

Fulcrum Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.4)

Name of Product/Version: Fulcrum v3.91

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

Report Date: January 2023

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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.

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 2.4 released in June 2021.

Applicable Standards/Guidelines

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

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

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

Yes

Jump to EN 301 549 Report

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
Also applies to: EN 301 549 Criteria 9.1.1.1 (Web) 10.1.1.1 (Non-web document) 11.1.1.1.1 (Open Functionality Software) 11.1.1.1.2 (Closed Functionality Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	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.

Criteria	Conformance Level	Remarks and Explanations
1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria 9.1.2.1 (Web) 10.1.2.1 (Non-web document) 11.1.2.1.1 (Open Functionality Software) 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The video player supports captions, audio description, and transcripts. The audio player supports transcripts.
1.2.2 Captions (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria 9.1.2.2 (Web) 10.1.2.2 (Non-web document) 11.1.2.2 (Open Functionality Software) 11.1.2.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The video player supports captions, audio descripiton, and transcripts.

Criteria	Conformance Level	Remarks and Explanations
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: EN 301 549 Criteria 9.1.2.3 (Web) 10.1.2.3 (Non-web document) 11.1.2.3.1 (Open Functionality Software) 11.1.2.3.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The video player supports captions, transcripts, and audio descriptions. The audio player supports transcripts.
1.3.1 Info and Relationships (Level A) Also applies to: EN 301 549 Criteria 9.1.3.1 (Web) 10.1.3.1 (Non-web document) 11.1.3.1.1 (Open Functionality Software) 11.1.3.1.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	Most of the information, structure, and relationships can be programmatically determined. Exceptions: On monograph catalog pages, the description 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. In the Fulcrum E-Reader when

Criteria	Conformance Level	Remarks and Explanations
		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.
		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.
1.3.2 Meaningful Sequence (Level A) Also applies to: EN 301 549 Criteria 9.1.3.2 (Web) 10.1.3.2 (Non-web document) 11.1.3.2.1 (Open Functionality Software) 11.1.3.2.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	See comments for 1.3.1.

Criteria	Conformance Level	Remarks and Explanations
1.3.3 Sensory Characteristics (Level A) Also applies to: EN 301 549 Criteria	Partially Supports	Most controls provide text labels not solely sensory characteristics. See exceptions above for 1.3.1 (links in the Fulcrum E-Reader).
1.4.1 Use of Color (Level A) Also applies to: EN 301 549 Criteria 9.1.4.1 (Web) 10.1.4.1 (Non-web document) 11.1.4.1 (Open Functionality Software) 11.4.1 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	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. Exceptions: 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.

Criteria	Conformance Level	Remarks and Explanations
1.4.2 Audio Control (Level A) Also applies to: EN 301 549 Criteria 9.1.4.2 (Web) 10.1.4.2 (Non-web document) 11.1.4.2 (Open Functionality Software) 11.4.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	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.
2.1.1 Keyboard (Level A) Also applies to: EN 301 549 Criteria 9.2.1.1 (Web) 10.2.1.1 (Non-web document) 11.2.1.1.1 (Open Functionality Software) 11.2.1.1.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	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).

Criteria	Conformance Level	Remarks and Explanations
2.1.2 No Keyboard Trap (Level A) Also applies to: EN 301 549 Criteria • 9.2.1.2 (Web) • 10.2.1.2 (Non-web document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Fulcrum supports standard keyboard navigation. Keyboard users cannot be trapped in a subset of content.
2.2.1 Timing Adjustable (Level A) Also applies to: EN 301 549 Criteria 9.2.2.1 (Web) 10.2.2.1 (Non-web document) 11.2.2.1 (Open Functionality Software) 11.2.2.1 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable.	There are no time limits set on content.

Criteria	Conformance Level	Remarks and Explanations
2.2.2 Pause, Stop, Hide (Level A) Also applies to: EN 301 549 Criteria 9.2.2.2 (Web) 10.2.2.2 (Non-web document) 11.2.2.2 (Open Functionality Software) 11.2.2.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	There is no moving, blinking, scrolling, or auto-updating information.
2.3.1 Three Flashes or Below Threshold (Level A) Also applies to: EN 301 549 Criteria 9.2.3.1 (Web) 10.2.3.1 (Non-web document) 11.2.3.1 (Open Functionality Software) 11.2.3.1(Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	There are no flashing elements.

Criteria	Conformance Level	Remarks and Explanations
2.4.1 Bypass Blocks (Level A) Also applies to: EN 301 549 Criteria 9.2.4.1 (Web) 10.2.4.1 (Non-web document) – Does not apply 11.2.4.1 (Open Functionality Software) Does not apply 11.2.4.1 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) – Does not apply to nonweb software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Supports	A hidden link (available to screen readers) allows users to skip to the main content of each page.

