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Executive Summary

Avoiding Conflicts of Interest Accessibility Conformance Report

Access Ingenuity's evaluation of the Avoiding Conflicts of Interest module identified accessibility features and functionalities of the learning module. This evaluation provided the information required to assess the conformance of the Avoiding Conflicts of Interest learning module with the WCAG 2.1 Accessibility Guidelines. Based on our evaluation, Access Ingenuity concludes that the learning module *Supports* these requirements.

Access Ingenuity, an independent authority in web accessibility, has evaluated the learning module and certifies it to be substantially conformant with Level A and Level AA of the Web Content Accessibility Guidelines version 2.1. Conformance issues that pose a significant barrier for users with disabilities have been addressed.

Access Ingenuity cannot verify the conformance of content changed after the date of our evaluation. However, based on our interactions with United Educators, Access Ingenuity is confident in their efforts to maintain a substantially conformant product.

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing Accessibility Conformance Reports (ACRs) that has been designed to create simplicity and uniformity/consistency in ACRs presented by a variety of suppliers. In preparing the Avoiding Conflicts of Interest learning module ACR, Access Ingenuity has used the ITIC-recommended *VPAT® Version 2.5Rev WCAG Edition*.

Based on this evaluation and on information published on the ITIC website (<http://www.itic.org>), Access Ingenuity presents the ACR for the Avoiding Conflicts of Interest learning module on the following pages.

United Educators Accessibility Conformance Report

WCAG Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version: [Avoiding Conflicts of Interest](#)

Report Date: May 7, 2026

Product Description: Web-based E-learning module to understand how to avoid conflicts of interest.

Contact Information: accessibility@ue.org

Notes: This course was created in Storyline, which contains accessibility barriers that are not author-controllable. United Educators has filed bugs with Articulate (Storyline) to try and address any outstanding issues.

Evaluation Methods Used:

New WCAG 2.1 criteria only:

Conformance to only the following WCAG 2.1 criteria was evaluated on May 5, 2026, using a combination of static analysis tools and manual testing with assistive technologies:

1.3.4 Orientation (AA)

1.3.5 Identify input purpose (AA)

1.4.10 Reflow (AA)

1.4.11 Non-Text Content (AA)

- 1.4.12 Text Spacing (AA)
- 1.4.13 Content on Hover or Focus (AA)
- 2.1.4 Character Key Shortcuts (A)
- 2.5.1 Pointer Gestures (A)
- 2.5.2 Pointer Cancellation (A)
- 2.5.3 Label in Name (A)
- 2.5.4 Motion Actuation (A)
- 4.1.3 Status Messages (AA).

The evaluation was conducted in the following desktop operating system and browser/screen reader combination:

1. Windows 11:
 - a. Chrome 147/JAWS 2026

The accessibility assessment was executed per the following steps:

- I. An accessibility expert conducted an overall technical analysis to identify issues of technical compliance that would affect the WCAG 2.1 Level A and AA criteria listed above.
- II. Keyboard accessibility analysis (for mobility and physically challenged users) of the appropriate new criteria impacting keyboard users was also tested.
- III. The accessibility for low vision users was tested by (1) using a bookmarklet and adjusting the course controls to test text spacing; and (2) testing color contrast of non-text elements using manual inspection in conjunction with Colour Contrast Analyser (CCA) Version 3.5.5.
- IV. Screen reader testing was performed by an expert accessibility evaluator to evaluate access for users who are sight impaired for the new WCAG 2.1 requirements.

WCAG 2.0 Evaluation

Conformance to the listed accessibility standards has been evaluated between August 17 – August 20, 2018 using a combination of static analysis tools and manual testing with assistive technologies.

The accessibility assessment was conducted according to the following steps:

- I. A sighted accessibility expert conducted an overall technical analysis in order to identify issues of technical compliance that would affect mobility impaired, deaf/hearing impaired and low vision users. The evaluator inspected each screen using Chrome with the Wave and aXe toolbars. Code analysis was conducted using browser Developer Tools (Chrome and Firefox).
- II. Keyboard accessibility analysis (for mobility and physically impaired users) was conducted by attempting to thoroughly navigate the web application through the keyboard, without using a mouse.
- III. For deaf and hard of hearing users, any video and audio content was assessed for proper captioning as well as descriptive text transcripts (also benefits visually impaired users).
- IV. The accessibility for low vision users was evaluated three ways: (1) using the screen magnification, palette, and contrast controls provided by the operating systems; (2) using the font resizing capability offered by the browser, and (3) using Colour Contrast Analyzer version 2.2.
- V. The screen reader testing was conducted by an expert screen reader user. The goal was to identify accessibility barriers that are likely to be experienced by users who are blind. The evaluator worked through the web application using Windows 10 with the JAWS for Windows (v. 2018.1803.24) screen reader with Chrome Version 68.0.3440.99 and Mac OS 10.13.3 with Safari and VoiceOver. Any pages found to have screen reader issues were re-examined in interactive sessions with a sighted evaluator.
- VI. Any usability issues for users with disabilities encountered during the accessibility assessments were also noted.

