



# Fulcrum Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.4)

**Name of Product/Version:** Fulcrum v2.77

**Product Description:** A publishing platform used by publishers and consortia to provide individual and library access to scholarly e-books.

**Report Date:** June 2021

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**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

**Notes:** This report evaluates the platform functionality not the accessibility of specific content. VPATs specific to content are currently being generated and will be made available at <https://fulcrum.org/accessibility>. For general notes on the accessibility of content see <https://www.fulcrum.org/accessibility/#content>. If you need a content-specific VPAT prior to its availability please e-mail [fulcrum-info@umich.edu](mailto:fulcrum-info@umich.edu).

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](#).

This report supersedes the Fulcrum Accessibility Conformance Report VPAT 2.3 released in March 2020.

## 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, Sections 10.1-10.4 of Chapter 10 - Non-Web documents, and Sections 11.1-11.4 and 11.8.2 of Chapter 11 - Non-Web Software (open and closed functionality), and Sections 12.1.2 and 12.2.4 of Chapter 12 – Documentation
- 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><u>1.1.1 Non-text Content</u></b> (Level A)</p> <p>Also applies to:<br/>           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>Supports</p>   | <p>Form fields and buttons include labels. Images have capability for alt-text. Videos have capability for captions, transcripts, and audio descriptions. Audio files have capability for transcripts.</p> |

| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
| <p><b><u>1.2.1 Audio-only and Video-only (Prerecorded)</u></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> | Supports          | The video player supports captions and transcripts. The audio player supports transcripts. |
| <p><b><u>1.2.2 Captions (Prerecorded)</u></b> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.1.2.2 (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>   | Supports          | The video player supports captions and transcripts.  |



| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
| <p><b><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u></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> | Supports           | The video player supports captions, transcripts, and audio descriptions. The audio player supports transcripts.  |
| <p><b><u>1.3.1 Info and Relationships</u></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>                               | Partially Supports | <p>Most of the information, structure, and relationships can be programmatically determined.</p> <p>Exceptions:</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>In the Fulcrum E-Reader when</p> |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--------------------|---|
|   |                    | <p>reading a book chapter, zoom and video player controls for each of the embedded pieces of media in the current chapter show up as buttons, which could potentially make it difficult to navigate quickly through the book and get to the menu buttons.</p> <p>In the Fulcrum E-Reader, depending on how the book content is encoded and if it has embedded media, the heading structure can cause confusion with multiple top-level headings and media players listed as headings.</p> |
| <p><b><u>1.3.2 Meaningful Sequence</u></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> | Partially Supports | See comments for <a href="#">1.3.1</a> .  |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--------------------|---|
| <p><b><u>1.3.3 Sensory Characteristics</u></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> | Partially Supports | <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>  |
| <p><b><u>1.4.1 Use of Color</u></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>                | Partially Supports | <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  |
|---|--------------------|---|
| <p><b><u>1.4.2 Audio Control</u></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> | Supports           | 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><b><u>2.1.1 Keyboard</u></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>  | Partially Supports | <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> |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <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>  | Supports          | Fulcrum supports standard keyboard navigation. Keyboard users cannot be trapped in a subset of content. |
| <p><a href="#">2.2.1 Timing Adjustable</a> (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> | Not Applicable.   | There are no time limits set on content.  |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><b><u>2.2.2 Pause, Stop, Hide</u></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>                | Not Applicable    | There is no moving, blinking, scrolling, or auto-updating information. |
| <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> | Not Applicable    | There are no flashing elements.  |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <p><a href="#">2.4.1 Bypass Blocks</a> (Level A)</p> <p>Also applies to:</p> <p>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> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul> | <p>Supports</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   |
|---|-------------------|--|
| <p><b><u>2.4.2 Page Titled</u></b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.2 (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> | Supports          | Web pages have descriptive titles that indicate the content of each page.                  |
| <p><b><u>2.4.3 Focus Order</u></b> (Level A)</p> <p>Also applies to:<br/>EN 301 549 Criteria</p> <ul style="list-style-type: none"> <li>• 9.2.4.3 (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>                                   | Supports          | Pages use a logical tab order that preserves meaning and operability with some exceptions. |



| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <p><b><u>2.4.4 Link Purpose (In Context)</u></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> | Supports          | Fulcrum supports functionality for descriptive label attributes for links.                            |
| <p><b><u>3.1.1 Language of Page</u></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>          | Supports          | Fulcrum uses the language attribute on the HTML element to specify the default language of each page. |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><b><u>3.2.1 On Focus</u></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> | Supports          | When any component receives focus, it does not initiate a change of context. |
| <p><b><u>3.2.2 On Input</u></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> | Supports          | Changing the setting of a component does not initiate a change of context.   |

