



U-M Press EBook Collection Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.5)

Name of Product/Version: Fulcrum v4.22 University of Michigan Press EBook Collection (UMP EBC)

Product Description: The UMP EBC is a comprehensive collection of the University of Michigan Press's scholarly ebooks for sale to libraries, hosted on the Fulcrum platform. The collection includes over 2,500 titles comprised of new UMP scholarly ebook titles, at least 80 new books a year, and over 1,500 backlist titles.

Report Date: July 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, Ace by DAISY Accessibility Checker for EPUB, Adobe Acrobat DC

Notes:

Web conformance for this report was generated by evaluating the following titles on Fulcrum:

- [Selma and the Liuzzo Murder Trials: The First Modern Civil Rights Convictions by James P. Turner](#)
- [Empires in World History: Power and the Politics of Difference by Jane Burbank and Frederick Cooper](#)
- [Show Sold Separately: Promos, Spoilers, and Other Media Paratexts by Jonathan Gray](#)

- [A Mid-Republican House From Gabii.](#)

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

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

This report supersedes the UMP EBC Accessibility Conformance Report VPAT 2.4 released in January 2023.

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 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

Standard/Guideline	Included in Report
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 2.2 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 – Web, Chapter 10 – Non-Web documents, Section 11 – Software, and Section 12 – Documentation and Support Services.
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.2 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:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.1.1 (Web) • 10.1.1.1 (Non-web document) • 11.1.1.1.1 (Open Functionality Software) • 11.1.1.1.2 (Closed Functionality Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Form fields and buttons include labels. Images have capability for alt-text and image descriptions. 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> <p>All titles published after 2019 contain at least basic textual descriptions of images, however these descriptions are only contained within EPUB files. Titles published in 2022 and after contain long descriptions of images. Disability Studies titles published between 2015-2018 contain textual descriptions of images in EPUB files through alt text. All other titles published before 2019 may not contain textual descriptions of images.</p>

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

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

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		<p>the Fulcrum website where transcripts can be accessed. Video players embedded in EPUB downloads support audio descriptions but do not support 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) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Most of the information, structure, and relationships can be programmatically determined.</p> <p>Exceptions:</p> <p>In the Fulcrum EReader 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> <p>In the Fulcrum EReader and in</p>

Criteria	Conformance Level	Remarks and Explanations
		<p>EPUB downloads, chapters and subheadings are tagged, but accuracy of heading structure will vary depending on year. For EPUBs published before 2021, endnotes and bibliographic entries in some books are not tagged with appropriate ARIA child or parent roles.</p> <p>PDF downloads include bookmarks for chapters and subsections but are untagged, so information, structure, and relationships cannot be programmatically determined.</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) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>EPUBs and EPUB downloads are tagged and content is ordered in a meaningful sequence. Some PDF downloads are untagged so a correct tab and reading order cannot be specified.</p> <p>Also see exceptions for 1.3.1.</p>

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

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		<p>through highlighting of the matched text.</p> <p>Color may be used to convey meaning in images and videos inside books published prior to 2021.</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) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>There is no audio that plays automatically. The video player provides capabilities for pausing and adjusting the volume of video content with keyboard control and labels for screen reader access.</p>
<p><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) 	<p>Web: 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</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Electronic Documents: Partially Supports	<p>between list items, and pressing [Space] or [Enter] to make selections).</p> <p>Exceptions:</p> <p>EPUB downloads are tagged and support standard keyboard navigation. PDF downloads are untagged and do not support keyboard navigation through headings and elements, though bookmarks allow navigation through chapters.</p>
<p><u>2.1.2 No Keyboard Trap</u> (Level A)</p> <p>Also applies to:</p> <p>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) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Fulcrum supports standard keyboard navigation. Keyboard users cannot be trapped in a subset of content.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<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>2.4.1 Bypass Blocks</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.1 (Web) • 10.2.4.1 (Non-web document) – Does not apply • 11.2.4.1 (Open Functionality Software) – Does not apply • 11.2.4.1 (Closed Software) – Does not apply • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>A hidden link (available to screen readers) allows users to skip to the main content of each page.</p> <p>EPUBs contain navigable contents and page lists that allow users to skip to the main content of the book.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.4 Link Purpose (In Context)</u> (Level A)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.4 (Web) • 10.2.4.4 (Non-web document) • 11.2.4.4 (Open Functionality Software) • 11.2.4.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Fulcrum supports functionality for descriptive label attributes for links.</p> <p>Quality of link labels will vary by publication and book, but most are descriptive in context.</p>
<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>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<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 EReader has forward and back buttons in addition to the slider tool.</p>

