

Accessibility Policy

Version 1.2: Updated May 2025

1. Overview

Brainfuse is committed to providing high-quality tutoring services to all eligible users at the institutions we support. We believe that access to our platform and services should be available without obstacles due to abilities or disabilities. As a result, we strive to make our platform accessible to all.

2. Purpose

The purpose of this policy is to promote equal access to the Brainfuse platform and services by improving the user experience for all users, including persons with disabilities.

3. Scope

This policy applies to all Brainfuse-controlled domains, services, and features. Brainfuse will ensure all third-parties are informed of this policy and will favor providers based on adherence to this accessibility policy. Brainfuse employees, contractors, consultants, temporaries, and other workers at Brainfuse, including all personnel affiliated with third parties, will receive this policy for review.

4. Policy

1. All new and updated features of the Brainfuse platform after the effective date of this policy will conform to WCAG Level AAA success criteria.
2. All existing features of the Brainfuse platform will be modified to conform to WCAG Level AAA success criteria within one year of the effective date of this policy.
3. If compliance with a standard is not technically feasible, Brainfuse will consider alternative formats and access options for individuals.

5. Governance

1. Brainfuse Accessibility Team
 - i. Role: The Brainfuse Accessibility Team, composed of key Brainfuse personnel, will oversee this policy, ensure compliance with standards, and advocate for accessibility for all approaches across the company. The accessibility team will include individuals from the following strategic areas:
 1. Senior Leadership: An executive on the team will provide the overall vision and goals for accessibility within the company and provide the necessary support and approvals to ensure progress for initiatives.

2. IT & Development: In-house tech and development will provide insight into technical feasibility, automated testing tools, and oversee compliance with accessibility standards in code and deployment.
3. Tutor & Client Success: Managers will advocate for client accessibility needs, monitor compliance with standards, and coordinate any actions required for follow-up.
4. Human Resources: Members from this area will develop accessibility training, ensure timely completion of audits and reports, manage resources, and coordinate with larger teams to champion accessibility initiatives.

6. Responsibilities

- i. Compliance: The team charged with overseeing this policy will monitor compliance with accessibility standards, including WCAG Level A, AA, and AAA success criteria, ADA, Section 508, and other relevant federal, state, and local laws.
- ii. Auditing & Reporting: The team charged with overseeing this policy will be responsible for developing, maintaining, and updating protocols for regularly scheduled manual and automated accessibility audits to identify potential accessibility issues and provide regular reports regarding key improvement metrics.
- iii. Development & Implementation: The team charged with overseeing this policy will be responsible for developing, maintaining, and updating guidelines for inclusive design during the development stage. In addition, the team will be responsible for developing, implementing, and updating accessibility testing for all development prior to and during implementation.
- iv. Awareness & Advocacy: The team charged with overseeing this policy will be responsible for advocating inclusive design and accessibility for all principles across the company by supporting teams with accessibility best practices.
- v. Training & Professional Development: The team charged with overseeing this policy will be responsible for ensuring regular training for new staff and refresher courses to keep teams up to date on best practices, accessibility standards, and new technologies.
- vi. Review & Updates: The team charged with overseeing this policy will be responsible for ensuring annual policy reviews and updates to compliance standards as changes occur.

7. Exclusions

1. Content that is not available to Brainfuse users or has been archived is not subject to the standards in this policy.
2. User content that is outside of the control of Brainfuse (e.g. content generated outside Brainfuse by users) and imported, uploaded, or saved on the Brainfuse

platform for user access, review, or use on the Brainfuse platform is not subject to this policy.

8. Revision History

Date of Change	Version	Responsible	Summary of Change
May 2024	1.0	Brainfuse Accessibility Team	Authored
July 2024	1.1	Brainfuse Accessibility Team	Reviewed and updated “Scope” to include third-parties
May 2025	1.2	Brainfuse Accessibility Team	Annual Review