

Accessibility Conformance Report — WCAG 2.1

Based on VPAT® Version 2.5Rev | Report Date: September 2026 | Supersedes the August 2022 WCAG 2.0 report as the current authoritative VPAT

Report Details

Name of Product/Version	Electronic License Management System (ELMS) / Kivuto Cloud, version 5.7
Product Description	ELMS (aka Kivuto Cloud) is a platform that helps schools distribute software and other digital resources to students, faculty, and staff. Our distribution platform makes it easy to manage licenses and securely distribute resources to eligible, verified users through school-branded WebStores.
Report Date	September 2026
Contact Information	compliance@kivuto.com
Notes	This report supersedes the August 2022 WCAG 2.0 Accessibility Conformance Report as Kivuto’s current authoritative statement of WCAG conformance. It restates, unchanged, all Level A and AA success criteria from WCAG 2.0 (which are unaffected by WCAG 2.1), and adds the twelve Level A/AA success criteria introduced in WCAG 2.1, identified in the Criteria column as “2.1 and 2.2” per WCAG 2.5Rev convention. This report is scoped to Level A and AA only; Level AAA is not addressed. The evaluation underlying this report was performed against ELMS version 5.7 and found the same results as the August 2022 WCAG 2.0 evaluation (originally performed against an earlier version). The August 2022 report, which also documents Level AAA, remains on file as the historical record of Kivuto’s WCAG 2.0-era conformance evaluation.
Evaluation Methods Used	Testing with assistive technologies Testing with code sniffers Testing based on general product knowledge

Applicable Standards/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 — not included in this report)
Web Content Accessibility Guidelines 2.1, at https://www.w3.org/TR/2021/REC-WCAG21-20210121/	Level A (Yes) Level AA (Yes) Level AAA (No — not included in this report)

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.

WCAG 2.1 Report

This report documents conformance with WCAG 2.1 Level A and AA success criteria, scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.1 Conformance Requirements. It restates all applicable WCAG 2.0 Level A and AA criteria (unchanged by WCAG 2.1) and adds the twelve Level A/AA success criteria introduced in WCAG 2.1. Level AAA is not addressed in this report; see the August 2022 report for Kivuto’s WCAG 2.0 Level AAA evaluation.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports	The ELMS application liberally uses imagery for product presentation purposes only. Wherever an image is displayed that explains visual content that the user may be unable to see, it is described by a localized alt attribute to communicate meaning. Decorative images that do not contribute to the understanding of the content or are duplicated by adjacent textual content are marked with aria-role “presentation”. Visual cues such as iconography are used to mark buttons and navigation and each occurrence carries an explicit screen-reader label, or an inline textual description with the icon marked with the aria-role “presentation”. Objects are labelled using arialabel, and in cases where purpose is not semantically evident, arialabelledby is used to describe nontext content.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	N/A	The ELMS application does not make use of pre-recorded audio or video functionality.

Criteria	Conformance Level	Remarks and Explanations
1.2.2 Captions (Prerecorded) (Level A)	N/A	The ELMS application does not embed pre-recorded audio functions, therefore captions are not used.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	N/A	The ELMS application does not embed pre-recorded video functions, therefore no audio descriptions or media alternatives are required.
1.3.1 Info and Relationships (Level A)	Supports	Aria landmarks are used to denote specific regions. For example, navigation, search and form are used. In cases where HTML5 semantic elements are appropriate (e.g. header, main, footer, article, nav, etc.), the ELMS platform uses those. Tabular data is structured using HTML tables and lists are presented using OL and UL, depending on the content. Fieldsets and legends are used in cases where the ELMS platform presents more comprehensive forms. Headings (h1-h6) are used properly, with structure and emphasis denoted by headings relative to superordinate ones (e.g.: pages only have a single .h1 which titles the page content, subordinate headings are h2 and between each h2, h3s are used for subheadings). Every form element is accompanied by a corresponding label furnished with “for attributes”, even when not visually presented.
1.3.2 Meaningful Sequence (Level A)	Supports	The user has the ability to tab through each field in a logical order. Screen readers can move logically through the screen to read content aloud to the user. ELMS is localized into both left-to-right and right-to-left languages, as such, text is justified according to the conventions of the given language. The root element is furnished with “lang” and “dir” attributes and values. Separate stylesheets are injected depending on whether LTR/RTL presentation is used.
1.3.3 Sensory Characteristics (Level A)	Supports	The ELMS application uses icon fonts to visually communicate form and function. In these cases, there is often an accompanying text label. In cases where only a font glyph is presented, there

