

Transparent Language Accessibility Conformance Report

VPAT® Version 2.1 – January 2019

Name of Product/Version: Transparent Language Online

Product Description: Online language learning tool

Date: January 2019

Contact information: cmcgonagle@transparent.com

Notes:

Evaluation Methods Used: Screen reader, keyboard-only, color contrast analyzer

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, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/	Level A (Yes) Level AA (Yes) Level AAA (Yes)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017 Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on January 22, 2018	(Yes)

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.
- **Supports with Exceptions:** 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 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Chapter 10 - Non-Web documents, Section 11.2.1- Non-Web Software (excluding closed functionality), and Section 11.2.2 - Non-Web Software (closed functionality).
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.0 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

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All audio content in the program does have text equivalent. A closed caption option is present in videos that support subtitles.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with exceptions	Alternative text is present for all activities with the exception of one. A closed caption option is present in videos that support subtitles.
1.2.2 Captions (Prerecorded) (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	A closed caption option is present in videos that support subtitles.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Does not Support	Audio descriptive text for videos is not available for all videos, but is in the process of being added to the program.
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All key program structure and relations are conveyed through text.
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Context is presented in a meaningful way
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Media is presented with a variety of ways
<p><u>1.4.1 Use of Color</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Colors pass the minimum of 3:1 contrast ratio
<p><u>1.4.2 Audio Control</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Volume control is available in courses, and sound can be paused
<p><u>2.1.1 Keyboard</u> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Tabbing through the main learning UI is supported and all of the learning activities were recently updated to support compliant keyboard tabbing
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to:</p>	Supports	Anything on the site that can gain focus can also be navigated away from

Criteria	Conformance Level	Remarks and Explanations
2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<u>2.2.1 Timing Adjustable</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The only timing that we enforce is timing out inactive users and timed learning activities, in which the timed aspect is essential
<u>2.2.2 Pause, Stop, Hide</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The site fully complies with all relevant guidelines
<u>2.3.1 Three Flashes or Below Threshold</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	No quick flashes occur at site.
<u>2.4.1 Bypass Blocks</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The site fully complies with all relevant guidelines
<u>2.4.2 Page Titled</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	PDFs and web pages contain correct title elements.
<u>2.4.3 Focus Order</u> (Level A) Also applies to: 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	PDFs and web pages contain correct title elements
<u>2.4.4 Link Purpose (In Context)</u> (Level A) Also applies to: 2017 Section 508	Supports	Links contain apt text descriptions or alt tags.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 		
<p>3.1.1 Language of Page (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Language attributes are specified within HTML and PDFs
<p>3.2.1 On Focus (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Focus on a component does not change the context
<p>3.2.2 On Input (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Changing of interface settings does not case a change of context
<p>3.3.1 Error Identification (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Error messages are given to the user when input errors are detected.
<p>3.3.2 Labels or Instructions (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Instructions and labels are provided.
<p>4.1.1 Parsing (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The site's markup is properly formatted according to these guidelines
<p>4.1.2 Name, Role, Value (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) 	Supports	Names and roles can be programtically determined for user interface components.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.4 Captions (Live) (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	There is no live media in the product
<p>1.2.5 Audio Description (Prerecorded) (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Does not Support	Audio descriptive text for videos in not available for all videos, but is in the process of being added to the program.
<p>1.4.3 Contrast (Minimum) (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Contrast ratios are applied in accordance with the guidelines in all areas
<p>1.4.4 Resize text (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Site is still navigable at zoom of 200% of text in the minimum 1024x768 browser window specification.
<p>1.4.5 Images of Text (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Images are used as supplementary learning aides, and can be customized in some instances. Particular presentations are considered essential and are exempt.
<p>2.4.5 Multiple Ways (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 	Supports	There are multiple ways to reach different parts of the site - search, buttons, links, navigation bar.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) – Does not apply to non-web docs 		
<p><u>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Heading and labels are descriptive
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports with Exceptions	Focus indication is not always available, we are working on enablement of focus notification to support this standard.
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Language attributes are specified within HTML and PDFs
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Consistent navigation mechanisms are present.
<p><u>3.2.4 Consistent Identification</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Components are consistently identified.
<p><u>3.3.3 Error Suggestion</u> (Level AA)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Supports	Error tip suggestions are provided at forms.
<p><u>3.3.4 Error Prevention (Legal, Financial, Data)</u> (Level AA)</p> <p>Also applies to:</p>	Supports	All submissions are reversible; financial transactions do not apply.

