



Fulcrum Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.5)

Name of Product/Version: Fulcrum v4.22

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

Report Date: June 25, 2025

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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. VPAT®s 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](#)

- [A Mid-Republican House From Gabii](#)
- [The Chemistry of Character in Breaking Bad by Jason Mittell](#)
- [Shipping Out: Race, Performance, and Labor at Sea by Anita Gonzalez](#)
- [Nature's Altars: Mountains, Gender, and American Environmentalism](#)
- [Assault on the Media: The Nixon Years by William E. Porter and Thomas A. Mascaro](#)

This report supersedes the Fulcrum Accessibility Conformance Report VPAT® 2.5 released in May 2024.

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	Level A – Yes Level AA – Yes Level AAA – Yes
Web Content Accessibility Guidelines 2.1 or WCAG 2.1	Level A – Yes Level AA – Yes Level AAA – Yes
Web Content Accessibility Guidelines 2.2 or WCAG 2.2 Jump to WCAG A Report Jump to WCAG AA Report Jump to WCAG AAA Report	Level A – Yes Level AA – Yes Level AAA – Yes
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018 Jump to Revised Section 508 Report	Yes
EN 301 549 Accessibility requirements for ICT products and services – V3.1.1 (2019-11) AND EN 301 549 Accessibility requirements for ICT products and services – V3.2.1 (2021-03)	Yes

Jump to EN 301 549 Report	
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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 Level AAA.

WCAG 2.2 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 2.2 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.2 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.1.1 Non-text Content</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<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> <p>3rd-party IRUS badge icons on monograph catalog pages, individual publication and book resources are missing alt text.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.1 Audio-only and Video-only (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.1 (Web) • 10.1.2.1 (Non-web document) • 11.1.2.1.1 (Open Functionality Software) • 11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The video player supports captions, audio description, and transcripts. The audio player supports transcripts.
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.2 (Web) • 10.1.2.2 (Non-web document) • 11.1.2.2 (Open Functionality Software) • 11.1.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The video player supports captions, audio description, and transcripts.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.3 (Web) • 10.1.2.3 (Non-web document) • 11.1.2.3.1 (Open Functionality Software) • 11.1.2.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>The video player supports captions, transcripts, and audio descriptions. The audio player supports transcripts.</p>
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.1 (Web) • 10.1.3.1 (Non-web document) • 11.1.3.1.1 (Open Functionality Software) • 11.1.3.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>Most of the information, structure, and relationships can be programmatically determined.</p> <p>Exceptions:</p> <p>In the Fulcrum E-Reader when 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>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.2 (Web) • 10.1.3.2 (Non-web document) • 11.1.3.2.1 (Open Functionality Software) • 11.1.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	See exceptions for 1.3.1 .
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.3 (Web) • 10.1.3.3 (Non-web document) • 11.1.3.3 (Open Functionality Software) • 11.1.3.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	<p>Controls provide text labels not solely sensory characteristics.</p> <p>See exceptions above for 1.3.1.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.1 Use of Color</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.1 (Web) • 10.1.4.1 (Non-web document) • 11.1.4.1 (Open Functionality Software) • 11.1.4.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	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>
<p><u>1.4.2 Audio Control</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.2 (Web) • 10.1.4.2 (Non-web document) • 11.1.4.2 (Open Functionality Software) • 11.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>There is no audio that plays automatically. The video player provides capabilities for pausing and adjusting the volume of video content with keyboard control and labels for screen reader access.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.1 Keyboard</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.1 (Web) • 10.2.1.1 (Non-web document) • 11.2.1.1.1 (Open Functionality Software) • 11.2.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Partially Supports</p>	<p>Fulcrum supports standard keyboard navigation and input functions (such as pressing [Tab] to move between input fields, pressing the arrow keys to move between list items, and pressing [Space] or [Enter] to make selections).</p> <p>Exceptions:</p> <p>In the Fulcrum Reader's Contents menu, focus is lost once reaching the end of the Content's list. In Fulcrum's PDF Reader, the focus needs to be a high contrast color. Currently, it is grey.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.2 (Web) • 10.2.1.2 (Non-web document) • 11.2.1.2 (Open Functionality Software) • 11.2.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Fulcrum supports standard keyboard navigation. Keyboard users cannot be trapped in a subset of content.
<p><u>2.1.4 Character Key Shortcuts</u></p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.1.4 (Web) • 10.2.1.4 (Non-web document) • 11.2.1.4.1 (Open Functionality Software) • 11.2.1.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Keyboard shortcuts in audio and video player can be remapped or disabled.

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.3.1 Three Flashes or Below Threshold</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.3.1 (Web) • 10.2.3.1 (Non-web document) • 11.2.3.1 (Open Functionality Software) • 11.2.3.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	There are no flashing elements.
<p><u>2.4.1 Bypass Blocks</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.1 (Web) • 10.2.4.1 (Non-web document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply • 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software 	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
<ul style="list-style-type: none"> • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 		
<p><u>2.4.2 Page Titled</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.2 (Web) • 10.2.4.2 (Non-web document) • 11.2.4.2 (Open Functionality Software) - Does not apply • 11.2.4.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Web pages have descriptive titles that indicate the content of each page.

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.3 Focus Order</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.3 (Web) • 10.2.4.3 (Non-web document) • 11.2.4.3 (Open Functionality Software) • 11.2.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Pages use a logical tab order that preserves meaning and operability with some exceptions.
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Fulcrum supports functionality for descriptive label attributes for links.

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.1 Pointer Gestures</u> (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.1 (Web) • 10.2.5.1 (Non-web document) • 11.2.5.1 (Open Functionality Software) • 11.2.5.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	<p>Fulcrum offers single-point operations for all functions that may also allow multipoint or path-based gestures. For example, zoom tools for images have single-point buttons in addition to pinch for touch screens. The ebook navigation slider in the Fulcrum E-Reader has forward and back buttons in addition to the slider tool.</p>
<p><u>2.5.2 Pointer Cancellation</u> (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.2 (Web) • 10.2.5.2 (Non-web document) • 11.2.5.2 (Open Functionality Software) • 11.2.5.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	<p>Fulcrum does not execute functions on the down-event of the pointer.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.3 Label in Name</u> (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.3 (Web) • 10.2.5.3 (Non-web document) • 11.2.5.3.1 (Open Functionality Software) • 11.2.5.3.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Fulcrum includes an accessible name that matches or includes the visible text label of components.
<p><u>2.5.4 Motion Actuation</u> (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.5.4 (Web) • 10.2.5.4 (Non-web document) • 11.2.5.4 (Open Functionality Software) • 11.2.5.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Not applicable	Fulcrum does not include functionality that can be operated by device or user motion.

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.1 Language of Page</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.1 (Web) • 10.3.1.1 (Non-web document) • 11.3.1.1.1 (Open Functionality Software) • 11.3.1.1.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Fulcrum uses the language attribute on the HTML element to specify the default language of each page.
<p><u>3.2.1 On Focus</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.1 (Web) • 10.3.2.1 (Non-web document) • 11.3.2.1 (Open Functionality Software) • 11.3.2.1 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	When any component receives focus, it does not initiate a change of context.

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.2.2 On Input</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.2 (Web) • 10.3.2.2 (Non-web document) • 11.3.2.2 (Open Functionality Software) • 11.3.2.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Changing the setting of a component does not initiate a change of context.
<p><u>3.2.6 Consistent Help</u> (Level A 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply</p> <p>Revised Section 508 – Does not apply</p>	Supports	Help mechanisms that are repeated on the site are provided as links to help pages and occur in the same order relative to other page content.

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.7 Redundant Entry</u> (Level A 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Search results pages pre-fill the search input with the previously entered search term. Search results pages also provide the previously searched term for the user to select.
<p><u>4.1.1 Parsing</u> (Level A)</p> <p>Also applies to: WCAG 2.0 and 2.1 – Always answer ‘Supports’ WCAG 2.2 (obsolete and removed) - Does not apply EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.1 (Web) • 10.4.1.1 (Non-web document) • 11.4.1.1.1 (Open Functionality Software) • 11.4.1.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	<p>Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.</p> <p>For WCAG 2.0, 2.1, EN 301 549, and Revised 508 Standards, the September 2023 errata update indicates this criterion is always supported. See the <u>WCAG 2.0 Editorial Errata</u> and the <u>WCAG 2.1 Editorial Errata</u>.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>4.1.2 Name, Role, Value</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.2 (Web) • 10.4.1.2 (Non-web document) • 11.4.1.2.1 (Open Functionality Software) • 11.4.1.2.2 (Closed Software) – Not required • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	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. See <u>1.3.3</u> for exceptions.</p> <p>In the PDF EReader, under the Contents section, there are two broken ARIA labels, where the reference exists but the target for the reference does not.</p>

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.4 Captions (Live)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.4 (Web) • 10.1.2.4 (Non-web document) • 11.1.2.4 (Open Functionality Software) • 11.1.2.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	Fulcrum does not include live video and audio content.
<p><u>1.2.5 Audio Description (Prerecorded)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.5 (Web) • 10.1.2.5 (Non-web document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The video player supports audio description.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.4 Orientation</u> (Level AA 2.1 and 2.2)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.4 (Web) • 10.1.3.4 (Non-web document) • 11.1.3.4 (Open Functionality Software) • 11.1.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Fulcrum does not restrict the view of content to single display orientation. The Fulcrum E-Reader allows for both portrait (scroll mode) and landscape view (page-by-page) display orientation.
<p><u>1.3.5 Identify Input Purpose</u> (Level AA 2.1 and 2.2)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.3.5 (Web) • 10.1.3.5 (Non-web document) • 11.1.3.5.1 (Open Functionality Software) • 11.1.3.5.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Not applicable	Fulcrum does not require input of personal information about the user.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	In the individual books and book resources, under the filter panel on the right, the text of the selected facet has a low color contrast. It's a green text on a white background.
<p><u>1.4.4 Resize text</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.4 (Web) • 10.1.4.4 (Non-web document) • 11.1.4.4.1 (Open Functionality Software) • 11.1.4.4.2 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	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>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.5 Images of Text</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.5 (Web) • 10.1.4.5 (Non-web document) • 11.1.4.5.1 (Open Functionality Software) • 11.1.4.5.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The Fulcrum platform does not use images of text, with the exception of logos and book cover images that are properly indicated as such to assistive technology.
<p><u>1.4.10 Reflow</u> (Level AA 2.1 and 2.2)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.10 (Web) • 10.1.4.10 (Non-web document) • 11.1.4.10 (Open Functionality Software) • 11.1.4.10 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Fulcrum content can be presented without a loss of information or functionality and without requiring scrolling with the exception of video, maps, and data tables.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.11 Non-text Contrast</u> (Level AA 2.1 and 2.2) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.11 (Web) • 10.1.4.11 (Non-web document) • 11.1.4.11 (Open Functionality Software) • 11.1.4.11 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	The presentation of user interface components and graphical objects have a contrast ratio of at least 3:1.
<p><u>1.4.12 Text Spacing</u> (Level AA 2.1 and 2.2) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.12 (Web) • 10.1.4.12 (Non-web document) • 11.1.4.12 (Open Functionality Software) • 11.1.4.12 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Default text display on Fulcrum contains line heights 1.5 times the size of font; spacing following paragraphs 2 times the font size; and proper letter and word spacing.

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.13 Content on Hover or Focus</u> (Level AA 2.1 and 2.2)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.13 (Web) • 10.1.4.13 (Non-web document) • 11.1.4.13 (Open Functionality Software) • 11.1.4.13 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Fulcrum drop-down buttons, menus, and nonmodal components are dismissable, hoverable, and persistent when receiving and then removing pointer hover or keyboard focus.
<p><u>2.4.5 Multiple Ways</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.5 (Web) • 10.2.4.5 (Non-web document) – Does not apply • 11.2.4.5 (Open Functionality Software) – Does not apply • 11.2.4.5 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software 	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
<ul style="list-style-type: none"> • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 		
<p><u>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Fulcrum pages and functions use headings and labels to describe topics or purpose.

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.7 (Web) • 10.2.4.7 (Non-web document) • 11.2.4.7 (Open Functionality Software) • 11.2.4.7 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Visual changes are applied to elements to indicate the current position of focus.
<p><u>2.4.11 Focus Not Obscured (Minimum)</u> (Level AA 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply</p> <p>Revised Section 508 – Does not apply</p>	Supports	Components are not hidden when receiving keyboard focus.
<p><u>2.5.7 Dragging Movements</u> (Level AA 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply</p> <p>Revised Section 508 – Does not apply</p>	Supports	The navigation slider in the Fulcrum E-Reader can be operated by a single pointer without dragging.
<p><u>2.5.8 Target Size (Minimum)</u> (Level AA 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply</p> <p>Revised Section 508 – Does not apply</p>	Supports	Targets for pointer inputs are 24 x 24 pixels in size or larger.

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.1.2 (Web) • 10.3.1.2 (Non-web document) • 11.3.1.2 (Open Functionality Software) – Does not apply • 11.3.1.2 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Partially Supports	Fulcrum supports tagging of language attributes for all elements except for some metadata fields.
<p><u>3.2.3 Consistent Navigation</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.3 (Web) • 10.3.2.3 (Non-web document) – Does not apply • 11.3.2.3 (Open Functionality Software) – Does not apply • 11.3.2.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p>	Supports	Navigation mechanisms are consistent across pages.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 		
<p><u>3.2.4 Consistent Identification</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.2.4 (Web) • 10.3.2.4 (Non-web document) – Does not apply • 11.3.2.4 (Open Functionality Software) – Does not apply • 11.3.2.4 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The Fulcrum platform provides consistent identification across pages for components that have the same functionality.

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.8 Accessible Authentication (Minimum)</u> (Level AA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Cognitive function tests in authentication processes provide mechanisms to assist the user in completing the test.
<p><u>4.1.3 Status Messages</u> (Level AA 2.1 and 2.2) Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.3 (Web) • 10.4.1.3 (Non-web document) • 11.4.1.3 (Open Functionality Software) • 11.4.1.3 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	Supports	Page content updates on search results are announced to assistive technology.

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.6 Sign Language (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Video player supports sign language translation in a separate video player synchronized with the main player.
<p><u>1.2.7 Extended Audio Description (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Does Not Support	Extended audio description is not supported.
<p><u>1.2.8 Media Alternative (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Video player supports text-based audio description and transcript.
<p><u>1.2.9 Audio-only (Live)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	Not Applicable	There is no live audio content.
<p><u>1.3.6 Identify Purpose</u> (Level AAA 2.1 and 2.2) EN 301 549 Criteria– Does not apply</p>	Partially supports	See <u>1.3.3 for exceptions</u> .

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply		
<p><u>1.4.6 Contrast Enhanced</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	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><u>1.4.7 Low or No Background Audio</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Applicable	This is an issue related to content not the platform itself.
<p><u>1.4.8 Visual Presentation</u> (Level AAA)</p> <ol style="list-style-type: none"> 1. Foreground and background colors can be selected by the user. 2. Width is no more than 80 characters or glyphs (40 if CJK). 3. Text is not justified (aligned to both the left and the right margins). 4. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. 5. Text can be resized without assistive technology up to 	<ol style="list-style-type: none"> 1. Does not support 2. Supports 3. Supports 4. Supports 5. Supports 	<ol style="list-style-type: none"> 1. Foreground and background colors cannot be selected by the user, except through operating system or browser settings. 2. Paragraphs of text do not exceed 80 characters in width. Publisher content may exceed 80 characters. 3. Text is not justified in the web pages. 4. Line spacing is 1.5 and paragraph spacing is 1.5 times larger than line spacing. 5. Text can be resized without assistive technology (through operating system or browser settings or extensions, and through

Criteria	Conformance Level	Remarks and Explanations
<p>200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window.</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>		<p>the zoom settings in the reader) up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window.</p>
<p><u>1.4.9 Images of Text (No Exception) Control</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	<p>The Fulcrum platform does not use images of text, with the exception of logos or book covers, which are properly identified to assistive technology.</p>
<p><u>2.1.3 Keyboard (No Exception)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	<p>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).</p>
<p><u>2.2.3 No Timing</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	<p>Webpages and features do not require timing, except for non-interactive video and audio.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.2.4 Interruptions</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Applicable	There are no interruptions.
<p><u>2.2.5 Re-authenticating</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Authentication sessions do not expire.
<p><u>2.3.2 Three Flashes</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Not Applicable	There are no flashing elements.
<p><u>2.3.3 Animation from Interactions</u> (Level AAA 2.1 and 2.2)</p> <p>EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	While animations that are used in loading icons cannot be disabled, they are considered essential to the information being conveyed.
<p><u>2.4.8 Location</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply 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

Criteria	Conformance Level	Remarks and Explanations
		catalog page as well as a navigation footer.
<p><u>2.4.9 Link Purpose (Link Only)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Fulcrum supports functionality for descriptive label attributes for links.
<p><u>2.4.10 Section Headings</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	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><u>2.4.12 Focus Not Obscured (Enhanced)</u> (Level AAA 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	User interface components are not hidden when receiving keyboard focus.
<p><u>2.4.13 Focus Appearance</u> (Level AAA 2.2 only)</p> <p>EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Supports	Fulcrum's default keyboard focus indicator when visible is larger than the area of the unfocused component and has a contrast ratio of 14:1.
<p><u>2.5.5 Target Size</u> (Level AAA 2.1 and 2.2)</p> <p>EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Partially supports	Most targets for pointer inputs are larger than 44 x 44 pixels.

Criteria	Conformance Level	Remarks and Explanations
		Exceptions: radio buttons for filtering content on Monograph catalog and Product details pages.
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Fulcrum does not restrict use of input modalities, allowing for different ways of inputting content and switching modes of input.
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	Not Applicable	This is an issue related to content not the platform itself.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply		
<u>3.2.5 Change on Request</u> (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.
<u>3.3.5 Help</u> (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.
<u>3.3.6 Error Prevention (All)</u> (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.
<u>3.3.9 Accessible Authentication (Enhanced)</u> (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Supports	Authentication methods that use cognitive function test of remembering password provides a mechanism to assist the user.

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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 (WCAG 1.1.1, 1.3.1, 1.3.2, 2.1.1, 4.1.2)</p>
302.2 With Limited Vision	Partially Supports	<p>Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast. See exceptions (WCAG 1.3.1, 1.4.3, 4.1.2)</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 it</p>

Criteria	Conformance Level	Remarks and Explanations
		<p>occurrence in the text, the matched result is only indicated through highlighting of the matched text.</p> <p>See exceptions (WCAG 1.4.1, 2.1.1, 4.1.2)</p>
302.4 Without Hearing	Partially Supports	<p>The video player supports captions and transcripts. The audio player supports transcripts.</p> <p>See exceptions (WCAG 4.1.2)</p>
302.5 With Limited Hearing	Partially Supports	<p>The video player supports captions and transcripts. The audio player supports transcripts.</p> <p>See exceptions (WCAG 4.1.2)</p>
302.6 Without Speech	Not Applicable	Fulcrum does not require speech input.

Criteria	Conformance Level	Remarks and Explanations
302.7 With Limited Manipulation	Partially Supports	<p>Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.</p> <p>See exceptions (WCAG 2.1.1, 4.1.2)</p>
302.8 With Limited Reach and Strength	Partially Supports	<p>Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.</p> <p>See exceptions (WCAG 2.1.1, 4.1.2)</p>
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially 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> <p>See exceptions (WCAG 1.3.1)</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 WCAG 2.2 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 WCAG 1.3.3 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	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.
<p>502.4 Platform Accessibility Features</p> <p>A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;</p> <p>B. Section 9.3.4 Provide adjustment of delay before key acceptance;</p>	<p>A. Not Applicable</p> <p>B. Not Applicable</p> <p>C. Not Applicable</p> <p>D. Supports</p> <p>E. Supports</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 supports captions and transcripts.</p> <p>E. Video player supports captions.</p>

Criteria	Conformance Level	Remarks and Explanations
<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>F. Supports</p> <p>G. Supports</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 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 and 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	Supports	Video player supports user control of audio descriptions at the same menu level as caption settings, keyboard settings, transcript, and 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 2.2 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 to fulcrum-info@umich.edu .

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Chapter 4: 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: WCAG 1.1.1, 1.3.1, 1.3.2, 2.1.1, 4.1.2.</p>
4.2.2 Usage with limited vision	Partially Supports	<p>Fulcrum supports standard browser magnification and magnification extensions and standard operating system contrast adjustments and provides sufficient color contrast.</p> <p>See exceptions: WCAG 1.3.1, 1.4.3, 2.4.6, 4.1.2.</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: In the Fulcrum E-Reader, when searching inside a book and following a search result to it</p>

Criteria	Conformance Level	Remarks and Explanations
		<p>occurrence in the text, the matched result is only indicated through highlighting of the matched text.</p> <p>See exceptions: WCAG 2.1.1, 4.1.2.</p>
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. Usage of the product does not require fine motor controls nor simultaneous actions.</p> <p>See exceptions: WCAG 2.1.1, 4.1.2.</p>

Criteria	Conformance Level	Remarks and Explanations
4.2.8 Usage with limited reach	Partially Supports	<p>Fulcrum supports keyboard navigation. Usage of the product does not require fine motor controls nor simultaneous actions.</p> <p>See exceptions: WCAG 2.1.1, 4.1.2.</p>
4.2.9 Minimize photosensitive seizure triggers	Supports	<p>Fulcrum does not include visual features with flashing that could trigger seizures</p>
4.2.10 Usage with limited cognition	Partially 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> <p>See exceptions: WCAG 1.3.1</p>
4.2.11 Privacy	Supports	<p>Fulcrum does not impede usage of standard privacy controls alongside assistive technologies. Users can connect a headset for private listening to screen reader announcements.</p>

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 2.2 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 2.2 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

Criteria	Conformance Level	Remarks and Explanations
11.5.2 Accessibility services	Heading cell – no response required	Heading cell – no response required
11.5.2.1 Platform accessibility service support for software that provides a user interface	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.2 Platform accessibility service support for assistive technologies	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.3 Use of accessibility services	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 .

Criteria	Conformance Level	Remarks and Explanations
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.
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.

Criteria	Conformance Level	Remarks and Explanations
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.
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

Criteria	Conformance Level	Remarks and Explanations
		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, 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

Criteria	Conformance Level	Remarks and Explanations
		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 allows users to change the font size and the font type.
11.8 Authoring tools	Heading cell – no response required	Heading cell – no response required
11.8.1 Content technology	Heading cell – no response required	Heading cell – no response required
11.8.2 Accessible content creation	Not applicable	Fulcrum is not an authoring platform or tool.

Criteria	Conformance Level	Remarks and Explanations
11.8.3 Preservation of accessibility information in transformations	Not applicable	Fulcrum is not an authoring platform or tool.
11.8.4 Repair assistance	Not applicable	Fulcrum is not an authoring platform or tool.
11.8.5 Templates	Not applicable	Fulcrum is not an authoring platform or tool.

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 2.2 section	See information in WCAG 2.2 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 .

Criteria	Conformance Level	Remarks and Explanations
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 2.2 section	See information in WCAG 2.2 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.