

Guide to Completing the Section 508 Evaluation Template

Background:

In 2001, the Information Technology Industry Council partnered with the General Services Administration to create a tool that would assist Federal contracting and procurement officials in fulfilling the market research requirements specified in Section 508. The result of their collaboration was the 508 Evaluation Template – a simple, web-based checklist that allows Vendors to document how their product **did** or **did not** meet the various Section 508 Requirements.

How the Section 508 Evaluation Template is organized:

This template is also known as the Voluntary Product Accessibility Template (VPAT)

The Section 508 Evaluation Template consists of a long series of tables. The **Summary Table** is used to provide a sense of your product's **overall** "level-of-conformance" with the Section 508 Standards. Subsequently, the **Section 1194.xx Tables** contain the detailed subparagraphs that a Section 508 Standard is composed of. It is within these **Section 1194.xx Tables** that you will define in detail how your product **did** or **did not** comply with a specific requirement.

Understanding the columns

Use the following to understand the use of the three columns in the Section 508 Evaluation Template's tables:

Summary Table

Column Name	Use
Criteria:	Describes Subparts B, C, and D of the Section 508 Standards.
Supporting Features:	Enter information summarizing a product's overall "level-of support" for the corresponding Subpart or, when appropriate, to specify Not Applicable . DO NOT ENTER REMARKS OR EXPLANATIONS IN THIS COLUMN.
Remarks/Explanations:	Enter general comments regarding a product's overall "level-of-conformance" with the Applicable Subpart.

Section 1194.xx Tables

Column Name	Use
Criteria:	Describes a specific guideline that a Subpart is composed of.
Supporting Features:	Enter information summarizing a product's "level-of-support" for a specific guideline.
Remarks/Explanations:	Enter detailed information on how the product did or did not support a specific guideline.

What information do I enter in columns 2 and 3?

The **Supporting Features** and **Remarks/Explanations** columns are used to document exactly how a product **did** or **did not** meet the Section 508 Standards.

Supporting Features (second column on 508 Evaluation Template)	
Language	What It Means...
Supports	Product FULLY meets the letter and intent of the Criteria.
Supports with Exceptions	Product does not ENTIRELY meet the letter and intent of the Criteria, but does provide some level of access.
Supports through Equivalent Facilitation	Product provides <i>alternative</i> methods to meet the intent of the Criteria.
Does not Support	Product does not meet the letter or intent of the Criteria.
Not Applicable	The Criteria does not apply to the product.

Remarks & Explanations (third column on 508 Evaluation Template)	
If 2 nd column states...	Then...
Supports	List exactly <u>what</u> features of the product do meet and describe <u>how</u> they are used to support the Criteria.
Supports with Exceptions	List exactly <u>what</u> features of the product do meet and describe <u>how</u> they are used to support the Criteria. AND List exactly <u>what</u> parts of the product do not meet and describe <u>how</u> they fail to support the Criteria.
Supports through Equivalent Facilitation	List exactly <u>what</u> <i>other</i> methods exist in the product and describe <u>how</u> they are used to support the Criteria.
Does not Support	Describe exactly <u>how</u> the product does not support the Criteria.
Not Applicable	Describe exactly <u>why</u> the criterion is not applicable to the product.

Typical Scenario for Completing a Section 508 Evaluation Template:

The VPATFDA requires a measure of technical detail in the responses.

- 1) Determine which sections of the **Technical Standards (Subpart B-1194.21-26)** apply to your product. * Keep in mind that you **always** must complete the **Functional Performance Criteria (Subpart C – 1194.31)** and **Information, Documentation, and Support (Subpart D – 1194.41)** sections of the Section 508 Evaluation Template.
- 2) For each section that applies, determine if the product does or does not meet the specific Criteria elements.
- 3) Using the information found in the [How the Section 508 Evaluation Template is organized](#) section, document in the **Section 1194.xx Tables** exactly **how** your product **did** or **did not** meet the applicable standard.
 - If the product **supports** the standard, provide detailed examples of **what** accessibility features exist and **how** they are used to support the standard.
 - If the product **does not support** the standard, remember that Section 508 allows products to meet the Access Board Standards in innovative, non-traditional ways. The product can meet the standard by providing an innovative solution, as long as the feature performs in the same manner as it does for any other user without a disability.
 - If the product **does not** possess an **innovative, non-traditional way** of supporting the standard, provide detailed examples of exactly **how** the product **did not** meet the standard.
- 4) Once documented in the **Section 1194.xx Tables** exactly how the product **did** or **did not** meet, return to the **Summary Table** and document the product's overall "level-of-conformance" in each of the applicable sections.
- 5) Post the final Section 508 Evaluation Template on your company's web site or on the [GSA Buy Accessible Wizard](#).
- 6) It is the Vendor's responsibility to maintain the integrity of the data on the Section 508 Evaluation Template. The USG uses this form to complete required Market Research associated with Section 508 and may use the form to eliminate this product compared to other **more accessible** products that meet USG business needs.

