



DocuSign Accessibility Conformance Report

(Based on VPAT® Version 2.5, WCAG Edition)

Name of Product: DocuSign CLM (Contract Review and Negotiations)

Report Date: March 25, 2025

Product Description: The Contract Review and Negotiations features of the DocuSign CLM web application allows users to track and monitor tasks assigned to them, conduct contract review, approvals, and negotiations.

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Notes: This Accessibility Conformance Report (ACR) includes the CLM contract review, search results, and tasks pages. All other pages under the DocuSign CLM web application are not within the scope of this ACR; separate ACRs will be created for other features within DocuSign CLM.

For more information about DocuSign Accessibility, please view the [DocuSign Accessibility Hub](#).

Evaluation Methods Used: We used a range of inspection methods to test for specific accessibility issues, including screen reader testing and keyboard-only testing. We used the following device, assistive technology, and tools to support our testing:

- Desktop web browser: Chrome, Safari
- Assistive technologies: NVDA, VoiceOver
- Accessibility testing tools: axe DevTools browser extension, Colour Contrast Analyser by TPGi

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) Level AAA (No)
Web Content Accessibility Guidelines 2.2	Level A (Yes) Level AA (Yes) 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 be used only in WCAG Level AAA criteria.

WCAG 2.2 Report

Note: When reporting on conformance with the WCAG 2.2 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.2 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	Most non-text content, including complex and functional images, have meaningful text equivalents. Most decorative images are ignored by screen readers. Exceptions: • The progress step controls within the "Welcome to DocuSign CLM" dialog are functional images without a text alternative.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	The web application does not contain prerecorded audio-only nor video-only content.
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	The web application does not contain prerecorded synchronized media.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not Applicable	The web application does not contain prerecorded synchronized media.

Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A)	Partially Supports	In most instances, information and structural relationships can be determined programmatically from the content. Exceptions: • Documents are displayed as images of text; their information and structural relationships cannot be programmatically determined. • Visually highlighted text within a document is not perceivable by assistive technology. This includes highlighted text associated with user comments and in-document text search. • Visual headings are not always defined as headings. • Related items are not always defined as lists. • Visual groupings within menus are not always defined. • In the search results table, checkboxes to select files or folders are not programmatically associated with the file or folder name. • On the search results page, the “# Selected” checkbox has a tooltip that is not programmatically associated with the checkbox.

Criteria	Conformance Level	Remarks and Explanations
		- When the page is zoomed in, the Task Management table is visually presented as a list but is implemented as a table. - Some required fields within external review tasks are not conveyed programmatically. - Fields within external review tasks do not convey their invalid state programmatically.
1.3.2 Meaningful Sequence (Level A)	Partially Supports	The reading sequence is meaningful throughout the web application, except when some dialogs are open. Content in the background is not hidden from assistive technology for the following dialogs: - The “Welcome to DocuSign CLM” modal - Search filters
1.3.3 Sensory Characteristics (Level A)	Supports	The web application does not rely on sensory characteristics for instructions.
1.4.1 Use of Color (Level A)	Supports	Color is not used as the sole means to convey information, indicate an action, prompt a response, or distinguish a visual element.
1.4.2 Audio Control (Level A)	Supports	The web application does not contain any audio which plays automatically for more than 3 seconds.

Criteria	Conformance Level	Remarks and Explanations
2.1.1 Keyboard (Level A)	Partially Supports	In most instances, interactive elements receive keyboard focus and are keyboard-operable. Exceptions: • Keyboard users cannot select text in documents or trigger the context menu that contains the “copy” and “comment” actions. • The buttons to remove search history items are neither focusable or keyboard-operable. • The progress step controls within the "Welcome to DocuSign CLM" dialog are neither focusable or keyboard-operable. • The tooltip for the “# Selected” checkbox that appears when multiple files or folders are selected on the search results page cannot be triggered with keyboard focus.
2.1.2 No Keyboard Trap (Level A)	Supports	There are no keyboard traps in the web application. Focus can be moved away from each control using only a keyboard interface.
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Supports	The web application does not provide character key shortcuts.
2.2.1 Timing Adjustable (Level A)	Supports	The web application does not feature time limits.

