



The e-Learning Accessibility and Section 508 Report

ANALYSIS AND COMMENTARY BY JOE PULICHINO

Recent research by the US Census Bureau indicates that as many as 20% of Americans have a disability that may interfere with the use of a computer for educational purposes. These findings may be generalized to other countries as well. How many of these citizens are potential e-Learners who will be left behind if e-Learning programs and courses are not designed, developed, and delivered with "accessibility" in mind? This question raises a number of issues about accessibility: awareness, standards, compliance, tools, technologies, best practices, and development costs.

To address these issues on behalf of our Members and Associates, The eLearning Guild has been working with Martie Buzzard who is project manager for e-Learning at the National Center for Disability Education and Training at the University of Oklahoma College of Continuing Education. She wrote an article, "More than Compliance: Accessible e-Learning that Makes a Difference," that appeared in the October 11, 2004 issue of *The eLearning Developers' Journal*, and in October 2004 she was co-presenter of a session at *The e-Learning Producers Conference & Expo* entitled, "Prototypes and Authoring Tools for Developing Section 508 Compliant e-Learning."

With Ms. Buzzard's help and guidance, the Guild Research Committee published an accessible e-Learning survey in order to find out what is going on in your organizations when it comes to accessible e-Learning. The results of the survey are contained in this report.

Summary of Results Highlights

The following data points offer a summary of the results of this survey. For more detail and commentary, please refer to the appropriate page of this report.

- **54% of respondents have very limited or no knowledge of Section 508 with respect to accessible websites.**
- **57% of respondents have very limited or no knowledge of Section 508 with respect to accessible e-Learning.**
- **50% of respondents have been involved in the design or development of accessible e-Learning.**
- **75% of accessible e-Learning designers and developers took advantage of accessibility functionality built into the software they used.**
- **16% of respondents' organizations are fully compliant with some externally established guidelines.**
- **29% of respondents' organizations are at least partially compliant with Section 508 guidelines.**

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About Accessibility and Section 508

The need for electronic and information technology accessibility regulation became more apparent when Graphical User Interfaces (GUI) replaced DOS. Since a GUI generally requires a mouse and therefore certain motor skills, this innovation added to the already considerable problems of using a keyboard for physically challenged users. Additionally, the use of more complex graphics made interaction with the computer increasingly difficult for vision impaired users. As software and Internet capabilities grew, so did the accessibility problem for disabled users, particularly the deaf and blind. Screen readers cannot read most visual content, such as pictures, animation, and word art. Audio content is inaccessible to deaf users unless a transcript is inserted onto the page.

So, in 1998 Congress amended the Rehabilitation Act to include Section 508, and this amendment was signed into law by President Bill Clinton that same year. Essentially, this amendment applies specifically to federal government organizations and requires the Attorney General to report on the accessibility of all federal electronic and information technology, including Websites, telecommunications, software, hardware and peripherals, and information kiosks. Section 508 is much like Sections 501 and 504 of the Rehabilitation Act, which prohibit disability-based discrimination. Although unlike Sections 501 and 504, which are "person-based," Section 508 is "technology-based." Although Section 508 was not enacted specifically to address learning technologies, it does apply to them. As defined by the National Center for Disability Education and Training, "Accessible e-Learning is electronically-generated instruction that is equally accessible and usable to those whose sensory, movement and cognitive limitations interfere with the use of the computer."

Now that Section 508 has been implemented (2001) it requires that when federal government and agencies procure, develop, and maintain or use electronic and information technology (EIT), they must ensure that it is accessible and in compliance with Section 508 standards developed by the Architectural and Transportation Barriers Compliance Board (Access Board).

But as Ms. Buzzard suggests, accessibility is about more than compliance. As she writes, "Inclusion is a matter of the heart. It stems from a personal desire to do the right thing, and to take the initiative for change." We have often spoken about the capability of e-Learning to make education and training available anytime, anywhere. But shouldn't it also be accessible to anyone? This report examines how and what our community is doing in this regard.