Criteria	Conformance Level	Remarks and Explanations
2017 Section 508 <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 		

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Does not Support	Sign language interpretation is not available.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Does not Support	No audio descriptions are given for videos.
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Does not Support	No audio descriptions are given for videos
1.2.9 Audio-only (Live) (Level AAA)	Not Applicable	There is no live media in the product
1.4.6 Contrast Enhanced (Level AAA)	Supports with exceptions	The 7:1 contrast ratio is not always met, though the other aspects of this criteria are met.
1.4.7 Low or No Background Audio (Level AAA)	Supports	Low or no background criteria are met.
1.4.8 Visual Presentation (Level AAA)	Supports with Exceptions	Blocks of text do not offer a method of optimizing through changing color or settings for text and width.
1.4.9 Images of Text (No Exception) Control (Level AAA)	Supports	Information is portrayed through text; images are only supplementary.
2.1.3 Keyboard (No Exception) (Level AAA)	Supports with Exceptions	Much of the program functionality is supported through keyboard equivalents.
2.2.3 No Timing (Level AAA)	Supports with exceptions	Much of the site contains no timed activity. Those that do offer the ability to pause the timer.
2.2.4 Interruptions (Level AAA)	Supports	Ability to control updates is present.
2.2.5 Re-authenticating (Level AAA)	Supports with exceptions	Ability to resume progress is present, though not specific to current items.
2.3.2 Three Flashes (Level AAA)	Supports	No quick flashes occur at site.
2.4.8 Location (Level AAA)	Supports	Breadcrumbs are provided when navigating into categories.
2.4.9 Link Purpose (Link Only) (Level AAA)	Supports with Exceptions	Much of the links in the program contain identifying text/aria labels.
2.4.10 Section Headings (Level AAA)	Supports	Section headings are present throughout the program.
3.1.3 Unusual Words (Level AAA)	Supports	A glossary of the site’s commonly used words is provided.

Criteria	Conformance Level	Remarks and Explanations
3.1.4 Abbreviations (Level AAA)	Supports	Abbreviations are spelled out in the context and spoken in the accompanying audio.
3.1.5 Reading Level (Level AAA)	Supports	Content is written as clearly and simply as possible.
3.1.6 Pronunciation (Level AAA)	Supports with exceptions	Much of the spoken words/phrases can be understood. In some languages, the content is difficult to pronounce properly.
3.2.5 Change on Request (Level AAA)	Supports with exceptions	Much of the site requires user to choose to change.
3.3.5 Help (Level AAA)	Supports	Help in the form of overlay text, help files, and instruction text is provided.
3.3.6 Error Prevention (All) (Level AAA)	Supports	Input errors are provided in all forms.

Chapter 5: Software

Notes:

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Not Applicable	Not Applicable
502.2.2 No Disruption of Accessibility Features	Supports	Apps do not override the accessibility options.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Supports	Role, state, properties, name, and description are able to be determined.
502.3.2 Modification of Object Information	Does not Support	Object states and properties cannot be set by assistive technology.
502.3.3 Row, Column, and Headers	Supports with Exceptions	Android web app table elements are programtically determinable. iOS app currently does not support
502.3.4 Values	Supports	Element values are able to be determined.
502.3.5 Modification of Values	Does not Support	Assistive technology is unable

Criteria	Conformance Level	Remarks and Explanations
		to programatically set values.
502.3.6 Label Relationships	Supports	All objects contain labels.
502.3.7 Hierarchical Relationships	iOS – Does not Support Android - Supports	iOS – App currently does not allow parent-child relationships to be programatically determined. Android - Web app is based on the website which meets requirements.
502.3.8 Text	Supports	Text content is programatically determinable.
502.3.9 Modification of Text	Does not Support	Text can not be modified by assistive technology.
502.3.10 List of Actions	Supports	Object actions are programatically determined.
502.3.11 Actions on Objects	Does not Support	Supported actions are not executable by assistive technologies.
502.3.12 Focus Cursor	Supports	Keyboard navigation is not available in mobile apps. Tap selection of contents will show focus.
502.3.13 Modification of Focus Cursor	Does not Support	Unable to place focus cursor by assistive technology.
502.3.14 Event Notification	iOS – Does not Support Android - Supports	iOS – Event changes are not programatically available to the assistive technology. Android – Event changes are programatically available to assistive technology.
502.4 Platform Accessibility Features	Not Applicable	Not Applicable
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Supports	Apps support high contrast, color, font type, font size, and focus cursor.
503.3 Alternative User Interfaces	Not Applicable	Not Applicable
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Supports with Exceptions	All audio content in the program has text equivalents that are used throughout the program, except in a few

