

ACLS Humanities EBook Collection Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: Fulcrum v3.5, ACLS Humanities EBook Collection

Product Description: ACLS Humanities EBook Collection (ACLS HEB) presents thousands of foundational books in the humanities and social sciences from hundreds of publishers.

Report Date: October 2022

Contact Information: fulcrum-info@umich.edu

Evaluation Methods Used: NVDA with Mozilla Firefox, VoiceOver with Safari, Axe Accessibility Chrome extension, Zoom Text Only Chrome extension, OpenDyslexic Font - Helperbird Chrome extension, WebAIM Color Contrast Checker, Windows accessibility settings (high contrast), manual keyboard checks, Ace by DAISY Accessibility Checker for EPUB, Adobe Acrobat DC

Notes:

Web conformance for this report was generated by evaluating the following titles on Fulcrum: [Selma and the Liuzzo Murder Trials: The First Modern Civil Rights Convictions by James P. Turner](#), [Empires in World History: Power and the Politics of Difference by Jane Burbank and Frederick Cooper](#), [Show Sold Separately: Promos, Spoilers, and Other Media Paratexts by Jonathan Gray](#), and [A Mid-Republican House From Gabii](#).

Electronic document conformance for this report was generated by evaluating the accessibility of the following titles:

- [Rome, Profile of a City](#)
- [Engendering Democracy in Brazil](#)
- [Building the American Highway System](#)
- [Oplontis Vol II](#)
- [Rethinking Islamic Studies: From Orientalism to Cosmopolitan](#)
- [Black Americans and Organized Labor: A New History](#)
- [Lake Erie Fisherman: Work, Identity, and Tradition](#)

This report supersedes the Fulcrum Accessibility Conformance Report VPAT 2.4 released in June 2021 in that it includes evaluation of content in ACLS HEB.

Applicable Standards/Guidelines

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

Standard/Guideline	Included in Report
<p>Web Content Accessibility Guidelines 2.0 or WCAG 2.0 (ISO/IEC 40500)</p> <p>Jump to WCAG 2.0 Level A Report</p> <p>Jump to WCAG 2.0 Level AA Report</p> <p>Jump to WCAG 2.0 Level AAA Report</p>	<p>Level A – Yes</p> <p>Level AA – Yes</p> <p>Level AAA – Yes</p>
<p>Web Content Accessibility Guidelines 2.1 or WCAG 2.1</p>	<p>Level A – No</p> <p>Level AA – No</p> <p>Level AAA – No</p>
<p>Revised Section 508 standards – the U.S. Federal accessibility standard, published by the U.S. Access Board in the Federal Register on January 18, 2017 and corrected on January 22, 2018</p> <p>Jump to Revised Section 508 Report</p>	<p>Yes</p>

Standard/Guideline	Included in Report
<p data-bbox="233 373 1013 485">EN 301 549 Accessibility requirements suitable for public procurement of ICT products and services in Europe, V2.1.2 (2018-08)</p> <p data-bbox="233 558 597 590">Jump to EN 301 549 Report</p>	<p data-bbox="1143 373 1195 405">Yes</p>

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 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 – Software, and Section 12 – Documentation and Support Services.
- 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

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.1.1.1 (Web) ● 10.1.1.1 (Non-web document) ● 11.1.1.1.1 (Open Functionality Software) ● 11.1.1.1.2 (Closed Functionality Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Does Not Support</p>	<p>Form fields and buttons include labels. Images have capability for alt-text but most publishers have not provided alt-text for books inside this collection.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.1 (Web) • 10.1.2.1 (Non-web document) • 11.1.2.1.1 (Open Functionality Software) • 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The web media player supports transcripts and audio descriptions when provided by the publisher. The web audio player supports transcripts when provided by the publisher.</p> <p>Audio content that is part of ACLS HEB contains transcripts however they are not embedded in the media player and provided as a PDF file.</p>
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.2 (Web) • 10.1.2.2 (Non-web document) • 11.1.2.2 (Open Functionality Software) • 11.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Not Applicable</p>	<p>There is no video content in this collection.</p>

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: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.3 (Web) • 10.1.2.3 (Non-web document) • 11.1.2.3.1 (Open Functionality Software) • 11.1.2.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised 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 video content in this collection.
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.1 (Web) • 10.1.3.1 (Non-web document) • 11.1.3.1.1 (Open Functionality Software) • 11.1.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Most of the information, structure, and relationships can be programmatically determined.</p> <p>Exceptions:</p> <p>In the Fulcrum E-Reader and in EPUB downloads, chapters and subheadings are tagged, but accuracy of heading structure will vary depending on publisher. PDF downloads are untagged so information, structure, and relationships cannot be programmatically determined.</p>