Criteria	Conformance Level	Remarks and Explanations
2.4.2 Page Titled (Level A) Also applies to: EN 301 549 Criteria 9.2.4.2 (Web) 10.2.4.2 (Non-web document) 11.2.4.2 (Open Functionality Software) Does not apply 11.2.4.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Web pages have descriptive titles that indicate the content of each page.
2.4.3 Focus Order (Level A) Also applies to: EN 301 549 Criteria 9.2.4.3 (Web) 10.2.4.3 (Non-web document) 11.2.4.3 (Open Functionality Software) 11.2.4.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Pages use a logical tab order that preserves meaning and operability with some exceptions.

Criteria	Conformance Level	Remarks and Explanations
2.4.4 Link Purpose (In Context) (Level A) Also applies to: EN 301 549 Criteria 9.2.4.4 (Web) 10.2.4.4 (Non-web document) 11.2.4.4 (Open Functionality Software) 11.2.4.4 (Closed Software 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Fulcrum supports functionality for descriptive label attributes for links.
3.1.1 Language of Page (Level A) Also applies to: EN 301 549 Criteria • 9.3.1.1 (Web) • 10.3.1.1 (Non-web document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	Fulcrum uses the language attribute on the HTML element to specify the default language of each page.

Criteria	Conformance Level	Remarks and Explanations
3.2.1 On Focus (Level A) Also applies to: EN 301 549 Criteria 9.3.2.1 (Web) 10.3.2.1 (Non-web document) 11.3.2.1 (Open Functionality Software) 11.3.2.1 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	When any component receives focus, it does not initiate a change of context.
3.2.2 On Input (Level A) Also applies to: EN 301 549 Criteria 9.3.2.2 (Web) 10.3.2.2 (Non-web document) 11.3.2.2 (Open Functionality Software) 11.3.2.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Changing the setting of a component does not initiate a change of context.

Criteria	Conformance Level	Remarks and Explanations
3.3.1 Error Identification (Level A) Also applies to: EN 301 549 Criteria 9.3.3.1 (Web) 10.3.3.1 (Non-web document) 11.3.3.1.1 (Open Functionality Software) 11.3.3.1.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	There are no opportunities for input errors.
3.3.2 Labels or Instructions (Level A) Also applies to: EN 301 549 Criteria 9.3.3.2 (Web) 10.3.3.2 (Non-web document) 11.3.3.2 (Open Functionality Software) 11.3.3.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Labels are provided for elements requiring user input.

Criteria	Conformance Level	Remarks and Explanations
4.1.1 Parsing (Level A) Also applies to: EN 301 549 Criteria 9.4.1.1 (Web) 10.4.1.1 (Non-web document) 11.4.1.1.1 (Open Functionality Software) 11.4.1.1.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.
4.1.2 Name, Role, Value (Level A) Also applies to: EN 301 549 Criteria 9.4.1.2 (Web) 10.4.1.2 (Non-web document) 11.4.1.2.1 (Open Functionality Software) 11.4.1.2.2 (Closed Software) – Not required 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	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 1.3.3 for exceptions.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA) Also applies to: EN 301 549 Criteria 9.1.2.4 (Web) 10.1.2.4 (Non-web document) 11.1.2.4 (Open Functionality Software) 11.1.2.4 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	Fulcrum does not include live video and audio content.

Criteria	Conformance Level	Remarks and Explanations
1.2.5 Audio Description (Prerecorded) (Level AA) Also applies to: EN 301 549 Criteria 9.1.2.5 (Web) 10.1.2.5 (Non-web document) 11.1.2.5 (Open Functionality Software) 11.1.2.5 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The video player supports audio description.
1.4.3 Contrast (Minimum) (Level AA) Also applies to: EN 301 549 Criteria 9.1.4.3 (Web) 10.1.4.3 (Non-web document) 11.1.4.3 (Open Functionality Software) 11.1.4.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The visual presentation of text and images of text provides sufficient color contrast.

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA) Also applies to: EN 301 549 Criteria 9.1.4.4 (Web) 10.1.4.4 (Non-web document) 11.1.4.4.1 (Open Functionality Software) 11.1.4.4.2 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Fulcrum supports standard zoom capabilities built into modern web browsers and operating systems. The Fulcrum E-Reader has a built-in zoom feature allowing text to be resized up to 400%.
1.4.5 Images of Text (Level AA) Also applies to: EN 301 549 Criteria 9.1.4.5 (Web) 10.1.4.5 (Non-web document) 11.1.4.5.1 (Open Functionality Software) 11.1.4.5.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	The Fulcrum platform does not use images of text, with the exception of logos that are properly indicated as such to assistive technology.