Date:

** Denotes Required

Name of Product:

Contact for more Information:

Refer to the [ITIC Best Practices](#) for filling out the following form.

Summary Table		
Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems		
Section 1194.22 Web-based internet information and applications	Not Applicable	Modifying the Rosetta Stone program to accommodate visually impaired persons would cause a "fundamental alteration" in the nature of our 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)].

Section 1194.23 Telecommunications Products		
Section 1194.24 Video and Multi-media Products		
Section 1194.25 Self-Contained, Closed Products		
Section 1194.26 Desktop and Portable Computers		
** Section 1194.31 Functional Performance Criteria		
** Section 1194.41 Information, documentation, and support.		

Section 1194.21 Software Applications and Operating Systems

* Refer to (<http://www.access-board.gov/sec508/guide/1194.21.htm>) for details on the guidelines listed below.

Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.		
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.		
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.		
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.		
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.		
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.		
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.		
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.		
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.		
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.		
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.		
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.		

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Section 1194.22 Web-based Internet information and applications

* Refer to (<http://www.access-board.gov/sec508/guide/1194.22.htm>) for details on the guidelines listed below.

Criteria	Supporting Features	Remarks and explanations
<p>(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).</p>	<p>Not Applicable</p>	<p>Typically, 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 learner's logic process. Sometimes, only 2 elements are used on a screen. This occurs on approximately 25% of screens. Visual images are used on 99% of screens. Text words in the target language are used on approximately 85% of screens. Spoken words in the target language are used on over 90% of screens.</p> <p>Providing a text equivalent to the visual image in the learner's native language would totally undermine the instructional methodology that underlies Rosetta Stone language learning courses.</p> <p>Rosetta Stone's language learning program is based on its unique Dynamic Immersion™ method to teach a foreign language. The method relies on the use of text and audio in the target language to create lessons, and replaces translation as is typically found in most language learning products. The program includes carefully chosen sequences and combinations of images to convey meaning. Lessons are made up of activities that teach all language skills – listening, reading, writing and speaking. Put simply, the Dynamic Immersion method teaches a foreign language the same way one learns their native language – through language immersion without using translation.</p> <p>The Rosetta Stone Dynamic Immersion method may or may not work for an individual with a disability, depending upon the nature and seriousness of the disability. For example, individuals with hearing or speech impairments, for the most part, should be able to use significant portions of the product. However, individuals with serious visual impairments would be unable to use the Rosetta Stone product. Since the foundation of the Rosetta Stone pedagogy is the Dynamic Immersion method which requires a carefully chosen sequence and combination of images making the software usable by visually impaired learners would cause a "fundamental alteration" in the nature of our 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)]. Specifically, modifying the Rosetta Stone program to accommodate visually impaired persons would require the inclusion of translated descriptions associated with all the images in the program. This "fundamental alteration" would run directly counter to the Rosetta Stone Dynamic Immersion method of</p>

		teaching languages through immersion without translation.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	There are no multimedia presentations (audio lecture synchronized with other media types) in Rosetta Stone courses.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports with Exceptions	Every screen includes text and/or spoken words in the target language (usually both). Colors in images are only relevant when conveying the meaning of words for colors in the target language.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Not Applicable	Style sheets are embedded in the screens and it is impossible for learners to disassociate style sheets.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Rosetta Stone does not utilize image maps in its courses.
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Not Applicable	Rosetta Stone does not utilize image maps in its courses.
(g) Row and column headers shall be identified for data tables.	Not Applicable	Rosetta Stone does not utilize data tables in its courses.
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	Not Applicable	Rosetta Stone does not utilize data tables in its courses.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Not Applicable	Rosetta Stone does not utilize frames in its courses.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports	Rosetta Stone has designed screens in its courses not to flicker with a frequency between 2 Hz and 55 Hz. In addition, Rosetta Stone only utilizes static images and static text. There is no blinking, scrolling, auto-updating, and text movement.
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Not Applicable	No text-only page can provide equivalents to the visual images that are integral to the instructional methodology that underlies Rosetta Stone language learning courses. See response in (a) for more detail.
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Not Applicable	Learners can use screen magnifiers or other similar hardware-only Assistive Technologies. Rosetta Stone does not support any Assistive Technology software beyond what is already included in a learner's browser as disruption (which can be inherent in the use of some Assistive Technology software) of the combination and sequencing of images, text and audio would cause a fundamental alteration in the nature of Rosetta Stone courses.
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret	Supports	Rosetta Stone Version 3 Enterprise requires Flash player plug-in installed on the browser. The Rosetta Stone system check web page