| Criteria   | Conformance Level | Remarks and Explanations                               |
|--|-------------------|--|
| <p><b><u>3.3.1 Error Identification</u></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> | Not Applicable    | There are no opportunities for input errors.           |
| <p><b><u>3.3.2 Labels or Instructions</u></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>   | Supports          | Labels are provided for elements requiring user input. |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--------------------|---|
| <p><b><u>4.1.1 Parsing</u></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>         | Supports           | Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.  |
| <p><b><u>4.1.2 Name, Role, Value</u></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> | 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 <a href="#">1.3.3</a> for exceptions. |



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

| Criteria  | Conformance Level     | Remarks and Explanations                                      |
|---|-----------------------|---|
| <p><a href="#"><u>1.2.4 Captions (Live)</u></a> (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>Not Applicable</p> | <p>Fulcrum does not include live video and audio content.</p> |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><b><u>1.2.5 Audio Description (Prerecorded)</u></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> | Supports          | The video player supports audio description.   |
| <p><b><u>1.4.3 Contrast (Minimum)</u></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>              | Supports          | The visual presentation of text and images of text provides sufficient color contrast. |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><b><u>1.4.4 Resize text</u></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>                     | Supports          | <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><b><u>1.4.5 Images of Text</u></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> | Supports          | <p>The Fulcrum platform does not use images of text, with the exception of logos that are properly indicated as such to assistive technology.</p>  |



| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
| <p><a href="#"><u>2.4.5 Multiple Ways</u></a> (Level AA)</p> <p>Also applies to:</p> <p>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> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul> | <p>Supports</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><b><u>2.4.6 Headings and Labels</u></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> | Partially Supports | <p>Fulcrum provides capabilities for defining descriptive headings and labels.</p> <p>See exceptions to labels at <a href="#">1.3.3</a>.</p> |
| <p><b><u>2.4.7 Focus Visible</u></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>           | Supports           | Visual changes are applied to elements to indicate the current position of focus.  |

| Criteria   | Conformance Level  | Remarks and Explanations  |
|--|--------------------|---|
| <p><b><u>3.1.2 Language of Parts</u></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> | Partially Supports | Fulcrum supports tagging of language attributes for all elements except for some metadata fields. |
| <p><b><u>3.2.3 Consistent Navigation</u></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>  | Supports           | Navigation mechanisms are consistent across pages.  |

| 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> | Supports          | The Fulcrum platform provides consistent identification across pages for components that have the same functionality. |

| 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>3.3.3 Error Suggestion</u></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> | Not Applicable    | There are no opportunities for input errors. |

| Criteria  | Conformance Level | Remarks and Explanations   |
|---|-------------------|--|
| <p><a href="#"><u>3.3.4 Error Prevention (Legal, Financial, Data)</u></a> (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> | Not Applicable    | There are no web pages that involve legal commitments or financial transactions, modify or delete user-controllable data, or submit user test responses. |

**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>              | Supports          | Video player supports sign language translation in a separate video player synchronized with the main player. |
| <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> | Does Not Support  | Extended audio description is not supported.  |
| <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>          | Supports          | Video player supports text-based audio description and transcript.  |
| <p><b><u>1.2.9 Audio-only (Live)</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>                         | Not Applicable    | There is no live audio content.   |

| Criteria   | Conformance Level   | Remarks and Explanations  |
|--|---|---|
| <p><b><u>1.4.6 Contrast Enhanced</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>   | Partially Supports  | <p>Main text content of platform and 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.</p>  |
| <p><b><u>1.4.7 Low or No Background Audio</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>  | Not Applicable  | This is an issue related to content not the platform itself.  |
| <p><b><u>1.4.8 Visual Presentation</u></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> </ol> <p>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> | <ol style="list-style-type: none"> <li>1. Does not support</li> <li>2. Does not support</li> <li>3. Partially Supports</li> <li>4. Does not support</li> <li>5. 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.</li> <li>3. Text is not justified in the web pages but is justified in the Fulcrum E-Reader.</li> <li>4. Line spacing is under 1.5 and paragraph spacing is equal to the line spacing.</li> <li>5. 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</li> </ol> |