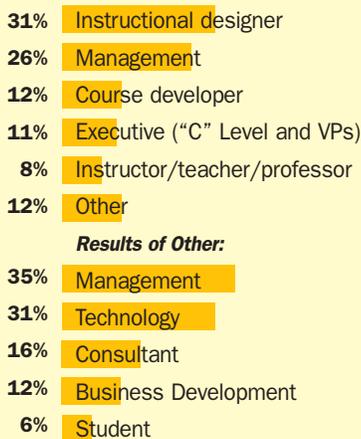
Demographics of Survey Respondents

Survey Background

We asked our respondents to identify themselves and their organizations by three attributes: their role in their organization, the size of their organization, and the type of their organization.

This survey, like all other Guild surveys, was open to Guild Members and Associates as well as to occasional Web site visitors. These surveys are completed by accessing the survey link on the homepage of the Guild Website. Naturally, Guild Members and Associates are more likely than non-members to participate, because each of the 15,000 plus Members and Associates receive an email notifying them of the survey and inviting them to participate. For this reason, we can classify this survey as a random sample because all members have an opportunity to participate, and their participation is random.

1. What is your role in your organization?



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Instructional designers made up 31% of survey respondents, which is approximately 11% above the survey response norm for the last eight Guild surveys. This frequency is most likely attributable to the subject matter covered in this survey, which is naturally of more interest to designers.

On the other hand, management respondents were approximately 11% lower than the aggregated average for the last eight Guild surveys. However, executive level response rates were up from an average of 5% to 11% in this survey. The lower level of "management" respondents may be connected to the large number of respondents who selected "other" and wrote themselves in as some form of manager rather than selecting "Management." Note the frequencies of the "Other" category.

The course developer response rate of 12% was consistent with the aggregate response rate for this group.

2. What is the size of your organization?



2. How many employees are in your entire organization?

There was a noticeable shift in survey respondents by organizational size. Typically, respondents have been split, nearly 50/50, between organizations larger or smaller than 2,500 employees. For this survey 63% of respondents were from organizations with fewer than 2,500 employees. This deviation from the aggregated survey norm may be due to the subject matter of this survey, Accessibility.

The smallest representative group was organizations of over 50,000 employees, which is rather typical for Guild surveys when considering the Guild's eight previous surveys.

The most represented group was those working for organizations with fewer than 100 employees, 29%.

Demographics of Survey Respondents

3. What kind of organization do you work for?



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Organizational type seems to be the most consistent demographic category over the last five Guild surveys in terms of frequencies. Non-learning corporations again had the largest response rate at 31%. However, this number is slightly skewed, and should be considered lower than the actual figure, due to respondents incorrectly categorizing their organization as “Other” when they are, in fact, non-learning corporations. The revised figure is approximately 36%, therefore we see that the response rate for that group, both revised and un-revised is in line with Guild survey norms.

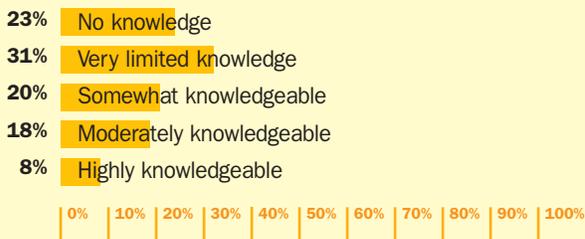
Learning corporations were the second largest response group accounting for 27%. So in total, corporations, both learning and non-learning, make up between 58% and 63%, depending on the revisions made.

All other groups are consistent with the prior five Guild survey response samples.

Respondents’ Knowledge of Section 508 Standards

We thought that it was important to establish a benchmark on the level of knowledge among the survey respondents on the subject of how Section 508 applies to both Websites and accessible e-Learning.

