



# ACLS Humanities EBook Collection Accessibility Conformance Report International Edition

(Based on VPAT® Version 2.5)

Name of Product/Version: Fulcrum v2.77, ACLS Humanities EBook Collection

**Product Description:** ACLS Humanities EBook Collection (ACLS HEB) presents thousands of foundational books in the humanities and social sciences from hundreds of publishers.

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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: <u>Selma and the Liuzzo Murder Trials: The First Modern Civil Rights Convictions by James P. Turner, Empires in World History: Power and the Politics of Difference by Jane Burbank and Frederick Cooper, Show Sold Separately: Promos, Spoilers, and Other Media Paratexts by Jonathan Gray, and A Mid-Republican House From Gabii.</u>

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

- Rome, Profile of a City
- Engendering Democracy in Brazil
- Building the American Highway System
- Oplontis Vol II

This report supersedes the Fulcrum Accessibility Conformance Report VPAT 2.3 released in May 2020 in that it includes evaluation of content in ACLS HEB.

## **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 – the U.S. Federal accessibility standard, published by the U.S. Access Board in the Federal Register on January 18, 2017 and corrected on January 22, 2018	Yes
Jump to Revised Section 508 Report	

EN 301 549 Accessibility requirements 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	

#### **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, 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
Also applies to: EN 301 549 Criteria 9.1.1.1 (Web) 10.1.1.1 (Non-web document) 11.1.1.1.1 (Open Functionality Software) 11.1.1.1.2 (Closed Functionality Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Does Not Support	Form fields and buttons include labels. Images have capability for alt text but most publishers have not provided alt text for books inside this collection.  Videos have capability for captions, transcripts, and audio descriptions. Audio files have capability for transcripts.  3rd-party IRUS badge icons on monograph catalog pages, individual publication and book resources are missing alt text.

Criteria	Conformance Level	Remarks and Explanations
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)  Also applies to: EN 301 549 Criteria  9.1.2.1 (Web)  10.1.2.1 (Non-web document)  11.1.2.1.1 (Open Functionality Software)  11.1.2.1.2.1 and 11.1.2.1.2.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Not applicable	The video player supports captions, audio description, and transcripts. The audio player supports transcripts. There is no audio or video in this collection.

Criteria	Conformance Level	Remarks and Explanations
1.2.2 Captions (Prerecorded) (Level A)  Also applies to: EN 301 549 Criteria  9.1.2.2 (Web)  10.1.2.2 (Non-web document)  11.1.2.2 (Open Functionality Software)  11.1.2.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Not applicable	The video player supports captions, audio description, and transcripts. There is no audio or video in this collection.

Criteria	Conformance Level	Remarks and Explanations
1.2.3 Audio Description or  Media Alternative (Prerecorded) (Level A)  Also applies to: EN 301 549 Criteria  9.1.2.3 (Web)  10.1.2.3 (Non-web document)  11.1.2.3.1 (Open Functionality Software)  11.1.2.3.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Not applicable	The video player supports captions, transcripts, and audio descriptions. The audio player supports transcripts.

Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A)  Also applies to: EN 301 549 Criteria  9.1.3.1 (Web)  10.1.3.1 (Non-web document)  11.1.3.1.1 (Open Functionality Software)  11.8.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Partially Supports	Most of the information, structure, and relationships can be programmatically determined.  Exceptions:  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.  In the Fulcrum E-Reader and in EPUB downloads, chapters and subheadings are tagged, but accuracy of heading structure will vary depending on publisher.  PDF downloads are untagged so information, structure, and relationships cannot be programmatically determined.

Criteria	Conformance Level	Remarks and Explanations
1.3.2 Meaningful Sequence (Level A)  Also applies to: EN 301 549 Criteria  9.1.3.2 (Web)  10.1.3.2 (Non-web document)  11.1.3.2.1 (Open Functionality Software)  11.1.3.2.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Partially Supports	EPUB downloads are tagged and content is ordered in a meaningful sequence. PDF downloads are untagged so a correct tab and reading order cannot be specified.  Also see comments for 1.3.1.

Criteria	Conformance Level	Remarks and Explanations
1.3.3 Sensory Characteristics (Level A)	Web: Partially Supports	Most controls provide text labels not solely sensory characteristics.
Also applies to: EN 301 549 Criteria  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)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Not Applicable	See exceptions above for 1.3.1

Criteria	Conformance Level	Remarks and Explanations
Also applies to: EN 301 549 Criteria  9.1.4.1 (Web)  10.1.4.1 (Non-web document)  11.1.4.1 (Open Functionality Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Partially Supports	Color is only used as a decorative or supplemental attribute of user interface elements. A textual representation is always used as the primary mechanism for conveying information.  Exceptions:  In the Fulcrum E-Reader, when searching inside a book and following a search result to it occurrence in the text, the matched result is only indicated through highlighting of the matched text.  Color may be used to convey meaning in images inside books.

