ELEMENT

Element Learning Management Solutions
Accessibility Conformance Report

Revised Section 508 Edition

VPAT® Version 2.3 – January 2026

Name of Product/Version: Element Learning Management System (ELMS)

Product Description: Learning Management System (COTS)

Date: January 16, 2026

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Notes:

Author	Date	Note
Richard Leherpeur	05/07/2019	Initial version
Martin A Mascarenas	05/07/2019	Reviewer
Richard Leherpeur	10/24/2019	Note 1 links in red
Richard Leherpeur	01/16/2026	Review and update

Evaluation Methods Used: Testing with Assistive Technologies

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, at *http://www.w3.org/TR/2008/REC-WCAG20-20081211/*	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017	Yes
Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on January 22, 2018	No

Terms

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

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

WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

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

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 (at bottom) Electronic Docs: Software: Authoring Tool: See Note 1 (at bottom)
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.3.2 Meaningful Sequence (Level A)	Web: Supports	Web: See Note 1

Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Electronic Docs: Software: Authoring Tool: See Note 1
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: Electronic Docs: Software: Authoring Tool:
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool) • 602.3 (Support Docs)		

2.2.1 Timing Adjustable (Level A)
Also applies to:
Revised Section 508
    • 501 (Web)(Software)
    • 504.2 (Authoring Tool)
    • 602.3 (Support Docs)
	Web: Not Applicable
	Electronic Docs: Not Applicable
	Software: Not Applicable
	Authoring Tool: Not Applicable
		Web:
		Electronic Docs:
		Software:
		Authoring Tool:

2.2.2 Pause, Stop, Hide (Level A)
Also applies to:
Revised Section 508
    • 501 (Web)(Software)
    • 504.2 (Authoring Tool)
    • 602.3 (Support Docs)
	Web: Not Applicable
	Electronic Docs: Not Applicable
	Software: Not Applicable
	Authoring Tool: Not Applicable
		Web:
		Electronic Docs:
		Software:
		Authoring Tool:

2.3.1 Three Flashes or Below Threshold (Level A)
Also applies to:
Revised Section 508
    • 501 (Web)(Software)
    • 504.2 (Authoring Tool)
    • 602.3 (Support Docs)
	Web: Not Applicable
	Electronic Docs: Not Applicable
	Software: Not Applicable
	Authoring Tool: Not Applicable
		Web:
		Electronic Docs:
		Software:
		Authoring Tool:

2.4.1 Bypass Blocks (Level A)
Also applies to:
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
	Web: Supports
	Electronic Docs: Not Applicable
	Authoring Tool: Supports
		Web: See Note 1
		Electronic Docs:
		Authoring Tool: See Note 1

2.4.2 Page Titled (Level A)
Also applies to:
Revised Section 508
    • 501 (Web)(Software)
    • 504.2 (Authoring Tool)
    • 602.3 (Support Docs)
	Web: Supports
	Electronic Docs: Not Applicable
	Software: Not Applicable
	Authoring Tool: Supports
		Web:
		Electronic Docs: See Note 1
		Software:
		Authoring Tool: See Note 1

Criteria	Conformance Level	Remarks and Explanations
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
3.1.1 Language of Page (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: Electronic Docs: Software: Authoring Tool:
3.2.1 On Focus (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
3.2.2 On Input (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable	Web: See Note 1 Electronic Docs: Software:

Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Authoring Tool: Supports	Authoring Tool: See Note 1
3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
4.1.1 Parsing (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1

Criteria	Conformance Level	Remarks and Explanations
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Not Applicable Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Not Applicable	Web: Electronic Docs: Software: Authoring Tool:
2.4.5 Multiple Ways (Level AA) Also applies to: 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	Web: Supports Electronic Docs: Not Applicable Authoring Tool: Not Applicable	Web: Electronic Docs: Authoring Tool:
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable	Web: See Note 1 Electronic Docs: Software:

Criteria	Conformance Level	Remarks and Explanations
• 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Authoring Tool: Supports	Authoring Tool: See Note 1
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: See Note 1 Electronic Docs: Software: Authoring Tool: See Note 1
3.2.3 Consistent Navigation (Level AA) Also applies to: 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	Web: Supports Electronic Docs: Not Applicable Authoring Tool: Not Applicable	Web: Electronic Docs: Authoring Tool:
3.2.4 Consistent Identification (Level AA) Also applies to: 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	Web: Supports Electronic Docs: Not Applicable Authoring Tool: Not Applicable	Web: Electronic Docs: Authoring Tool:
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: Electronic Docs: Software: Authoring Tool:

Criteria	Conformance Level	Remarks and Explanations
• 602.3 (Support Docs)		
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Not Applicable Software: Not Applicable Authoring Tool: Supports	Web: Electronic Docs: Software: Authoring Tool:

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
1.2.8 Media Alternative (Prerecorded) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
1.2.9 Audio-only (Live) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
1.4.6 Contrast Enhanced (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
1.4.7 Low or No Background Audio (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
1.4.8 Visual Presentation (Level AAA)	Web: Supports	Web: See Note 1

Criteria	Conformance Level	Remarks and Explanations
Also applies to: Revised Section 508 – Does not apply		
1.4.9 Images of Text (No Exception) Control (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web: See Note 1
2.1.3 Keyboard (No Exception) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
2.2.3 No Timing (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
2.2.4 Interruptions (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
2.2.5 Re-authenticating (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
2.3.2 Three Flashes (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
2.4.8 Location (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
2.4.9 Link Purpose (Link Only) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
2.4.10 Section Headings (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
3.1.3 Unusual Words (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:

Criteria	Conformance Level	Remarks and Explanations
3.1.4 Abbreviations (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
3.1.5 Reading Level (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Not Applicable	Web:
3.1.6 Pronunciation (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
3.2.5 Change on Request (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
3.3.5 Help (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:
3.3.6 Error Prevention (All) (Level AAA) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web:

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Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	
302.2 With Limited Vision	Supports	
302.3 Without Perception of Color	Supports	
302.4 Without Hearing	Supports	
302.5 With Limited Hearing	Supports	
302.6 Without Speech	Supports	
302.7 With Limited Manipulation	Supports	
302.8 With Limited Reach and Strength	Supports	
302.9 With Limited Language, Cognitive, and Learning Abilities	Not Applicable	

Chapter 4: Hardware

Notes: This chapter has been removed as Element LMS is a Web Based Software as a Service (SaaS) Solution.

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Supports	
502.2.2 No Disruption of Accessibility Features	Supports	
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Supports	
502.3.2 Modification of Object Information	Supports	
502.3.3 Row, Column, and Headers	Supports	
502.3.4 Values	Supports	
502.3.5 Modification of Values	Supports	
502.3.6 Label Relationships	Supports	

Criteria	Conformance Level	Remarks and Explanations
502.3.7 Hierarchical Relationships	Supports	
502.3.8 Text	Supports	
502.3.9 Modification of Text	Supports	
502.3.10 List of Actions	Supports	
502.3.11 Actions on Objects	Supports	
502.3.12 Focus Cursor	Supports	
502.3.13 Modification of Focus Cursor	Supports	
502.3.14 Event Notification	Supports	
502.4 Platform Accessibility Features	Supports	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Supports	
503.3 Alternative User Interfaces	Supports	
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Supports	
503.4.2 Audio Description Controls	Supports	
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	See WCAG 2.0 section	See information in WCAG section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Supports	
504.2.2 PDF Export	Supports	
504.3 Prompts	Supports	
504.4 Templates	Supports	

Chapter 6: Support Documentation and Services

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
602.2 Accessibility and Compatibility Features	Supports	
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Not Applicable	
603.3 Accommodation of Communication Needs	Supports	

Notes

Note 1 - Most of the content created on Element LMS is created by end users. It is always possible for the end user to create content that is not compliant. However, it is always possible for the end user to create compliant content in the LMS or update the content to make it compliant.

Legal Disclaimer

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