Criteria	Conformance Level	Remarks and Explanations
2.2.2 Pause, Stop, Hide (Level A)	Supports	The web application does not display content that moves, blinks, scrolls, or auto-updates.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	The web application does not contain flashing content.
2.4.1 Bypass Blocks (Level A)	Supports	The web application contains a “skip link” to bypass the header navigation content.
2.4.2 Page Titled (Level A)	Supports	All web pages have titles that describe their topic or purpose.
2.4.3 Focus Order (Level A)	Partially Supports	In most cases, elements that receive focus are presented in a logical order that honors the presentation and preserves meaning. In most cases, focus is properly managed. Exceptions: • Some menus found in the header incorrectly force focus inside the popup when content is revealed. • Focus is not always moved to the newly added content. This applies to: ○ The sidebar panels in the document preview, such as “Details”, “Add Reminder”, and “Tasks” ○ The “Welcome to Docusign CLM” modal content • Focus is not properly moved into some dialogs and keyboard focus is not properly contained within some dialogs

Criteria	Conformance Level	Remarks and Explanations
		when they are displayed. This includes the “Welcome to DocuSign CLM” modal, and the search results filters, such as “Expiration Date” and “Party”. ● Focus is lost in some situations. This includes: ○ In the “All Filters” modal of search results page when adding or removing filters ○ In the “Customize Columns” modal of the search results page when tabbing away from the combobox when its empty ○ In the search filters, after selecting a “month” or “year” with the date picker ○ In the “Choose Users” modal after sorting users by name. This modal is displayed when assigning or reassigning tasks. ○ On the search results page, when bulk de-selecting all files or folders by unchecking the “# Selected” checkbox ● The date picker’s focus order does not match the visual order of the month, year, and arrow controls.
2.4.4 Link Purpose (In Context) (Level A)	Supports	The purpose of each link can be determined from the link text alone or from the link text

Criteria	Conformance Level	Remarks and Explanations
		together with its programmatically determined link context.
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Supports	All functionality can be operated using a single pointer. There are no path-based or multi-point gestures within the web application.
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	All single-pointer functionality is executed on the up event and a mechanism to cancel or undo the action is provided.
2.5.3 Label in Name (Level A 2.1 and 2.2)	Partially Supports	In most cases, the accessible name of components contain the text that is presented visually. Exceptions: • The search filter dialogs that appear on the search results page, such as “Expiration Date” and “Party”, all have the accessible name of “Filter Menu” instead of the visible label and dialog heading. • The visually labelled “Change” button that triggers a dialog on the search results page has the accessible name “Open Results Settings Dialog”.
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Not Applicable	The web application does not have functionality operated by device motion or user motion.

Criteria	Conformance Level	Remarks and Explanations
3.1.1 Language of Page (Level A)	Supports	The human language of each page can be programmatically determined.
3.2.1 On Focus (Level A)	Supports	User interface components do not initiate a change of context when they receive focus.
3.2.2 On Input (Level A)	Partially Supports	In most cases, the web application does not cause an unexpected change of context when interacting with elements. Exception: On the search results page, when a user selects a document or folder in the table, the search bar and filters above the table are replaced by new controls to perform actions on the current selection.
3.2.6 Consistent Help (Level A 2.2 only)	Supports	Help mechanisms, where provided on multiple pages, appear in the same order relative to other content on the page.
3.3.1 Error Identification (Level A)	Supports	Input errors are identified when the user submits each form, and the errors are described to the user in text.
3.3.2 Labels or Instructions (Level A)	Partially Supports	In most cases, labels or instructions are provided and visible for all form fields. Exceptions: The search field contains placeholder text in place of visible instruction text.

Criteria	Conformance Level	Remarks and Explanations
		In the “Customize Columns” dialog of the search results page, the combobox contains placeholder text in place of visible instruction text.
3.3.7 Redundant Entry (Level A 2.2 only)	Supports	The web application does not require information previously entered to be entered again.
4.1.1 Parsing (Level A)	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 . For WCAG 2.2, this success criterion is obsolete and removed.
4.1.2 Name, Role, Value (Level A)	Partially Supports	The web application provides the correct name, role, state, and other important accessibility information for most of its controls. These properties are properly associated and available on controls for users who rely on assistive technology. Exceptions: - The “Help” and user avatar popups are incorrectly implemented as ARIA menus instead of ARIA disclosures. - The “Actions” menu does not programmatically indicate its ARIA collapsed state.

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		• The “Apps menu” dialog is not implemented as an ARIA dialog. It does not have an accessible name or the expected role and properties. • The “Welcome to DocuSign CLM” dialog is not properly implemented as an ARIA dialog. It does not have an accessible name or the appropriate role. Additionally, its “Close” icon button also does not have an accessible name. • The buttons to remove search history items are incorrectly nested within listbox options, which incorrectly contributes to the accessible names of the options. • The search filters that appear on the search results page, such as “Expiration Date” and “Party”, are implemented as modal dialogs, but do not have the expected ARIA modal property. • The document search dialog is not implemented as an ARIA dialog. It does not have an accessible name nor the expected role and properties. • The date picker’s month and year selection controls are incorrectly implemented as menus.