| Criteria   | Conformance Level         | Remarks and Explanations   |
|--|---------------------------|--|
| <p>Also applies to:<br/>EN 301 549 Criteria – Does not apply<br/>Revised Section 508 – Does not apply</p>  |                           | <p>text on a full-screen window.</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>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.</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>Partially Supports</p> | <p>See <a href="#">2.1.1</a> for exceptions.</p>   |
| <p><b><u>2.2.3 No Timing</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>Supports</p>           | <p>Webpages and features do not require timing, except for non-interactive video and audio.</p>  |
| <p><b><u>2.2.4 Interruptions</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>Not Applicable</p>     | <p>There are no interruptions.</p>   |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--------------------|---|
| <p><b><u>2.2.5 Re-authenticating</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>        | Supports           | Authentication sessions do not expire.  |
| <p><b><u>2.3.2 Three Flashes</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>            | Not Applicable     | There are no flashing elements.   |
| <p><b><u>2.4.8 Location</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>                 | Supports           | 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. |
| <p><b><u>2.4.9 Link Purpose (Link Only)</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> | Partially Supports | <p>Fulcrum supports functionality for descriptive label attributes for links.</p> <p>Exceptions:<br/> The “more” link in the monograph catalog pages.</p>   |

| Criteria   | Conformance Level | Remarks and Explanations   |
|--|-------------------|--|
| <p><b><u>2.4.10 Section Headings</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> | Supports          | 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><b><u>3.1.3 Unusual Words</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>     | Not Applicable    | This is an issue related to content not the platform itself.   |
| <p><b><u>3.1.4 Abbreviations</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>     | Not Applicable    | This is an issue related to content not the platform itself.   |
| <p><b><u>3.1.5 Reading Level</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>     | Not Applicable    | This is an issue related to content not the platform itself.   |
| <p><b><u>3.1.6 Pronunciation</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>     | Not Applicable    | This is an issue related to content not the platform itself.   |

| Criteria  | Conformance Level | Remarks and Explanations  |
|---|-------------------|---|
| <p><b><u>3.2.5 Change on Request</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>      | Supports          | Changes of context are initiated only by user request.  |
| <p><b><u>3.3.5 Help</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>                   | Supports          | Search boxes include suggestions (“Search works”, “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><b><u>3.3.6 Error Prevention (All)</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> | Supports          | 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              | Partially Supports | <p>Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies.</p> <p>See exceptions to labels (<a href="#">WCAG 1.3.3</a>).</p>  |
| 302.2 With Limited Vision         | Supports           | <p>Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast.</p>   |
| 302.3 Without Perception of Color | Partially Supports | <p>Color is only used as a decorative or supplemental attribute of user interface elements.</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</p> |

| Criteria                        | Conformance Level  | Remarks and Explanations   |
|---------------------------------|--------------------|--|
|                                 |                    | through highlighting of the matched text.  |
| 302.4 Without Hearing           | Supports           | The video player supports captions and transcripts. The audio player supports transcripts.   |
| 302.5 With Limited Hearing      | Supports           | The video player supports captions and transcripts. The audio player supports transcripts.   |
| 302.6 Without Speech            | Not Applicable     | Fulcrum does not require speech input.   |
| 302.7 With Limited Manipulation | Partially Supports | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.</p> <p>Usage of the product does not require fine motor controls nor simultaneous actions.</p> |

| Criteria   | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
| 302.8 With Limited Reach and Strength                          | Partially Supports | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.</p> <p>Usage of the product does not require fine motor controls nor simultaneous actions.</p> |
| 302.9 With Limited Language, Cognitive, and Learning Abilities | Supports           | <p>Fulcrum uses a logical focus order. The video and audio players allow for speed adjustment. The interface is consistent, intuitive, and simple to navigate.</p>                     |

## 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  | Supports                             | Platform allows user control of accessibility features, including text zoom in the reader and adjustments to captions in the video player. |
| 502.2.2 No Disruption of Accessibility Features | Supports                             | Fulcrum is compatible with operating system and browser accessibility features configured by the user.                                     |
| 502.3 Accessibility Services                    | Heading cell – no response required  | Heading cell – no response required  |



| Criteria                                   | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
| 502.3.1 Object Information                 | Partially Supports | <p>Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies.</p> <p>See <a href="#">WCAG 1.3.3</a> for exceptions.</p> |
| 502.3.2 Modification of Object Information | Supports           | All user-set states and properties are capable of being set programmatically, including through assistive technologies.  |
| 502.3.3 Row, Column, and Headers           | Not Applicable     | Fulcrum does not use tables.   |
| 502.3.4 Values                             | Supports           | Fulcrum uses standard HTML or and ARIA object attributes.  |
| 502.3.5 Modification of Values             | Supports           | All user-set input is capable of being set programmatically, including through assistive technologies.   |