Criteria	Conformance Level	Remarks and Explanations
		is an arialabelledby or screenreader-only CSS styling used to communicate textually.
1.4.1 Use of Color (Level A)	Supports	Contextual colors are used to communicate state-related changes, however, in all cases text is used to communicate purpose. Focus and active states are visually communicated using salient outlining that meets contrast thresholds. On the subject of contrast thresholds, color schemes are user-selectable, but logic is embedded in the ELMS application to ensure that contrasting colors (in cases of text presented on background color) meet AA thresholds of at least 4.5:1 for any sized text).
1.4.2 Audio Control (Level A)	N/A	The ELMS application does not embed pre-recorded audio functions, therefore captions are not used.
2.1.1 Keyboard (Level A)	Supports	All functionality is ensured using the keyboard. In cases where the document is altered due to user action, keyboard focus is adjusted to newly-exposed regions with an emphasis toward headers to communicate new context. In the rare cases where the document is altered for other reasons, aria-live attributes are used to communicate such changes.
2.1.2 No Keyboard Trap (Level A)	Supports	The user can move to and from any element on a page using the keyboard only.
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Supports	Application does not use single-character key shortcuts that could conflict with assistive technology, and does not implement custom character-key shortcuts.
2.2.1 Timing Adjustable (Level A)	Partially Supports	One time limit is enforced by the system: a 15-minute session limit. Everything else is directly controllable by the user, including the dismissal and updating of all dynamic content. Each round-trip interaction with the page refreshes the session limit, meaning a user will have at least 15 minutes to interact with each page. This does not create a barrier to accessibility: we have tested navigation of all pages with primary users of screen readers and have not encountered

Criteria	Conformance Level	Remarks and Explanations
		anything constituting a barrier in practice. If 15 minutes is likely to be insufficient for a given page, the user can refresh the page and continue. In current roadmap; expected no later than January 2027.
2.2.2 Pause, Stop, Hide (Level A)	Supports	Auto-scrolling, moving or blinking content is not used in the ELMS platform.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	Animations are judiciously used, and steps are taken to ensure that salient changes are not mistakenly presented as blinking content (for example, where a loading indicator is presented, a time floor of 2 seconds is used to ease the perceived impact).
2.4.1 Bypass Blocks (Level A)	Supports	Aria landmarks, heading elements and other semantic elements are used to facilitate rapid traversal of each document. Expandable and collapsible menus are used to allow users to bypass content.
2.4.2 Page Titled (Level A)	Supports	Descriptive page titles are employed across the ELMS application.
2.4.3 Focus Order (Level A)	Supports	Focus order is logically determined based on sequences and relationships. The DOM order matches the visual order in each cases where order is significant (N.B: there is a single case where the page heading is in reverse DOM order, but this is to facilitate responsive design and doubles to present navigation items to keyboard users first [before a visual banner image]).
2.4.4 Link Purpose (In Context) (Level A)	Supports	Link texts are descriptive as to their purpose. If text such as “Learn more” is used to elaborate the related short-form content, the link has a “button” role, which opens a modal with lengthier textual content inside. Focus is adjusted to the modal context, with the h2 header selected by default). In certain cases, a link[role=button] may expand aria-hidden content contained in an aria-controls element. In this case, ariaexpanded attributes are toggled, the content is unhidden and focus is managed accordingly.

