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Executive Summary

Recognizing and Avoiding Race, Color, and National Origin Discrimination Accessibility Conformance Report

Access Ingenuity's evaluation of the Recognizing and Avoiding Race, Color, and National Origin Discrimination module identified accessibility features and functionalities of the learning module. This evaluation provided the information required to assess the conformance of the Recognizing and Avoiding Race, Color, and National Origin Discrimination learning module with the WCAG 2.1 Accessibility Guidelines. Based on our evaluation, Access Ingenuity concludes that the learning module *Partially 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. Most 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination learning module on the following pages.

United Educators Accessibility Conformance Report

WCAG Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version: [Recognizing and Avoiding Race, Color, and National Origin Discrimination](#)

Report Date: May 9, 2026

Product Description: Web-based E-learning module for higher education supervisors which examines how race, color, and national origin discrimination can occur in the workplace.

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 9 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:

Windows 11: Chrome 148/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 was evaluated between September 19th- October 6th, 2023, using a combination of static analysis tools and manual testing with assistive technologies.

The evaluation was conducted in the following desktop operating systems and browser/screen reader combinations:

1. Windows 11:
 - a. Chrome Version 117/JAWS 2023
2. Mac OS 12.6.5
 - a. Safari/VoiceOver

The accessibility assessment was executed per the following steps:

- I. A sighted accessibility expert conducted an overall technical analysis to identify issues of technical compliance that would affect mobility impaired, deaf/hearing impaired and low-vision users. The evaluator inspected the web pages using Chrome and the Chrome Developer tools as well as the axe DevTools plugin.
- II. Keyboard accessibility analysis (for mobility and physically challenged users) was conducted by attempting to thoroughly navigate the web pages through the keyboard, without using a mouse.
- III. The accessibility for low-vision users was evaluated two ways: (1) using the resizing capability offered by the browser, and (2) using Colour Contrast Analyser (CCA) Version 3.1.2.
- IV. Videos were assessed for proper captioning for deaf and hard-of-hearing users as well as the need for audio descriptions and transcripts for screen reader users.
- V. 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.

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)

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes) 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination 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	There is no non-live audio-only or video-only content in the module.
1.2.2 Captions (Prerecorded) (Level A)	Supports	All non-live, web-based video content in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module has synchronized captions available.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	All non-live, web-based video content in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module is sufficiently described with the audio track provided, making a separate audio description track unnecessary.

Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A)	Partially Supports	All visual structure and relationship information is provided through object information or is available in text with the following exceptions: <ul style="list-style-type: none"> • There is one heading that is not identified as a heading for assistive technology on the implicit bias slide. • Headings within the carousels are not identified as headings for screen reader users.
1.3.2 Meaningful Sequence (Level A)	Supports	The markup of the Recognizing and Avoiding Race, Color, and National Origin Discrimination module enables the reading and navigation order to be logical and intuitive.
1.3.3 Sensory Characteristics (Level A)	Supports	Instructions in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module do not rely on shape, size, visual location or sound.
1.4.1 Use of Color (Level A)	Supports	Throughout the Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module.

Criteria	Conformance Level	Remarks and Explanations
2.1.1 Keyboard (Level A)	Supports	All functionality in the Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module is not timed at any point.
2.2.2 Pause, Stop, Hide (Level A)	Supports	There is no automatically moving content the Recognizing and Avoiding Race, Color, and National Origin Discrimination module.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	There is no flashing content in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module.

Criteria	Conformance Level	Remarks and Explanations
2.4.1 Bypass Blocks (Level A)	Supports	<p>The Recognizing and Avoiding Race, Color, and National Origin Discrimination 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	<p>The Recognizing and Avoiding Race, Color, and National Origin Discrimination module has a descriptive and informative page title and unique slide titles.</p>
2.4.3 Focus Order (Level A)	Partially Supports	<p>The Recognizing and Avoiding Race, Color, and National Origin Discrimination module has a logical navigation order for its interactive elements, with one exception:</p> <ul style="list-style-type: none"> • When modals are dismissed, focus is not returned to the activating element. • When users move forward in carousels, focus does not move to the newly revealed content.
2.4.4 Link Purpose (In Context) (Level A)	Supports	<p>The purpose of links in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module are adequately identified.</p>
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Supports	<p>Storyline 360 courses support touchscreen gestures, but learners are not required to use them.</p>

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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module is appropriately identified.
3.2.1 On Focus (Level A)	Supports	When focus changes in the Recognizing and Avoiding Race, Color, and National Origin Discrimination 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.

Criteria	Conformance Level	Remarks and Explanations
3.2.2 On Input (Level A)	Supports	When a user inputs information or interacts with a form control in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module, this does not result in a change in the page content, change focus, launch an additional window, or otherwise disorient the user.
3.3.1 Error Identification (Level A)	Supports	Adequate error identification is provided when forms are submitted without selecting a value(s) in the Recognizing and Avoiding Race, Color, and National Origin Discrimination module.
3.3.2 Labels or Instructions (Level A)	Supports	The Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module.
1.2.5 Audio Description (Prerecorded) (Level AA)	Supports	All videos are sufficiently described in the narration provided and those that are not have audio descriptions provided.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	The course works in both landscape and portrait modes.
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 Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module is presented as an accessible SVG that can be adjusted to modify the text presentation.

Criteria	Conformance Level	Remarks and Explanations
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.
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.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA)	Supports	The Recognizing and Avoiding Race, Color, and National Origin Discrimination module has informative page headings and labels.
2.4.7 Focus Visible (Level AA)	Supports	The Recognizing and Avoiding Race, Color, and National Origin Discrimination module has a focus indicator on all page elements.
3.1.2 Language of Parts (Level AA)	Supports	The content in the in Recognizing and Avoiding Race, Color, and National Origin Discrimination module is only delivered in one language.
3.2.3 Consistent Navigation (Level AA)	Supports	The navigation Recognizing and Avoiding Race, Color, and National Origin Discrimination module is in the same relative order to the main content across all screens of the module.
3.2.4 Consistent Identification (Level AA)	Supports	Components that have the same function across multiple screens of the Recognizing and Avoiding Race, Color, and National Origin Discrimination module are labeled consistently.
3.3.3 Error Suggestion (Level AA)	Supports	The Recognizing and Avoiding Race, Color, and National Origin Discrimination 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 Recognizing and Avoiding Race, Color, and National Origin Discrimination module does not collect data or record scores.

Criteria	Conformance Level	Remarks and Explanations
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.