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply		
<p><u>2.5.2 Pointer Cancellation</u> (Level A 2.1 and 2.2) 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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>Fulcrum does not execute functions on the down-event of the pointer.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.4 Motion Actuation</u> (Level A 2.1 and 2.2)</p> <p>Also applies to:</p> <p>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>	<p>Web: Not applicable</p> <p>Electronic Documents: Not applicable</p>	<p>Fulcrum and ebooks do not include functionality that can be operated by device or user motion.</p>

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) 	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum uses the language attribute on the HTML element to specify the default language of each page.</p> <p>Some PDF downloads do not specify a language attribute.</p>

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) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Changing the setting of a component does not initiate a change of context.</p>
<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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>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.</p>

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

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>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>

Criteria	Conformance Level	Remarks and Explanations
<p>4.1.2 Name, Role, Value (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.4.1.2 (Web) • 10.4.1.2 (Non-web document) • 11.4.1.2.1 (Open Functionality Software) • 11.4.1.2.2 (Closed Software) – Not required • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See 1.3.3 for exceptions.</p>

Table 2: Success Criteria, Level AA

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.5 Audio Description (Prerecorded)</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.2.5 (Web) • 10.1.2.5 (Non-web document) • 11.1.2.5 (Open Functionality Software) • 11.1.2.5 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>The video player supports audio descriptions.</p> <p>Video associated with books produced after 2020 have audio descriptions available. Video players embedded in the Fulcrum EReader and in EPUB downloads support audio descriptions.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.3.5 Identify Input Purpose</u> (Level AA 2.1 and 2.2) Also applies to: 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>	<p>Web: Not applicable</p> <p>Electronic Documents: Not applicable</p>	<p>Fulcrum does not require input of personal information about the user.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.1.4.3 (Web) • 10.1.4.3 (Non-web document) • 11.1.4.3 (Open Functionality Software) • 11.1.4.3 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>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> <p>Some images in books may not present sufficient color contrast. Some books do not present sufficient color contrast for page numbers in the Fulcrum EReader and EPUB downloads.</p>

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

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) 		
<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>	<p>Web: Supports</p> <p>Electronic Documents: Partially supports</p>	<p>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.</p> <p>EPUBs format supports reflow, titles available only in PDF do not support reflow.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.11 Non-text Contrast</u> (Level AA 2.1 and 2.2)</p> <p>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>	<p>Web: Supports</p> <p>Electronic documents: Not applicable</p>	<p>The presentation of user interface components and graphical objects have a contrast ratio of at least 3:1.</p>
<p><u>1.4.12 Text Spacing</u> (Level AA 2.1 and 2.2)</p> <p>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>	<p>Web: Supports</p> <p>Electronic documents: Partially supports</p>	<p>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.</p> <p>Most ebooks follow the above text display guidelines, however a small portion of ebooks may not.</p>

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>	<p>Web: Supports</p> <p>Electronic documents: Not applicable</p>	<p>Fulcrum drop-down buttons, menus, and nonmodal components are dismissable, hoverable, and persistent when receiving and then removing pointer hover or keyboard focus.</p>
<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>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>The Fulcrum platform provides navigation links, search functions, table of contents, embedded media, and links to media from the Fulcrum EReader and from monograph catalog pages.</p>

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>2.4.6 Headings and Labels</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.2.4.6 (Web) • 10.2.4.6 (Non-web document) • 11.2.4.6 (Open Functionality Software) • 11.2.4.6 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum pages and functions use headings and labels to describe topics or purpose.</p> <p>Quality of headings and labels may vary by publication. Most publications include descriptive headings. EPUB downloads include descriptive heading tags. PDF downloads do not include heading tags but do include bookmarks for chapter headings.</p> <p>See additional exceptions to labels at 1.3.3 and 2.4.4.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.7 Focus Visible</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.4.7 (Web) ● 10.2.4.7 (Non-web document) ● 11.2.4.7 (Open Functionality Software) ● 11.2.4.7 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Visual changes are applied to elements to indicate the current position of focus.</p>
<p><u>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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>Components are not hidden when receiving keyboard focus.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.7 Dragging Movements</u> (Level AA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>The navigation slider in the Fulcrum EReader can be operated by a single pointer without dragging.</p>
<p><u>2.5.8 Target Size (Minimum)</u> (Level AA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>Targets for pointer inputs are 24 x 24 pixels in size or larger.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.2 Language of Parts</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.3.1.2 (Web) ● 10.3.1.2 (Non-web document) ● 11.3.1.2 (Open Functionality Software) – Does not apply ● 11.3.1.2 (Closed Software) – Does not apply ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports tagging of language attributes for all elements except for some metadata fields.</p> <p>EPUBs and EPUB downloads of titles published beginning in 2021 include language of parts tagging. If any of these titles do not include language of parts tagging, it is indicated in EPUB metadata.</p>

