



Digital Accessibility Standards for Course Design and Review

WCAG 2.2, ADA Title II, Section 508, Quality Matters

How to Use This Document

- **Checklist tables** indicate **required criteria** for accessibility compliance and Quality Matters review.
 - **UDL Tips and Design Guidance** indicate **recommended best practices** that enhance inclusion and learning effectiveness but may not be legally mandated.
 - **Applicable Standards** identify the authoritative requirements that support each section.
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Status: Ready-to-use institutional review guide

Last updated: January 2026

Executive Summary

This document represents an update to prior institutional guidance on accessible course design. It reflects significant changes in federal accessibility law, international web accessibility standards, and quality assurance frameworks, including the release of **WCAG 2.2 (October 2023)** and the **ADA Title II Final Rule (April 2024)**.

The revisions ensure that instructional practices, course review processes, and accessibility expectations remain **current, and aligned with nationally recognized standards**, while continuing to support inclusive teaching through **Universal Design for Learning (UDL)**.

Standards & Authorities

- **WCAG 2.2** (W3C Recommendation, October 2023). [Link to WCAG Standards](#)
- **ADA Title II Final Rule** (U.S. DOJ, April 2024). [Link to ADA Title II](#).
- **Section 508 of the Rehabilitation Act** (WCAG 2.0 AA baseline). [Link to Section 508](#).
- **Quality Matters Higher Education Rubric (7th Ed., 2023)**. [Link to Quality Matters](#).

- **Universal Design for Learning Guidelines v3.0 (CAST, 2024).** [Link to UDL Guidelines.](#)

Compliance Timeline (U.S. Public Institutions)

Design guidance: Courses and instructional materials should be developed and remediated to meet **WCAG 2.2 AA** as early as practicable to ensure readiness ahead of federal compliance deadlines and to minimize retroactive remediation.

- **Large entities:** April 2026
- **Small entities:** April 2027

Institutional Position

- Courses and materials should be **designed to WCAG 2.2 AA** to ensure forward compatibility.
- Accessibility is addressed **proactively** during design and development, not retroactively.
- Universal Design for Learning is used to **reduce accommodation needs** and improve learning outcomes for all students.

1. Purpose & Scope

We are committed to creating learning experiences that are **accessible, equitable, innovative, and engaging for all learners**. Accessibility is both a legal requirement and a quality expectation. This document updates prior guidance to align with:

- **WCAG 2.2** (W3C Recommendation, October 2023)
- **ADA Title II Final Rule** (U.S. DOJ, April 2024)
- **Section 508 of the Rehabilitation Act** (U.S. Federal)
- **Quality Matters Higher Education Rubric (7th Ed., 2023)**
- **Universal Design for Learning (UDL) Guidelines v3.0 (CAST, 2024)**

This guide provides **review checklists, remediation guidance, and design strategies** for content in the LMS (D2L Brightspace) and for instructional materials (Word, PowerPoint, PDF, multimedia, assessments, and third-party tools).

2. Regulatory & Quality Framework Alignment

2.1 Accessibility Standards & Laws

Framework	Current Requirement	Notes
WCAG	WCAG 2.2	Supersedes 2.1; adds new success criteria focused on

		cognitive, motor, and low-vision access
ADA Title II	WCAG 2.1 AA required	Compliance deadlines: April 2026 (large entities), April 2027 (small entities)
Section 508	WCAG 2.0 AA	Federal baseline; WCAG 2.2 is the safest forward-compatible practice
EU (reference)	EN 301 549 (WCAG 2.1-aligned)	Useful for multinational programs

Best-practice approach: Design to **WCAG 2.2 AA**, even where law references earlier versions.