| Criteria                           | Conformance Level | Remarks and Explanations  |
|------------------------------------|-------------------|---|
| 502.3.6 Label Relationships        | 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>” element and “aria-labelledby” or “aria-label” attributes. |
| 502.3.7 Hierarchical Relationships | Supports          | Fulcrum uses standard HTML markup to express hierarchical relationships.  |
| 502.3.8 Text                       | Supports          | Fulcrum renders strings as plain text values in HTML.   |
| 502.3.9 Modification of Text       | Supports          | All user-set input is capable of being set programmatically, including through assistive technologies.  |
| 502.3.10 List of Actions           | Supports          | Fulcrum uses standard HTML or and ARIA object attributes for actions such as search and filter.   |

| Criteria   | Conformance Level                                 | Remarks and Explanations   |
|--|---|--|
| 502.3.11 Actions on Objects  | Partially Supports                                | Fulcrum allows assistive technology to programmatically execute available actions on objects with the exception of interactive stats charts.                                     |
| 502.3.12 Focus Cursor  | Supports  | Fulcrum uses visual changes to elements to indicate the current position of focus.   |
| 502.3.13 Modification of Focus Cursor  | Partially Supports                                | <p>Cursor focus is modifiable through keyboard controls.</p> <p>See <a href="#">WCAG 2.1.1</a> for exceptions.</p>   |
| 502.3.14 Event Notification  | Supports  | 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. |
| <p>502.4 Platform Accessibility Features</p> <p>A. Section 9.3.3 Enable sequential entry of multiple (chorded)</p> | <p>A. Not Applicable</p> <p>B. Not Applicable</p> | <p>A. Simultaneous keystrokes not required.</p> <p>B. Not applicable.</p> <p>C. Not applicable.</p> <p>D. Audio player supports transcripts. Video player</p>                    |

| Criteria  | Conformance Level  | Remarks and Explanations  |
|---|--|---|
| <p>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>C. Not Applicable</p> <p>D. Supports</p> <p>E. Supports</p> <p>F. Supports</p> <p>G. Supports</p> | <p>supports captions and transcripts.</p> <p>E. Video player supports captions.</p> <p>F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers.</p> <p>G. Video player supports captions and allows user to toggle caption display on or off.</p> |
| 503 Applications  | Heading cell – no response required  | Heading cell – no response required   |
| 503.2 User Preferences  | 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   |

| Criteria   | Conformance Level                   | Remarks and Explanations   |
|--|-------------------------------------|--|
|  |                                     | <p>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.</p> |
| 503.3 Alternative User Interfaces                      | Not Applicable                      | <p>Fulcrum does not provide any alternative user interfaces that function as assistive technology.</p>   |
| 503.4 User Controls for Captions and Audio Description | Heading cell – no response required | <p>Heading cell – no response required</p>   |
| 503.4.1 Caption Controls                               | Supports                            | <p>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.</p>  |
| 503.4.2 Audio Description Controls                     | Partially Supports                  | <p>Video player supports user control of audio descriptions at the same menu level as caption settings, keyboard settings, and transcript</p>  |

| Criteria  | Conformance Level                   | Remarks and Explanations                  |
|---|-------------------------------------|---|
|   |                                     | but not at the same menu level as volume. |
| 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”)   | Not Applicable                      | Fulcrum is not an authoring tool.         |
| 504.2.1 Preservation of Information Provided for Accessibility in Format Conversion | Not Applicable                      |   |
| 504.2.2 PDF Export  | Not Applicable                      |   |
| 504.3 Prompts   | Not Applicable                      |   |
| 504.4 Templates   | 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    |                                      |  |

| <b>Criteria</b>                            | <b>Conformance Level</b> | <b>Remarks and Explanations</b>              |
|--|--------------------------|--|
| 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               | Partially Supports | <p>Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies.</p> <p>See exceptions to labels (<a href="#">WCAG 1.3.3</a>).</p>   |
| 4.2.2 Usage with limited vision          | Supports           | <p>Fulcrum supports standard browser magnification and magnification extensions and standard operating system contrast adjustments and provides sufficient color contrast.</p>   |
| 4.2.3 Usage without perception of colour | Partially Supports | <p>Color is only used as a decorative or supplemental attribute of user interface elements.</p> <p>Exceptions:<br/>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</p> |