Criteria	Conformance Level	Remarks and Explanations
2.4.5 Multiple Ways (Level AA) Also applies to: EN 301 549 Criteria 9.2.4.5 (Web) 10.2.4.5 (Non-web document) – Does not apply 11.2.4.5 (Open Functionality Software) – Does not apply 11.2.4.5 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs	Supports	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.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA) Also applies to: EN 301 549 Criteria 9.2.4.6 (Web) 10.2.4.6 (Non-web document) 11.2.4.6 (Open Functionality Software) 11.2.4.6 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	Fulcrum provides capabilities for defining descriptive headings and labels. See exceptions to labels at 1.3.3.
2.4.7 Focus Visible (Level AA) Also applies to: EN 301 549 Criteria 9.2.4.7 (Web) 10.2.4.7 (Non-web document) 11.2.4.7 (Open Functionality Software) 11.2.4.7 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Supports	Visual changes are applied to elements to indicate the current position of focus.

Criteria	Conformance Level	Remarks and Explanations
3.1.2 Language of Parts (Level AA) Also applies to: EN 301 549 Criteria 9.3.1.2 (Web) 10.3.1.2 (Non-web document) 11.3.1.2 (Open Functionality Software) Does not apply 11.3.1.2 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Partially Supports	Fulcrum supports tagging of language attributes for all elements except for some metadata fields.
3.2.3 Consistent Navigation (Level AA) Also applies to: EN 301 549 Criteria • 9.3.2.3 (Web) • 10.3.2.3 (Non-web document) – Does not apply • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) Revised Section 508	Supports	Navigation mechanisms are consistent across pages.

Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) – Does not apply to non- web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 		
3.2.4 Consistent Identification (Level AA) Also applies to: EN 301 549 Criteria 9.3.2.4 (Web) 10.3.2.4 (Non-web document) – Does not apply 11.3.2.4 (Open Functionality Software) – Does not apply 11.3.2.4 (Closed Software) – Does not apply 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508	Supports	The Fulcrum platform provides consistent identification across pages for components that have the same functionality.

Criteria	Conformance Level	Remarks and Explanations
 501 (Web)(Software) – Does not apply to non- web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non- web docs 		
3.3.3 Error Suggestion (Level AA) Also applies to: EN 301 549 Criteria 9.3.3.3 (Web) 10.3.3.3 (Non-web document) 11.3.3.3 (Open Functionality Software) 11.3.3.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Not Applicable	There are no opportunities for input errors.

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: EN 301 549 Criteria 9.3.3.4 (Web) 10.3.3.4 (Non-web document) 11.3.3.4 (Open Functionality Software) 11.3.3.4 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 504.2 (Authoring Tool) 602.3 (Support Docs)	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
1.2.6 Sign Language (Prerecorded) (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Video player supports sign language translation in a separate video player synchronized with the main player.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Does Not Support	Extended audio description is not supported.
Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply		
1.2.8 Media Alternative (Prerecorded) (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Video player supports text-based audio description and transcript.
1.2.9 Audio-only (Live) (Level AAA)	Not Applicable	There is no live audio content.
Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply		

Criteria	Conformance Level	Remarks and Explanations
1.4.6 Contrast Enhanced (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Partially Supports	Main text content of platform and publications meets enhanced contrast ratio (black on white). Text in some of the headings, labels, buttons and indicators does not meet enhanced contrast ratio.
1.4.7 Low or No Background Audio (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	This is an issue related to content not the platform itself.
 1.4.8 Visual Presentation (Level AAA) Foreground and background colors can be selected by the user. Width is no more than 80 characters or glyphs (40 if CJK). Text is not justified (aligned to both the left and the right margins). 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. 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. 	 Does not support Does not support Supports Does not support Supports 	 Foreground and background colors cannot be selected by the user, except through operating system or browser settings. Some paragraphs of text exceed 80 characters in width. Text is not justified in the web pages. Line spacing is under 1.5 and paragraph spacing is equal to the line spacing. 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

Criteria	Conformance Level	Remarks and Explanations
Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply		text on a full-screen window.
1.4.9 Images of Text (No Exception) Control (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	The Fulcrum platform does not use images of text, with the exception of logos which are properly identified as logos to assistive technology.
2.1.3 Keyboard (No Exception) (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Fulcrum supports 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).
2.2.3 No Timing (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Webpages and features do not require timing, except for non-interactive video and audio.
2.2.4 Interruptions (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	There are no interruptions.

Criteria	Conformance Level	Remarks and Explanations
2.2.5 Re-authenticating (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Authentication sessions do not expire.
2.3.2 Three Flashes (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	There are no flashing elements.
2.4.8 Location (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	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.
2.4.9 Link Purpose (Link Only) (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Fulcrum supports functionality for descriptive label attributes for links.