4. Rate your knowledge of Section 508 standards with respect to accessible Websites:

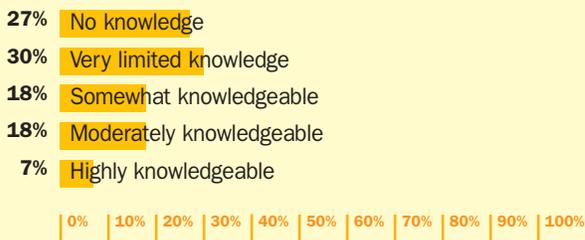


The results show that a majority of survey respondents have either very limited or no knowledge of Section 508 with respect to either Websites (54%) or accessible e-Learning (57%).

• 26% of respondents consider themselves moderately to highly knowledgeable of Section 508 with respect to accessible Websites.

• 25% of respondents consider themselves moderately to highly knowledgeable of Section 508 with respect to accessible e-Learning.

5. Rate your knowledge of Section 508 standards with respect to accessible e-Learning:

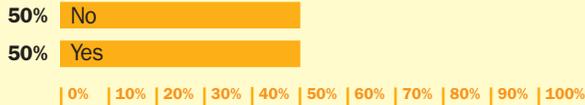


Since our respondents are primarily e-Learning professionals, it may have been hypothesized that they would be more knowledgeable about Section 508 with respect to accessible e-Learning as opposed to Websites. Yet, there is no difference in the level of knowledge of Section 508 standards with respect to either Websites or accessible e-Learning among our sample. We can conclude that the issue is a lack of knowledge about Section 508 regardless of the application.

Clearly, if there is to be an increase in the design and delivery of accessible e-Learning, especially that which complies with Section 508, there will need to be considerable learning on the subject by most designers.

Respondents' Accessibility Design and Development Experience

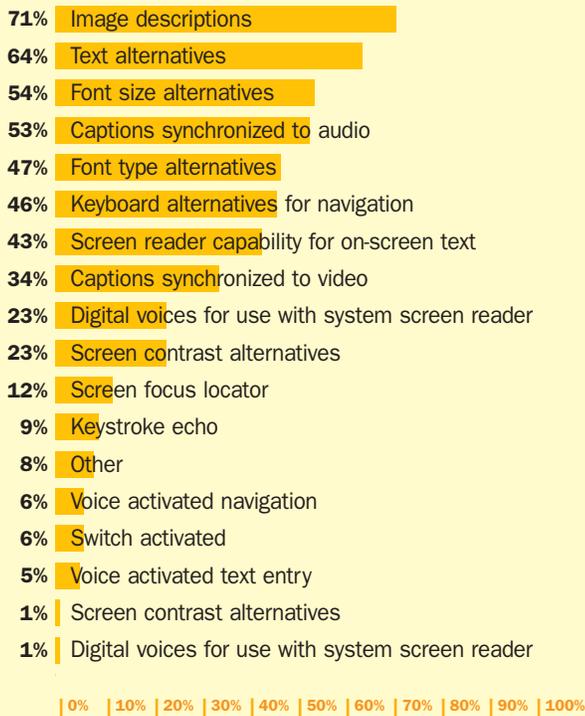
6. Have you ever been involved in the design or development of accessible e-Learning?



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Note that half of our respondents have been involved in the design and development of accessible e-Learning despite the general lack of knowledge of Section 508 when it comes to accessible e-Learning.

7. If you have ever been involved in the design or development of accessible e-Learning, what accessibility features did you include?



7. If you have ever been involved in the design or development of accessible e-Learning, what accessibility features did you include?

Respondents who have been involved in the design or development of accessible e-Learning were invited to select all of the accessibility features they included in their design. Most of these respondents selected several choices.

Among the many choices provided several received a considerably strong frequency. It would appear that most have to do with compensating for a learner's vision problems.

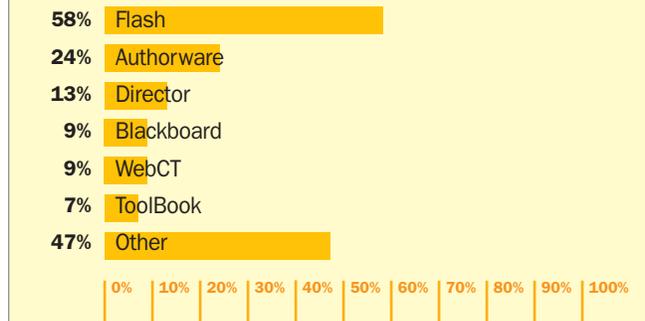
8% of respondents selected "Other." We have listed them below to show the complete range of possibilities.