2.2 Quality Matters (QM) Alignment

This guide maps directly to:

- **QM 8.1** – Course navigation is logical, consistent, and efficient
 - **QM 8.2** – Course design facilitates readability and minimizes distractions
 - **QM 8.3** – Accessibility of course content and media
 - **QM 8.4** – Accessibility of course technologies and tools
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2.3 Universal Design for Learning (UDL)

All criteria support CAST UDL principles:

- **Multiple Means of Representation** (perception, language, comprehension)
 - **Multiple Means of Action & Expression** (interaction, expression, executive function)
 - **Multiple Means of Engagement** (relevance, effort, persistence)
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3. What Changed: WCAG 2.1 → WCAG 2.2 (NEW SECTION)

This section explains why updates were required and highlights new **WCAG 2.2** success criteria that affect instructional design.

While **WCAG 2.1** significantly improved accessibility for mobile access and low vision, research and enforcement experience showed persistent barriers for learners with **motor disabilities**, **cognitive and learning disabilities**, and users of **keyboard-only or assistive**

technologies. WCAG 2.2 responds to these gaps by strengthening requirements related to **focus visibility, target size, drag-and-drop interactions, form completion, and consistency of help.**

These updates have direct implications for **LMS navigation, interactive activities, assessments, quizzes, and forms**, making them especially relevant for **course designers and instructors.**

3.1 New WCAG 2.2 Success Criteria (AA-Relevant)

Success Criteria	Name	Design Impact
2.4.11 (AA)	Focus Not Obscured (Minimum)	Sticky headers, pop-ups, and chat widgets must not cover focused content
2.4.12 (AAA)	Focus Not Obscured (Enhanced)	Best practice for complex interfaces
2.4.13 (AAA)	Focus Appearance	Improves keyboard visibility
2.5.7 (AA)	Dragging Movements	Drag-and-drop must have a non-drag alternative
2.5.8 (AA)	Target Size (Minimum)	Click/tap targets must be at least 24×24 CSS pixels
3.2.6 (A)	Consistent Help	Help mechanisms must be consistently located
3.3.7 (A)	Redundant Entry	Users should not have to re-enter information unnecessarily

3.2 Why This Matters for Courses

- Improves access for **keyboard users, students with motor impairments, and neurodivergent learners**
 - Reduces cognitive load during navigation and assessment
 - Directly affects LMS tools, quizzes, discussions, and third-party integrations
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4. Layout & Navigation (LMS Content)

Why this matters: Clear, consistent layout and navigation are foundational to accessibility and usability. Proper heading structure and predictable navigation support screen reader users, keyboard-only users, and learners with cognitive or executive-function disabilities. These practices are also central to quality course design and reduce cognitive load for all learners.

Key references:

W3C, *Headings and Page Structure*:

<https://www.w3.org/WAI/tutorials/page-structure/headings/>

WCAG 2.2 Understanding 1.3.1 (Info and Relationships):

<https://www.w3.org/WAI/WCAG22/Understanding/info-and-relationships.html>

Quality Matters, General Standard 8:

<https://qualitymatters.org/qa-resources/rubric-standards/higher-ed-rubric>

D2L, *Accessibility in Brightspace*: <https://www.d2l.com/accessibility/>

Brightspace Accessibility Checker Overview: <https://documentation.brightspace.com/>

Applicable Standards

- WCAG 2.2: **1.3.1, 2.4.6, 2.4.11**
- QM: **8.1**
- UDL: Representation, Engagement

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Page layout is simple, uncluttered, and responsive	☐	☐	☐	
Heading structure is hierarchical (H1–H3)	☐	☐	☐	
Headings are used instead of bold text	☐	☐	☐	
Navigation labels are consistent across modules	☐	☐	☐	
Instructions do not rely on location, color, shape, or sound	☐	☐	☐	
Keyboard focus is visible and not obscured	☐	☐	☐	

UDL Tip: Chunk content into short sections with clear headings to support executive function.

5. Tables

Why this matters: Tables that are not properly structured can be difficult or impossible for screen reader users to interpret. Using semantic table markup ensures that relationships between headers and data cells are programmatically determinable and presented in a meaningful sequence.