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2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Supports	Application does not use multipoint or path-based gestures that cannot be replicated with a single pointer.
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	All events are coordinated on up-event. Pointer cancellations are supported.
2.5.3 Label in Name (Level A 2.1 and 2.2)	Supports	Our testing ensures that visible text labels function as programmatic accessible names.
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Supports	We do not rely on motion actuation as a distinct means of UI. All interactions are achievable with conventional user interface components.
3.1.1 Language of Page (Level A)	Supports	The language and text directionality is identified by the lang and dir attributes respectively on the HTML page.
3.2.1 On Focus (Level A)	Supports	Focus is not used as a trigger for content changes; explicit buttons are presented to trigger form submissions and the like.
3.2.2 On Input (Level A)	Supports	Submit buttons are used to update pages based on form inputs.
3.3.1 Error Identification (Level A)	Supports	Error messages pertaining to a particular field are surfaced in the following form: “FieldName: Descriptive Error”, for example, on submitting sign-in without a username: “UserName: A valid value is required”. The error element is surfaced in an assertive aria-live region, which is also ariaatomic (for the case where there are multiple repetitive errors). The e-commerce webstores also make use of in-line validation that allows users to resolve their errors in context.
3.3.2 Labels or Instructions (Level A)	Supports	Descriptive labels are used throughout the ELMS application. These labels are placed in immediate proximity to their associated controls in order to maximize predictability of relationships. Proper “for” attributes are used to associate labels and controls. Required fields are indicated using HTML5 required attributes on the field and “required” verbiage/asterix in their labels. When forms are submitted and returned in an erroneous or incomplete state, all values are persisted with the exception of sensitive

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		information (e.g. password, credit card security codes, etc.). As outlined above, error messages indicate which fields are incomplete.
4.1.1 Parsing (Level A)	Supports	Web pages are well-formed in order to ensure proper parsing. Nodes are, unless void (according to HTML spec) explicitly closed. HTML IDs are unique, repeat attributes are not present. Pages are regularly parsed and validated using code validation tools.
4.1.2 Name, Role, Value (Level A)	Supports	Most of the markup produced by the ELMS application uses standard HTML controls and as such, meets this criterion. In the select cases where elements are used in non-standard ways (e.g. links functioning as buttons), roles are provided. As mentioned above, in cases where font icons are used without visual labels, aria labels are provided.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	N/A	The ELMS application does not embed pre-recorded audio or video functions, therefore captions are not used.
1.2.5 Audio Description (Prerecorded) (Level AA)	N/A	The ELMS application does not embed pre-recorded audio or video functions, therefore descriptions and captions are not used.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	Our platform is mobile responsive and tested thoroughly to work on multiple form factors and orientations. We do not lock the application to any orientation.
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Does Not Support	Lack of support for this criterion introduces a potential inconvenience due to inconsistent autocomplete behaviour. Support for this criterion is in our roadmap, with a target of no later than January 2027. This does not create a barrier to accessibility: although we have not yet incorporated autocomplete attributes with detail tokens, all of our input fields are named

Criteria	Conformance Level	Remarks and Explanations
		descriptively and correctly in alignment with criterion 2.5.3. The possibility for inconvenience is use-case dependent — for example, if user information is furnished via SSO, further user-specific input is not necessary, and if offerings are free, shipping/payment fields are suppressed. Once provided, wherever possible, we persist entered values (e.g. shipping/billing address, first/last name). Where useful, information can be furnished via SSO using the eduPerson specification, and users with extensive reliance on autocomplete can be provisioned automatically or via push orders.
1.4.3 Contrast (Minimum) (Level AA)	Supports	All applicable text under the WCAG spec (including large text) meets 4.5:1 contrast thresholds. As the background is configurable for WebStore Administrators, the ELMS application contains logic to ensure the contrasting color meets the above contrast threshold.
1.4.4 Resize text (Level AA)	Supports	The ELMS platform uses Bootstrap as its CSS framework which uses percentages for container sizes and is mobile-responsive. For high zoom percentages, each page alters its structure to conform to the reduced resolution. This means that content is not cropped as controls, images and text resizes to conform to the viewport's new dimensions.
1.4.5 Images of Text (Level AA)	Supports	The ELMS platform does not consist of any images of text that are non-essential or customizable according to the WCAG spec. Further, in cases where customizable content is likely to contain images of text (e.g.: WebStore banner images), ELMS applies descriptive title tags using the textual title of the WebStore.
1.4.10 Reflow (Level AA 2.1 and 2.2)	Supports	
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	In current roadmap toward full validation; expected no later than January 2027.
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Supports	