Results from "Other" (in alphabetical order)

- Alternative training (paper, classroom)
- Appropriate colors
- Captions (not synchronized)
- Cascading Spreadsheet (CSS) for placement rather than tables
- D link
- Full text printouts
- Large hot spots
- Large key, shape and color code input device
- Programming and multimedia accessibility techniques
- Reflow display
- Scripts
- Skip navigation, form control labels, etc.
- Three modal delivery of each concept
- Transcripts for audio and video

Respondents' Accessibility Design and Development Experience

8. In the design or development of your accessible e-Learning, what software do you use to create accessible courseware?



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In this question as well, respondents were invited to select more than one choice.

What is most striking about this list, including the high percentage of "Other" responses, is that these are common design and development tools. There does not seem to be a design or development software product that has been created specifically for accessible e-Learning design and development.

The "Other" list also points out a significant oversight on our part concerning the choices we provided for this question. Dreamweaver was mentioned by 12% of those who selected "Other," which makes it the fourth highest frequency.

Results from "Other" (in alphabetical order)

- Acrobat 6
- ANGEL
- ATutor
- BASIC
- Captivate
- CCT
- Centra
- Contribute
- Coursebuilder
- DHTML
- Dreamweaver
- Geo LCMS
- Hand coded
- hicaption
- HTML
- Janison
- java
- Knowledge Producer
- KoolTool
- LearnerWeb
- LearningSpace
- Lectora
- Microsoft Producer
- MySQL storage
- N@tschool
- OnDemand
- OutStart Evolution
- PowerPoint
- Proprietary software
- Qld Government Designed
- ReadyGo
- RoboDemo
- WBT TopClass
- Workforce Connections
- XHTML

9. In the design or development of your accessible e-Learning, did you take advantage of accessibility functionality built into the software you used?



9. In the design or development of your accessible e-Learning, did you take advantage of accessibility functionality built into the software you used?

- **75% of respondents do take advantage of accessibility functionality built into the design and development software that they use.**

As Martie Buzzard points out, this result should be good news to the developers of e-Learning design and development software, and hopefully it will encourage them to build in more accessibility functionality. For those 25% who do not, we wonder what they do use, and if they would use the built-in functionality if they knew how to.

Standards, Guidelines, and Compliance in Respondents' Organizations

We asked a series of questions aimed at determining to what extent the respondents' organizations used standards or guidelines for accessible e-Learning, and whether they were now, or were planning to be, compliant with those standards. In general, our respondents reported that very few organizations adhered to standards and were fully compliant.

10. What is your organization's policy on standards for making products accessible to learners with disabilities, whether internally or for sale?

- 6% Goal to be fully compliant within 12 months
- 8% Goal to be fully compliant within 1 - 3 years
- 1% Goal to be fully compliant within 3 - 5 years
- 16% Partially compliant with externally established guidelines
- 16% Fully compliant with externally established guidelines
- 9% We are compliant with internally developed guidelines
- 11% No company-wide policy, groups have their own policies
- 15% We are not compliant with any established guidelines
- 18% I do not know



10. What is your organization's policy on standards for making products accessible to learners with disabilities, whether internally or for sale?

The best we can report here is that no single response received a considerable frequency among survey respondents. The range is quite interesting in its variance and it seems that no clearly established pattern for standards or compliance has emerged in the industry. Perhaps most telling of all is the plurality answer of "I do not know" at 18%.