Criteria	Conformance Level	Remarks and Explanations
		activities where the inclusion of such captions would invalidate the activity. For such cases, Transparent Language is developing an accessibility mode that will provide alternative learning activities appropriate for the use that still deliver the pedagogical value of the lesson.
503.4.2 Audio Description Controls	Supports with Exceptions	Alternative text is missing from some areas. Transparent Language is currently going through the process of adding compliant subtitles to all video segments in the program include descriptive comments for such sensory elements. It is expected that we will be compliant by the end of the summer 2018, if not sooner.
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)	See WCAG 2.0 section	See information in WCAG section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	Not Applicable
504.2.2 PDF Export	Not Applicable	Not Applicable
504.3 Prompts	Not Applicable	Not Applicable
504.4 Templates	Not Applicable	Not Applicable

2017 Section 508 Report

Notes:

Chapter 3: Functional Performance Criteria (FPC)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports with exceptions	Focus and tabbing are not fully

Criteria	Conformance Level	Remarks and Explanations
		supported at the moment.
302.2 With Limited Vision	Supports (Level AA)	Minimum color contrast 3:1 is passed.1.4.3 Minimum color contrast 4.5:1 is passed.1.4.4 Site is navigable when zoomed in.
302.3 Without Perception of Color	Supports (Level AA)	Minimum color contrast 3:1 is passed.1.4.3 Minimum color contrast 4.5:1 is passed.
302.4 Without Hearing	Does not Support	Videos do not have subtitles
302.5 With Limited Hearing	Supports (Level A)	Audio controls are available to increase sound, however1.2.1 Videos do not have subtitles
302.6 Without Speech	Supports (Level AA)	Speech is not required; course activities that use speech may be skipped
302.7 With Limited Manipulation	Supports with exceptions	Focus and tabbing are not fully supported at the moment.
302.8 With Limited Reach and Strength	Supports with exceptions	Focus and tabbing are not fully supported at the moment
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports (Level AA)	Supports currently -Familiar terms are used so that they do not have to learn new symbols, terms or design patterns.Error tooltips are given to help prevent the user from making mistakes, and make it easy to correct mistakes when they do occur.Items like Navigation headers and breadcrumbs are used to help orientate the user and help the user restore the context when it is lost.Help file pages are written in an easy to understand manner.

Chapter 6: Support Documentation and Services

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response	Heading cell – no response

Criteria	Conformance Level	Remarks and Explanations
	required	required
602.2 Accessibility and Compatibility Features	Supports	Information on the accessibility and compatibility features can be found at our support web pages, or by contacting our help desk.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	Alternate formats usable by individuals with disabilities will be provided upon request.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Support services include information on accessibility and compatibility features
603.3 Accommodation of Communication Needs	Supports	Our help desk is supports a variety of communication methods: phone, email, fax, postal mail, and our contact support form.

Chapter [9: Web](#) (see WCAG 2.0 section)

Notes:

Chapter [12: Documentation and Support Services](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
12.1 Product documentation	Heading cell – no response required	Heading cell – no response required
12.1.1 Accessibility and compatibility features	Supports	
12.1.2 Accessible documentation	See WCAG 2.0 section	See information in WCAG section
12.2 Support Services	Heading cell – no response required	Heading cell – no response required
12.2.2 Information on accessibility and compatibility features	Supports	
12.2.3 Effective communication	Supports	
12.2.4 Accessible documentation	See WCAG 2.0 section	See information in WCAG

Criteria	Conformance Level	Remarks and Explanations
		section

Legal Disclaimer – Transparent Language, Inc.

As the Transparent Language Online system updates existing functionality and develops new capabilities, we methodically address accessibility for learners with special needs. Although Transparent Language Online has not been formally tested for WCAG or 508 compliance by third-parties, through good programming practices and our own on-going internal testing we are working to support more and more aspects of ADA and WCAG compliance. Our team is building knowledge so that, where feasible, we can support the broadest possible access to our learning system. The above VPAT® 2.1 statement is our internal assessment of our compliance with 508 and WCAG criteria for software application and web sites. While we believe that we have done an appropriate assessment of Transparent Language Online status for each criteria we encourage all parties using this VPAT to provide their own appropriate independent review.