterion is supported. When content shows on hover or keyboard focus, there is a way to dismiss the additional content without moving the hover or focus, the pointer can be moved

Criteria	Conformance Level	Remarks and Explanations
 9.1.4.13 (Web) 10.1.4.13 (Non-web document) 11.1.4.13 (Open Functionality Software) 11.1.4.13 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 – Does not apply 		over the additional content without having it disappear, and the additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or the information is no longer valid.
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 nonweb software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to nonweb docs	Supports	This criterion is supported. Throughout Sakai, there is more than one way to locate a Web page within a set of Web pages, except for where the Web Page is the result of, or a step in a process.
2.4.6 Headings and Labels (Level AA) Also applies to: EN 301 549 Criteria • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs)	Partially Supports	This criterion is supported, except for a few isolated cases where users may not be able to understand the purpose and context of headings or form elements. One example of a student facing instance is when taking an Assessment in Test & Quizzes. The labels for the up and down arrow buttons used in the progress bar could be described

Criteria	Conformance Level	Remarks and Explanations
12.2.4 (Support Docs) Revised Section 508		better, so screen reader users can easily determine their
• 501 (Web)(Software)		purpose.
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.4.7 Focus Visible (Level AA)	Supports	This criterion is supported. Throughout Sakai, there are clear
Also applies to:		and distinctive focus indicators visible on components receiving
EN 301 549 Criteria		keyboard tab focus.
• 9.2.4.7 (Web)		Reyboard tab rocas.
 10.2.4.7 (Non-web document) 		
• 11.2.4.7 (Open Functionality Software)		
• 11.2.4.7 (Closed Software)		
• 11.8.2 (Authoring Tool)		
• 12.1.2 (Product Docs)		
• 12.2.4 (Support Docs)		
Revised Section 508		
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		T
3.1.2 Language of Parts (Level AA)	Supports	This criterion is supported. In-page language switches happen
Also applies to: EN 301 549 Criteria		only in user-generated content. Users can indicate the language
• 9.3.1.2 (Web)		switch in their content.
• 10.3.1.2 (Web)		
• 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)		

Criteria	Conformance Level	Remarks and Explanations
3.2.3 Consistent Navigation (Level AA)	Supports	This criterion is supported. Consistent navigation is maintained
Also applies to:		throughout the application. Navigational mechanisms that
EN 301 549 Criteria		repeat on multiple Web pages occur in the same relative order
• 9.3.2.3 (Web)		each time they are repeated, unless a change is initiated by the
 10.3.2.3 (Non-web document) – Does not apply 		, , , , , ,
 11.3.2.3 (Open Functionality Software) – Does 		user.
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)	Supports	This criterion is supported. Identical names are maintained for
Also applies to:		controls that have the same functionality, allowing users to
EN 301 549 Criteria		consistently identify these elements.
• 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		

Criteria	Conformance Level	Remarks and Explanations
3.3.3 Error Suggestion (Level AA) Also applies to: EN 301 549 Criteria 9.3.3.3 (Web) 10.3.3.3 (Non-web document) 11.3.3.3 (Open Functionality Software) 11.3.3.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	This criterion is supported. If there are errors when submitting a form, suggestions for how to fix/remove the errors are provided.
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)	Supports	This criterion is supported. While there are no instances of legal or financial transactions in the application, some tools like Tests & Quizzes, Assignments, etc. use a multi-step submission confirmation process to assist with error prevention of certain user-generated data. For example, while data entered by the user is not automatically checked for input errors, the Tests & Quizzes tool provides a mechanism for the student to review/correct/confirm the information before they are prompted to submit their Assessment. Technically, once an Assessment has been submitted, the action can't be reversed. However, if a problem with a submission is discovered after the fact, Sakai provides Students with multiple communication tools/methods for reporting issues to the Instructor, who has the ability to delete the original submission and/or allow a retake.

Criteria	Conformance Level	Remarks and Explanations
4.1.3 Status Messages (Level AA 2.1 only)	Partially Supports	This criterion is supported, except for a limited number of
		·
		occurred, and know what actions they are able to perform, but may not always know what the crux of the issue is.