11. Which of the following established guidelines do you follow?

- 29% Section 508
- 28% We don't follow any guidelines
- 21% Internally developed guidelines
- 13% W3Cs Web Accessibility Initiative
- 7% Other externally established guidelines
- 2% Other



11. Which of the following established guidelines do you follow?

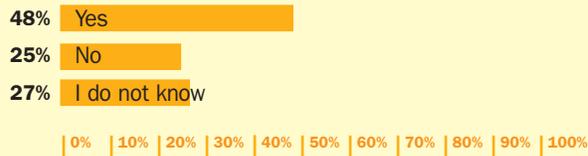
Here too we see that there is a virtual three-way tie between Section 508, no guidelines, and internally developed guidelines. The "Other" list reminds us that some of our respondents work outside of the United States and are following their own countries' guidelines.

Results from "Other" (in alphabetical order)

- ADA
- AICC/SCORM
- Also follow Canadian guidelines
- Bobby approved
- Canadian guidelines not mandatory
- Data exchange
- Follow guidelines our clients comply with
- Internal guidelines and common sense
- New Zealand law
- Provincially mandated
- SCORM 1.2, AICC Level 1, etc.
- W3C and AccessTec recommendations
- Wondering which guidelines to follow

Standards, Guidelines, and Compliance in Respondents' Organizations

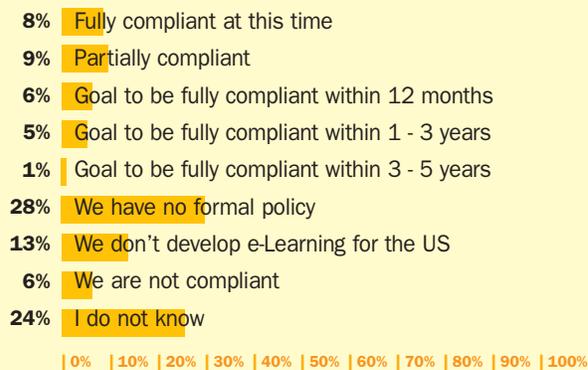
12. Does your organization have plans to develop and deliver accessible e-Learning within the next year?



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This result does strike us as something of a trend. If we remove those respondents who do not know, we see that 66% of respondents' organizations have plans to develop and deliver accessible e-Learning within the next year. While there may be some uncertainty about the standard or guideline to be used, it does seem that the respondents' organizations are moving in the direction of making more e-Learning accessible to more learners. This is surely a trend in the right direction.

13. What is your organization's policy regarding its compliance with Section 508 standards for e-Learning products it develops for internal use or for sale?

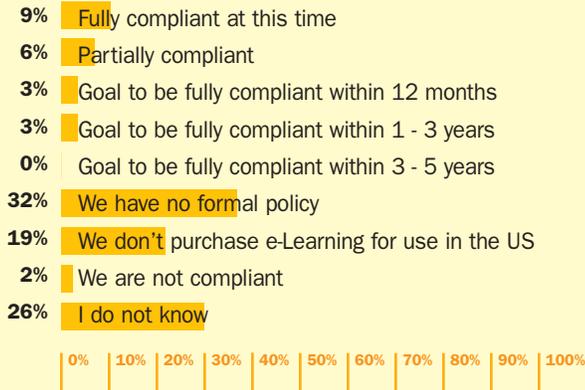


13. What is your organization's policy regarding its compliance with Section 508 standards for e-Learning products it develops for internal use or for sale?

- **17% of respondents' organizations are either partially or fully compliant with Section 508 for e-Learning products they build for internal use or for sale.**

Standards, Guidelines, and Compliance in Respondents' Organizations

14. What is your organization's policy regarding its compliance with Section 508 standards for e-Learning products it purchases?

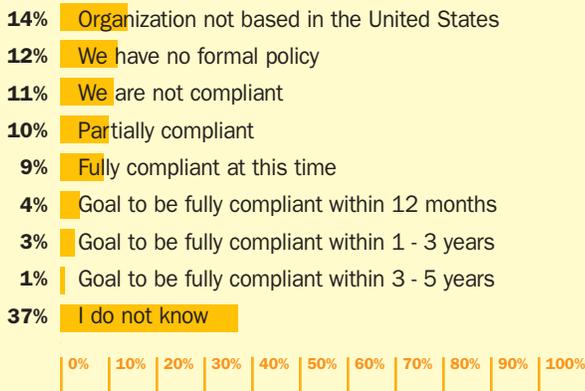


14. What is your organization's policy regarding its compliance with Section 508 standards for e-Learning products it purchases?

