



# U-M Press EBook Collection Accessibility Conformance Report International Edition

## VPAT® Version 2.3 (Revised) – April 2019

**Name of Product/Version:** Fulcrum v2.57.4 University of Michigan Press EBook Collection (UMP EBC)

**Product Description:** The UMP EBC is a comprehensive collection of the University of Michigan Press's scholarly ebooks for sale to libraries, hosted on the Fulcrum platform. The collection includes over 1,400 titles comprised of new UMP scholarly ebook titles, at least 80 new books a year, and over 1,000 backlist titles.

**Report Date:** May 2020

**Contact Information:** [fulcrum-info@umich.edu](mailto: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 in the UMP EBC:

- [Handiland: The Crippest Place on Earth](#)
- [Resisting Spirits: Drama Reform and Cultural Transformation in the People's Republic of China](#)
- [Campaign Finance and Political Polarization: When Purists Prevail](#)
- [Stamping the American Memory: Collectors, Citizens, and the Post](#)
- [Good Vibrations: Brian Wilson and the Beach Boys in Critical Perspective](#)
- [Animal Acts: Performing Species Today, Developing Writers in Higher Education: A Longitudinal Study](#)
- [For Dear Life: Women's Decriminalization and Human Rights in Focus](#)
- [Cueva Blanca: Social Change in the Archaic of the Valley of Oaxaca](#)

This report supersedes the Fulcrum Accessibility Conformance Report VPAT 2.3 released in March 2020 in that it includes evaluation of content in the UMP EBC.

## Applicable Standards/Guidelines

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

| Standard/Guideline   | Included in Report   |
|--|--|
| <p><a href="#">Web Content Accessibility Guidelines 2.0</a> or WCAG 2.0 (ISO/IEC 40500)</p> <p>Jump to <a href="#">WCAG 2.0 Level A Report</a></p> <p>Jump to <a href="#">WCAG 2.0 Level AA Report</a></p> <p>Jump to <a href="#">WCAG 2.0 Level AAA Report</a></p>        | <p>Level A – <b>Yes</b></p> <p>Level AA – <b>Yes</b></p> <p>Level AAA – <b>Yes</b></p> |
| <p><a href="#">Web Content Accessibility Guidelines 2.1</a> or WCAG 2.1</p>  | <p>Level A – <b>No</b></p> <p>Level AA – <b>No</b></p> <p>Level AAA – <b>No</b></p>    |
| <p><a href="#">Revised Section 508 standards</a> – 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 <a href="#">Revised Section 508 Report</a></p> | <p><b>Yes</b></p>  |

[EN 301 549 Accessibility requirements suitable for public procurement of ICT products and services in Europe, V2.1.2 \(2018-08\)](#)

Jump to [EN 301 549 Report](#)

**Yes**

## Terms

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

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can 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><b>1.1.1 Non-text Content</b> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>● 9.1.1.1 (Web)</li> <li>● 10.1.1.1 (Non-web document)</li> <li>● 11.1.1.1.1 (Open Functionality Software)</li> <li>● 11.1.1.1.2 (Closed Functionality Software)</li> <li>● 11.8.2 (Authoring Tool)</li> <li>● 12.1.2 (Product Docs)</li> <li>● 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>● 501 (Web)(Software)</li> <li>● 504.2 (Authoring Tool)</li> <li>● 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p><br><p>Electronic Documents: Partially Supports</p> | <p>Form fields and buttons include labels. Images have capability for alt-text and image descriptions.</p><br><p>All titles published after 2019 contain at least basic textual descriptions of images, however these descriptions are only contained within EPUB files. Disability Studies titles published between 2015-2018 contain textual descriptions of images in EPUB files. All other titles published before 2019 do not contain textual descriptions of images. PDF downloads do not include alt-text and image descriptions for images.</p> |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
| <p><b>1.2.1 Audio-only and Video-only (Prerecorded)</b> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.1 (Web)</li> <li>• 10.1.2.1 (Non-web document)</li> <li>• 11.1.2.1.1 (Open Functionality Software)</li> <li>• 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>The web video player supports transcripts and audio descriptions when provided by the publisher. The web audio player supports transcripts when provided by the publisher.</p> <p>All audio and video associated with books produced after 2018 have transcripts or captions available. Video associated with books produced after 2020 have both captions and audio descriptions available. Video and audio players embedded in the Fulcrum E-Reader support audio descriptions but do not support transcripts. Embedded players provide links to the full video and audio players on the Fulcrum website. Video and audio players embedded in EPUB downloads support audio descriptions but do not support transcripts and do not include working links to the full video players.</p> |



| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
| <p><b>1.2.2 Captions (Prerecorded)</b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.2 (Web)</li> <li>• 10.1.2.2 (Non-web document)</li> <li>• 11.1.2.2 (Open Functionality Software)</li> <li>• 11.1.2.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                                   | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>The web video player supports captions when provided by the publisher. Video players embedded in the Fulcrum E-Reader and EPUB downloads support captions when provided.</p> <p>All video associated with books produced after 2018 have transcripts or captions available. Video associated with books produced after 2020 have captions available.</p>   |
| <p><b>1.2.3 Audio Description or Media Alternative (Prerecorded)</b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.3 (Web)</li> <li>• 10.1.2.3 (Non-web document)</li> <li>• 11.1.2.3.1 (Open Functionality Software)</li> <li>• 11.1.2.3.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>The web video player supports transcripts and audio descriptions when provided by the publisher.</p> <p>All video associated with books produced after 2018 have transcripts or captions available. Video associated with books produced after 2020 have both captions and audio descriptions available. Video players embedded in the Fulcrum E-Reader support audio descriptions but do not support transcripts. Embedded video players provide links to the full video players on the Fulcrum website. Video players embedded in EPUB downloads support audio</p> |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
|   |  | <p>descriptions but do not support transcripts and do not include working links to the full video players.</p>   |
| <p><b><a href="#">1.3.1 Info and Relationships</a></b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.3.1 (Web)</li> <li>• 10.1.3.1 (Non-web document)</li> <li>• 11.1.3.1.1 (Open Functionality Software)</li> <li>• 11.1.3.1.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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>For most books (over 99% of the collection), in the Fulcrum E-Reader and in EPUB downloads, chapters and subheadings are tagged, but accuracy of heading structure will vary depending on publisher. Endnotes and bibliographic entries in some books are not tagged with appropriate ARIA child or parent roles. Fixed layout books (less than 1% of the collection) are not tagged. PDF downloads include</p> |

| Criteria | Conformance Level | Remarks and Explanations  |
|----------|-------------------|---|
|          |                   | <p>bookmarks for chapters and subsections but are untagged, so information, structure, and relationships cannot be programmatically determined.</p> <p>On monograph catalog pages, the 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>VoiceOver-only Exception:</p> <p>In the Fulcrum E-Reader, not all links in a book chapter read in the rotor (if video or image is selected, only the links for those controls are visible in the rotor). When focus is in the book, reader menu bars and controls (e.g. close reader, preferences, table of contents) no longer show up in links or buttons - users have to cycle through the entire chapter and out of the book to get back to these controls.</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| <p><b><a href="#">1.3.2 Meaningful Sequence</a></b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.3.2 (Web)</li> <li>• 10.1.3.2 (Non-web document)</li> <li>• 11.1.3.2.1 (Open Functionality Software)</li> <li>• 11.1.3.2.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Most EPUB downloads, except for fixed layout books (less than 1% of the collection), 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 <a href="#">1.3.1</a>.</p> |
| <p><b><a href="#">1.3.3 Sensory Characteristics</a></b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.3.3 (Web)</li> <li>• 10.1.3.3 (Non-web document)</li> <li>• 11.1.3.3 (Open Functionality Software)</li> <li>• 11.1.3.3 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Supports</p>           | <p>Most controls provide text labels not solely sensory characteristics. See exceptions above for <a href="#">1.3.1</a> (links in the Fulcrum E-Reader).</p>   |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
| <p><b>1.4.1 Use of Color</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.4.1 (Web)</li> <li>• 10.1.4.1 (Non-web document)</li> <li>• 11.1.4.1 (Open Functionality Software)</li> <li>• 11.1.4.1 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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> <p>Color may be used to convey meaning in images and videos inside books.</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| <p><b>1.4.2 Audio Control</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.4.2 (Web)</li> <li>• 10.1.4.2 (Non-web document)</li> <li>• 11.1.4.2 (Open Functionality Software)</li> <li>• 11.1.4.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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>   |
| <p><b>2.1.1 Keyboard</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.1.1 (Web)</li> <li>• 10.2.1.1 (Non-web document)</li> <li>• 11.2.1.1.1 (Open Functionality Software)</li> <li>• 11.2.1.1.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>  | <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>Users cannot adjust the interactive stats charts on monograph catalog pages with keyboard controls.</p> <p>Most EPUB downloads, except for fixed layout books (less than 1% of the collection), are tagged and</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
|  |  | support standard keyboard navigation. PDF downloads are untagged and do not support keyboard navigation through headings and elements, though bookmarks allow navigation through chapters. |
| <p><a href="#">2.1.2 No Keyboard Trap</a> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.1.2 (Web)</li> <li>• 10.2.1.2 (Non-web document)</li> <li>• 11.2.1.2 (Open Functionality Software)</li> <li>• 11.2.1.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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>   |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
| <p><b>2.2.1 Timing Adjustable</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.2.1 (Web)</li> <li>• 10.2.2.1 (Non-web document)</li> <li>• 11.2.2.1 (Open Functionality Software)</li> <li>• 11.2.2.1 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p> | <p>There are no time limits set on content.</p>   |
| <p><b>2.2.2 Pause, Stop, Hide</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.2.2 (Web)</li> <li>• 10.2.2.2 (Non-web document)</li> <li>• 11.2.2.2 (Open Functionality Software)</li> <li>• 11.2.2.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p> | <p>There is no moving, blinking, scrolling, or auto-updating information that starts automatically.</p> |



| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b><u>2.3.1 Three Flashes or Below Threshold</u></b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.3.1 (Web)</li> <li>• 10.2.3.1 (Non-web document)</li> <li>• 11.2.3.1 (Open Functionality Software)</li> <li>• 11.2.3.1 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                                      | <p>Web: Partially Supports</p> <p>Electronic Documents: Supports</p> | <p>The only content that flashes more than three times in a second is the loading animation for the PDF E-Reader on the Fulcrum site (approximately 15% of the publications in this collection open in the PDF E-Reader). There is no flashing content in downloads.</p> |
| <p><b><u>2.4.1 Bypass Blocks</u></b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.1 (Web)</li> <li>• 10.2.4.1 (Non-web document) – Does not apply</li> <li>• 11.2.4.1 (Open Functionality Software) – Does not apply</li> <li>• 11.2.4.1 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> </ul> | <p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>     | <p>A hidden link (available to screen readers) allows users to skip to the main content of each page.</p>  |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
| <ul style="list-style-type: none"> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>  |  |   |
| <p><b>2.4.2 Page Titled</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>9.2.4.2 (Web)</li> <li>10.2.4.2 (Non-web document)</li> <li>11.2.4.2 (Open Functionality Software) - Does not apply</li> <li>11.2.4.2 (Closed Software) – Does not apply</li> <li>11.8.2 (Authoring Tool)</li> <li>12.1.2 (Product Docs)</li> <li>12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | <p>Web: Supports</p> <p>Electronic Documents:<br/>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> |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
| <p><b>2.4.3 Focus Order</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.3 (Web)</li> <li>• 10.2.4.3 (Non-web document)</li> <li>• 11.2.4.3 (Open Functionality Software)</li> <li>• 11.2.4.3 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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. Most EPUB downloads (over 99% of the collection) are tagged and ensure correct tab and reading order.</p> <p>Exceptions:</p> <p>In the Fulcrum E-Reader, when a user tabs into a book, they are taken back to the first link in the chapter, rather than the first link on the currently opened page.</p> <p>EPUB downloads of fixed layout books are untagged. PDF downloads are untagged and do not specify a tab or reading order.</p> |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
| <p><b>2.4.4 Link Purpose (In Context)</b><br/>(Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.4 (Web)</li> <li>• 10.2.4.4 (Non-web document)</li> <li>• 11.2.4.4 (Open Functionality Software)</li> <li>• 11.2.4.4 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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 publication and book, but most are descriptive in context.</p>  |
| <p><b>3.1.1 Language of Page</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.1.1 (Web)</li> <li>• 10.3.1.1 (Non-web document)</li> <li>• 11.3.1.1.1 (Open Functionality Software)</li> <li>• 11.3.1.1.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>          | <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.</p> <p>Fixed layout books (less than 1% of the collection) do not specify a language attribute for the text inside the book.</p> <p>PDF downloads do not specify a language attribute.</p> |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b>3.2.1 On Focus</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.2.1 (Web)</li> <li>• 10.3.2.1 (Non-web document)</li> <li>• 11.3.2.1 (Open Functionality Software)</li> <li>• 11.3.2.1 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Supports</p> | <p>In the Fulcrum E-Reader, when a user tabs into a book, they are taken back to the first link in the chapter, rather than the first link on the currently opened page.</p> |
| <p><b>3.2.2 On Input</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.2.2 (Web)</li> <li>• 10.3.2.2 (Non-web document)</li> <li>• 11.3.2.2 (Open Functionality Software)</li> <li>• 11.3.2.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Supports</p> <p>Electronic Documents: Supports</p>           | <p>Changing the setting of a component does not initiate a change of context.</p>  |

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

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b>4.1.1 Parsing</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.4.1.1 (Web)</li> <li>• 10.4.1.1 (Non-web document)</li> <li>• 11.4.1.1.1 (Open Functionality Software)</li> <li>• 11.4.1.1.2 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>         | <p>Web: Supports</p> <p>Electronic Documents: Supports</p>                     | <p>Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.</p>  |
| <p><b>4.1.2 Name, Role, Value</b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.4.1.2 (Web)</li> <li>• 10.4.1.2 (Non-web document)</li> <li>• 11.4.1.2.1 (Open Functionality Software)</li> <li>• 11.4.1.2.2 (Closed Software) – Not required</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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 <a href="#">1.3.3</a> and <a href="#">2.4.4</a> for exceptions.</p> |

**Table 2: Success Criteria, Level AA**

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b>1.2.4 Captions (Live)</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.4 (Web)</li> <li>• 10.1.2.4 (Non-web document)</li> <li>• 11.1.2.4 (Open Functionality Software)</li> <li>• 11.1.2.4 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                 | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>         | <p>Fulcrum does not include live video and audio content.</p>  |
| <p><b>1.2.5 Audio Description (Prerecorded)</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.5 (Web)</li> <li>• 10.1.2.5 (Non-web document)</li> <li>• 11.1.2.5 (Open Functionality Software)</li> <li>• 11.1.2.5 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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>Video associated with books produced after 2020 have audio descriptions available. Video players embedded in the Fulcrum E-Reader and in EPUB downloads support audio descriptions.</p> |



| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| <p><b>1.4.3 Contrast (Minimum)</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.4.3 (Web)</li> <li>• 10.1.4.3 (Non-web document)</li> <li>• 11.1.4.3 (Open Functionality Software)</li> <li>• 11.1.4.3 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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 images in books may not present sufficient color contrast. Some books do not present sufficient color contrast for page numbers in the Fulcrum E-Reader and EPUB downloads.</p>  |
| <p><b>1.4.4 Resize text</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.4.4 (Web)</li> <li>• 10.1.4.4 (Non-web document)</li> <li>• 11.1.4.4.1 (Open Functionality Software)</li> <li>• 11.1.4.4.2 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>    | <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 non-fixed layout EPUB downloads (over 99% of the collection) can be resized. Text in fixed layout EPUB downloads and PDF downloads cannot be resized except through zooming in on the image.</p> |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b>1.4.5 Images of Text</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.4.5 (Web)</li> <li>• 10.1.4.5 (Non-web document)</li> <li>• 11.1.4.5.1 (Open Functionality Software)</li> <li>• 11.1.4.5.2 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>                                   | <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 that are properly indicated as such to assistive technology. Fixed layout books can be displayed as page images or as text only.</p> <p>Most downloads do not use images of text, except for EPUB downloads of fixed layout books (less than 1% of the collection).</p> |
| <p><b>2.4.5 Multiple Ways</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.5 (Web)</li> <li>• 10.2.4.5 (Non-web document) – Does not apply</li> <li>• 11.2.4.5 (Open Functionality Software) – Does not apply</li> <li>• 11.2.4.5 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> </ul> | <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  |
|---|--|---|
| <ul style="list-style-type: none"> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>   |  |   |
| <p><b>2.4.6 Headings and Labels</b><br/>(Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>9.2.4.6 (Web)</li> <li>10.2.4.6 (Non-web document)</li> <li>11.2.4.6 (Open Functionality Software)</li> <li>11.2.4.6 (Closed Software)</li> <li>11.8.2 (Authoring Tool)</li> <li>12.1.2 (Product Docs)</li> <li>12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Fulcrum provides capabilities for defining descriptive headings and labels.</p> <p>Quality of headings and labels may vary by publication. Most publications, except for fixed layout publications (less than 1% of the collection), include descriptive headings. Fixed layout publications do not include headings but do include table of contents. Most EPUB downloads, except for fixed layout publications, include descriptive heading tags. PDF downloads do not include heading tags but do</p> |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
|   |  | <p>include bookmarks for chapter headings.</p> <p>See additional exceptions to labels at <a href="#">1.3.3</a> and <a href="#">2.4.4</a>.</p> |
| <p><b><a href="#">2.4.7 Focus Visible</a></b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.7 (Web)</li> <li>• 10.2.4.7 (Non-web document)</li> <li>• 11.2.4.7 (Open Functionality Software)</li> <li>• 11.2.4.7 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Supports</p> <p>Electronic Documents: Supports</p> | <p>Visual changes are applied to elements to indicate the current position of focus.</p>  |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p><b>3.1.2 Language of Parts</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.1.2 (Web)</li> <li>• 10.3.1.2 (Non-web document)</li> <li>• 11.3.1.2 (Open Functionality Software) – Does not apply</li> <li>• 11.3.1.2 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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> |
| <p><b>3.2.3 Consistent Navigation</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.2.3 (Web)</li> <li>• 10.3.2.3 (Non-web document) – Does not apply</li> <li>• 11.3.2.3 (Open Functionality Software) – Does not apply</li> <li>• 11.3.2.3 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p>  | <p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>           | <p>Navigation mechanisms are consistent across pages.</p>  |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>  |  |  |
| <p><b><u>3.2.4 Consistent Identification</u></b><br/>(Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.2.4 (Web)</li> <li>• 10.3.2.4 (Non-web document) – Does not apply</li> <li>• 11.3.2.4 (Open Functionality Software) – Does not apply</li> <li>• 11.3.2.4 (Closed Software) – Does not apply</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> </ul> | <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                            |
|--|--|---|
| <ul style="list-style-type: none"> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>  |  |   |
| <p><b>3.3.3 Error Suggestion</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.3.3 (Web)</li> <li>• 10.3.3.3 (Non-web document)</li> <li>• 11.3.3.3 (Open Functionality Software)</li> <li>• 11.3.3.3 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p> | <p>There are no opportunities for input errors.</p> |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
| <p><b>3.3.4 Error Prevention (Legal, Financial, Data)</b> (Level AA)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.3.3.4 (Web)</li> <li>• 10.3.3.4 (Non-web document)</li> <li>• 11.3.3.4 (Open Functionality Software)</li> <li>• 11.3.3.4 (Closed Software)</li> <li>• 11.8.2 (Authoring Tool)</li> <li>• 12.1.2 (Product Docs)</li> <li>• 12.2.4 (Support Docs)</li> </ul> <p>Revised Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> | <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><b><u>1.2.6 Sign Language (Prerecorded)</u></b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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><b><u>1.2.7 Extended Audio Description (Prerecorded)</u></b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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><b><u>1.2.8 Media Alternative (Prerecorded)</u></b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>          | <p>Web: Partially Supports</p> <p>Electronic Documents: Does Partially Supports</p> | <p>The web video and audio players support transcripts and text-based audio descriptions when provided by the publisher. All audio and video associated with books produced after 2018 have transcripts or captions available. Video and audio players embedded in the Fulcrum E-Reader do not support audio descriptions but do not support transcripts. Embedded players provide links to the full video or audio players on the Fulcrum website. Video and audio players embedded in EPUB downloads support audio descriptions but do not support transcripts and do not</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
|  |  | include working links to the full video or audio players.  |
| <p><b>1.2.9 Audio-only (Live)</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria– Does not apply<br/>Revised Section 508 – Does not apply</p>           | Not Applicable   | There is no live audio content.  |
| <p><b>1.4.6 Contrast Enhanced</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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. Some books do not present sufficient color contrast for page numbers in the Fulcrum E-Reader and EPUB downloads.</p> |
| <p><b>1.4.7 Low or No Background Audio</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | Level of background audio will vary by publication and media resource. No mechanism to turn off background audio is supported.   |

| Criteria   | Conformance Level   | Remarks and Explanations   |
|--|---|--|
| <p><b>1.4.8 Visual Presentation</b> (Level AAA)</p> <ol style="list-style-type: none"> <li>1. Foreground and background colors can be selected by the user.</li> <li>2. Width is no more than 80 characters or glyphs (40 if CJK).</li> <li>3. Text is not justified (aligned to both the left and the right margins).</li> <li>4. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing.</li> <li>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.</li> </ol> <p>Also applies to:<br/> EN 301 549 Criteria – Does not apply<br/> Revised Section 508 – Does not apply</p> | <p>Web:</p> <ol style="list-style-type: none"> <li>1. Does not support</li> <li>2. Partially Supports</li> <li>3. Partially Supports</li> <li>4. Does not support</li> <li>5. Partially Supports</li> </ol> <p>Electronic Documents</p> <ol style="list-style-type: none"> <li>1. Does not support</li> <li>2. Partially Supports</li> <li>3. Partially Supports</li> <li>4. Partially Supports</li> <li>5. Partially Supports</li> </ol> | <ol style="list-style-type: none"> <li>1. Foreground and background colors cannot be selected by the user, except through operating system or browser settings.</li> <li>2. Paragraphs of text exceed 80 characters in width by default but can be resized to be under 80 characters in reflowable EPUB publications (over 99% of the collection).</li> <li>3. Text is not justified in the web interface but is justified for most publications in the Fulcrum E-Reader (except for text-only OCR view for fixed layout publications) and in most PDF downloads. Justification in EPUB downloads can be modified if supported by the EPUB reader.</li> <li>4. Line spacing is under 1.5 and paragraph spacing is equal to the line spacing. Some EPUB readers may allow line and paragraph spacing to be modified for EPUB downloads.</li> <li>5. For reflowable EPUB publications, text can be resized without assistive technology (through operating system or browser settings or extensions, and through the zoom settings in the</li> </ol> |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--|---|
|  |  | <p>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>                            |
| <p><b><u>1.4.9 Images of Text (No Exception) Control</u></b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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. Fixed layout books can be displayed as page images or as text only.</p> <p>Most downloads do not use images of text, except for EPUB downloads of fixed layout books (less than 1% of the collection).</p> |
| <p><b><u>2.1.3 Keyboard (No Exception)</u></b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>               | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>See <a href="#">2.1.1</a> for exceptions.</p>  |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
| <p><b>2.2.3 No Timing</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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><b>2.2.4 Interruptions</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>     | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p> | <p>There are no interruptions.</p>  |
| <p><b>2.2.5 Re-authenticating</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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><b>2.3.2 Three Flashes</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>     | <p>Web: Partially Supports</p> <p>Electronic Documents: Supports</p>   | <p>See <a href="#">WCAG 2.3.1</a> for details.</p>  |
| <p><b>2.4.8 Location</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
|  |  | <p>catalog page as well as a navigation footer. Books in the Fulcrum E-Reader indicate location numbers and page numbers. EPUB downloads provide a clickable table of contents as well as location numbers and page numbers. PDF downloads provide chapter locations via bookmarks and page numbers and a footer on each page with information about the book.</p> |
| <p><b>2.4.9 Link Purpose (Link Only)</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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:<br/>The “more” link in the monograph catalog pages is not descriptive without context. Quality of link labels will vary by publication. Some books include links that are not descriptive without context.</p>  |
| <p><b>2.4.10 Section Headings</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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:<br/>In the Fulcrum E-Reader and EPUB downloads, chapter headings are listed twice (one</p>  |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
|   |  | <p>heading for the chapter number and a separate heading for the name of the chapter). Quality of heading structure varies by publisher. Fixed layout publications (less than 1% of the collection) include a table of contents but not heading tags. PDF downloads include chapter bookmarks but do not include heading tags.</p> |
| <p><b>3.1.3 Unusual Words</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>The platform does not use unusual words. Some publications may use unusual words, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.</p>   |
| <p><b>3.1.4 Abbreviations</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <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>   |
| <p><b>3.1.5 Reading Level</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p> | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Reading level varies by publication.</p>  |
| <p><b>3.1.6 Pronunciation</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply</p>  | <p>Web: Partially Supports</p>   | <p>Presence of mechanisms for identifying pronunciation of words will vary by publication.</p>   |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--|--|
| Revised Section 508 – Does not apply   | Electronic Documents: Partially Supports                         |  |
| <p><b>3.2.5 Change on Request</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>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.   |
| <p><b>3.3.5 Help</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>                   | <p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p> | Search boxes include suggestions (“Search works”, “Search resources”, “Search inside text...”). Search filters include labels that identify the application or removal of a search filter to assistive technology. |
| <p><b>3.3.6 Error Prevention (All)</b> (Level AAA)</p> <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p> | <p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p> | Submissions of text input are reversible.  |



# Revised Section 508 Report

## Chapter 3: Functional Performance Criteria (FPC)

| Criteria                          | Conformance Level   | Remarks and Explanations  |
|-----------------------------------|---|---|
| 302.1 Without Vision              | Web: Partially Supports<br><br>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.<br><br>See WCAG <a href="#">1.1.1</a> , <a href="#">1.2.1</a> , <a href="#">1.2.3</a> , <a href="#">1.3.2</a> , <a href="#">1.3.3</a> , <a href="#">1.4.5</a> , <a href="#">2.4.4</a> , <a href="#">2.4.6</a> for exceptions. |
| 302.2 With Limited Vision         | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast.<br><br>See WCAG <a href="#">1.2.1</a> , <a href="#">1.2.3</a> , <a href="#">1.4.3</a> , and <a href="#">1.4.5</a> for exceptions.  |
| 302.3 Without Perception of Color | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Color is only used as a decorative or supplemental attribute of user interface elements.<br><br>See WCAG <a href="#">1.4.1</a> for exceptions.  |

| Criteria                        | Conformance Level  | Remarks and Explanations   |
|---------------------------------|--|--|
| 302.4 Without Hearing           | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Audio content includes captions or transcripts, with exceptions listed in WCAG <a href="#">1.2.1</a> and <a href="#">1.2.2</a>.</p> |
| 302.5 With Limited Hearing      | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Audio content includes captions or transcripts, with exceptions listed in WCAG <a href="#">1.2.1</a> and <a href="#">1.2.2</a>.</p> |
| 302.6 Without Speech            | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>         | <p>Fulcrum does not require speech input.</p>  |
| 302.7 With Limited Manipulation | <p>Web: Partially Supports</p> <p>Electronic Documents:</p>                    | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.</p>  |

| Criteria   | Conformance Level   | Remarks and Explanations   |
|--|---|--|
|  | 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<br><br>Electronic Documents: Partially Supports | Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.<br><br>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<br><br>Electronic Documents: Partially Supports | Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate. Reading level of publications varies. Some video and audio content may not include captions, transcripts, or audio description (see <a href="#">WCAG 1.2.1</a> , <a href="#">1.2.2</a> , and <a href="#">1.2.3</a> 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 <a href="#">WCAG 2.0</a> 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<br><br>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 fixed layout EPUB downloads (less than 1% of the collection) do not allow resizing or modification of text. |
| 502.2.2 No Disruption of Accessibility Features | Web: Supports<br><br>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<br><br>Electronic Documents: Partially Supports | Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies.<br><br>See WCAG <a href="#">1.1.1</a> , <a href="#">1.3.3</a> , and <a href="#">4.1.2</a> for exceptions. |
| 502.3.2 Modification of Object Information | Web: Supports<br><br>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<br><br>Electronic Documents: Partially Supports | The quality of row, column, and header tagging differs by publication.  |

| Criteria                           | Conformance Level   | Remarks and Explanations  |
|------------------------------------|---|---|
| 502.3.4 Values                     | Web: Supports<br><br>Electronic Documents: Supports                     | Fulcrum uses standard HTML or and ARIA object attributes.   |
| 502.3.5 Modification of Values     | Web: Supports<br><br>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<br><br>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>” and “aria-labelledby” attributes. |
| 502.3.7 Hierarchical Relationships | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum uses standard HTML markup to express hierarchical relationships.<br><br>See WCAG <a href="#">2.4.6</a> and <a href="#">2.4.10</a> for exceptions to hierarchical heading and subheading structures.   |

| Criteria                     | Conformance Level   | Remarks and Explanations  |
|------------------------------|---|---|
| 502.3.8 Text                 | Web: Supports<br><br>Electronic Documents: Partially Supports | Fulcrum renders most strings as plain text values in HTML. Fixed layout EPUB publications (less than 1%) can be displayed as image scans or as text. Fixed layout EPUB downloads only include images of text, but the PDF downloads of the same publications include machine readable text. |
| 502.3.9 Modification of Text | Web: Supports<br><br>Electronic Documents: Not Applicable     | All user-set input is capable of being set programmatically, including through assistive technologies.  |
| 502.3.10 List of Actions     | Web: Supports<br><br>Electronic Documents: Not Applicable     | Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.  |
| 502.3.11 Actions on Objects  | Web: Partially Supports                                       | Fulcrum allows assistive technology to programmatically execute available actions on objects with the exception of interactive stats charts.  |

| Criteria                              | Conformance Level   | Remarks and Explanations   |
|---------------------------------------|---|--|
|                                       | Electronic Documents: Supports  |  |
| 502.3.12 Focus Cursor                 | Web: Supports<br><br>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<br><br>Electronic Documents: Partially Supports | Cursor focus is modifiable through keyboard controls.<br><br>See <a href="#">WCAG 2.1.1</a> for exceptions.  |
| 502.3.14 Event Notification           | Web: Supports<br><br>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. |



| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| <p>502.4 Platform Accessibility Features</p> <p>A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;</p> <p>B. Section 9.3.4 Provide adjustment of delay before key acceptance;</p> <p>C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance;</p> <p>D. Section 10.6.7 Allow users to choose visual alternative for audio output;</p> <p>E. Section 10.6.8 Synchronize audio equivalents for visual events;</p> <p>F. Section 10.6.9 Provide speech output services; and</p> <p>G. Section 10.7.1 Display any captions provided.</p> | <p>A. Not Applicable</p> <p>B. Not Applicable</p> <p>C. Not Applicable</p> <p>D. Web: Partially Supports Electronic Documents: Supports</p> <p>E. Web: Supports Electronic Documents: Does Not Support</p> <p>F. Web: Partially Supports Electronic Documents: Partially Supports</p> <p>G. Web: Supports Electronic</p> | <p>A. Simultaneous keystrokes not required.</p> <p>B. Not applicable.</p> <p>C. Not applicable.</p> <p>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.</p> <p>E. Audio description is synchronized with video when provided.</p> <p>F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers, with exceptions listed in WCAG <a href="#">1.1.1</a>, <a href="#">1.3.2</a>, <a href="#">1.3.3</a>, <a href="#">1.4.5</a>, <a href="#">2.4.4</a>, <a href="#">2.4.6</a>.</p> <p>G. Captions can be turned on via keyboard in the video player when provided.</p> |

| Criteria                          | Conformance Level   | Remarks and Explanations  |
|-----------------------------------|---|---|
|                                   | Documents:<br>Supports  |   |
| 503 Applications                  | Heading cell – no response required                                     | Heading cell – no response required   |
| 503.2 User Preferences            | Web: Partially Supports<br><br>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 type. Reflowable EPUB downloads (over 99% of the collection) allow for modification of font size, contrast, spacing, and other features, but PDF downloads do not. |
| 503.3 Alternative User Interfaces | Web: Not Applicable   | Fulcrum does not provide any alternative user interfaces that function as assistive technology.   |

| Criteria   | Conformance Level   | Remarks and Explanations   |
|--|---|--|
|  | Electronic Documents: Not Applicable                                    |  |
| 503.4 User Controls for Captions and Audio Description | Heading cell – no response required                                     | Heading cell – no response required  |
| 503.4.1 Caption Controls                               | Web: Supports<br><br>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<br><br>Electronic Documents: Partially Supports | Video player supports user control of audio descriptions at the same menu level as caption settings, keyboard settings, and transcript but not at the same menu level as volume. |
| 504 Authoring Tools                                    | Heading cell – no response required                                     | Heading cell – no response required  |

| Criteria  | Conformance Level   | Remarks and Explanations          |
|---|---|-----------------------------------|
| 504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)   | Web: Not Applicable<br><br>Electronic Documents: Not Applicable | Fulcrum is not an authoring tool. |
| 504.2.1 Preservation of Information Provided for Accessibility in Format Conversion | Web: Not Applicable<br><br>Electronic Documents: Not Applicable |                                   |
| 504.2.2 PDF Export  | Web: Not Applicable<br><br>Electronic Documents: Not Applicable |                                   |
| 504.3 Prompts   | Web: Not Applicable   |                                   |

| Criteria        | Conformance Level   | Remarks and Explanations |
|-----------------|---|--------------------------|
|                 | Electronic Documents: Not Applicable                            |                          |
| 504.4 Templates | Web: Not Applicable<br><br>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 <a href="#">Fulcrum Accessibility Page</a> . |
| 602.3 Electronic Support Documentation                           | See <a href="#">WCAG 2.0</a> 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  |
|--|-------------------|---|
|  |                   | <a href="https://www.fulcrum.org/accessibility/">https://www.fulcrum.org/accessibility/</a> |
| 603.3 Accommodation of Communication Needs | Supports          | Support services are provided through email.  |

# EN 301 549 Report

## Chapter 4: [4.2 Functional Performance Statements \(FPS\)](#)

| Criteria                                 | Conformance Level   | Remarks and Explanations  |
|--|---|---|
| 4.2.1 Usage without vision               | Web: Partially Supports<br><br>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.<br><br>See WCAG <a href="#">1.1.1</a> , <a href="#">1.2.1</a> , <a href="#">1.2.3</a> , <a href="#">1.3.2</a> , <a href="#">1.3.3</a> , <a href="#">1.4.5</a> , <a href="#">2.4.4</a> , <a href="#">2.4.6</a> for exceptions. |
| 4.2.2 Usage with limited vision          | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast.<br><br>See WCAG <a href="#">1.2.1</a> , <a href="#">1.2.3</a> , <a href="#">1.4.3</a> , and <a href="#">1.4.5</a> for exceptions.  |
| 4.2.3 Usage without perception of colour | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Color is only used as a decorative or supplemental attribute of user interface elements.<br><br>See WCAG <a href="#">1.4.1</a> for exceptions.  |



| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--|--|
| 4.2.4 Usage without hearing                       | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Audio content includes captions or transcripts, with exceptions listed in WCAG <a href="#">1.2.1</a> and <a href="#">1.2.2</a>.</p> |
| 4.2.5 Usage with limited hearing                  | <p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p> | <p>Audio content includes captions or transcripts, with exceptions listed in WCAG <a href="#">1.2.1</a> and <a href="#">1.2.2</a>.</p> |
| 4.2.6 Usage without vocal capability              | <p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>         | <p>Fulcrum does not require speech input</p>   |
| 4.2.7 Usage with limited manipulation or strength | <p>Web: Partially Supports</p> <p>Electronic Documents:</p>                    | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.</p>  |

| Criteria                                       | Conformance Level   | Remarks and Explanations   |
|--|---|--|
|  | Partially Supports  | Usage of the product does not require fine motor controls nor simultaneous actions.  |
| 4.2.8 Usage with limited reach                 | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.<br><br>Usage of the product does not require fine motor controls nor simultaneous actions.  |
| 4.2.9 Minimize photosensitive seizure triggers | Web: Partially Supports<br><br>Electronic Documents: Supports           | See <a href="#">WCAG 2.3.1</a> for exceptions.   |
| 4.2.10 Usage with limited cognition            | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate. Reading level of publications varies. Some video and audio content may not include captions, transcripts, or audio description (see <a href="#">WCAG 1.2.1</a> , <a href="#">1.2.2</a> , and <a href="#">1.2.3</a> for details). |

| Criteria       | Conformance Level                                   | Remarks and Explanations   |
|----------------|---|--|
| 4.2.11 Privacy | Web: Supports<br><br>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 |

| Criteria                         | Conformance Level   | Remarks and Explanations  |
|----------------------------------|---|---|
| 7.1.1 Captioning playback        | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | When available, captions can be turned on via mouse or keyboard in the video player. See <a href="#">WCAG 1.2.2</a> for details.          |
| 7.1.2 Captioning synchronization | Web: Supports<br><br>Electronic Documents: Supports                     | Video player synchronizes captions with audio/visual content, when captions are provided.   |
| 7.1.3 Preservation of captioning | Web: Not Applicable<br><br>Electronic Documents: Not Applicable         | Video player supports WebVTT caption file format and allows the user to set presentational aspects.                                       |
| 7.2.1 Audio description playback | Web: Partially Supports<br><br>Electronic Documents:                    | When available, audio description can be turned on via mouse or keyboard in the video player. See <a href="#">WCAG 1.2.1</a> for details. |

| Criteria   | Conformance Level   | Remarks and Explanations  |
|--|---|---|
|  | Partially Supports  |   |
| 7.2.2 Audio description synchronization              | Web: Supports<br><br>Electronic Documents: Partially Supports           | Video player synchronizes audio description with audio/visual content, when provided.   |
| 7.2.3 Preservation of audio description              | Web: Supports<br><br>Electronic Documents: Supports                     | Video player supports audio description tracks, when provided.  |
| 7.3 User controls for captions and audio description | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | 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 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 <a href="#">WCAG 2.0</a> section | See information in WCAG section  |
| 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 <a href="#">WCAG 2.0</a> section | See information in WCAG section               |
| 11.5 Interoperability with assistive technology   | Heading cell – no response required  | Heading cell – no response required           |
| 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 |

| Criteria                               | Conformance Level   | Remarks and Explanations  |
|--|---|---|
| 11.5.2.3 Use of accessibility services | Web: Supports<br><br>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.  |
| 11.5.2.5 Object information            | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies.<br><br>See WCAG <a href="#">1.1.1</a> , <a href="#">1.3.3</a> , and <a href="#">4.1.2</a> for exceptions. |
| 11.5.2.6 Row, column, and headers      | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | The quality of row, column, and header tagging differs by publication.  |



| Criteria                            | Conformance Level   | Remarks and Explanations  |
|-------------------------------------|---|---|
| 11.5.2.7 Values                     | Web: Supports<br><br>Electronic Documents: Supports                     | Fulcrum uses standard HTML or and ARIA object attributes.   |
| 11.5.2.8 Label relationships        | Web: Supports<br><br>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>” and “aria-labelledby” attributes. |
| 11.5.2.9 Parent-child relationships | Web: Partially Supports<br><br>Electronic Documents: Partially Supports | Fulcrum uses standard HTML markup to express hierarchical relationships.<br><br>See WCAG <a href="#">2.4.6</a> and <a href="#">2.4.10</a> for exceptions to hierarchical heading and subheading structures.   |
| 11.5.2.10 Text                      | Web: Supports<br><br>Electronic Documents:                              | Fulcrum renders most strings as plain text values in HTML. Fixed layout EPUB publications can be displayed as image scans or as text. Fixed layout EPUB   |

| Criteria   | Conformance Level   | Remarks and Explanations  |
|--|---|---|
|  | Partially Supports  | downloads are only rendered as image scans.   |
| 11.5.2.11 List of available actions                      | Web: Supports<br><br>Electronic Documents: Not Applicable     | Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.  |
| 11.5.2.12 Execution of available actions                 | Web: Partially Supports<br><br>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<br><br>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                                       | Fulcrum allows keyboards and assistive technologies to programmatically modify focus, text insertion point, and selection                     |

| Criteria   | Conformance Level   | Remarks and Explanations   |
|--|---|--|
|  | Electronic Documents: Partially Supports                  | attributes of user interface elements.<br><br>See <a href="#">WCAG 2.1.1</a> for exceptions.   |
| 11.5.2.15 Change notification                    | Web: Supports<br><br>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. |
| 11.5.2.16 Modifications of states and properties | Web: Supports<br><br>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<br><br>Electronic Documents: Not Applicable | All user-set input is capable of being set programmatically, including through assistive technologies.   |

| Criteria                                       | Conformance Level   | Remarks and Explanations   |
|--|---|--|
| 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<br><br>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 fixed layout EPUB downloads are image scans and do not allow resizing or modification of text.  |
| 11.6.2 No disruption of accessibility features | Web: Supports<br><br>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<br><br>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 |

| Criteria             | Conformance Level                   | Remarks and Explanations   |
|----------------------|-------------------------------------|--|
|                      |                                     | the font size but not the type. EPUB downloads allow for modification of font size, contrast, spacing, and other features, but PDF downloads do not. |
| 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  |
|--|--------------------------------------|---|
| <b>12.1 Product documentation</b>                              | 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 <a href="#">Fulcrum Accessibility Page</a> .  |
| 12.1.2 Accessible documentation                                | See <a href="#">WCAG 2.0</a> section | See information in WCAG 2.0 section   |
| <b>12.2 Support Services</b>                                   | 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 <a href="#">Fulcrum Accessibility Page</a> .  |
| 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 <a href="#">WCAG 2.0</a> 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.