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

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

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.3.4 Error Prevention (Legal, Financial, Data)</u> (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> • 9.3.3.4 (Web) • 10.3.3.4 (Non-web document) • 11.3.3.4 (Open Functionality Software) • 11.3.3.4 (Closed Software) • 11.8.2 (Authoring Tool) • 12.1.2 (Product Docs) • 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There are no web pages that involve legal commitments or financial transactions, modify or delete user-controllable data, or submit user test responses.</p>
<p><u>3.3.8 Accessible Authentication (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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>Cognitive function tests in authentication processes provide mechanisms to assist the user in completing the test.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>4.1.3 Status Messages</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"> • 9.4.1.3 (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>	<p>Web: Supports</p> <p>Electronic documents: Not applicable</p>	<p>Page content updates on search results are announced to assistive technology.</p>

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.6 Sign Language (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Does not support</p>	<p>Video player supports sign language translation in a separate video player synchronized with the main player.</p>
<p><u>1.2.7 Extended Audio Description (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Does Not Support</p> <p>Electronic Documents: Does Not Support</p>	<p>Extended audio description is not supported.</p>
<p><u>1.2.8 Media Alternative (Prerecorded)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Video and audio player supports text-based audio description and transcript.</p> <p>All audio and video associated with books produced after 2018 have transcripts or captions available. Video and audio players embedded in the Fulcrum EReader support audio descriptions but do not support transcripts. Embedded players provide links to the full video or audio players on the Fulcrum website.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.2.9 Audio-only (Live)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not Applicable</p> <p>Electronic Documents: Not Applicable</p>	<p>There is no live audio content.</p>
<p><u>1.3.6 Identify Purpose</u> (Level AAA 2.1 and 2.2)</p> <p>EN 301 549 Criteria– Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially supports</p> <p>Electronic Documents: Not applicable</p>	<p>See 1.3.3 for exceptions.</p>
<p><u>1.4.6 Contrast Enhanced</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Main text content of platform and most publications meets enhanced contrast ratio (black on white).</p> <p>Text in some of the headings, labels, buttons and indicators does not meet enhanced contrast ratio.</p> <p>Some scanned books available only in PDF format may not present sufficient color contrast, depending on the quality of the scan. Some images in books may not present sufficient color contrast. Some books do not present sufficient color contrast for page numbers in the Fulcrum EReader and EPUB downloads.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>1.4.7 Low or No Background Audio</u> (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not applicable</p> <p>Electronic Documents: Partially Supports</p>	<p>Level of background audio will vary by publication and media resource. No mechanism to turn off background audio is supported.</p>
<p><u>1.4.8 Visual Presentation</u> (Level AAA)</p> <ol style="list-style-type: none"> 1. Foreground and background colors can be selected by the user. 2. Width is no more than 80 characters or glyphs (40 if CJK). 3. Text is not justified (aligned to both the left and the right margins). 4. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. 5. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web:</p> <ol style="list-style-type: none"> 1. Does not support 2. Supports 3. Supports 4. Supports 5. Supports <p>Electronic Documents</p> <ol style="list-style-type: none"> 1. Does not support 2. Supports 3. Partially Supports 4. Partially Supports 5. Partially 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 by default. 3. Text is not justified in the web interface but is justified for most publications in the Fulcrum EReader and in most PDF downloads. Justification in EPUB downloads can be modified if supported by the EPUB reader. 4. Line spacing is under 1.5 and paragraph spacing is equal to the line spacing. Some EPUB readers may allow line and paragraph spacing to be modified for EPUB downloads. 5. For EPUB publications, text can be resized without assistive technology (through operating system or browser settings or extensions, and through