- **15% of respondents' organizations are either partially or fully compliant with Section 508 for e-Learning products they buy.**

Taken together the results of questions 13 and 14 underscore that, from a policy standpoint with regard to Section 508, there is not a significant level of compliance nor is there a strong trend toward becoming compliant. Only 8% are fully compliant when it comes to e-Learning products it designs for internal use or for sale; and only 9% are fully compliant when it comes to e-Learning products that they purchase. Very few intend to be fully compliant over the next several years.

15. To what extent is your organization's Website Section 508 compliant?



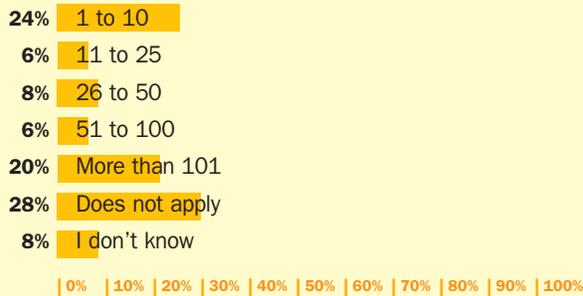
15. To what extent is your organization's Website Section 508 compliant?

It seems that Section 508 compliance for the respondents' organizations Websites is not much more common, as only 19% are either partially or fully compliant at this time.

Course Development Activity in Respondents' Organizations

In this set of questions we sought to discover what percentage of our respondents' organizations e-Learning courses (online or CD-ROM) meet any externally established (including Section 508) or internally developed accessibility standards. We asked respondents to consider e-Learning courses built for both employees and customers.

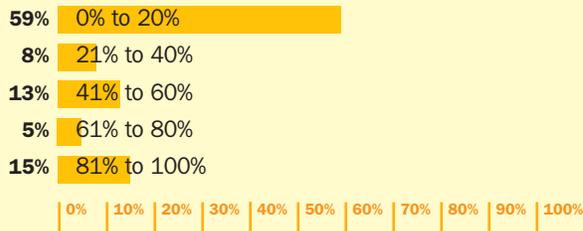
16. How many online or CD-ROM courses does your organization currently offer to your employees?



In analyzing the data for question 17, we removed those respondents who answered either "Does not apply" or "I don't know" to question 16. This represented 36% of the total number of respondents to question 16.

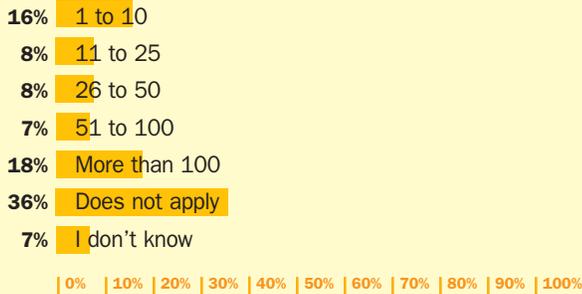
Of those remaining, a majority of 59% of the respondents reported that only 20% or less of the online or CD-ROM course that their organizations currently offer to employees meet any externally established or internally developed accessibility standards.

17. What percentage of these courses meets any externally established (including Section 508) or internally developed accessibility standards?



Course Development Activity in Respondents' Organizations

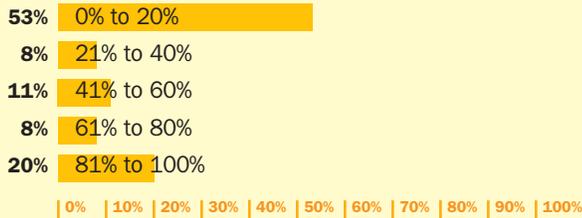
18. How many online or CD-ROM courses does your organization currently offer to your customers?