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1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	
2.4.5 Multiple Ways (Level AA)	Supports	The ELMS platform provides multiple ways to navigate its structure: a comprehensive search, navigational links. Since the content of many pages are determined by user selection (e.g.: Offering Details pages require an offering to be selected), a site map is not a feasible means of facilitating navigation on the administrative side. However, a sitemap is used on the e-commerce webstores to provide navigation to all pages that are not part of, or the result of, a process.
2.4.6 Headings and Labels (Level AA)	Supports	Headings and labels are used to identify sections throughout the application. Headings are incrementally used in a predictable manner to denote sub-regions within larger groups.
2.4.7 Focus Visible (Level AA)	Supports	Focus indicators are used throughout the site to indicate focus on interactable elements. The focus indicator surrounds the control in a visually salient manner. In the case of buttons, the background color is altered to communicate focus and active states.
3.1.2 Language of Parts (Level AA)	Supports	The lang attribute is used throughout the site to communicate changes in languages. For supported right-to-left languages, bi-directional indicators are explicitly placed in the document to communicate changes in directionality for content consisting of mixed RTL/LTR directional runs.
3.2.3 Consistent Navigation (Level AA)	Supports	The user experience in the ELMS platform is designed to navigate the hierarchy of catalogs and products that are available to the user in question. As such, navigation is completely consistent, as pages and their constituent controls are identical and are merely rendering the distinct properties on a case-by-case basis.
3.2.4 Consistent Identification (Level AA)	Supports	Content is labelled consistently throughout the application. This not only serves the purposes of accessibility, but also of localization. As such, textual content is necessarily derived from a

Criteria	Conformance Level	Remarks and Explanations
		singular source, thereby creating consistency. In cases where images are used, their corresponding descriptive textual labels are also consistently used.
3.3.3 Error Suggestion (Level AA)	Supports	Wherever possible, error messages are descriptive and communicate the nature of the error. For example, when a required value is missing, the error message surfaced communicates the field name and the nature of the error. In the situations where date and time input is required, the required format is communicated (in advance and in response to erroneous input). Errors are properly identified in aria-live regions. In cases like general or unexpected errors, this does not apply.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	Since the ELMS application contains an E-Commerce component, financial transactions occur. When such transactions arise, data entered by the user is always checked, with an opportunity presented to amend the data in question when errors occur. Additionally, an “Order Confirmation” step always occurs in the case of transactions involving a financial commitment. ELMS also surfaces customer support contact information which connects users (using a variety of communication means including email, social media and telephone) to an onpremises support person in case a reversal is required.
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Supports	

Legal Disclaimer

The information in this report is accurate as of the evaluation date stated above. This report is one component of a broader accessibility evaluation process and should not be relied upon as the sole basis for a procurement decision; Kivuto encourages customers to supplement this report with their own testing and direct discussion of specific accessibility requirements. This report does not constitute legal advice or a legal guarantee of conformance with any accessibility law or regulation, and does not create any additional obligations beyond those expressly stated in a written agreement between Kivuto and the customer. Kivuto will review and update this report as material changes

to the product's accessibility conformance occur, and superseded reports are retained on file as the historical record.