Key references:

W3C, *Tables Tutorial*: <https://www.w3.org/WAI/tutorials/tables/>

WCAG 2.2 Understanding 1.3.1:
<https://www.w3.org/WAI/WCAG22/Understanding/info-and-relationships.html>

WebAIM, *Creating Accessible Tables*: <https://webaim.org/techniques/tables/>

Applicable Standards

- WCAG 2.2: 1.3.1, 1.3.2
- QM: 8.1
- UDL: Representation

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Tables are used only for tabular data (not layout)	☐	☐	☐	
Table headers (<th>) are defined for rows and/or columns	☐	☐	☐	
Header cells include correct scope (row/col)	☐	☐	☐	
No merged, split, or nested cells	☐	☐	☐	
Tables include captions where context is needed	☐	☐	☐	
Data order is logical when read linearly	☐	☐	☐	

UDL Tip: When tables are complex, provide a text summary or alternative representation.

6. Links & Hypertext

Why this matters: Many screen reader users navigate by links alone. Descriptive, meaningful link text ensures that users can understand purpose and destination without surrounding context, improving efficiency and comprehension.

Key references:

WCAG 2.2 Understanding 2.4.4 (Link Purpose):
<https://www.w3.org/WAI/WCAG22/Understanding/link-purpose-in-context.html>

WebAIM, *Links and Hypertext*: <https://webaim.org/techniques/hypertext/>

Applicable Standards

- WCAG 2.2: **2.4.4**
- QM: **8.1**
- UDL: Representation

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Link text clearly describes destination or purpose	☐	☐	☐	
Raw URLs are not used as link text	☐	☐	☐	
Links are concise and meaningful out of context	☐	☐	☐	
Icons used as links include accessible text or alt text	☐	☐	☐	
Links are visually distinguishable beyond color alone	☐	☐	☐	

UDL Tip: Descriptive links support comprehension and reduce cognitive load.

7. Lists

Why this matters: Properly coded lists communicate structure and relationships to assistive technologies. Visually formatted lists that lack semantic markup can cause confusion and reduce navigability for screen reader users.

Key references:

W3C, *Lists Tutorial*: <https://www.w3.org/WAI/tutorials/page-structure/content/#lists>

WCAG 2.2 Understanding 1.3.1:
<https://www.w3.org/WAI/WCAG22/Understanding/info-and-relationships.html>

Applicable Standards

- WCAG 2.2: **1.3.1**
- QM: **8.1**
- UDL: Representation

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Ordered and unordered lists use built-in list tools	☐	☐	☐	
Lists are not simulated using symbols or spacing	☐	☐	☐	
Nested lists follow a logical hierarchy	☐	☐	☐	
List items are concise and parallel in structure	☐	☐	☐	

UDL Tip: Well-structured lists support scanning and executive function.

8. Color & Contrast

Why this matters: Insufficient contrast and reliance on color alone can prevent users with low vision or color-vision deficiencies from perceiving content. WCAG contrast requirements ensure text and interface elements remain readable across a wide range of visual conditions.

Key references:

WCAG 2.2 Understanding 1.4.3 (Contrast Minimum):

<https://www.w3.org/WAI/WCAG22/Understanding/contrast-minimum.html>

WCAG 2.2 Understanding 1.4.1 (Use of Color):

<https://www.w3.org/WAI/WCAG22/Understanding/use-of-color.html>

WebAIM, *Color Contrast*: <https://webaim.org/articles/contrast/>

Applicable Standards

- WCAG 2.2: **1.4.1, 1.4.3**
- QM: **8.2**
- UDL: Representation

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Text contrast meets 4.5:1 minimum	☐	☐	☐	
Large text meets 3:1 minimum	☐	☐	☐	
Color is not the sole means of conveying meaning	☐	☐	☐	

Links have sufficient contrast and a secondary cue	☐	☐	☐	
Red/green combinations are avoided or supplemented	☐	☐	☐	

UDL Tip: Pair color with text labels or icons to reinforce meaning.

9. Images

Why this matters: Images that convey information must have text alternatives so that learners who cannot see them can access equivalent content. Appropriate alt text supports screen readers, braille displays, and text-only formats.