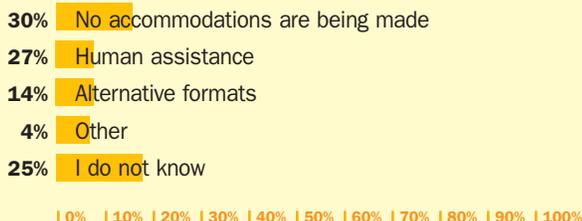
In analyzing the data for this question 19, we removed those respondents who answered either "Does not apply" or "I don't know" to question 18. This represented 43% of the total number of respondents to question 18.

Of those remaining, a majority of 53% of the respondents reported that only 20% or less of the online or CD-ROM course that their organizations currently offer to employees meet any externally established or internally developed accessibility standards.

19. What percentage of these courses meets any externally established (including Section 508) or internally developed accessibility standards?



20. What accommodations are currently being made for courses that do not meet any externally established (including Section 508) or internally developed accessibility standards?



The fact that 25% of respondents do not know what accommodations are being made when courses do not meet accessibility standards reveals that there remains a considerable lack of awareness of the issue. Considering that 30% report that no accommodations are being made underscores the fact that there remains considerable inertia when it comes to making e-Learning accessible. Finally, the fact that the primary mode of accommodation is human assistance reveals how limited the options are if e-Learning is not made accessible in the first place.

Barriers to Accessible e-Learning

21. In your opinion, which of the following are the three most significant barriers to development and delivery of accessible e-Learning?



Results from “Other” (in alphabetical order)

- Accessibility can be perceived as extra
- Applying guidelines internally
- Assumption that it is only a technical issue
- Client request only
- Compromise on interactivity options
- Customers are not interested in this
- Existing standards facilitate piracy
- Industry has few who need accessibility accommodation
- Internal training, only computer skills required
- Lack of easily accessible “how to” training
- Lack of understanding by clients
- Low PC/Internet penetration
- Should not develop to cater to a small percentage
- Students with disabilities have human assistance
- Technical barriers to setting keyboard focus
- Tools using wrong paradigm
- Unaware of standards and guidelines

21. In your opinion, which of the following are the three most significant barriers to development and delivery of accessible e-Learning?

According to our respondents, the three most significant barriers are:

- **61% Lack of expertise among practitioners**
- **45% Low organizational priority and support**
- **39% Costs to retrofit existing courseware**

With cost and low organizational priority and support being significant issues, we wonder if the responsible practitioners (e-Learning designers and developers) will get the education and training they will need on Section 508 standards, or even on how to design for accessible e-Learning. In fact, getting that education and training is non-trivial. As Ms. Buzzard writes in her recent article in *The eLearning Developers’ Journal*, “More than Compliance: Accessible e-Learning that Makes a Difference,” there are at least six processes that will improve a practitioner’s knowledge about accessible e-Learning:

1. Study Section 508 guidelines and convert them into functional descriptions of your e-Learning product(s).
2. Become familiar with assistive technology, and learn how it will interact with your delivery media.
3. Get acquainted with people with disabilities and learn how they use assistive technology.
4. Make research-based decisions on ways to incorporate accessibility into your current and future products.
5. Be creative and seek innovative ways to engage your learning audience in interactive multimedia.
6. Develop prototypes as you go, and field test them.

We must also underscore that “limited audience” (38%) was close behind cost as a barrier. Is there really too limited an audience to justify the time and money to design and develop accessible e-Learning? Or is it just a perception that the audience is limited?

Respondents who selected “other” seem to note only slightly different barriers than those put forth in the survey. Indeed, many of the responses are closely related to many of the prepared answers. Most notably, some of these survey respondents cite what seems to be “limited audience” as one of their most significant barriers, for example, “Should not develop to cater to a small percentage,” “Industry has few who need accessibility accommodation,” or “Customers are not interested in this.”

Respondents also seemed to indicate a lack of technical wherewithal in order to develop or implement section 508 compliant technologies.

Hot Links

These links and many others can be found in the Guild Resource Directory.