Criteria	Conformance Level	Remarks and Explanations
1.4.2 Audio Control (Level A)  Also applies to: EN 301 549 Criteria  9.1.4.2 (Web)  10.1.4.2 (Non-web document)  11.1.4.2 (Open Functionality Software)  11.4.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Not applicable	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.  There is no audio or video content in the collection.

Criteria	Conformance Level	Remarks and Explanations
2.1.1 Keyboard (Level A)  Also applies to: EN 301 549 Criteria  9.2.1.1 (Web)  10.2.1.1 (Non-web document)  11.2.1.1.1 (Open Functionality Software)  11.2.1.1.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Partially Supports	Fulcrum supports standard keyboard navigation and input functions (such as pressing [Tab] to move between input fields, pressing the arrow keys to move between list items, and pressing [Space] or [Enter] to make selections).  Exceptions:  In the Fulcrum Reader's Content 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.  EPUB downloads are tagged and support standard keyboard navigation. PDF downloads are untagged and do not support keyboard navigation through headings and elements.

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

Criteria	Conformance Level	Remarks and Explanations
2.1.4 Character Key Shortcuts  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic documents: Not applicable	Keyboard shortcuts in audio and video player can be remapped or disabled.  There is no audio or video content in the collection.

Criteria	Conformance Level	Remarks and Explanations
2.2.1 Timing Adjustable (Level A)	Web: Not Applicable	There are no time limits set on content.
Also applies to: EN 301 549 Criteria  9.2.2.1 (Web)  10.2.2.1 (Non-web document)  11.2.2.1 (Open Functionality Software)  11.2.2.1 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Not Applicable	

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

Criteria	Conformance Level	Remarks and Explanations
2.3.1 Three Flashes or Below Threshold (Level A)  Also applies to: EN 301 549 Criteria  9.2.3.1 (Web)  10.2.3.1 (Non-web document)  11.2.3.1 (Open Functionality Software)  11.2.3.1(Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Not Applicable  Electronic Documents: Not Applicable	There are no flashing elements.

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

Criteria	Conformance Level	Remarks and Explanations
2.4.2 Page Titled (Level A)  Also applies to: EN 301 549 Criteria  9.2.4.2 (Web)  10.2.4.2 (Non-web document)  11.2.4.2 (Open Functionality Software)  Does not apply  11.2.4.2 (Closed Software) – Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Web pages have descriptive titles that indicate the content of each page.  EPUB downloads specify a descriptive title.  PDF downloads do not specify a descriptive title.

Criteria	Conformance Level	Remarks and Explanations
2.4.3 Focus Order (Level A)  Also applies to: EN 301 549 Criteria  9.2.4.3 (Web)  10.2.4.3 (Non-web document)  11.2.4.3 (Open Functionality Software)  11.2.4.3 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Pages use a logical tab order that preserves meaning and operability with some exceptions. EPUB downloads are tagged and ensure correct tab and reading order.  Exceptions:  PDF downloads are untagged and do not specify a tab or reading order.

Criteria	Conformance Level	Remarks and Explanations
2.4.4 Link Purpose (In Context) (Level A)  Also applies to: EN 301 549 Criteria  9.2.4.4 (Web)  10.2.4.4 (Non-web document)  11.2.4.4 (Open Functionality Software)  11.2.4.4 (Closed Software  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Fulcrum supports functionality for descriptive label attributes for links.  Exceptions:  Quality of link labels will vary by publisher and book, but most are descriptive in context.

Criteria	Conformance Level	Remarks and Explanations
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Not Applicable	Fulcrum offers single-point operations for all functions that may also allow multipoint or pathbased 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.

Criteria	Conformance Level	Remarks and Explanations
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  • 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)  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Not applicable	Fulcrum does not execute functions on the down-event of the pointer.

Criteria	Conformance Level	Remarks and Explanations
2.5.3 Label in Name (Level A 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Supports	Fulcrum includes an accessible name that matches or includes the visible text label of components.  EPUBs and PDFs contain accessible names that match the visible text label.

Criteria	Conformance Level	Remarks and Explanations
2.5.4 Motion Actuation (Level A 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Not applicable  Electronic Documents: Not applicable	Fulcrum and ebooks do not include functionality that can be operated by device or user motion.

Criteria	Conformance Level	Remarks and Explanations
3.1.1 Language of Page (Level A)  Also applies to: EN 301 549 Criteria  9.3.1.1 (Web)  10.3.1.1 (Non-web document)  11.3.1.1.1 (Open Functionality Software)  11.3.1.1.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Fulcrum uses the language attribute on the HTML element to specify the default language of each page.  Exceptions: Some publishers may not specify a language attribute for the text inside a publication. EPUB downloads specify a language in the metadata but some publishers may not specify a language attribute in the HTML. PDFs and PDF downloads do not specify a language attribute.