Key references:

WCAG 2.2 Understanding 1.1.1 (Non-text Content):

<https://www.w3.org/WAI/WCAG22/Understanding/non-text-content.html>

W3C, *Images Concepts*: <https://www.w3.org/WAI/tutorials/images/>

WebAIM, *Alternative Text*: <https://webaim.org/techniques/alttext/>

Applicable Standards

- WCAG 2.2: 1.1.1
- QM: 8.3
- UDL: Representation

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
Informative images include meaningful alt text	☐	☐	☐	
Decorative images use null alt (alt="")	☐	☐	☐	
Functional images include functional alt text	☐	☐	☐	
Complex images include extended descriptions	☐	☐	☐	
Images are clear, readable, and not pixelated	☐	☐	☐	

UDL Tip: Provide text alternatives that convey the same instructional value.

10. Multimedia & Interactive Elements

Why this matters: Multimedia and interactive content introduce additional accessibility considerations, including captions, transcripts, keyboard operability, and alternatives to complex gestures. WCAG 2.2 expands requirements for drag-and-drop and target size to better support users with motor and mobility impairments.

Key references:

WCAG 2.2 Understanding 1.2 (Time-based Media):

<https://www.w3.org/WAI/WCAG22/Understanding/>

WCAG 2.2 Understanding 2.5.7 (Dragging Movements):

<https://www.w3.org/WAI/WCAG22/Understanding/dragging-movements.html>

CAST UDL Guidelines: <https://udlguidelines.cast.org/>

Applicable Standards

- WCAG 2.2: **1.2.1–1.2.5, 2.1.1, 2.5.7, 2.5.8**
- QM: **8.3, 8.4**
- UDL: Representation, Action & Expression, Engagement

Scope (NEW)

This section covers **video, audio, animations, simulations, and interactive design elements**, including: - Drag-and-drop activities - Interactive timelines, maps, and hotspots - Simulations and scenario-based learning - Embedded third-party interactive tools

Review Checklist – Multimedia (Playback & Access)

Criteria	Meets	Does Not Meet	N/A	Notes
Videos include accurate, synchronized captions	☐	☐	☐	
Audio-only content includes transcripts	☐	☐	☐	
Video and audio players are keyboard accessible	☐	☐	☐	
Auto-play is disabled or user-controlled	☐	☐	☐	
Audio description is provided when visuals convey meaning	☐	☐	☐	

Review Checklist – Interactive Elements (WCAG 2.2 Focus)

Criteria	Meets	Does Not Meet	N/A	Notes
Drag-and-drop activities have a non-drag alternative (e.g., select-and-submit)	☐	☐	☐	
Interactive elements are fully operable by keyboard	☐	☐	☐	
Click/tap targets meet minimum size (24×24 CSS pixels)	☐	☐	☐	
Focus indicator is visible and not obscured	☐	☐	☐	
Instructions do not rely solely on motion or gesture	☐	☐	☐	
Time limits can be adjusted, paused, or disabled	☐	☐	☐	

Design Guidance for Drag-and-Drop (NEW)

Why this matters: WCAG 2.2 **2.5.7 Dragging Movements (AA)** requires that users who cannot perform dragging gestures (e.g., motor impairments, tremors, screen reader users) have an equivalent way to complete the task.

Acceptable alternatives include: - Select an item → choose destination from a list → submit - Use arrow keys or buttons (Move Up / Move Down / Assign) - Provide a parallel activity (matching via dropdowns)

Not sufficient: - “Keyboard users can tab through draggable items” *without* a way to complete the action

UDL Alignment for Interactive Design

Use this as design guidance, not a scored checklist.

- **Representation:** Provide a brief text explanation of what the interaction is intended to teach or assess.
- **Action & Expression:** Offer multiple ways to complete the task (e.g., drag, select from a list, type a response).

- **Engagement:** Allow retries, flexible pacing, and clear, actionable feedback.

UDL Tip: Offer transcripts to support flexible pacing and review.