Criteria	Conformance Level	Remarks and Explanations
		<p>On monograph catalog pages, the book description or table of contents is the default tab and it's not immediately obvious to screen reader users based on the listing of headings and links that other tabs exist. The tabs and tab panels however are accessible and functional to screen reader technology and keyboard-only users.</p>
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.2 (Web) • 10.1.3.2 (Non-web document) • 11.1.3.2.1 (Open Functionality Software) • 11.1.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>EPUB downloads are tagged and content is ordered in a meaningful sequence. PDF downloads are untagged so a correct tab and reading order cannot be specified.</p> <p>Also see comments for 1.3.1.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.3 (Web) • 10.1.3.3 (Non-web document) • 11.1.3.3 (Open Functionality Software) • 11.1.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Most controls provide text labels not solely sensory characteristics. See exceptions above for 1.3.1 (links in the Fulcrum E-Reader).</p>
<p><u>1.4.1 Use of Color</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.1 (Web) • 10.1.4.1 (Non-web document) • 11.1.4.1 (Open Functionality Software) • 11.1.4.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Color is only used as a decorative or supplemental attribute of user interface elements. A textual representation is always used as the primary mechanism for conveying information.</p> <p>Exceptions:</p> <p>In the Fulcrum E-Reader, when searching inside a book and following a search result to its occurrence in the text, the matched result is only indicated through highlighting of the matched text.</p>

Criteria	Conformance Level	Remarks and Explanations
		Color may be used to convey meaning in images inside books.
<p><u>1.4.2 Audio Control</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.2 (Web) • 10.1.4.2 (Non-web document) • 11.1.4.2 (Open Functionality Software) • 11.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>There is no audio that plays automatically. The video player provides capabilities for pausing and adjusting the volume of video content with keyboard control and labels for screen reader access.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.1 Keyboard</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.1 (Web) • 10.2.1.1 (Non-web document) • 11.2.1.1.1 (Open Functionality Software) • 11.2.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports standard keyboard navigation and input functions (such as pressing [Tab] to move between input fields, pressing the arrow keys to move between list items, and pressing [Space] or [Enter] to make selections).</p> <p>Exceptions:</p> <p>EPUB downloads are tagged and support standard keyboard navigation. PDF downloads are untagged and do not support keyboard navigation through headings and elements.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.2 (Web) • 10.2.1.2 (Non-web document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Fulcrum supports standard keyboard navigation. Keyboard users cannot be trapped in a subset of content.</p>
<p><u>2.2.1 Timing Adjustable</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.1 (Web) • 10.2.2.1 (Non-web document) • 11.2.2.1 (Open Functionality Software) • 11.2.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no time limits set on content.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.2.2 Pause, Stop, Hide</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.2.2 (Web) • 10.2.2.2 (Non-web document) • 11.2.2.2 (Open Functionality Software) • 11.2.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There is no moving, blinking, scrolling, or auto-updating information.</p>
<p><u>2.3.1 Three Flashes or Below Threshold</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.3.1 (Web) • 10.2.3.1 (Non-web document) • 11.2.3.1 (Open Functionality Software) • 11.2.3.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Not Applicable</p>	<p>There are no flashing elements.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.1 Bypass Blocks</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.1 (Web) • 10.2.4.1 (Non-web document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply • 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised 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 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>A visually hidden link (available to screen readers) allows users to skip to the main content of each page.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.2 Page Titled</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.2 (Web) • 10.2.4.2 (Non-web document) • 11.2.4.2 (Open Functionality Software) - Does not apply • 11.2.4.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Web pages have descriptive titles that indicate the content of each page.</p> <p>EPUB downloads specify a descriptive title. PDF downloads do not specify a descriptive title.</p>
<p><u>2.4.3 Focus Order</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.3 (Web) • 10.2.4.3 (Non-web document) • 11.2.4.3 (Open Functionality Software) • 11.2.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Pages use a logical tab order that preserves meaning and operability with some exceptions. EPUB downloads are tagged and ensure correct tab and reading order.</p> <p>Exceptions:</p> <p>PDF downloads are untagged and do not specify a tab or reading order.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports functionality for descriptive label attributes for links. Quality of link labels will vary by publisher and book, but most are descriptive in context.</p>
<p><u>3.1.1 Language of Page</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.1 (Web) • 10.3.1.1 (Non-web document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum uses the language attribute on the HTML element to specify the default language of each page. Some publishers may not specify a language attribute for the text inside a publication.</p> <p>EPUB downloads specify a language in the metadata but some publishers may not specify a language attribute in the HTML. PDF downloads do not specify a language attribute.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.1 On Focus</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.1 (Web) • 10.3.2.1 (Non-web document) • 11.3.2.1 (Open Functionality Software) • 11.3.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>When any component receives focus, it does not initiate a change of context.</p>
<p><u>3.2.2 On Input</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.2 (Web) • 10.3.2.2 (Non-web document) • 11.3.2.2 (Open Functionality Software) • 11.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Changing the setting of a component does not initiate a change of context.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.1 Error Identification</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.1 (Web) • 10.3.3.1 (Non-web document) • 11.3.3.1.1 (Open Functionality Software) • 11.3.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no opportunities for input errors.</p>
<p><u>3.3.2 Labels or Instructions</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.2 (Web) • 10.3.3.2 (Non-web document) • 11.3.3.2 (Open Functionality Software) • 11.3.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Labels are provided for elements requiring user input.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>4.1.1 Parsing</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.1 (Web) • 10.4.1.1 (Non-web document) • 11.4.1.1.1 (Open Functionality Software) • 11.4.1.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.</p>
<p><u>4.1.2 Name, Role, Value</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.2 (Web) • 10.4.1.2 (Non-web document) • 11.4.1.2.1 (Open Functionality Software) • 11.4.1.2.2 (Closed Software) – Not required • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See 1.3.3 and 2.4.4 for exceptions.</p>