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)

Standard/Guideline	Included In Report
	Level AAA (No)
Web Content Accessibility Guidelines 2.2	Level A (No) Level AA (No) Level AAA (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 only be used in WCAG Level AAA criteria.

WCAG 2.1 Report

Note: When reporting on conformance with the WCAG 2.1 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)	Supports	The Avoiding Conflicts of Interest module provides alternative text where necessary for users of assistive technology, as well as accessible button and link labeling.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	The Avoiding Conflicts of Interest module does not have any audio-only or video-only content.
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	The Avoiding Conflicts of Interest module does not have any video or media elements.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not Applicable	The Avoiding Conflicts of Interest module does not have any video or media elements.
1.3.1 Info and Relationships (Level A)	Supports	All visual structure and relationship information is provided through object information or is available in text.
1.3.2 Meaningful Sequence (Level A)	Supports	The markup of the Avoiding Conflicts of Interest module enables the reading and navigation order to be logical and intuitive.
1.3.3 Sensory Characteristics (Level A)	Supports	Instructions in the Avoiding Conflicts of Interest module do not rely on shape, size, visual location or sound.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Supports	Throughout the Avoiding Conflicts of Interest module, color alone is not used as the sole method of conveying content or distinguishing visual elements.
1.4.2 Audio Control (Level A)	Supports	There is no automatically playing audio in the Avoiding Conflicts of Interest module.
2.1.1 Keyboard (Level A)	Supports	All functionality in the Avoiding Conflicts of Interest module is available to keyboard-only users using standard keyboard navigation and input functions.
2.1.2 No Keyboard Trap (Level A)	Supports	Keyboard focus is never locked or trapped at any page element in the Avoiding Conflicts of Interest module.
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Supports	Built-in shortcuts support this criterion. There are no author-defined shortcuts. Built-in keyboard shortcuts do not use single keys. Accidental activation of shortcuts is avoided by requiring modifier keys. For example, Ctrl+Alt+M mutes/unmutes the course audio. Learners can also turn off built-in keyboard shortcuts altogether if they prefer.
2.2.1 Timing Adjustable (Level A)	Supports	The Avoiding Conflicts of Interest module is not timed at any point.
2.2.2 Pause, Stop, Hide (Level A)	Supports	There is no automatically moving content in the Avoiding Conflicts of Interest module.

Criteria	Conformance Level	Remarks and Explanations
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	There is no flashing content in the Avoiding Conflicts of Interest module.
2.4.1 Bypass Blocks (Level A)	Supports	<p>The Avoiding Conflicts of Interest module provides a “Back to Top” link to skip navigation elements on every screen.</p> <p>The module also has a main landmark region on every screen as an alternative to the skip link.</p>
2.4.2 Page Titled (Level A)	Supports	The Avoiding Conflicts of Interest module has a descriptive and informative page title and unique slide titles.
2.4.3 Focus Order (Level A)	Supports	The Avoiding Conflicts of Interest module has a logical navigation order for its interactive elements.
2.4.4 Link Purpose (In Context) (Level A)	Supports	<p>The purpose of the links in the Avoiding Conflicts of Interest module is adequately identified in all cases.</p> <p>There are no links or form image buttons with the same text that go to different locations.</p>
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Supports	Storyline 360 courses support touchscreen gestures, but learners are not required to use them.