11. AI, Accessibility & UDL

Guidance: Artificial intelligence (AI) tools may support accessibility and Universal Design for Learning when used thoughtfully; however, **AI-generated outputs do not guarantee accessibility or compliance.** Content creators remain responsible for ensuring that AI-assisted materials meet applicable accessibility standards, are reviewed for accuracy, and provide equivalent access for all learners.

Applicable Standards

- WCAG 2.2 (varies by output)
- QM: **8.3, 8.4**
- UDL: All principles

Review Checklist

Criteria	Meets	Does Not Meet	N/A	Notes
AI-generated captions are reviewed and corrected	☐	☐	☐	
AI-generated alt text is edited for instructional context	☐	☐	☐	
AI summaries supplement—not replace—source content	☐	☐	☐	
Students are informed when AI tools are used	☐	☐	☐	
AI tools meet institutional accessibility requirements	☐	☐	☐	

UDL Tip: AI can support multiple means of expression when choices are offered.

12. Assessments & Quizzes (NEW)

Why this matters: Assessments must measure learning outcomes—not a learner’s ability to navigate inaccessible interfaces. Accessible assessment design ensures that timing, navigation, and interaction methods do not create unnecessary barriers.

Key references:

WCAG 2.2 Understanding 2.2.1 (Timing Adjustable):

<https://www.w3.org/WAI/WCAG22/Understanding/timing-adjustable.html>

WCAG 2.2 Understanding 2.5.7 (Dragging Movements):

<https://www.w3.org/WAI/WCAG22/Understanding/dragging-movements.html>

Quality Matters, Standard 8.3:

<https://qualitymatters.org/qa-resources/rubric-standards/higher-ed-rubric>

Applicable Standards

- WCAG 2.2: **2.1.1, 2.4.3, 2.4.11, 2.5.7, 2.2.1, 3.3.1**
- QM: **8.3, 8.5**
- UDL: Action & Expression, Engagement

Review Checklist – Assessments & Quizzes

Criteria	Meets	Does Not Meet	N/A	Notes
All assessment elements are keyboard accessible	☐	☐	☐	
Quiz navigation is logical and consistent	☐	☐	☐	
Drag-and-drop questions include a non-drag alternative	☐	☐	☐	
Time limits can be extended or removed when needed	☐	☐	☐	
Instructions do not rely on color, position, or gesture	☐	☐	☐	
Error messages are clear and descriptive	☐	☐	☐	

UDL Tip: Allow multiple ways to demonstrate learning (typed, recorded, file upload).

13. Forms & Data Entry (NEW)

Why this matters: Forms are a common point of failure for accessibility. WCAG 2.2 introduces new protections against redundant entry to reduce cognitive load and prevent errors for users with memory, attention, or motor disabilities.

Key references:

WCAG 2.2 Understanding 3.3.7 (Redundant Entry):

<https://www.w3.org/WAI/WCAG22/Understanding/redundant-entry.html>

WCAG 2.2 Understanding 3.3.1 (Error Identification):

<https://www.w3.org/WAI/WCAG22/Understanding/error-identification.html>

Applicable Standards

- WCAG 2.2: **3.3.1, 3.3.7, 1.3.1, 2.4.6**
- QM: **8.3**
- UDL: Action & Expression

Review Checklist – Forms

Criteria	Meets	Does Not Meet	N/A	Notes
Form fields have programmatic labels	☐	☐	☐	
Required fields are clearly identified	☐	☐	☐	
Users are not required to re-enter information unnecessarily	☐	☐	☐	
Errors are described with suggestions for correction	☐	☐	☐	
Forms are fully operable by keyboard	☐	☐	☐	

UDL Tip: Reduce cognitive load by minimizing required inputs.

14. Third-Party Tool Accessibility Review Template (NEW)

Why this matters: Third-party tools are part of the instructional environment and must meet the same accessibility expectations as LMS content. Documented review processes reduce institutional risk and support consistent adoption decisions.