Criteria	Conformance Level	Remarks and Explanations
		- Each comment on the document incorrectly has a “button” role. Due to the controls within each comment, this causes nested interactive controls. - Documents that are displayed as images of text have an invalid role of “document”, which results in the alternative text not being read by some assistive technology.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	The web application does not contain synchronized media with live audio content.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	The web application does not contain any prerecorded synchronized media.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	Content does not restrict its view and orientation to a single display orientation.
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Supports	All form fields in the web application that collect user input identify their purpose.
1.4.3 Contrast (Minimum) (Level AA)	Supports	Text has sufficient contrast against its background.
1.4.4 Resize Text (Level AA)	Partially Supports	When content is scaled up to 200%, there is a loss of the following content and functionality:

Criteria	Conformance Level	Remarks and Explanations
		• Dialogs found on the search results page, such as “All Filters”, “Results type”, and search filters • The numbered pagination buttons for search results • “Choose documents” dialog shown when adding related documents from the document details panel
1.4.5 Images of Text (Level AA)	Supports	Documents are presented as images of text. This presentation is considered essential to support the document viewer functionality.
1.4.10 Reflow (Level AA 2.1 and 2.2)	Does Not Support	When content is set to a width of 320 CSS pixels, one or more of these three issues frequently occur: • There is a loss of information • There is a loss of functionality • The layout requires horizontal scrolling
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	All interface components and graphical objects have a contrast ratio of at least 3:1.
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Supports	The web application allows for relevant text style properties to be changed without a loss of content or functionality.
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	Content that appears on hover or focus is dismissible, hoverable, and persistent.
2.4.5 Multiple Ways (Level AA)	Supports	The web application in scope operates primarily as a document explorer and viewer with associated tasks. The application

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		provides a way to search and find documents, as well as consistent site navigation to move between search results and assigned tasks. When viewing documents, this site navigation remains available, along with breadcrumbs to navigate the folder structure a document is contained within.
2.4.6 Headings and Labels (Level AA)	Partially Supports	In most cases, headings and labels are descriptive throughout the web application. Exceptions: • In the “All Filters” dialog, the labels of the controls to star and unstar filters do not include the name of the filter they apply to. • In the “Choose Users” dialog, the button to sort users by name does not describe whether the sorting order is ascending or descending. This modal is displayed when assigning or reassigning tasks.
2.4.7 Focus Visible (Level AA)	Partially Supports	There is one instance where a keyboard operable user interface component did not provide a visible keyboard focus indicator: • The button to change the user account on the “Log In” page

Criteria	Conformance Level	Remarks and Explanations
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)	Partially Supports	In most cases, when interactive elements receive keyboard focus, the focused element is not obscured or entirely hidden. Exceptions: - When navigating to a document from the “Tasks” page, the collapsable “Tasks” panel will be open automatically. Depending on the width of the viewport, this panel obscures or entirely hides the following elements when focused: - The document page navigation and zoom controls - Focusable text in the document associated with user comments
2.5.7 Dragging Movements (Level AA 2.2 only)	Does Not Support	The web application contains one instance where functionality is operated with dragging movements. Dragging is used to reorder columns in the “Columns” dialog found on the search results page. This functionality is not operable with a single pointer.
2.5.8 Target Size (Minimum) (Level AA 2.2 only)	Supports	The target size of pointer inputs is at least 24 by 24 CSS pixels.
3.1.2 Language of Parts (Level AA)	Supports	The human language of each passage or phrase in the content can be programmatically determined.

Criteria	Conformance Level	Remarks and Explanations
3.2.3 Consistent Navigation (Level AA)	Supports	Navigational mechanisms that are repeated on multiple pages within a set of pages occur in the same relative order each time they are repeated.
3.2.4 Consistent Identification (Level AA)	Supports	Components that have the same functionality within a set of pages are identified consistently.
3.3.3 Error Suggestion (Level AA)	Supports	For all automatically detected input errors where suggestions for correction are known, the suggestions are provided to the user.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not Applicable	The web application does not contain pages that cause legal commitments or financial transactions, modify, or delete user-controllable data in a data storage system, or submit user test responses.
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)	Supports	The web application does not require a cognitive function test for any steps.
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Partially Supports	In most instances, status messages can be programmatically determined and do not require focus. Exceptions: In the “Tasks” panel of a document, when a user attempts to complete a task without the required fields, errors are not communicated to screen reader users without the fields receiving focus.

Criteria	Conformance Level	Remarks and Explanations
		• The “All items de-selected” message that can appear when paginating through search results is rarely announced properly to the user. • In the “Customize Columns” modal of the search results page, items added or removed using the editable combobox are not announced to the user.

Table 3: Success Criteria, Level AAA

Notes: Not Evaluated.

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