Criteria	Conformance Level	Remarks and Explanations
2.4.10 Section Headings (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	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.
3.1.3 Unusual Words (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	This is an issue related to content not the platform itself.
3.1.4 Abbreviations (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	This is an issue related to content not the platform itself.
3.1.5 Reading Level (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	This is an issue related to content not the platform itself.
3.1.6 Pronunciation (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Not Applicable	This is an issue related to content not the platform itself.

Criteria	Conformance Level	Remarks and Explanations
3.2.5 Change on Request (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Changes of context are initiated only by user request.
3.3.5 Help (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	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.
3.3.6 Error Prevention (All) (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Submissions of text input are reversible.

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Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	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 exceptions to labels (WCAG 1.3.3).
302.2 With Limited Vision	Supports	Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast.
302.3 Without Perception of Color	Partially Supports	Color is only used as a decorative or supplemental attribute of user interface elements.
		Exceptions:
		In the Fulcrum E-Reader, when searching inside a book and following a search result to it occurrence in the text, the matched result is only indicated

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	Supports	Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.
302.8 With Limited Reach and Strength	Supports	Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities	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.

Chapter 4: Hardware

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

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.0 section	See information in WCAG section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	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	Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies. See WCAG 1.3.3 for exceptions.
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.</label>
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	Supports	Fulcrum allows assistive technology to programmatically execute available actions.	
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	Supports	Cursor focus is modifiable through keyboard controls.	
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.	
502.4 Platform Accessibility Features	A. Not Applicabl e B. Not	A. Simultaneous keystrokes not required. B. Not applicable. C. Not applicable.	
A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes; B. Section 9.3.4 Provide adjustment of delay before key	Applicabl e C. Not Applicabl e	D. Audio player supports transcripts. Video player supports captions and transcripts. E. Video player supports	
acceptance;	D. Supports E. Supports	captions.	

Criteria	Conformance Level	Remarks and Explanations
C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance; D. Section 10.6.7 Allow users to	F. Supports G. Supports	 F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers. G. Video player supports
choose visual alternative for audio output;		captions and allows user to toggle caption display on or off.
E. Section 10.6.8 Synchronize audio equivalents for visual events;		
F. Section 10.6.9 Provide speech output services; and		
G. Section 10.7.1 Display any captions provided.		
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 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-

Criteria	Conformance Level	Remarks and Explanations
		Reader allows users to change the font size but not the font type.
503.3 Alternative User Interfaces	Not Applicable	Fulcrum does not provide any alternative user interfaces that function as assistive technology.
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	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	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.

Criteria	Conformance Level	Remarks and Explanations
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 Fulcrum Accessibility Page.
602.3 Electronic Support Documentation	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non- Electronic Support Documentation	Not Applicable	Support documentation is provided in electronic format.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features		

Criteria	Conformance Level	Remarks and Explanations
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	Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See exceptions to labels (WCAG
		<u>1.3.3</u>).
4.2.2 Usage with limited vision	Supports	Fulcrum supports standard browser magnification and magnification extensions and standard operating system contrast adjustments and provides sufficient color contrast.
4.2.3 Usage without perception of colour	Partially Supports	Color is only used as a decorative or supplemental attribute of user interface elements. Exceptions: In the Fulcrum E-Reader, when searching inside a book and following a search result to it occurrence in the text, the matched result is only indicated

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	Supports	Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.
4.2.8 Usage with limited reach	Supports	Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.

Criteria	Conformance Level	Remarks and Explanations
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.
7.2.1 Audio description playback	Supports	Video player supports audio descriptions.

Criteria	Conformance Level	Remarks and Explanations
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 WCAG 2.0 section	See information in WCAG section
11.5 Interoperability with assistive technology	Heading cell – no response required	Heading cell – no response required
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 WCAG 1.3.3.
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.</label>
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	Supports	Fulcrum allows assistive technology to programmatically execute available actions on objects.

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	Supports	Fulcrum allows keyboards and assistive technologies to programmatically modify focus, text insertion point, and selection attributes of user interface elements.
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.
11.5.2.17 Modifications of values and text	Supports	All user-set input is capable of being set programmatically,

Criteria	Conformance Level	Remarks and Explanations
		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-Reader. The Fulcrum E-Reader

Criteria	Conformance Level	Remarks and Explanations
		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
12.1 Product documentation	Heading cell – no response required	Heading cell – no response required
12.1.1 Accessibility and compatibility features	Supports	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page.
12.1.2 Accessible documentation	See WCAG 2.0 section	See information in WCAG 2.0 section
12.2 Support Services	Heading cell – no response required	Heading cell – no response required
12.2.2 Information on accessibility and compatibility features	Supports	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page.
12.2.3 Effective communication	Supports	Support services are provided via email, but shall additional support be required Fulcrum staff can accommodate accessibility needs to facilitate user support.
12.2.4 Accessible documentation	See WCAG 2.0 section	See information in WCAG 2.0 section

Chapter 13: ICT Providing Relay or Emergency Service Access

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