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.4 Captions (Live)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none">• 9.1.2.4 (Web)• 10.1.2.4 (Non-web document)• 11.1.2.4 (Open Functionality Software)• 11.1.2.4 (Closed Software)• 11.8.2 (Authoring Tool)• 12.1.2 (Product Docs)• 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none">• 501 (Web)(Software)• 504.2 (Authoring Tool)• 602.3 (Support Docs)	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>Fulcrum does not include live video and audio content.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.5 Audio Description (Prerecorded)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.5 (Web) • 10.1.2.5 (Non-web document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The web video player supports audio descriptions when provided by the publisher.</p> <p>Videos associated with books do not have audio descriptions available. Remediation can be requested on demand.</p>
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The visual presentation of text in interface elements and most books present sufficient color contrast. Some scanned books may not present sufficient color contrast, depending on the quality of the scan. Some images in books may not present sufficient color contrast.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.4 Resize text</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.4 (Web) • 10.1.4.4 (Non-web document) • 11.1.4.4.1 (Open Functionality Software) • 11.1.4.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports standard zoom capabilities built into modern web browsers and operating systems.</p> <p>The Fulcrum E-Reader has a built-in zoom feature allowing text to be resized up to 400%.</p> <p>Text in EPUB downloads can be resized. Text in PDF downloads cannot be resized except through zooming in on the image.</p>
<p><u>1.4.5 Images of Text</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.5 (Web) • 10.1.4.5 (Non-web document) • 11.1.4.5.1 (Open Functionality Software) • 11.1.4.5.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The Fulcrum platform does not use images of text, with the exception of logos that are properly indicated as such to assistive technology. Scanned books can be displayed as page images or as text only (through uncorrected OCR). Scanned book titles added after 2020 contain text.</p> <p>90% of PDF downloads are images of text. PDF downloaded titles that have been added after 2020 contain OCR.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.5 Multiple Ways</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.5 (Web) • 10.2.4.5 (Non-web document) – Does not apply • 11.2.4.5 (Open Functionality Software) – Does not apply • 11.2.4.5 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised 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 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>The Fulcrum platform provides navigation links, search functions, table of contents, embedded media, and links to media from the Fulcrum E-Reader and from monograph catalog pages.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum provides capabilities for defining descriptive headings and labels. Quality of headings and labels may vary by publisher. Reflowable EPUB publications (less than 10% of the publications in the collection) include descriptive headings. Fixed layout EPUB and PDF publications (scanned books) do not include headings. EPUB downloads include descriptive headings, but PDF downloads do not.</p> <p>See additional exceptions to labels at 1.3.3 and 2.4.4.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.7 (Web) • 10.2.4.7 (Non-web document) • 11.2.4.7 (Open Functionality Software) • 11.2.4.7 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Visual changes are applied to elements to indicate the current position of focus.</p>
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.2 (Web) • 10.3.1.2 (Non-web document) • 11.3.1.2 (Open Functionality Software) – Does not apply • 11.3.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Does Not Support</p> <p>Electronic Documents: Does Not Support</p>	<p>While Fulcrum supports tagging of language attributes for all elements except for some metadata fields, the publications in this collection do not include language of parts tagging.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.3 (Web) • 10.3.2.3 (Non-web document) – Does not apply • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised 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 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Navigation mechanisms are consistent across pages.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.4 Consistent Identification</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.4 (Web) • 10.3.2.4 (Non-web document) – Does not apply • 11.3.2.4 (Open Functionality Software) – Does not apply • 11.3.2.4 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised 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 	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>The Fulcrum platform provides consistent identification across pages for components that have the same functionality.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.3 Error Suggestion</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.3 (Web) • 10.3.3.3 (Non-web document) • 11.3.3.3 (Open Functionality Software) • 11.3.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no opportunities for input errors.</p>
<p><u>3.3.4 Error Prevention (Legal, Financial, Data)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.4 (Web) • 10.3.3.4 (Non-web document) • 11.3.3.4 (Open Functionality Software) • 11.3.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no web pages that involve legal commitments or financial transactions, modify or delete user-controllable data, or submit user test responses.</p>