Table 3: Success Criteria, Level AAA

Notes: Not Evaluated

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Notes: Since Revised Section 508 Functional Performance Criteria <u>map</u> to WCAG success criteria, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other Revised Section 508 Functional Performance Criteria were either not applicable or no response was needed.

Chapter 4: Hardware

Notes: Not Applicable

Chapter 5: Software

Notes: Since Revised Section 508 Functional Performance Criteria <u>map</u> to WCAG success criteria, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other Revised Section 508 Functional Performance Criteria were either not applicable or no response was needed.

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	No response required	No response required
602 Support Documentation	No response required	No response required
602.2 Accessibility and Compatibility Features	Supports	Product includes a help section devoted to accessibility and users of assistive technology. A link to this "Accessibility Information" page can be found in the footer of every Sakai site/page, and features an overview of the product that includes organization, landmarks, a list of skip links, access keys and supportive information for accessible and efficient navigation and operation. Information on color/contrast modification and enlarging screen elements are also available. Detailed information is also provided on best practices for creating accessible content for the product.
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	Product is open source. While support documentation is provided electronically, customers also have the option of

Criteria	Conformance Level	Remarks and Explanations
		contracting with one of <u>Sakai's commercial affiliates</u> to provide hosting, development, and technical support for the application
		and infrastructure of the product to IT staff at the client institution. End-user support is dependent upon the available
		resources at the adopting institution. End users receive
		alternate support via offline and in-person methods as
		determined appropriate by their academic institution.
603 Support Services	No response required	No response required
603.2 Information on Accessibility and Compatibility	Supports	A basic overview of best practices for accessibility is provided as
Features		part of faculty/staff training, if it is requested by the client.
		Clients are reminded to keep accessibility in mind when
		creating content and given examples of best practices and
		common pitfalls. Clients are also referred to the section of the
		online support documentation devoted to accessibility and
		compatibility features in 602.2 mentioned above. In addition,
		Sakai leverages a third-party software called "Screen Steps" for
		maintaining the online "Sakai 22 User Guide". This is an
		accessible, screen-reader friendly platform that is relatively
		easy for assistive technology users to navigate. The Sakai User
		Guide includes an alphabetized listing of Tools/Features along
		with many related topics which are all indexed in an intuitive,
		easy-to-find table of contents. While a majority of the "how to"
		articles contain screenshots that are primarily visual in nature,
		the graphics do include alternative text, and screen reader
		users can still follow along within the context of the steps being
		described. The "Sakai 22 User Guide" also includes a search
		feature that can be used to quickly locate a specific help topic,
		or check for related content covered in any number of
		community user-contributed help articles.
603.3 Accommodation of Communication Needs	Not applicable	Product is open source. Customers have the option of
		contracting with one of <u>Sakai's commercial affiliates</u> to provide

Criteria	Conformance Level	Remarks and Explanations
		hosting, development, and technical support for the application
		and infrastructure of the product to IT staff at the client
		institution. End-user support is dependent upon the available
		resources at the adopting institution. Institutions shall
		accommodate the communication needs of individuals with
		disabilities as determined appropriate by the institution. Sakai
		does maintain an email listserv that people can use to reach out
		to the Sakai Accessibility Team at any point if they have a
		question/problem. Questions sent to
		Accessibility@SakaiLMS.org will receive a timely response,
		usually within the same day, and often within a few hours of
		their inquiry. If a user requires a particular type of
		accommodation, we are able to lean on members of the Sakai
		open source community, who are always willing to share their
		resources and expertise to try and provide whatever specialized
		assistance is needed.

EN 301 549 Report

Notes:

Chapter 4: Functional Performance Statements (FPS)

Notes: Since EN 301 549 for ICT <u>adopted</u> WCAG 2.1 in 2018, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other EN 301 549 for ICT were either not applicable or no response was needed.

Chapter <u>5: Generic Requirements</u>

Notes: Since EN 301 549 for ICT <u>adopted</u> WCAG 2.1 in 2018, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other EN 301 549 for ICT were either not applicable or no response was needed.

Chapter 6: ICT with Two-Way Voice Communication

Notes: Not Applicable

Chapter 7: ICT with Video Capabilities

Notes: Not Applicable

Chapter 8: Hardware

Notes: Not Applicable

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

Notes: Since EN 301 549 for ICT <u>adopted</u> WCAG 2.1 in 2018, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other EN 301 549 for ICT were either not applicable or no response was needed.

Chapter 10: Non-Web Documents

Notes: Not Applicable

Chapter 11: Software

Notes: Since EN 301 549 for ICT <u>adopted</u> WCAG 2.1 in 2018, any applicable standards are referenced under their respective WCAG Success Criteria column(s) of the WCAG 2.x A & AA sections of this report. All other EN 301 549 for ICT were either not applicable or no response was needed.

Chapter 12: Documentation and Support Services

Criteria	Conformance Level	Remarks and Explanations
12.1 Product documentation	No response required	No response required
12.1.1 Accessibility and compatibility features	Supports	Product includes a help section devoted to accessibility and users of assistive technology. A link to this "Accessibility Information" page can be found in the footer of every Sakai site/page and features an overview of the product that includes organization, landmarks, a list of skip links, access keys and

Criteria	Conformance Level	Remarks and Explanations
		supportive information for accessible and efficient navigation and operation. Information on color/contrast modification and enlarging screen elements are also available. Detailed information is also provided on best practices for creating accessible content for the product.
12.1.2 Accessible documentation	See WCAG 2.x section	See information in WCAG 2.x section
12.2 Support Services	No response required	No response required
12.2.2 Information on accessibility and compatibility features	Supports	A basic overview of best practices for accessibility is provided as part of faculty/staff training, if it is requested by the client. Clients are reminded to keep accessibility in mind when creating content and given examples of best practices and common pitfalls. Clients are also referred to the section of the online support documentation devoted to accessibility and compatibility features in 12.1.1 mentioned above. In addition, Sakai leverages a third-party software called "Screen Steps" for maintaining the online "Sakai 22 User Guide". This is an accessible, screen-reader friendly platform that is relatively easy for assistive technology users to navigate. The Sakai User Guide includes an alphabetized listing of Tools/Features along with many related topics which are all indexed in an intuitive, easy-to-find table of contents. While a majority of the "how to" articles contain screenshots that are primarily visual in nature, the graphics do include alternative text, and screen reader users can still follow along within the context of the steps being described. The "Sakai 22 User Guide" also includes a search feature that can be used to quickly locate a specific help topic, or check for related content covered in any number of community user-contributed help articles.
12.2.3 Effective communication	Not applicable	Product is open source. Customers have the option of contracting with one of Sakai's commercial affiliates to provide hosting, development, and technical support for the application and infrastructure of the product to IT staff at the client institution. End-user support is dependent upon the available resources at the adopting institution. Institutions shall accommodate the communication needs of individuals with

Criteria	Conformance Level	Remarks and Explanations
		disabilities as determined appropriate by the institution. Sakai does maintain an email listserv that people can use to reach out to the Sakai Accessibility Team at any point if they have a question/problem. Questions sent to Accessibility@SakaiLMS.org will receive a timely response, usually within the same day, and often within a few hours of
		their inquiry. If a user requires a particular type of accommodation, we are able to lean on members of the Sakai open source community, who are always willing to share their resources and expertise to try and provide whatever specialized assistance is needed.
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: Not Applicable

Legal Disclaimer (Sakai)

Compliance with EN 301 549 for ICT and Revised Section 508 standards (and the stated goal of meeting WCAG 2.1 A & AA Success Criteria) varies from tool to tool, and to a certain extent depends on how tools are configured. Much of a user's experience - and how accessible Sakai feels to that user - will be determined by the content added to it, so a site with good accessibility will also require some forethought on the part of an instructor or designer.