Criteria	Conformance Level	Remarks and Explanations
		the zoom settings in the reader) up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. For PDF publications and PDF downloads, text cannot be resized without assistive technology in a way that doesn't require the user to scroll horizontally.
<p><u>1.4.9 Images of Text (No Exception) Control</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<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>	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<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>See 2.1.1 for exceptions.</p>
<p><u>2.2.3 No Timing</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply</p>	<p>Web: Supports</p>	<p>Webpages, documents, and features do not require timing, except for non-interactive video and audio.</p>

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply	Electronic Documents: Supports	
2.2.4 Interruptions (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Not Applicable Electronic Documents: Not Applicable	There are no interruptions.
2.2.5 Re-authenticating (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports Electronic Documents: Not Applicable	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	Web: Supports Electronic Documents: Supports	See WCAG 2.3.1 for details.
2.3.3 Animation from Interactions (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports Electronic Documents: Not applicable	While animations that are used in loading icons cannot be disabled, they are considered essential to the information being conveyed.

Criteria	Conformance Level	Remarks and Explanations
<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>	<p>Web: Supports</p> <p>Electronic Documents: Supports</p>	<p>Press, monograph catalog, and media pages contain a breadcrumb trail at the top of each page. Navigation within monograph catalog pages is organized through tabs, with the selected tab clearly indicated. Each page provides a link to the Fulcrum home page, the press page, and the main monograph catalog page as well as a navigation footer.</p> <p>Books in the Fulcrum EReader indicate location numbers and page numbers. EPUB downloads provide a clickable table of contents as well as location numbers and page numbers. PDF downloads provide chapter locations via bookmarks and page numbers and a footer on each page with information about the book.</p>
<p><u>2.4.9 Link Purpose (Link Only)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Fulcrum supports functionality for descriptive label attributes for links.</p> <p>Exceptions: Quality of link labels will vary by publication. Some books include links that are not descriptive without context.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.4.10 Section Headings</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>Section headings are used to organize HTML content and the Fulcrum EReader has capability for chapters and subheadings to be organized with section headings.</p> <p>Exceptions:</p> <p>In the Fulcrum EReader and EPUB downloads prior to 2021, chapter headings are listed twice (one heading for the chapter number and a separate heading for the name of the chapter). Quality of heading structure varies by publication and imprint. PDF downloads include chapter bookmarks but do not include heading tags.</p>
<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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>User interface components are not hidden when receiving keyboard focus.</p>
<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>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>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>

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.5.5 Target Size</u> (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Partially supports</p> <p>Electronic Documents: Partially supports</p>	<p>Most targets for pointer inputs are larger than 44 x 44 pixels.</p> <p>Exceptions: radio buttons for filtering content on Monograph catalog and Product details pages.</p>
<p><u>2.5.6 Concurrent Input Mechanisms</u> (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not applicable</p>	<p>Fulcrum does not restrict use of input modalities, allowing for different ways of inputting content and switching modes of input.</p>
<p><u>3.1.3 Unusual Words</u> (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not applicable</p> <p>Electronic Documents: Partially Supports</p>	<p>Ebook content may use unusual words, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.</p>
<p><u>3.1.4 Abbreviations</u> (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not applicable</p> <p>Electronic Documents: Partially Supports</p>	<p>Ebook content may use abbreviations, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.</p>
<p><u>3.1.5 Reading Level</u> (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not applicable</p> <p>Electronic Documents: Partially Supports</p>	<p>Reading level varies by publication.</p>

Criteria	Conformance Level	Remarks and Explanations
<p><u>3.1.6 Pronunciation</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Not applicable</p> <p>Electronic Documents: Partially Supports</p>	<p>Presence of mechanisms for identifying pronunciation of words will vary by publication.</p>
<p><u>3.2.5 Change on Request</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Changes of context are initiated only by user request.</p>
<p><u>3.3.5 Help</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Search boxes include suggestions (“Search and discover books”, “Search resources”, “Search inside text...”). Search filters include labels that identify the application or removal of a search filter to assistive technology.</p>
<p><u>3.3.6 Error Prevention (All)</u> (Level AAA)</p> <p>Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Submissions of text input are reversible.</p>
<p><u>3.3.9 Accessible Authentication (Enhanced)</u> (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply</p>	<p>Web: Supports</p> <p>Electronic Documents: Not Applicable</p>	<p>Authentication methods that use cognitive function test of remembering password provides a mechanism to assist the user.</p>

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply		

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Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See exceptions to labels (WCAG 1.1.1, 1.3.1, 1.3.2, 2.1.1, 4.1.2)
302.2 With Limited Vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast. See exceptions (WCAG 1.3.1, 1.4.3, 4.1.2)
302.3 Without Perception of Color	Web: Partially Supports Electronic Documents:	Color is only used as a decorative or supplemental attribute of user interface elements. See WCAG 1.4.1 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	
302.4 Without Hearing	Web: Partially Supports Electronic Documents: Partially Supports	The video player supports captions and transcripts. The audio player supports transcripts. Audio content includes captions or transcripts, with exceptions listed in WCAG 1.2.1 and 1.2.2 .
302.5 With Limited Hearing	Web: Partially Supports Electronic Documents: Partially Supports	The video player supports captions and transcripts. The audio player supports transcripts. Audio content includes captions or transcripts, with exceptions listed in WCAG 1.2.1 and 1.2.2 .
302.6 Without Speech	Web: Not Applicable Electronic Documents: Not Applicable	Fulcrum does not require speech input.

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

Chapter 4: Hardware

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

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.2 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	Web: Supports Electronic Documents: Supports	Platform allows user control of accessibility features, including text zoom in the Fulcrum EReader. EPUB and PDF downloads can be opened with any compatible document reader.
502.2.2 No Disruption of Accessibility Features	Web: Supports Electronic Documents: Supports	The Fulcrum platform and downloads are compatible with operating system and browser accessibility features configured by the user.

Criteria	Conformance Level	Remarks and Explanations
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.3 , and 4.1.2 for exceptions.
502.3.2 Modification of Object Information	Web: Supports Electronic Documents: Not Applicable	All user-set states and properties are capable of being set programmatically, including through assistive technologies.
502.3.3 Row, Column, and Headers	Web: Partially Supports Electronic Documents:	Platform does not use tables. The quality of row, column, and header tagging differs by publication.

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

Criteria	Conformance Level	Remarks and Explanations
502.3.7 Hierarchical Relationships	Web: Supports Electronic Documents: Partially Supports	<p>Fulcrum uses standard HTML markup to express hierarchical relationships.</p> <p>See WCAG 2.4.6 and 2.4.10 for exceptions to hierarchical heading and subheading structures.</p>
502.3.8 Text	Web: Supports Electronic Documents: Supports	<p>Fulcrum renders most strings as plain text values in HTML.</p> <p>PDF-only and PDF downloads of publications may include scanned page images but will also include machine readable text.</p>
502.3.9 Modification of Text	Web: Supports Electronic Documents: Not Applicable	<p>All user-set input is capable of being set programmatically, including through assistive technologies.</p>
502.3.10 List of Actions	Web: Supports	<p>Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.</p>

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

Criteria	Conformance Level	Remarks and Explanations
502.3.14 Event Notification	Web: Supports Electronic Documents: Not Applicable	Fulcrum notifies screen reader users when switching between tabs in monograph catalog pages. Screen reader users are notified when moving between pages in the Fulcrum EReader.
<p>502.4 Platform Accessibility Features</p> <p>A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;</p> <p>B. Section 9.3.4 Provide adjustment of delay before key acceptance;</p> <p>C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance;</p> <p>D. Section 10.6.7 Allow users to choose visual alternative for audio output;</p> <p>E. Section 10.6.8 Synchronize audio equivalents for visual events;</p> <p>F. Section 10.6.9 Provide speech output services; and</p>	<p>A. Not Applicable</p> <p>B. Not Applicable</p> <p>C. Not Applicable</p> <p>D. Web: Supports Electronic Documents: Supports</p> <p>E. Web: Supports Electronic Documents: Does Not Support</p> <p>F. Web: Supports</p>	<p>A. Simultaneous keystrokes not required.</p> <p>B. Not applicable.</p> <p>C. Not applicable.</p> <p>D. Audio content is accessible through a visually displayed text transcript or video captions, with exceptions listed in WCAG 1.2.1 and 1.2.2.</p> <p>E. Audio description is synchronized with video when provided.</p> <p>F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers and text-to-speech browser plugins, with exceptions listed in WCAG 1.1.1, 1.3.2, 1.3.3, 1.4.5, 2.4.4, 2.4.6.</p> <p>G. Captions can be turned on via keyboard in the video player when provided.</p>

Criteria	Conformance Level	Remarks and Explanations
G. Section 10.7.1 Display any captions provided.	<p>Electronic Documents: Partially Supports</p> <p>G. Web: Supports Electronic Documents: Supports</p>	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	<p>Web: Partially Supports</p> <p>Electronic Documents: Partially Supports</p>	<p>User preferences from operating system settings and browser extensions for color, contrast, font type, font size, and focus cursor are respected with the following exceptions: font type and font size set through browser extensions affect all text except for the content of books in the Fulcrum EReader. However, the Fulcrum EReader allows users to change the font size and font type. Reflowable EPUB downloads allow for modification of font size,</p>

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

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Supports	keyboard settings, and transcript at the same level as volume.
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter “not applicable”)	Web: Not Applicable Electronic Documents: Not Applicable	Fulcrum is not an authoring tool.
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Web: Not Applicable Electronic Documents: Not Applicable	
504.2.2 PDF Export	Web: Not Applicable	

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

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	<p>Accessibility and compatibility features are explained on the Fulcrum Accessibility Page.</p> <p>Additional accessibility information on content is available at https://ebc.press.umich.edu/accessibility.</p>
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.

Criteria	Conformance Level	Remarks and Explanations
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Information on accessibility and compatibility is provided at https://www.fulcrum.org/accessibility/ and information specific to content is available at https://ebc.press.umich.edu/accessibility
603.3 Accommodation of Communication Needs	Supports	Support services are provided through email and accessible contact forms.

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Chapter 4: 4.2 Functional Performance Statements (FPS)

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe the identity, operation, and state of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.2.1 , 1.2.3 , 1.3.2 , 1.3.3 , 1.4.5 , 2.4.4 , 2.4.6 for exceptions.
4.2.2 Usage with limited vision	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports standard browser magnification and magnification extensions and provides sufficient color contrast. See WCAG 1.2.1 , 1.2.3 , 1.4.3 , and 1.4.5 for exceptions.
4.2.3 Usage without perception of colour	Web: Partially Supports Electronic Documents:	Color is only used as a decorative or supplemental attribute of user interface elements. See WCAG 1.4.1 for exceptions.

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

Criteria	Conformance Level	Remarks and Explanations
4.2.7 Usage with limited manipulation or strength	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions. Usage of the product does not require fine motor controls nor simultaneous actions.
4.2.8 Usage with limited reach	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions. Usage of the product does not require fine motor controls nor simultaneous actions.
4.2.9 Minimize photosensitive seizure triggers	Web: Supports Electronic Documents: Supports	See WCAG 2.3.1 for exceptions.
4.2.10 Usage with limited cognition	Web: Partially Supports Electronic Documents:	Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate. Reading level of publications varies. Some video and audio

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	content may not include captions, transcripts, or audio description (see WCAG 1.2.1 , 1.2.2 , and 1.2.3 for details).
4.2.11 Privacy	Web: Supports Electronic Documents: Supports	Fulcrum does not impede usage of standard privacy controls alongside assistive technologies. Users can connect a headset for private listening to screen reader announcements.

Chapter 5: Generic Requirements

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

Chapter 6: ICT with Two-Way Voice Communication

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

Chapter 7: ICT with Video Capabilities

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

Criteria	Conformance Level	Remarks and Explanations
7.2.1 Audio description playback	Web: Supports Electronic Documents: Partially Supports	When available, audio description can be turned on via mouse or keyboard in the video player. See WCAG 1.2.1 for details.
7.2.2 Audio description synchronization	Web: Supports Electronic Documents: Partially Supports	Video player synchronizes audio description with audio/visual content, when provided.
7.2.3 Preservation of audio description	Web: Supports Electronic Documents: Supports	Video player supports audio description tracks, when provided.
7.3 User controls for captions and audio description	Web: Supports Electronic Documents: 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 and description toggles 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. section](#))

Chapter 10: Non-web Documents

Criteria	Conformance Level	Remarks and Explanations
10.0 General	Heading cell – no response required	Heading cell – no response required
10.1.1.1 through 10.4.1.3	See WCAG 2.2 section	See information in WCAG section
10.5 Caption positioning	Supports	Captions appear at the bottom of the screen and may partially obscure video content.
10.6 Audio description timing	Supports	When provided, audio description does not interfere with relevant audio information in synchronized media.

