

Transparent Language Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version

Transparent Language Online (TLO) 2.68

Report Date

August 7, 2026

Product Description

"Learning Portal" User Interface for a language learning platform and Administrator features for managing the platform

Contact Information

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Notes

Evaluation does not include LessonGin and CourseBuilder, our authoring tools. Any criteria which would be exclusive to them are marked "Not Applicable". Features for creating and editing vocabulary items that are available in the "learning portal" user interface do not meet the definition of "authoring tools" for the purpose of these regulations because they do not produce content that is "for use by others", and they are included in the "Web" evaluations for the appropriate criteria. PDFs created as part of the lesson-authoring process are being updated to the PDF/UA standard.

Evaluation does not include KidSpeak, an optional legacy product only available on certain versions of TLO.

Evaluation does not include any non-web documents, which are not accounted for in the VPAT template's description of what belongs in each category. CSV, XSLX, and TXT downloads are not tested for accessibility due to the limitations of those formats. PDF versions of reports on user data and PDF "completion certificates" for learning content are being updated to the PDF/UA standard.

Evaluation Methods Used

QA testers with accessibility training manually reviewed the product features using screen readers, keyboard-only navigation, color contrast analyzers, text spacing plugins, browser text and zoom settings, and various desktop and mobile OS built-in features. They also used WAVE and an internally-developed Deque axe-core script to automatically flag potential issues for manual review.

Remarks and Explanations:

Please see the following linked pages for [system requirements for our web app](#) and for [our mobile apps](#). We test on a variety of different devices and configurations.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standards/guidelines

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected 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.
- 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 only be used in WCAG Level AAA criteria.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- 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: Our product is intended mainly for use as a web app, to be displayed either in a web browser or in our a hybrid mobile app. The mobile app contains some offline features and some content loaded from the internet and displays content very similarly to how it displays in a web browser. Where answers for software differ from answers for web in the following table, this is due to offline-only features or to app-specific differences from the web browser experience. We do not provide offline support docs, only help files available in HTML form, but Support Docs are listed here as a separate category for reader convenience.

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Partially Supports Software: Supports Support Docs: Supports	Web: Configurable images in portions of the Node Admin that are typically used only by Transparent employees are missing descriptions (and the ability for users to specify descriptions of custom images). Otherwise, non-text content is used decoratively or has accessible alternatives. Software: Admin features are not available in the app. All non-text content that can appear in the app is used decoratively or has accessible alternatives. Support Docs: Non-text content in support docs is extremely rare and has accessible alternatives.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to:	Web: Partially Supports	Web: Some lessons contain videos without descriptions. These are off by default and can be

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Software: Supports Support Docs: Not Applicable	available at the discretion of the subscribing organization. Audio content without text is present in some learning activities but this does not meet the WCAG definition of "audio-only" due to being interactive. Some audio-based learning activities require the user to hear to complete them and can't be skipped when inside lessons. We can make such activities skippable if needed. Software: One offline-only activity requires the user to hear to complete them but is presented as purely optional, not included in lessons. Support Docs: There is no audio or video content in support docs.
1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Not Applicable	Web: Our "courseware player" for learning activities supports captions in its own video player and embedded videos from YouTube and Vimeo. All official TL lessons with videos contain captions when appropriate. Software: Functionality when offline is identical to functionality online. Support Docs: There is no audio or video content in support docs.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Not Applicable	Web: Some lessons contain videos without descriptions. These are off by default and can be available at the discretion of the subscribing organization. We are working on updating our video player and adding descriptions so lessons with videos can be available to all users. Our learning activities support embedded videos from YouTube and Vimeo which contain description tracks.

Criteria	Conformance Level	Remarks and Explanations
		Software: Functionality when offline is identical to functionality online. Support Docs: There is no video content in support docs.
1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Some improvements needed for navigating tables, especially in the "Table" learning activity. Otherwise, pages are organized and marked up in a way that can be programmatically determined and navigated. Software: Functionality when offline is identical to functionality online. Support Docs: Support docs are organized and marked up in a way that can be programmatically determined and navigated.
1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: One known bug affecting one page on Android devices. Otherwise, we apply very consistent and clear visual and tab orders for navigation. Software: Functionality when offline is identical to functionality online. Support Docs: We apply very consistent and clear visual and tab orders for navigation.
1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: We refer to UI elements by their labels, not their characteristics. Software: Functionality when offline is identical to functionality online.

Criteria	Conformance Level	Remarks and Explanations
		Support Docs: We refer to UI elements by their labels, not their characteristics.
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Some buttons that change color to indicate they have received focus fall short of the expected contrast threshold (see WCAG 1.4.3 below) which also impacts this criterion, and we intend to change this in an upcoming release. Otherwise, we ensure that all content that conveys information uses some cue other than color. Software: Functionality when offline is identical to functionality online. Support Docs: We ensure that all content that conveys information uses some cue other than color.
1.4.2 Audio Control (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Not Applicable	Web: All features with sound have sound controls. Software: Functionality when offline is identical to functionality online. Support Docs: There is no audio content in support docs.
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Some known difficulties using keyboards with mobile devices, which we are working on support for, and with certain admin features that are typically only used by Transparent Language employees, which we are working on accessible replacements for. Otherwise, the UI is extensively keyboard-supported. Software: Admin features are not available in the app. Other functionality when offline is identical to functionality online.

Criteria	Conformance Level	Remarks and Explanations
		Support Docs: Support docs can be fully navigated by keyboard.
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Supports. Support Docs: Supports	Web: One known bug affecting an admin feature that is typically only used by Transparent Language Employees. Otherwise, the UI is extensively keyboard-supported. Software: Admin features are not available in the app. Other functionality when offline is identical to functionality online. Support Docs: Support docs can be fully navigated by keyboard.
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: All time-sensitive features can be extended indefinitely, can have timing disabled, or have non-timing-based alternatives, except one assessment activity for which timing is considered essential. Software: When offline, there is no automatic logout for inactivity. Other functionality when offline is identical to functionality online. Support Docs: The only timing-based feature in the support docs is the automatic logout for inactivity, which can be configured by admins and dismissed/extended indefinitely by all users.
2.2.2 Pause, Stop, Hide (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: All features to which this applies are timers or loading animations that are exempt as "essential". Timers in non-assessment activities may be extended/dismissed, see 2.2.1 above. Software: When offline, there is no automatic logout for inactivity. Other functionality when offline is identical to functionality online.

Criteria	Conformance Level	Remarks and Explanations
		Support Docs: The only automatically-updating feature in the support docs is the automatic logout for inactivity, which can be configured by admins and dismissed/extended indefinitely by all users.
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: No content ever intentionally flashes and we are not aware of any current bugs that cause flashing. Software: Functionality when offline is identical to functionality online. Support Docs: No content ever intentionally flashes and we are not aware of any current bugs that cause flashing.
2.4.1 Bypass Blocks (Level A) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Software: Supports Support Docs: Not Applicable	Web: Bypass menus exist for skipping over the repeated navigation bars and for skipping to specific sections within pages. Software: Functionality when offline is identical to functionality online. Support Docs: Support docs do not contain the types of repeated content this criterion is intended to address.
2.4.2 Page Titled (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: All pages have relevant titles. Software: Functionality when offline is identical to functionality online. Support Docs: All pages have relevant titles.
2.4.3 Focus Order (Level A) Also applies to: Revised Section 508 501 (Web)(Software)	Web: Partially Supports Software: Partially Supports	Web: One known bug when searching for content on a page that we are already redesigning. Some issues affecting admin features that are typically only used by Transparent Language. Some issues with

Criteria	Conformance Level	Remarks and Explanations
504.2 (Authoring Tool) 602.3 (Support Docs)	Support Docs: Supports	incorporating outside calendar widgets into admin features. Otherwise, we apply very consistent and clear visual and tab orders for navigation. Some known issues with navigating by tab order are exclusive to using external keyboards with iOS devices and are caused by the Safari browser failing to implement the HTML standard correctly, for which we do not currently have a workaround. Software: Functionality when offline is identical to functionality online. Support Docs: We apply very consistent and clear visual and tab orders for navigation.
2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: All links are descriptively labeled. Software: Functionality when offline is identical to functionality online. Support Docs: All links are descriptively labeled.
3.1.1 Language of Page (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: All pages are tagged with the currently-selected localization language (or with English when localization is not available). Software: Functionality when offline is identical to functionality online. Support Docs: All pages are tagged with the currently-selected localization language (or with English when localization is not available).
3.2.1 On Focus (Level A) Also applies to: Revised Section 508	Web: Supports Software: Supports	Web: We never intentionally make focus cause changes of context and are not aware of any bugs that cause this to happen.

Criteria	Conformance Level	Remarks and Explanations
501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Support Docs: Supports	Software: Functionality when offline is identical to functionality online. Support Docs: We never intentionally make focus cause changes of context and are not aware of any bugs that cause this to happen.
3.2.2 On Input (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: We never intentionally make inputs cause changes of context without an explicit confirmation and are not aware of any bugs that cause this to happen. Software: Functionality when offline is identical to functionality online. Support Docs: We never intentionally make inputs cause changes of context without an explicit confirmation and are not aware of any bugs that cause this to happen.
3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: We provide specific and actionable error and warning messages. Software: Functionality when offline is identical to functionality online. Support Docs: We provide specific and actionable error and warning messages.
3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Mobile mode does not currently display the list of keyboard shortcuts available in learning activities. Otherwise, we provide labels of all UI components and methods to easily find other interaction methods. Software: Functionality when offline is identical to functionality online.

Criteria	Conformance Level	Remarks and Explanations
		Support Docs: We provide labels of all UI components and methods to easily find other interaction methods.
4.1.1 Parsing (Level A) Also applies to: WCAG 2.0 – Always answer ‘Supports’ Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	For WCAG 2.0 and the 508 standards, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata .
4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Some bugs in how screen readers on mobile devices describe labels or changes to content. One known bug where a feature used only for setting up classes has an incorrect ARIA role. Otherwise, we ensure that all UI elements are properly marked up. Software: Functionality when offline is identical to functionality online. Support Docs: We ensure that all UI elements are properly marked up.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool)	Web: Not Applicable Software: Not Applicable	Web: We do not provide live content. Software: We do not provide live content. Support Docs: We do not provide live content.

Criteria	Conformance Level	Remarks and Explanations
602.3 (Support Docs)	Support Docs: Not Applicable	
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Not Applicable	Web: Some lessons contain videos without descriptions. These are off by default and can be available at the discretion of the subscribing organization. We are working on adding descriptions so lessons with videos can be available to all users. Software: Functionality when offline is identical to functionality online. Support Docs: There is no video content in support docs.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Supports Support Docs: Supports	Web: Some elements in admin features that are typically used only by Transparent employees fail the minimum contrast thresholds and we plan to replace them. Otherwise, we ensure that all content that conveys information meets contrast standards. Software: Admin features are not available in the app. Other functionality when offline is identical to functionality online. Support Docs: We ensure that all content that conveys information meets contrast standards.
1.4.4 Resize text (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: One feature we are in the process of redesigning causes text to not consistently follow browser zoom settings in certain learning activities. Otherwise, all features are compatible with browser and device zoom and/or text resizing.

Criteria	Conformance Level	Remarks and Explanations
		Software: Functionality when offline is identical to functionality online. Support Docs: All features are compatible with browser and device zoom and/or text resizing.
1.4.5 Images of Text (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Supports Support Docs: Supports	Web: Images of text are in use only in learning activities where they are deemed essential and in one admin feature only used by Transparent Language employees which we plan to replace. Software: Admin features are not available in the app. Other functionality when offline is identical to functionality online. Support Docs: Support pages are compatible with browser and device zoom and/or text resizing.
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Software: Not Applicable Support Docs: Does Not Support	Web: Inside of learning activities, the user can open a menu to select any of the activities in the current lesson at any time instead of proceeding through the preset sequence. In all other contexts, they can navigate between pages at least by navigation bar or sitemap, with some pages also connected by direct links when appropriate. Software: Per regulations, this does not apply to non-web software. Support Docs: Per regulations, this does not apply to <i>non-web</i> documents, but our documentation (help files) are online and accessed from the website or app. Help is currently contextual to the page the user opens it from, so it lacks navigation options. We plan to add a help landing page/index which will be added to the sitemap and link to the other help files.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Supports	Web: We provide text headings and labels for almost all features and ARIA labels in case other methods of marking things are not adequate. Software: Functionality when offline is identical to functionality online. Support Docs: We provide text headings and labels for almost all features and ARIA labels in case other methods of marking things are not adequate.
2.4.7 Focus Visible (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: One known bug where a visible focus indicator is missing from certain buttons. Some specific buttons with low-contrast focus indicators. All focusable elements are supposed to have indicators, and we have a plan to redesign our focus indicators in general for better visibility, including those that already meet the letter of WCAG. Software: Functionality when offline is identical to functionality online. Support Docs: All focusable elements inside of support docs have compliant focus indicators.
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Supports	Web: Substantial changes needed for full support. Some mixed-language content has language tags, but most does not. We intend to add tags for lesson titles, vocabulary items, and anything else that does not necessarily match the user's selected UI localization language unless the expected language is unpredictable. Software: Functionality when offline is identical to functionality online.

Criteria	Conformance Level	Remarks and Explanations
		Support Docs: Support docs do not currently contain mixed-language text that would require this. If we add any in the future, it can be tagged easily.
3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Software: Supports Support Docs: Supports	Web: We use similar layouts and consistent terminology across different pages. Software: Per regulations, this does not apply to non-web software. However, functionality when offline is identical to functionality online. Support Docs: We use similar layouts and consistent terminology across different pages.
3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Software: Not Applicable Support Docs: Supports	Web: We use similar or identical names for elements with the same function. Software: Per regulations, this does not apply to non-web software. Support Docs: We use similar or identical names for elements with the same function.
3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports Software: Partially Supports Support Docs: Not Applicable	Web: Some error messages should be clarified, particularly those in admin features intended for use by Transparent Language employees only. Features where error suggestion is valid allow it, for example by showing correct answers in non-assessment learning activities when learners answer incorrectly to allow them to practice the material and try again. Software: Functionality when offline is identical to functionality online. Support Docs: Support docs do not contain any input fields. If we add a search function, we will revisit this.

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports Software: Supports Support Docs: Not Applicable	Web: All interactions that this criterion applies to have some form of confirmation step to avoid unintentional submissions. Software: Functionality when offline is identical to functionality online. Support Docs: Support docs do not contain any input fields or otherwise collect any information to which this criterion applies.

Revised Section 508 Report

Notes:

Chapter 3: [Functional Performance Criteria](#) (FPC)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	Most features are designed to be usable with a screen reader, but certain learning activities require the use of images and when they appear inside lessons, they can't be skipped or substituted for.
302.2 With Limited Vision	Partially Supports	Our baseline of using WCAG-compliant labels, color contrast, and compatibility with zooming/resizing means that the default settings <i>are</i> usable with limited vision except when bugs occur as noted in the WCAG section above.

Criteria	Conformance Level	Remarks and Explanations
302.3 Without Perception of Color	Supports	We never use color as the only distinguishing feature between elements or states or otherwise as the only way to communicate information.
302.4 Without Hearing	Partially Supports	Some uses of audio have captions or other text alternatives, but certain learning activities require hearing and when they appear inside lessons, they can't be skipped or substituted for.
302.5 With Limited Hearing	Partially Supports	Some uses of audio have captions or other text alternatives, but certain learning activities require hearing and when they appear inside lessons, they can't be skipped or substituted for.
302.6 Without Speech	Supports	Speech is only used in certain learning activities that are skippable at no penalty to the user.
302.7 With Limited Manipulation	Partially Supports	All features are operable by keyboard only or by single-pointer non-timed interactions, except as described as bugs in the WCAG section above.
302.8 With Limited Reach and Strength	Supports	No feature ever expects greater reach or strength than that needed to operate a keyboard, mouse, touchscreen, or other input device, and all features are intended to be operable by voice controls through use of appropriate labeling.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	We use familiar terms are so that users 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 orient the user and help the user restore the context when it is lost. Help file pages are written in an easy to understand manner. Learning content and activities are written for appropriate-level audiences.

Chapter 4: [Hardware](#)

Notes: this chapter does not apply to any of our products, so was not evaluated.

Chapter 5: [Software](#)

Notes: In this section, whenever the ICT Standards refer to "platform" features, we construe this to refer to both when our web content displays in a browser and when embedded content from elsewhere displays within our products.

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG 2.0 section
502 Interoperability with Assistive Technology		
502.2.1 User Control of Accessibility Features	Supports	We mainly build our products to be broadly accessible without using optional features, but the optional features that we do provide are enabled through settings menus and can be chosen/customized independently of each other.
502.2.2 No Disruption of Accessibility Features	Partially Supports	One feature we are in the process of redesigning causes text to not consistently follow browser zoom settings in certain learning activities. (See WCAG 1.4.4, above.) All other features are designed to be compatible with platform features.
502.3 Accessibility Services		
502.3.1 Object Information	Partially Supports	All UI elements are properly labeled and exposed except when there are bugs impacting the ability to get this information. See WCAG section, above, particularly 1.3.1 and 4.1.2.

Criteria	Conformance Level	Remarks and Explanations
502.3.2 Modification of Object Information	Partially Supports	All UI elements are compatible with a variety of input methods except where there are bugs impacting specific uses. See WCAG section, above, particularly 2.1.1.
502.3.3 Row, Column, and Headers	Partially Supports	Most tables are constructed and marked up in ways that meet this requirement, but this is not yet implemented everywhere, see WCAG 1.3.1, above.
502.3.4 Values	Supports	All UI elements are designed to have programmatically determinable values and we are not aware of any bugs that impact this.
502.3.5 Modification of Values	Partially Supports	All UI elements are compatible with a variety of input methods except where there are bugs impacting specific uses. See WCAG section, above, particularly 2.1.1.
502.3.6 Label Relationships	Supports	All labels are associated with their UI elements.
502.3.7 Hierarchical Relationships	Supports	We use a hierarchical header structure that is compliant with WCAG and use iframes for embedded content.
502.3.8 Text	Supports	Text is implemented in standard ways that are programmatically determinable.
502.3.9 Modification of Text	Partially Supports	All UI elements are compatible with a variety of input methods except where there are bugs impacting specific uses. See WCAG section, above, particularly 2.1.1.
502.3.10 List of Actions	Partially Supports	The only known unusual action that doesn't have that type of announcement is a shortcut key for using a drag handle, which is a feature we intend to

Criteria	Conformance Level	Remarks and Explanations
		completely replace in the next update. Our UI elements are generally used in very normal ways that don't need the additional markup required here, and when we do have nonstandard interactions, instructions for them are programmatically determinable and often also available as plain text.
502.3.11 Actions on Objects	Supports	All UI elements can be operated using assistive tech or have alternatives that can be, complying with WCAG 1.3.1 and 2.1.1 above and with newer WCAG requirements not adopted by these regulations such as 2.5.1: Pointer Gestures and 2.5.7: Dragging Movements
502.3.12 Focus Cursor	Partially Supports	We design all features to be operated by focus cursor. All exceptions are treated as bugs, see WCAG section above, especially 1.3.1, 2.1.1, 2.4.3, 2.4.7.
502.3.13 Modification of Focus Cursor	Partially Supports	We design all features to be operated by acting on the item that currently has focus. All exceptions are treated as bugs, see WCAG section above, especially 1.3.1, 2.1.1, 2.4.3.
502.3.14 Event Notification	Supports	Our notifications and updates to UI elements are designed to comply with WCAG 2.1 AA-level 4.1.3: Status Messages.
502.4 Platform Accessibility Features	Partially Supports	We are unsure of the extent to which we are "a platform" for the purposes of this regulation. However, for the sake of caution and user-friendliness, our status for the specific ANSI/HFES 200.2 requirements is:

Criteria	Conformance Level	Remarks and Explanations
		9.3.3, 9.3.4, and 9.3.5 – we do not block features of supported OSes for the types of keyboard use described in these guidelines. 10.6.7 – we do not have the types of notification sounds this requirement is intended to cover. 10.6.8 – we do not block features of other video platforms that enable this when videos are embedded, but we have not yet updated our own video player to support audio descriptions, see WCAG 1.2.3 above 10.6.9 – we provide the vast majority of content as plain unhidden text which speech synthesis software can find and interpret, and content that is not text is either essential in that other format or is a bug we intend to fix (see WCAG section, especially 1.1.1, 3.1.1, 3.3.2, and 4.1.2) 10.7.1 – we support captions in our own video player and in embedded videos from YouTube and Vimeo, see WCAG 1.2.2 above
503 Applications		
503.2 User Preferences	Supports	Offline-only features available in the hybrid mobile apps respect mobile OS settings without any exceptions that we are aware of. As a web and hybrid app, TLO respects browser and mobile OS settings in most circumstances (including when online content is downloaded for offline use).

Criteria	Conformance Level	Remarks and Explanations
		Exceptions are treated as bugs, see WCAG section, especially 1.4.4, and are not in the scope of this requirement.
503.3 Alternative User Interfaces	Supports	We provide many built-in optional accessibility features, including the ability to display the desktop browser site in "mobile mode", which allows more flexibility in the viewport size, but we do not rely on a full separate alternative version.
<i>503.4 User Controls for Captions and Audio Description</i>		
503.4.1 Caption Controls	Supported	Our video player's captions option is in the main bar of player options. Where embedded videos from YouTube or Vimeo appear, we do not modify or interfere with their players' interfaces.
503.4.2 Audio Description Controls	Not Supported	Our video player does not currently have an option for changing audio tracks, see WCAG 1.2.3 above. Where embedded videos from YouTube or Vimeo appear, we do not modify or interfere with their players' interfaces.
<i>504 Authoring Tools</i>		
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	Not Applicable	Our authoring tools are not included in this document.
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	Our authoring tools are not included in this document.
504.2.2 PDF Export	Not Applicable	Our authoring tools are not included in this document.
504.3 Prompts	Not Applicable	Our authoring tools are not included in this document.

Criteria	Conformance Level	Remarks and Explanations
504.4 Templates	Not Applicable	Our authoring tools are not included in this document.

Chapter 6: [Support Documentation and Services](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope		
602 Support Documentation		
602.2 Accessibility and Compatibility Features	Partially Supports	Our contextual help files explain built-in accessibility features on particular pages and some supported alternatives (focusing on keyboard-only navigation) but they do not explain compatibility with assistive tech in general.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	We only provide help files in electronic formats, via a dedicated HTML-based help section in our web and hybrid apps.
603 Support Services		
603.2 Information on Accessibility and Compatibility Features	Supports	Tech support is available by contact form, e-mail, or phone, answered by Transparent Language employees with relevant knowledge.
603.3 Accommodation of Communication Needs	Supports	Tech support is available by contact form, e-mail, or phone, answered by Transparent Language employees with relevant knowledge.

Legal Disclaimer (Company)

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 ongoing internal testing we are working to support more aspects of ADA and WCAG compliance. Our team builds knowledge so that, where feasible, we can provide the broadest possible access to our learning system. The above VPAT® 2.5 statement is our internal assessment of our compliance with 508 and WCAG criteria for software applications and web sites. While we believe that we have done an appropriate assessment of Transparent Language Online status for each criterion we encourage all parties using this VPAT to provide their own appropriate independent review.