Criteria	Conformance Level	Remarks and Explanations
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	Click events happen when learners release the mouse button, not when they press the mouse button down. They can move the mouse away from the target before releasing the button if they do not want to activate the target.
2.5.3 Label in Name (Level A 2.1 and 2.2)	Supports	All user interface components with labels that include text or images of text have names that contains the text that is presented visually.
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Not Applicable	Storyline 360 does not support motion controls so this is not present in this course and learners cannot control courses by moving their tablets or smartphones.
3.1.1 Language of Page (Level A)	Supports	The language of the Avoiding Conflicts of Interest module is appropriately identified.
3.2.1 On Focus (Level A)	Supports	When focus changes in the Avoiding Conflicts of Interest module, this does not ever cause a change in page content, spawn a new browser window, or cause any other change that disorients the user.
3.2.2 On Input (Level A)	Supports	When a user inputs information or interacts with a form control in the Avoiding Conflicts of Interest module, this does not result in a change in the page content, change focus, launch an additional window, or otherwise disorient the user.

Criteria	Conformance Level	Remarks and Explanations
3.3.1 Error Identification (Level A)	Supports	Adequate error identification is provided when forms are submitted without selecting a value(s) in the Avoiding Conflicts of Interest module.
3.3.2 Labels or Instructions (Level A)	Supports	The Avoiding Conflicts of Interest module has sufficient labels, cues, and instructions for required interactive elements.
4.1.1 Parsing (Level A) WCAG 2.0 and 2.1 – Always answer ‘Supports’ WCAG 2.2 (obsolete and removed) - Does not apply	Supports	For WCAG 2.0 and 2.1, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata .
4.1.2 Name, Role, Value (Level A)	Supports	Markup in the Avoiding Conflicts of Interest module facilitates accessibility.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	There is no live multimedia content in the Avoiding Conflicts of Interest module.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	The Avoiding Conflicts of Interest module does not have any video or media elements.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	The course works in both landscape and portrait modes.

Criteria	Conformance Level	Remarks and Explanations
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Supports	Storyline 360 does not currently support programmatic input-field identification or auto-filling forms. However, there are no form input fields that would require this in the learning module.
1.4.3 Contrast (Minimum) (Level AA)	Supports	All text in the in the Avoiding Conflicts of Interest module meets minimum contrast requirement.
1.4.4 Resize text (Level AA)	Supports	The module content is readable and functional when the page is zoomed to 200%.
1.4.5 Images of Text (Level AA)	Supports	All content within the slides of the Avoiding Conflicts of Interest module is presented as an accessible SVG that can be adjusted to modify the text presentation.
1.4.10 Reflow (Level AA 2.1 and 2.2)	Supports	The learning module is built in Storyline 360 which is a two-dimensional presentation with fixed aspect ratios. It is designed to zoom in and out, but it cannot reflow without losing meaning and context. As a result, learners might see vertical and/or horizontal scroll bars at the highest zoom levels. The exception in the guideline allows two-dimensional content, such as presentations, to scroll in both directions.
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	All User Interface Components and Graphical Objects have sufficient color contrast.

Criteria	Conformance Level	Remarks and Explanations
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Partially Supports	Text spacing around the course player can be adjusted but text within the course cannot be adjusted unless accessible text is selected. In some areas, content will also overlap when text spacing is applied. Additionally, when text spacing is applied, some content is presented in scrollable regions where scroll bars are not in a logical focus order and have missing focus indicators. This is a known Storyline limitation.
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	Where content appears on hover or focus, it is dismissible, hoverable and persistent.
2.4.5 Multiple Ways (Level AA)	Not Applicable	Progress through the module is sequential, so users can only navigate the course using the previous and next buttons on each slide.
2.4.6 Headings and Labels (Level AA)	Supports	The Avoiding Conflicts of Interest module has informative page headings and labels.
2.4.7 Focus Visible (Level AA)	Supports	The Avoiding Conflicts of Interest module has a focus indicator on all page elements.
3.1.2 Language of Parts (Level AA)	Supports	The content in the Avoiding Conflicts of Interest module is only delivered in one language.
3.2.3 Consistent Navigation (Level AA)	Supports	The navigation of the Avoiding Conflicts of Interest module is in the same relative order to the main content across all screens of the module.

Criteria	Conformance Level	Remarks and Explanations
3.2.4 Consistent Identification (Level AA)	Supports	Components that have the same function across multiple screens of the Avoiding Conflicts of Interest module are labeled consistently.
3.3.3 Error Suggestion (Level AA)	Supports	The Avoiding Conflicts of Interest module has timely and accessible error suggestions when an error has been made in a knowledge check question.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not Applicable	The Avoiding Conflicts of Interest module does not collect data or record scores.
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Supports	Screen reader users are made aware of all status messages when they appear.