<p>page content, the page must provide a link to a plug-in or applet that complies with 1194.21(a) through (l).</p>		<p>http://launch.rosettastone.com/en/system_recommendations/rs3) clearly identifies when an acceptable version of Flash player is absent through the use of text, bullet points (only used for individual requirements that a learner's computer does not meet), an image of an X inside of a circle and text box. Requirements that a learner computer meets during the system check are identified as acceptable through the use of text, no bullet points and an image of a checkmark inside of a circle.</p> <p>Learner guidance for remedying a missing or unsupported version of Flash includes text instructions, live hyperlink and listing of actual URL for Adobe download site.</p>
<p>(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.</p>	<p>Not Applicable / Does not Support</p>	<p>Not Applicable – There are no electronic forms in Rosetta Stone courses.</p> <p>Does not Support – If clients do not integrate Rosetta Stone courses with their LMSs and do not utilize a single sign-on (SSO), then their learners must access courses through a Rosetta Stone portal. This subset of clients can either import a list of learners or direct their learners to self-register. If learners are self-registering, they must complete an online form. This form does not support any Assistive Technology software beyond what is already included in a learner's browser.</p>
<p>(o) A method shall be provided that permits users to skip repetitive navigation links.</p>	<p>Not Applicable</p>	<p>There are no repetitive navigation links in Rosetta Stone courses. More importantly, the Rosetta Stone course application defaults to control learner progression through a course (learner does have option to skip steps in the progression) and dynamically alters individual learner paths to add certain activities based on learner scoring during a course.</p>
<p>(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.</p>	<p>Supports with Exceptions</p>	<p>Rosetta Stone does not require time responses so this is typically not applicable. However, the course application does close the browser window after 10 minutes of no learner interaction with the course and there is no warning before the 10 minute period expires.</p>

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

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Section 1194.23 Telecommunications Products

* Refer to (<http://www.access-board.gov/sec508/guide/1194.23.htm>) for details on the guidelines listed below.

Criteria	Supporting Features	Remarks and explanations
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.		
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.		
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.		
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.		
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.		
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.		
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.		
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.		
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable		

format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.		
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.		
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.		
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.		
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.		

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Section 1194.24 Video and Multi-media Products		
<i>* Refer to (http://www.access-board.gov/sec508/guide/1194.24.htm) for details on the guidelines listed below.</i>		
Criteria	Supporting Features	Remarks and explanations
(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.		
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.		
(c) All training and informational video and multimedia productions which support the agency's mission,		

regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.		
(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.		
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.		

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Section 1194.25 Self-Contained, Closed Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.25.htm) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).		
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.		
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.		
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.		
(h) When a product permits a user to adjust color and		

contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.		
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.		
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.		
(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.		

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Section 1194.26 Desktop and Portable Computers		
* Refer to (http://www.access-board.gov/sec508/guide/1194.26.htm) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).		
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(d) Where provided, at least one of each type of		

expansion slots, ports and connectors shall comply with publicly available industry standards

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Section 1194.31 Functional Performance Criteria		
Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Not Applicable	Modifying the Rosetta Stone program to accommodate visually impaired persons would cause a “fundamental alteration” in the nature of our 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)].
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Not Applicable	Modifying the Rosetta Stone program to accommodate visually impaired persons would cause a “fundamental alteration” in the nature of our 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)].
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided	Supports with Exceptions	Modifying the Rosetta Stone program to accommodate hearing impaired persons would cause a “fundamental alteration” in the nature of our 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)]. Please note that hearing impaired persons can take portions of Rosetta Stone courses. Rosetta Stone can support separate courses with lowered mastery thresholds to adjust for exercises in which hearing is essential and at which hearing impaired learners are at a disadvantage.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Supports with Exceptions	Modifying the Rosetta Stone program to accommodate hearing impaired persons would cause a “fundamental alteration” in the nature of our 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)].

		Please note that hearing impaired persons can take portions of Rosetta Stone courses. Rosetta Stone can support separate courses with lowered mastery thresholds to adjust for exercises in which hearing is essential and at which hearing impaired learners are at a disadvantage.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Supports	Speech recognition features can be turned off for speech impaired learners.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Not Applicable	Modifying the Rosetta Stone program to accommodate persons with disabilities that hinder the use of a computer mouse would cause a "fundamental alteration" in the nature of our 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)].

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Section 1194.41 Information, documentation, and support.		
Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supports	<p>If a person with a visual or fine motor control disability cannot use the Rosetta Stone program, then there is no need for support documentation for that person.</p> <p>Documentation is available for hearing impaired learners that does not require the use of hearing.</p> <p>Documentation is available for speech impaired learners that does not require the use of speech.</p>
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supports	<p>If a person with a visual or fine motor control disability cannot use the Rosetta Stone program, then there is no need for a description of accessibility and compatibility features for that person.</p> <p>If a client wants a separate set of Rosetta Stone courses for hearing impaired learners with adjusted mastery thresholds, Rosetta Stone will provide description and</p>

		<p>instructions at no additional charge.</p> <p>Description of compatibility features already exist at no additional charge.</p>
<p>(c) Support services for products shall accommodate the communication needs of end-users with disabilities.</p>	<p>Supports</p>	<p>If a person with a visual or fine motor control disability cannot use the Rosetta Stone program, then there is no need for support services for that person.</p> <p>Text-based support services are available for hearing and speech impaired learners (as well as for other learners).</p>

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