The Importance of Section 508 Compliance, by Emily Hollis

<http://www.clomedia.com/content/anviewer.asp?a=309>

More Than Compliance: Accessible E-Learning That Makes a Difference, by Martie Buzzard

<http://www.elearningguild.com/pdf/2/101104mgt-h.pdf>

The Federal Agency responsible for setting accessibility guidelines and standards.

<http://www.access-board.gov/>

A brief case study in creating an accessible website.

<http://www.acesibility.com/casestudy.html>

Free website dedicated to testing other web pages for section 508 compliance.

<http://bobby.watchfire.com>

Government website explaining section 508 compliance.

<http://www.section508.gov/>

Information Technology and People with Disabilities: The Current State of Federal Accessibility, presented by the Attorney General to the President of the United States, April 2000.

<http://www.usdoj.gov/crt/508/report/content.htm>

A brief guide to why accessibility is important.

http://www.usablenet.com/accessibility_usability/accessibility.html

*This survey generated responses from over 300 Members and Associates; these results are statistically significant and can be generalized to the entire Guild membership.

About the author

Joe Pulichino, Director of Research, The eLearning Guild



Joe Pulichino began his career in education as an English instructor at Rutgers University over 25 years ago. Since then he has held a number of senior management positions in the technology sector where he was responsible for the development, delivery, and marketing of a wide range of corporate education programs and services. Most recently he has served as vice-president of education services at Sybase, vice-president of eLearning at Global Knowledge Network, and CEO of EduPoint. He is an adjunct faculty member of the Pepperdine University Graduate School of Education and Psychology where he is completing his Ed.D. in Education Technology. The focus of his research is on informal and organizational learning. Joe is principal of the Athena Learning Group, a virtual network of consultants and academics working in the fields of learning, knowledge management, performance enhancement and Communities of Practice.

The Research Committee Members

- Ms. Dawn Adams**, Content Manager, Microsoft Global e-Learning Services
- Dr. David J. Brand**, Learning Design & Technology, 3M Corporation
- Mr. Jerry Day**, Senior Technical Training Developer, Pillar Data Systems
- Ms. Silke Fleischer**, Product Manager, Macromedia
- Dr. Nancy Grey**, Director — Pharmaceutical Regulatory Education, Pfizer
- Ms. Sheila Jagannathan**, e-Learning Specialist, The World Bank Institute
- Dr. Warren Longmire**, Manager, Learning Strategy, Convergys
- Dr. Maggie Martinez**, CEO, The Training Place
- Dr. Patti Shank**, Managing Partner, LearningPeaks, LLC
- Dr. Richard Smith**, Instructional Designer, Amerind
- Celisa Steele**, Chief Creative Officer, Isoph
- Ernie Thor**, Senior Instructional Designer, AT&T Wireless
- Angela van Barneveld**, Senior Learning Design Specialist, Canada Customs and Revenue Agency

To learn more about this subject:

To learn more about learning and professional development, we encourage you to search the following pages on the Guild's Web site using the keywords: Accessibility, Section 508.

The Resource Directory: <http://www.eLearningGuild.com/resources/resources/index.cfm?action=viewcats>

The eLearning Developers' Journal: <http://www.eLearningGuild.com/articles/abstracts/index.cfm?action=view>

About the Guild



The eLearning Guild is a global Community of Practice for designers, developers, and managers of e-Learning. Through this member-driven community, the Guild provides high-quality learning opportunities, networking services, resources, and publications.

Guild members represent a diverse group of instructional designers, content developers, Web developers, project managers, contractors, consultants, managers and directors of training and learning services – all of whom share a common interest in e-Learning design, development, and management. Members work for organizations in the corporate, government, academic, and K-12 sectors. They also are employees of e-Learning product and service providers, consultants, students, and self-employed professionals.

The 15,000 plus members of this growing, worldwide community look to the Guild for timely, relevant, and objective information about e-Learning to increase their knowledge, improve their professional skills, and expand their personal networks.



The eLearning Developers' Journal is the premier weekly online publication of The eLearning Guild. The Journal showcases practical strategies and techniques for designers, developers, and managers of e-Learning.

The eLearning Guild organizes a variety of industry events focused on participant learning:

