

# **Rosetta Stone Accessibility Conformance Report**

## **WCAG 2.2 Edition**

(Based on VPAT® Version 2.5Rev)

**Name of Product/Version: Rosetta Stone for Libraries (Foundations)**

**Report Date: 28 July 2025**

**Product Description: Rosetta Stone for Libraries components tested include Foundations web app, Learn Languages mobile app and Rosetta Stone Library portal.**

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**Notes:**

**Evaluation Methods Used:** The following applications were used to evaluate this product:

- **Desktop browser: Chrome, Microsoft Edge**
- **Assistive technologies (AT): NVDA**
- **Accessibility testing tools: Browser developer tools, Axe Accessibility extension, and WAVE Evaluation Tool extension, JavaScript bookmarklets such as for text spacing**
- **Keyboard-only (except for mobile app-focused criteria) testing focused on usage with Assistive Technology**

# Applicable Standards/Guidelines

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

Standard/Guideline	Included In Report
<a href="#">Web Content Accessibility Guidelines 2.0</a>	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)
<a href="#">Web Content Accessibility Guidelines 2.1</a>	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)
<a href="#">Web Content Accessibility Guidelines 2.2</a>	Level A (Yes / No) Level AA (Yes / No) Level AAA (Yes / No)

## Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

## WCAG 2.2 Report

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

## Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p><a href="#">1.1.1 Non-text Content</a> (Level A)</p>	<p>Partially Supports</p>	<p>Essential exception: Satisfying this requirement solely within the self-paced product would require a “fundamental alteration” in the nature of the Rosetta Stone language learning product and is exempt according to Section 1194.3(e) of the Rehabilitation Act of 1973, Section 508. [36 C.F.R. § 1194.3(e)]. Frequently, Rosetta Stone presents a learner with a 3-element set of i) visual images, ii) some text words in the target language and iii) the same words spoken by a native speaker. The learner uses logic to derive the meaning of the words as spoken and listed in text. The images are the most important of the 3 elements to the learner's logic process. Sometimes, only 2 elements are used on a screen. Providing a text equivalent to the visual image in the learner's native language would undermine the instructional methodology that underlies Rosetta Stone language learning courses. Please note that Rosetta Stone can provide licenses for additional fees that include 1:1 tutoring and some Visually impaired learners have benefitted from 1:1 tutoring sessions.</p>
<p><a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)</p>	<p>Partially Supports</p>	<p>Some activity types provide audio-only prompts without an alternative for time-based media that presents equivalent information. For activities with audio-only recordings, these are sometimes paired with an image intended to complement the meaning. Many audio-only recordings also show corresponding text. Videos on screens tested include the audio track and are not video-only. As stated in 1.1.1, frequently,</p>

Criteria	Conformance Level	Remarks and Explanations
		Rosetta Stone presents a learner with a 3-element set of i) visual images, ii) some text words in the target language and iii) the same words spoken by a native speaker. The learner uses logic to derive the meaning of the words as spoken and listed in text.
<a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)	Partially Supports	Essential exception: Most prerecorded videos include captions or a full transcript of the full audio track. There are activities that focus on listening skills, which utilize a combination of audiovisual media without providing captions. This simulates a real-world interaction where a native speaker would engage a learner in a language other than their own, in where captions would not be present.
<a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)	Partially Supports	Most prerecorded videos include captions or a transcript with the full dialogue of the audio track. Most of the video information is already provided in the audio tracks reviewed.
<a href="#">1.3.1 Info and Relationships</a> (Level A)	Supports	
<a href="#">1.3.2 Meaningful Sequence</a> (Level A)	Supports	
<a href="#">1.3.3 Sensory Characteristics</a> (Level A)	Partially Supports	Some of the button icons used consistently do not have additional text description. These include largely universal icons such as play and pause video or audio controls (rightward-pointing triangle or speaker icon), and another icon for speaking and recording speech (microphone). Other standardized icons used without additional text description include a gear cog (settings) in Foundations and a magnifying lens (optional zoom).
<a href="#">1.4.1 Use of Color</a> (Level A)	Partially Supports	Some buttons change color when usable based on completion of other steps, such as when signing in after entering an email address and password. Some activities require steps such as listening to a sound recording prior to enablement of a submit response

Criteria	Conformance Level	Remarks and Explanations
		button. Most pages and content are not using color as the only visual means of conveying information.
<a href="#">1.4.2 Audio Control</a> (Level A)	Supports	
<a href="#">2.1.1 Keyboard</a> (Level A)	Partially Supports	Some significant elements cannot be selected via keyboard-only without using special Mouse Keys to accomplish pointer device action emulation. Testing showed that navigation with NVDA was often easier where a pointer device or emulator action is essential. NVDA by default provided more granular and meaningful prompts including cues such as “clickable”.
<a href="#">2.1.2 No Keyboard Trap</a> (Level A)	Supports	
<a href="#">2.1.4 Character Key Shortcuts</a> (Level A 2.1 and 2.2)	Supports	
<a href="#">2.2.1 Timing Adjustable</a> (Level A)	Supports	
<a href="#">2.2.2 Pause, Stop, Hide</a> (Level A)	Supports	
<a href="#">2.3.1 Three Flashes or Below Threshold</a> (Level A)	Supports	
<a href="#">2.4.1 Bypass Blocks</a> (Level A)	Supports	
<a href="#">2.4.2 Page Titled</a> (Level A)	Supports	
<a href="#">2.4.3 Focus Order</a> (Level A)	Supports	
<a href="#">2.4.4 Link Purpose (In Context)</a> (Level A)	Supports	
<a href="#">2.5.1 Pointer Gestures</a> (Level A 2.1 and 2.2)	Supports	
<a href="#">2.5.2 Pointer Cancellation</a> (Level A 2.1 and 2.2)	Supports	
<a href="#">2.5.3 Label in Name</a> (Level A 2.1 and 2.2)	Supports	Visually labeled components used for navigation or to outline the lessons match; however, images in learning content are not labeled. This would defeat the lesson objective in instructing learners.
<a href="#">2.5.4 Motion Actuation</a> (Level A 2.1 and 2.2)	Not Applicable	
<a href="#">3.1.1 Language of Page</a> (Level A)	Partially Supports	The default human language of most pages is defined as English, so screen readers such as NVDA use appropriate pronunciation rules for English. Certain language interface options can change some page text language without redefining the default language to

Criteria	Conformance Level	Remarks and Explanations
		enable programmatic activation of different pronunciation rules.
<a href="#">3.2.1 On Focus</a> (Level A)	Supports	
<a href="#">3.2.2 On Input</a> (Level A)	Supports	
<a href="#">3.2.6 Consistent Help</a> (Level A 2.2 only)	Supports	
<a href="#">3.3.1 Error Identification</a> (Level A)	Supports	
<a href="#">3.3.2 Labels or Instructions</a> (Level A)	Supports	
<a href="#">3.3.7 Redundant Entry</a> (Level A 2.2 only)	Supports	
<a href="#">4.1.1 Parsing</a> (Level A) WCAG 2.0 and 2.1 – Always answer ‘Supports’ WCAG 2.2 (obsolete and removed) - Does not apply	Supports	For WCAG 2.0 and 2.1, the September 2023 errata update indicates this criterion is always supported. See the <a href="#">WCAG 2.0 Editorial Errata</a> and the <a href="#">WCAG 2.1 Editorial Errata</a> .
<a href="#">4.1.2 Name, Role, Value</a> (Level A)	Supports	

## Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.2.4 Captions (Live)</a> (Level AA)	Not Applicable	There is no live component for learners. All lesson content is prerecorded.
<a href="#">1.2.5 Audio Description (Prerecorded)</a> (Level AA)	Supports	
<a href="#">1.3.4 Orientation</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.3.5 Identify Input Purpose</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.3 Contrast (Minimum)</a> (Level AA)	Supports	
<a href="#">1.4.4 Resize text</a> (Level AA)	Supports	
<a href="#">1.4.5 Images of Text</a> (Level AA)	Supports	
<a href="#">1.4.10 Reflow</a> (Level AA 2.1 and 2.2)	Partially Supports	Conforms on most screen sizes up to 200% zoom. Notifications are displayed should a page size require scrolling.

<b>Criteria</b>	<b>Conformance Level</b>	<b>Remarks and Explanations</b>
<a href="#">1.4.11 Non-text Contrast</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.12 Text Spacing</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.13 Content on Hover or Focus</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">2.4.5 Multiple Ways</a> (Level AA)	Supports	
<a href="#">2.4.6 Headings and Labels</a> (Level AA)	Supports	
<a href="#">2.4.7 Focus Visible</a> (Level AA)	Partially Supports	Some components allow focus to move to non-visible content before selection. NVDA can help with navigation by providing readable text when the focus is otherwise not visible.
<a href="#">2.4.11 Focus Not Obscured (Minimum)</a> (Level AA 2.2 only)	Supports	
<a href="#">2.5.7 Dragging Movements</a> (Level AA 2.2 only)	Not Applicable	Dragging movements are not a feature of Rosetta Stone for Libraries.
<a href="#">2.5.8 Target Size (Minimum)</a> (Level AA 2.2 only)	Supports	
<a href="#">3.1.2 Language of Parts</a> (Level AA)	Supports	
<a href="#">3.2.3 Consistent Navigation</a> (Level AA)	Partially Supports	Most navigation is consistent, but some can be difficult to understand due to the repeating activity names related to progress descriptions.
<a href="#">3.2.4 Consistent Identification</a> (Level AA)	Supports	
<a href="#">3.3.3 Error Suggestion</a> (Level AA)	Supports	
<a href="#">3.3.4 Error Prevention (Legal, Financial, Data)</a> (Level AA)	Not Applicable	There are no legal commitments or financial transactions for the user.
<a href="#">3.3.8 Accessible Authentication (Minimum)</a> (Level AA 2.2 only)	Supports	
<a href="#">4.1.3 Status Messages</a> (Level AA 2.1 and 2.2)	Supports	

### **Table 3: Success Criteria, Level AAA**

Notes: Table 3 has been removed because this product has not been tested for conformance to WCAG Level AAA criteria.

## **Legal Disclaimer (Company)**

The foregoing VPAT is provided on a good-faith basis based on Rosetta Stone's current understanding of the compliance of the Rosetta Stone for Libraries Service with the standards and criteria set forth above. This VPAT was created by Rosetta Stone employees based on their knowledge of the WCAG standards and the Rosetta Stone for Libraries Service. This VPAT does not reflect a comprehensive audit of the Rosetta Stone for Libraries Service or an expert opinion regarding the accessibility of the Rosetta Stone for Libraries Service. Accordingly, this documentation is provided "AS-IS" without any warranty or guarantee. If any suspected errors are found in this documentation, please promptly contact Rosetta Stone so that we may investigate.