Chapter 11: Software

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

Criteria	Conformance Level	Remarks and Explanations
11.1.1.1 through 11.4.1.3	See WCAG 2.2 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
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	Web: Supports Electronic Documents: Not Applicable	Fulcrum uses standard platform accessibility services.
11.5.2.4 Assistive technology	Not Applicable	Fulcrum is not itself an assistive technology.
11.5.2.5 Object information	Web: Partially Supports Electronic Documents: Partially Supports	Fulcrum uses WAI-ARIA attributes to describe the role, state, and description of user interface elements to Assistive Technologies. See WCAG 1.1.1 , 1.3.3 , and 4.1.2 for exceptions.

Criteria	Conformance Level	Remarks and Explanations
11.5.2.6 Row, column, and headers	Web: Supports Electronic Documents: Partially Supports	The quality of row, column, and header tagging differs by publication.
11.5.2.7 Values	Web: Supports Electronic Documents: Supports	Fulcrum uses standard HTML or and ARIA object attributes.
11.5.2.8 Label relationships	Web: Supports Electronic Documents: Supports	Fulcrum uses standard HTML and WAI-ARIA attributes to describe label relationships of user interface elements to assistive technologies. This includes the use of “<label>” element and “aria-labelledby” and “aria-label” attributes.
11.5.2.9 Parent-child relationships	Web: Supports Electronic Documents:	Fulcrum uses standard HTML markup to express hierarchical relationships.

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	See WCAG 2.4.6 and 2.4.10 for exceptions to hierarchical heading and subheading structures.
11.5.2.10 Text	Web: Supports Electronic Documents: Partially Supports	Fulcrum renders most strings as plain text values in HTML. PDF-only and PDF downloads may contain page image scans but have OCR text behind them to work with assistive technologies.
11.5.2.11 List of available actions	Web: Supports Electronic Documents: Not Applicable	Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.
11.5.2.12 Execution of available actions	Web: Supports Electronic Documents: Supports	Fulcrum allows assistive technology to programmatically execute available actions on objects with the exception of interactive stats charts.

Criteria	Conformance Level	Remarks and Explanations
11.5.2.13 Tracking of focus and selection attributes	Web: Supports Electronic Documents: Not Applicable	Focus, text insertion point, and selection attributes of user interface elements are programmatically determinable by assistive technologies.
11.5.2.14 Modification of focus and selection attributes	Web: Supports Electronic Documents: Partially Supports	Fulcrum allows keyboards and assistive technologies to programmatically modify focus, text insertion point, and selection attributes of user interface elements. See WCAG 2.1.1 for exceptions.
11.5.2.15 Change notification	Web: Supports Electronic Documents: Not Applicable	Fulcrum notifies screen reader users when switching between tabs in monograph catalog pages. Screen reader users are notified when moving between pages in the Fulcrum EReader.
11.5.2.16 Modifications of states and properties	Web: Supports	All user-set states and properties are capable of being set programmatically, including through assistive technologies.

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Not Applicable	
11.5.2.17 Modifications of values and text	Web: Supports Electronic Documents: Not Applicable	All user-set input is capable of being set programmatically, including through assistive technologies.
11.6 Documented accessibility usage	Heading cell – no response required	Heading cell – no response required
11.6.1 User control of accessibility features	Web: Supports Electronic Documents: Partially Supports	The Fulcrum platform allows user control of accessibility features, including text zoom in the Fulcrum EReader. EPUB and PDF downloads can be opened with any document reader.
11.6.2 No disruption of accessibility features	Web: Supports	The Fulcrum platform and downloads are compatible with operating system and browser

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Supports	accessibility features configured by the user.
11.7 User preferences	Web: Partially Supports Electronic Documents: Partially Supports	User preferences from operating system settings and browser extensions for color, contrast, font type, font size, and focus cursor are respected with the following exceptions: font type and font size set through browser extensions affect all text except for the content of books in the Fulcrum EReader. However, the Fulcrum EReader allows users to change the font size and font type. EPUB downloads allow for modification of font size, contrast, spacing, and other features, but PDF downloads do not.
11.8 Authoring tools	Heading cell – no response required	Heading cell – no response required
11.8.1 Content technology	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
11.8.2 Accessible content creation	Not applicable	Fulcrum is not an authoring platform or tool.
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 .
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.