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.6 Sign Language (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Does Not Support</p> <p>Electronic Documents: Does Not Support</p>	<p>The video and audio content in this collection does not provide sign language translation.</p>
<p><u>1.2.7 Extended Audio Description (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Does Not Support</p> <p>Electronic Documents: Does Not Support</p>	<p>Extended audio description is not supported.</p>
<p><u>1.2.8 Media Alternative (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The web video and audio players support transcripts and text-based audio descriptions when provided by the publisher.</p>
<p><u>1.2.9 Audio-only (Live)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	<p>Not Applicable</p>	<p>There is no live audio content.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.6 Contrast Enhanced</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Main text content of platform and most publications meets enhanced contrast ratio (black on white).</p> <p>Text in some of the headings, labels, buttons and indicators does not meet enhanced contrast ratio. Some scanned books may not present sufficient color contrast, depending on the quality of the scan. Some images in books may not present sufficient color contrast.</p>
<p><u>1.4.7 Low or No Background Audio</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Level of background audio will vary by publication and media resource. No mechanism to turn off background audio is supported.</p>
<p><u>1.4.8 Visual Presentation</u> (Level AAA)</p> <ol style="list-style-type: none"> 1. Foreground and background colors can be selected by the user. 2. Width is no more than 80 characters or glyphs (40 if CJK). 3. Text is not justified (aligned to both the left and the right margins). 4. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at 	<p>Web:</p> <ol style="list-style-type: none"> 1. Does not support 2. Partially Supports 3. Partially Supports 4. Does not support 5. Partially Supports <p>Electronic Documents</p> <ol style="list-style-type: none"> 1. Does not support 	<ol style="list-style-type: none"> 1. Foreground and background colors cannot be selected by the user, except through operating system or browser settings. 2. Paragraphs of text exceed 80 characters in width by default but can be resized to be under 80 characters in reflowable EPUB publications (less than 10% of the collection). 3. Text is not justified in the web interface but is justified in the Fulcrum E-Reader (except for text-

Criteria	Conformance Level	Remarks and Explanations
<p>least 1.5 times larger than the line spacing.</p> <p>5. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window.</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>2. Partially Supports</p> <p>3. Partially Supports</p> <p>4. Partially Supports</p> <p>5. Partially Supports</p>	<p>only OCR view for fixed layout publications) and in PDF downloads.</p> <p>Justification in EPUB downloads can be modified if supported by the EPUB reading system.</p> <p>4. Line spacing is under 1.5 and paragraph spacing is equal to the line spacing. Some EPUB reading systems may allow line and paragraph spacing to be modified for EPUB downloads.</p> <p>5. For reflowable EPUB publications (less than 10% of the collection), text can be resized without assistive technology (through operating system or browser settings or extensions, and through the zoom settings in the reader) up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. For fixed layout EPUB and PDF publications and PDF downloads, text cannot be resized without assistive technology in a way that doesn't require the user to scroll horizontally.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.9 Images of Text (No Exception) Control</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The Fulcrum platform does not use images of text, with the exception of logos which are properly identified as logos to assistive technology. Scanned books can be displayed as page images or as text only (through uncorrected OCR).</p> <p>90% of PDF downloads are images of text. PDF downloaded titles that have been added after 2020 contain OCR.</p>
<p><u>2.1.3 Keyboard (No Exception)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>See 2.1.1 for exceptions.</p>
<p><u>2.2.3 No Timing</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Webpages, documents, and features do not require timing, except for non-interactive video and audio.</p>
<p><u>2.2.4 Interruptions</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no interruptions.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>2.2.5 Re-authenticating (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Authentication sessions do not expire.</p>
<p>2.3.2 Three Flashes (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Not Applicable</p>	<p>There are no flashing or video elements.</p>
<p>2.4.8 Location (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Press, monograph catalog, and media pages contain a breadcrumb trail at the top of each page. Navigation within monograph catalog pages is organized through tabs, with the selected tab clearly indicated. Each page provides a link to the Fulcrum home page, the press page, and the main monograph catalog page as well as a navigation footer. Books in the Fulcrum E-Reader indicate location numbers and/or page numbers. EPUB downloads provide a clickable table of contents as well as location numbers. PDF downloads provide page numbers and a footer on each page with information about the book.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.9 Link Purpose (Link Only)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports functionality for descriptive label attributes for links.</p> <p>Exceptions: Quality of link labels will vary by publication and book. Some books include links that are not descriptive without context.</p>
<p><u>2.4.10 Section Headings</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Section headings are used to organize HTML content and the Fulcrum E-Reader has capability for chapters and subheadings to be organized with section headings.</p> <p>Exceptions: For the majority of content (90%) in the Fulcrum E-Reader and EPUB downloads, chapter headings are listed twice (one heading for the chapter number and a separate heading for the name of the chapter). Quality of heading structure varies by publisher. PDF downloads do not include headings.</p>
<p><u>3.1.3 Unusual Words</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p>	<p>The platform does not use unusual words. Some publications may use unusual words, and presence of mechanisms for identifying</p>

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Partially Supports	definitions (such as glossaries) will vary by publication.
<p><u>3.1.4 Abbreviations</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	The platform does not use abbreviations. Some publications may use abbreviations, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.
<p><u>3.1.5 Reading Level</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	Reading level varies by publication.
<p><u>3.1.6 Pronunciation</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	Presence of mechanisms for identifying pronunciation of words will vary by publication.
<p><u>3.2.5 Change on Request</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	Changes of context are initiated only by user request.

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.5 Help</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Search boxes include suggestions (“Search and discover books”, “Search resources”, “Search inside text...”). Search filters include labels that identify the application or removal of a search filter to assistive technology.</p>
<p><u>3.3.6 Error Prevention (All)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Submissions of text input are reversible.</p>

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.2 , 1.3.3 , 1.4.5 , 2.4.4 , 2.4.6 for exceptions.
302.2 With Limited Vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast. See WCAG 1.4.3 and 1.4.5 for exceptions.
302.3 Without Perception of Color	Web: Partially Supports Electronic Documents: Partially Supports	Color is only used as a decorative or supplemental attribute of user interface elements. See WCAG 1.4.1 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
302.4 Without Hearing	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	Some video and audio content may not include captions, transcripts, or audio description (See WCAG 1.2.1 and 1.2.2 for details).
302.5 With Limited Hearing	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	Some video and audio content may not include captions, transcripts, or audio description (See WCAG 1.2.1, 1.2.2 for details).
302.6 Without Speech	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	Fulcrum does not require speech input.
302.7 With Limited Manipulation	Web: Partially Supports	Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Partially Supports	Usage of the product does not require fine motor controls nor simultaneous actions.
302.8 With Limited Reach and Strength	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions. Usage of the product does not require fine motor controls nor simultaneous actions.
302.9 With Limited Language, Cognitive, and Learning Abilities	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate. Reading level of publications varies. Reading level of publications varies. Some video and audio content may not include captions, transcripts, or audio description (See WCAG 1.2.1, 1.2.2, and 1.2.3 for details).

Chapter 4: Hardware

Notes: Fulcrum is a web software application and is not subject to the requirements of this section.

Chapter 5: Software

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	Web: Supports Electronic Documents: Partially Supports	The Fulcrum platform allows user control of accessibility features, including text zoom in the reader. EPUB and PDF downloads can be opened with any document reader, though 90% of PDF downloads are image scans or text and do not allow resizing or modification of text.
502.2.2 No Disruption of Accessibility Features	Web: Supports Electronic Documents: Supports	The Fulcrum platform and downloads are compatible with operating system and browser accessibility features configured by the user.

Criteria	Conformance Level	Remarks and Explanations
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.3 , and 4.1.2 for exceptions.
502.3.2 Modification of Object Information	Web: Supports Electronic Documents: Not Applicable	All user-set states and properties are capable of being set programmatically, including through assistive technologies.
502.3.3 Row, Column, and Headers	Web: Partially Supports Electronic Documents:	Tables include correct row, column, and header tags in reflowable EPUBs (less than 10% of the collection) but not in fixed layout and PDF publications.

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	
502.3.4 Values	Web: Supports Electronic Documents: Supports	Fulcrum uses standard HTML or and ARIA object attributes.
502.3.5 Modification of Values	Web: Supports Electronic Documents: Not Applicable	All user-set input is capable of being set programmatically, including through assistive technologies.
502.3.6 Label Relationships	Web: Supports Electronic Documents: Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe label relationships of user interface elements to assistive technologies. This includes the use of “<label>” elements and “aria-labelledby” and “aria-label” attributes.

Criteria	Conformance Level	Remarks and Explanations
502.3.7 Hierarchical Relationships	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum uses standard HTML markup to express hierarchical relationships.</p> <p>See WCAG 2.4.6 and 2.4.10 for exceptions to hierarchical heading and subheading structures.</p>
502.3.8 Text	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum renders most strings as plain text values in HTML. Fixed layout EPUB publications can be displayed as image scans or as (uncorrected) OCR text. 90% of PDF downloads are only rendered as image scans. Titles added after 2020 contain PDF downloads that are rendered as text.</p>
502.3.9 Modification of Text	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>All user-set input is capable of being set programmatically, including through assistive technologies.</p>
502.3.10 List of Actions	<p>Web: Supports</p>	<p>Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.</p>

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Not Applicable	
502.3.11 Actions on Objects	Web: Partially Supports Electronic Documents: Supports	Fulcrum allows assistive technology to programmatically execute available actions on objects with the exception of interactive stats charts.
502.3.12 Focus Cursor	Web: Supports Electronic Documents: Not Applicable	Fulcrum uses visual changes to elements to indicate the current position of focus.
502.3.13 Modification of Focus Cursor	Web: Partially Supports Electronic Documents: Partially Supports	Cursor focus is modifiable through keyboard controls. See WCAG 2.1.1 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
502.3.14 Event Notification	Web: Supports Electronic Documents: Not Applicable	Fulcrum notifies screen reader users when switching between tabs in monograph catalog pages. Screen reader users are notified when moving between pages in the Fulcrum E-Reader.
502.4 Platform Accessibility Features A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes; B. Section 9.3.4 Provide adjustment of delay before key acceptance; C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance; D. Section 10.6.7 Allow users to choose visual alternative for audio output; E. Section 10.6.8 Synchronize audio equivalents for visual events; F. Section 10.6.9 Provide speech output services; and	A. Not Applicable B. Not Applicable C. Not Applicable D. Web: Partially Supports Electronic Documents: Partially Supports E. Web: Support Electronic Documents: Does Not Support F. Web: Supports	A. Simultaneous keystrokes not required. B. Not applicable. C. Not applicable. D. Audio content is accessible through a visually displayed text transcript or video captions, with exceptions listed in WCAG 1.2.1 and 1.2.2. E. Audio description is synchronized with video when provided. F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers. EPUB downloads are accessible to screen readers but PDF downloads are not. G. Captions can be turned on via keyboard in the video player when provided. Captions are available when provided by publisher.

Criteria	Conformance Level	Remarks and Explanations
G. Section 10.7.1 Display any captions provided.	<p>Electronic Documents: Partially Supports</p> <p>G. Web: Supports Electronic Documents: Partially Supports</p>	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>User preferences from operating system settings and browser extensions for color, contrast, font type, font size, and focus cursor are respected with the following exceptions: font type and font size set through browser extensions affect all text except for the content of books in the Fulcrum E-Reader. However, the Fulcrum E-Reader allows users to change the font size but not the font type. EPUB downloads allow for modification of font size, contrast,</p>

Criteria	Conformance Level	Remarks and Explanations
		spacing, and other features, but PDF downloads do not.
503.3 Alternative User Interfaces	Web: Not Applicable Electronic Documents: Not Applicable	Fulcrum does not provide any alternative user interfaces that function as assistive technology.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Web: Supports Electronic Documents: Supports	Video player supports user control of captions, including toggle, position, font, size, text color, background, and opacity. Toggle is at the same menu level as volume control.
503.4.2 Audio Description Controls	Web: Partially Supports Electronic Documents:	Video player supports user control of audio descriptions at the same menu level as caption settings, keyboard settings, and transcript

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	<p>but not at the same menu level as volume.</p> <p>Audio descriptions are available when provided by publisher, but most videos do not contain audio description.</p>
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”)	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	Fulcrum is not an authoring tool.
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	

Criteria	Conformance Level	Remarks and Explanations
504.2.2 PDF Export	Web: Not Applicable Electronic Documents: Not Applicable	
504.3 Prompts	Web: Not Applicable Electronic Documents: Not Applicable	
504.4 Templates	Web: Not Applicable Electronic Documents: Not Applicable	

Chapter 6: Support Documentation and Services

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 required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page .
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	Support documentation is provided in electronic format.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Information on accessibility and compatibility is provided at

Criteria	Conformance Level	Remarks and Explanations
		https://www.fulcrum.org/accessibility/
603.3 Accommodation of Communication Needs	Supports	Support services are provided through email.

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Chapter 4: 4.2 Functional Performance Statements (FPS)

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.2 , 1.3.3 , 1.4.5 , 2.4.4 , 2.4.6 for exceptions.
4.2.2 Usage with limited vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports standard browser magnification and magnification extensions and standard operating system contrast adjustments and provides sufficient color contrast. See WCAG 1.4.3 and 1.4.5 for exceptions.
4.2.3 Usage without perception of colour	Web: Partially Supports Electronic Documents:	Color is only used as a decorative or supplemental attribute of user interface elements. See WCAG 1.4.1 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	
4.2.4 Usage without hearing	Web: Partially Supports Electronic Documents: Partially Supports	Most audio content does not include captions or transcripts, with exceptions listed in WCAG 1.2.1 and 1.2.2.
4.2.5 Usage with limited hearing	Web: Partially Supports Electronic Documents: Partially Supports	Most audio content does not include captions or transcripts, with exceptions listed in WCAG 1.2.1 and 1.2.2.
4.2.6 Usage without vocal capability	Web: Not Applicable Electronic Documents: Not Applicable	Fulcrum does not require speech input

Criteria	Conformance Level	Remarks and Explanations
4.2.7 Usage with limited manipulation or strength	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions.</p> <p>Usage of the product does not require fine motor controls nor simultaneous actions.</p>
4.2.8 Usage with limited reach	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions.</p> <p>Usage of the product does not require fine motor controls nor simultaneous actions.</p>
4.2.9 Minimize photosensitive seizure triggers	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Fulcrum does not include visual features with flashing that could trigger seizures</p>
4.2.10 Usage with limited cognition	<p>Web: Partially Supports</p> <p>Electronic Documents:</p>	<p>Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate.</p>

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	Reading level of publications varies.
4.2.11 Privacy	Web: Supports Electronic Documents: Supports	Fulcrum does not impede usage of standard privacy controls alongside assistive technologies. Users can connect a headset for private listening to screen reader announcements.

Chapter 5: Generic Requirements

Notes: Fulcrum supports standard assistive technologies and is therefore not subject to the Closed Functionality criteria described in this chapter.

Chapter 6: ICT with Two-Way Voice Communication

Notes: Fulcrum does not offer two-way voice communication and is therefore not subject to the criteria described in this chapter.

Chapter 7: ICT with Video Capabilities

Criteria	Conformance Level	Remarks and Explanations
7.1 Caption processing technology	Heading cell – no response required	Heading cell – no response required
7.1.1 Captioning playback	Web: Partially Supports Electronic Documents: Partially Supports	When available, captions can be turned on via mouse or keyboard in the video player. See WCAG 1.2.2 for details.
7.1.2 Captioning synchronization	Web: Supports Electronic Documents: Supports	Video player synchronizes captions with audio/visual content, when captions are provided.
7.1.3 Preservation of captioning	Web: Not Applicable Electronic Documents: Not Applicable	Video player supports WebVTT caption file format and allows the user to set presentational aspects.

Criteria	Conformance Level	Remarks and Explanations
7.2.1 Audio description playback	Web: Partially Supports Electronic Documents: Partially Supports	When available, audio description can be turned on via mouse or keyboard in the video player. See WCAG 1.2.1 for details.
7.2.2 Audio description synchronization	Web: Supports Electronic Documents: Partially Supports	Video player synchronizes audio description with audio/visual content, when provided.
7.2.3 Preservation of audio description	Web: Supports Electronic Documents: Supports	Video player supports audio description tracks, when provided.
7.3 User controls for captions and audio description	Web: Partially Supports Electronic Documents:	Video player supports user control of captions, including toggle, position, font, size, text color, background, and opacity as well as user control of audio description. Caption toggle is

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	at the same menu level as primary media controls, but audio description settings are not.

Chapter 8: Hardware

Notes: Fulcrum is a web software application and is not subject to the requirements of this section.

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

Chapter 10: Non-web Documents

Criteria	Conformance Level	Remarks and Explanations
10.0 General	Heading cell – no response required	Heading cell – no response required
10.1.1.1 through 10.4.1.3	See WCAG 2.0 section	See information in WCAG section

Criteria	Conformance Level	Remarks and Explanations
10.5 Caption positioning	Does Not Support	Captions appear at the bottom of the screen and may partially obscure video content.
10.6 Audio description timing	Supports	When provided, audio description does not interfere with relevant audio information in synchronized media.

Chapter 11: Software

Notes: Fulcrum is not an authoring platform therefore sections 11.8.1 – 11.8.5 are not applicable and have been omitted.

Criteria	Conformance Level	Remarks and Explanations
11.1.1.1 through 11.4.1.3	See WCAG 2.0 section	See information in WCAG section
11.5 Interoperability with assistive technology	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
11.5.1 Closed functionality (informative)	Heading cell – no response required	Heading cell – no response required
11.5.2 Accessibility services	Heading cell – no response required	Heading cell – no response required
11.5.2.1 Platform accessibility service support for software that provides a user interface	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.2 Platform accessibility service support for assistive technologies	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.3 Use of accessibility services	Web: Supports Electronic Documents: Not Applicable	Fulcrum uses standard platform accessibility services.
11.5.2.4 Assistive technology	Not Applicable	Fulcrum is not itself an assistive technology.

Criteria	Conformance Level	Remarks and Explanations
11.5.2.5 Object information	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.3 , and 4.1.2 for exceptions.
11.5.2.6 Row, column, and headers	Web: Partially Supports Electronic Documents: Partially Supports	Tables include correct row, column, and header tags in reflowable EPUBs (less than 10% of the collection) but not in fixed layout publications.
11.5.2.7 Values	Web: Supports Electronic Documents: Supports	Fulcrum uses standard HTML or and ARIA object attributes.
11.5.2.8 Label relationships	Web: Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe label relationships of user interface elements to assistive technologies. This includes the

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Supports	use of “<label>” elements and “aria-labelledby” and “aria-label” attributes.
11.5.2.9 Parent-child relationships	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses standard HTML markup to express hierarchical relationships. See WCAG 2.4.6 and 2.4.10 for exceptions to hierarchical heading and subheading structures.
11.5.2.10 Text	Web: Supports Electronic Documents: Partially Supports	Fulcrum renders most strings as plain text values in HTML. Fixed layout EPUB publications can be displayed as image scans or as (uncorrected) OCR text. 90 % of PDF downloads are only rendered as image scans. Titles added after 2020 are PDFs that contain text.
11.5.2.11 List of available actions	Web: Supports Electronic Documents: Not Applicable	Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.

Criteria	Conformance Level	Remarks and Explanations
11.5.2.12 Execution of available actions	Web: Partially Supports Electronic Documents: Supports	Fulcrum allows assistive technology to programmatically execute available actions on objects with the exception of interactive stats charts.
11.5.2.13 Tracking of focus and selection attributes	Web: Supports Electronic Documents: Not Applicable	Focus, text insertion point, and selection attributes of user interface elements are programmatically determinable by assistive technologies.
11.5.2.14 Modification of focus and selection attributes	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum allows keyboards and assistive technologies to programmatically modify focus, text insertion point, and selection attributes of user interface elements. See WCAG 2.1.1 for exceptions.
11.5.2.15 Change notification	Web: Supports	Fulcrum notifies screen reader users when switching between tabs in monograph catalog pages. Screen reader users are notified

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Not Applicable	when moving between pages in the Fulcrum E-Reader.
11.5.2.16 Modifications of states and properties	Web: Supports Electronic Documents: Not Applicable	All user-set states and properties are capable of being set programmatically, including through assistive technologies.
11.5.2.17 Modifications of values and text	Web: Supports Electronic Documents: Not Applicable	All user-set input is capable of being set programmatically, including through assistive technologies.
11.6 Documented accessibility usage	Heading cell – no response required	Heading cell – no response required
11.6.1 User control of accessibility features	Web: Supports Electronic Documents:	The Fulcrum platform allows user control of accessibility features, including text zoom in the reader. EPUB and PDF downloads can be opened with any document reader, though 90% of PDF downloads are image scans and

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	do not allow resizing or modification of text.
11.6.2 No disruption of accessibility features	Web: Supports Electronic Documents: Supports	The Fulcrum platform and downloads are compatible with operating system and browser accessibility features configured by the user.
11.7 User preferences	Web: Partially Supports Electronic Documents: Partially Supports	User preferences from operating system settings and browser extensions for color, contrast, font type, font size, and focus cursor are respected with the following exceptions: font type and font size set through browser extensions affect all text except for the content of books in the Fulcrum E-Reader. However, the Fulcrum E-Reader allows users to change the font size but not the font type. EPUB downloads allow for modification of font size, contrast, spacing, and other features, but PDF downloads do not.

Criteria	Conformance Level	Remarks and Explanations
11.8 Authoring tools	Heading cell – no response required	Heading cell – no response required

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

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	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page .
12.1.2 Accessible documentation	See WCAG 2.0 section	See information in WCAG 2.0 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	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page .
12.2.3 Effective communication	Supports	Support services are provided via email, but shall additional support be required Fulcrum staff can accommodate accessibility needs to facilitate user support.
12.2.4 Accessible documentation	See WCAG 2.0 section	See information in WCAG 2.0 section

Chapter [13: ICT Providing Relay or Emergency Service Access](#)

Notes: Fulcrum does not offer two-way voice communication and is therefore not subject to the criteria described in this chapter.