| Criteria  | Conformance Level  | Remarks and Explanations   |
|---|--------------------|--|
|   |                    | through highlighting of the matched text.  |
| 4.2.4 Usage without hearing                       | Supports           | The video player supports captions and transcripts. The audio player supports transcripts.   |
| 4.2.5 Usage with limited hearing                  | Supports           | The video player supports captions and transcripts. The audio player supports transcripts.   |
| 4.2.6 Usage without vocal capability              | Not Applicable     | Fulcrum does not require speech input  |
| 4.2.7 Usage with limited manipulation or strength | Partially Supports | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> for exceptions.</p> <p>Usage of the product does not require fine motor controls nor simultaneous actions.</p> |

| Criteria                                       | Conformance Level  | Remarks and Explanations   |
|--|--------------------|--|
| 4.2.8 Usage with limited reach                 | Partially Supports | <p>Fulcrum supports keyboard navigation. See <a href="#">WCAG 2.1.1</a> 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 | Supports           | Fulcrum does not include visual features with flashing that could trigger seizures   |
| 4.2.10 Usage with limited cognition            | Supports           | Fulcrum uses a logical focus order. The video and audio players allow for speed adjustment. The interface is consistent, intuitive, and simple to navigate.                            |
| 4.2.11 Privacy                                 | 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         | Supports                            | Video player supports captions.   |
| 7.1.2 Captioning synchronization  | Supports                            | Video player synchronizes captions with audio/visual content.                                       |
| 7.1.3 Preservation of captioning  | 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                     | Supports          | Video player supports audio descriptions.   |
| 7.2.2 Audio description synchronization              | Supports          | Video player synchronizes audio description with audio/visual content.  |
| 7.2.3 Preservation of audio description              | Supports          | Video player supports audio description tracks.   |
| 7.3 User controls for captions and audio description | 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 and audio description toggle are at the same menu level as primary media controls. |

## **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**

Notes: Fulcrum does not include non-web documents and is therefore not subject to the requirements of this section.

## 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 |

| Criteria   | Conformance Level              | Remarks and Explanations  |
|--|--------------------------------|---|
| 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                                     | Supports                       | 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  | Partially Supports             | Fulcrum uses labels to describe the role, state, and description of user interface elements to Assistive Technologies. See <a href="#">WCAG 1.3.3</a> . |
| 11.5.2.6 Row, column, and headers  | Supports                       | Tables used in Fulcrum support pages properly identify headers for column and rows.   |
| 11.5.2.7 Values  | Supports                       | Fulcrum uses standard HTML or and ARIA object attributes.   |



| Criteria                                 | Conformance Level  | Remarks and Explanations  |
|--|--------------------|---|
| 11.5.2.8 Label relationships             | 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>” element and “aria-labelledby” or “aria-label” attributes. |
| 11.5.2.9 Parent-child relationships      | Supports           | Fulcrum uses standard HTML markup to express hierarchical relationships.  |
| 11.5.2.10 Text                           | Supports           | Fulcrum renders strings as plain text values in HTML.   |
| 11.5.2.11 List of available actions      | Supports           | Fulcrum uses standard HTML or and ARIA object attributes for actions such as search and filter.   |
| 11.5.2.12 Execution of available actions | 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  |
|--|--------------------|---|
| 11.5.2.13 Tracking of focus and selection attributes     | Supports           | 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 | Partially Supports | <p>Fulcrum allows keyboards and assistive technologies to programmatically modify focus, text insertion point, and selection attributes of user interface elements.</p> <p>See <a href="#">WCAG 2.1.1</a> for exceptions.</p> |
| 11.5.2.15 Change notification                            | Supports           | 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         | Supports           | All user-set states and properties are capable of being set programmatically, including through assistive technologies.   |

| Criteria                                       | Conformance Level                   | Remarks and Explanations   |
|--|-------------------------------------|--|
| 11.5.2.17 Modifications of values and text     | Supports                            | 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  | Supports                            | Platform allows user control of accessibility features, including text zoom in the reader and adjustments to captions in the video player.   |
| 11.6.2 No disruption of accessibility features | Supports                            | Fulcrum is compatible with operating system and browser accessibility features configured by the user.   |
| 11.7 User preferences                          | 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- |

| Criteria             | Conformance Level                   | Remarks and Explanations   |
|----------------------|-------------------------------------|--|
|                      |                                     | Reader. The Fulcrum E-Reader allows users to change the font size but not the font type. |
| 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.