Key references:

U.S. DOJ, ADA Title II Digital Accessibility Guidance:

<https://www.ada.gov/resources/web-guidance/>

Section 508, ICT Testing Baseline: <https://www.section508.gov/sell/acr/>

VPAT Guidance: <https://www.itic.org/policy/accessibility/vpat>

Purpose

Use this template **before adopting or requiring any external tool.**

Review Checklist – Third-Party Tools

Criteria	Meets	Does Not Meet	N/A	Notes
Vendor provides a current VPAT/ACR	☐	☐	☐	
Tool supports keyboard-only navigation	☐	☐	☐	
Media includes captions/transcripts	☐	☐	☐	
Dragging interactions have alternatives	☐	☐	☐	
Known accessibility issues are documented	☐	☐	☐	

Decision Status: ☐ Approved ☐ Approved with Exceptions ☐ Not Approved

15. Brightspace-Specific Repair Workflows (NEW)

Why this matters: Even well-designed content can fail accessibility checks if platform-specific tools are misused. These workflows translate WCAG requirements into concrete actions within D2L Brightspace.

Key references:

D2L, *Accessibility in Brightspace*: <https://www.d2l.com/accessibility/>

Brightspace Accessibility Checker Overview: <https://documentation.brightspace.com/>

Common Repairs

Pages & Content: - Use built-in heading styles - Avoid tables for layout - Run Brightspace Accessibility Checker

Quizzes: - Avoid drag-and-drop unless alternatives exist - Enable extended time accommodations

Discussions: - Provide text-based alternatives to multimedia posts

16. Accessible Documents (NEW)

Why this matters: Documents are often downloaded, shared, and reused outside the LMS. Ensuring accessibility at the source (Word, Google Docs, Slides) prevents downstream remediation issues, especially when exporting to PDF.

Key references:

W3C, *Document Accessibility*: <https://www.w3.org/WAI/standards-guidelines/>

Microsoft, *Make your documents accessible*: <https://support.microsoft.com/accessibility>

Google, *Accessibility in Docs & Slides*:
<https://support.google.com/docs/answer/6199477>

Word, Google Docs, & Slides

Applicable Standards

- WCAG 2.2: 1.1.1, 1.3.1, 1.4.3
- QM: 8.3

Review Checklist – Documents

Criteria	Meets	Does Not Meet	N/A	Notes
Built-in heading styles are used	☐	☐	☐	
Images include appropriate alt text	☐	☐	☐	
Color contrast meets minimum ratios	☐	☐	☐	
Lists and reminders use true formatting	☐	☐	☐	

PDFs

Additional Requirements

- Tagged PDF structure
- Logical reading order
- Searchable text (not scanned images)

Review Checklist – PDFs

Criteria	Meets	Does Not Meet	N/A	Notes
PDF is properly tagged	☐	☐	☐	
Reading order is logical	☐	☐	☐	
Images include alt text	☐	☐	☐	
Document passes PDF accessibility check	☐	☐	☐	

Appendix A: WCAG 2.1 → WCAG 2.2 Summary of Changes

WCAG 2.2 builds on WCAG 2.1 by introducing new success criteria that address motor access, cognitive load, and usability issues commonly encountered in modern web and LMS environments. These changes emphasize reducing interaction barriers and improving predictability and ease of use across instructional technologies.

New or Updated Success Criteria with Instructional Impact

Success Criterion	Level	Instructional Impact
2.4.11 Focus Not Obscured (Minimum)	AA	Sticky headers, pop-ups, and toolbars must not cover focused content
2.5.7 Dragging Movements	AA	Drag-and-drop activities must include a non-drag alternative
2.5.8 Target Size (Minimum)	AA	Interactive elements must be large enough for reliable selection
3.2.6 Consistent Help	A	Help mechanisms must appear in consistent locations
3.3.7 Redundant Entry	A	Users should not be required to re-enter previously provided information

Why This Matters for Courses

- LMS tools increasingly rely on **interactive and gesture-based controls**
- Students may access courses using **keyboards, assistive technologies, or mobile devices**
- Designing to WCAG 2.2 reduces remediation burden and legal risk

Reference:

WCAG 2.2 Understanding Docs – <https://www.w3.org/WAI/WCAG22/Understanding/>