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

Criteria	Conformance Level	Remarks and Explanations
3.2.2 On Input (Level A)  Also applies to: EN 301 549 Criteria  9.3.2.2 (Web)  10.3.2.2 (Non-web document)  11.3.2.2 (Open Functionality Software)  11.3.2.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Not Applicable	Changing the setting of a component does not initiate a change of context.
3.2.6 Consistent Help (Level A 2.2 only)  EN 301 549 Criteria – Does not apply  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Not applicable	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
3.3.1 Error Identification (Level A)	Web: Not Applicable	There are no opportunities for input errors.
Also applies to: EN 301 549 Criteria  9.3.3.1 (Web)  10.3.3.1 (Non-web document)  11.3.3.1.1 (Open Functionality Software)  11.3.3.1.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
3.3.2 Labels or Instructions (Level A)	Web: Supports	Labels are provided for elements requiring user input.
Also applies to: EN 301 549 Criteria  9.3.3.2 (Web)  10.3.3.2 (Non-web document)  11.3.3.2 (Open Functionality Software)  11.3.3.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Not Applicable	
3.3.7 Redundant Entry (Level A 2.2 only)	Web: Supports	Search results pages pre-fill the search input with the previously
EN 301 549 Criteria – Does not apply  Revised Section 508 – Does not apply	Electronic Documents: Not applicable	entered search term. Search results pages also provide the previously searched term for the user to select.

Criteria	Conformance Level	Remarks and Explanations
4.1.1 Parsing (Level A)  Also applies to: EN 301 549 Criteria  9.4.1.1 (Web)  10.4.1.1 (Non-web document)  11.4.1.1.1 (Open Functionality Software)  11.4.1.1.2 (Closed Software) – Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Supports	Fulcrum uses semantically-correct markup for all interface elements. The markup is programmatically generated to prevent parsing errors.  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 WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata.

Criteria	Conformance Level	Remarks and Explanations
4.1.2 Name, Role, Value (Level A)  Also applies to: EN 301 549 Criteria  9.4.1.2 (Web) 10.4.1.2 (Non-web document) 11.4.1.2.1 (Open Functionality Software) 11.4.1.2.2 (Closed Software) – Not required 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	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 1.3.3 for exceptions.

Table 2: Success Criteria, Level AA

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

Criteria	Conformance Level	Remarks and Explanations
1.2.5 Audio Description (Prerecorded) (Level AA)	Web: Supports	The video player supports audio descriptions.
Also applies to: EN 301 549 Criteria  9.1.2.5 (Web)  10.1.2.5 (Non-web document)  11.1.2.5 (Open Functionality Software)  11.1.2.5 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Not Applicable	There is no video content in the collection.

Criteria	Conformance Level	Remarks and Explanations
1.3.4 Orientation (Level AA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  9.1.3.4 (Web)  10.1.3.4 (Non-web document)  11.1.3.4 (Open Functionality Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Supports	Fulcrum does not restrict the view of content to single display orientation. The Fulcrum EReader allows for both portrait (scroll mode) and landscape view (pageby-page) display orientation.  Ebooks do not restrict the view of content to single display orientation.

Criteria	Conformance Level	Remarks and Explanations
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2) Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Not applicable  Electronic Documents: Not applicable	Fulcrum does not require input of personal information about the user.

Criteria	Conformance Level	Remarks and Explanations
1.4.3 Contrast (Minimum) (Level AA)  Also applies to: EN 301 549 Criteria  9.1.4.3 (Web)  10.1.4.3 (Non-web document)  11.1.4.3 (Open Functionality Software)  11.1.4.3 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially Supports  Electronic Documents: Partially Supports	The visual presentation of text in interface elements and most books present sufficient color contrast. Some scanned books may not present sufficient color contrast, depending on the quality of the scan. Some images in books may not present sufficient color contrast.  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.

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA)  Also applies to: EN 301 549 Criteria  9.1.4.4 (Web)  10.1.4.4 (Non-web document)  11.1.4.4.1 (Open Functionality Software)  11.1.4.4.2 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Fulcrum supports standard zoom capabilities built into modern web browsers and operating systems.  The Fulcrum EReader has a builtin zoom feature allowing text to be resized up to 400%.  Text in EPUB downloads can be resized. Text in PDFs and PDF downloads cannot be resized except through zooming in on the image, which is capable in the Fulcrum EReader.

Criteria	Conformance Level	Remarks and Explanations
1.4.5 Images of Text (Level AA)  Also applies to: EN 301 549 Criteria  9.1.4.5 (Web)  10.1.4.5 (Non-web document)  11.1.4.5.1 (Open Functionality Software)  11.1.4.5.2 (Closed Software) – Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Electronic Documents: Partially Supports	The Fulcrum platform does not use images of text, with the exception of logos that are properly indicated as such to assistive technology.  Exceptions:  Many titles in the collection are reformatted from print to digital, thus are scanned books in PDF format with uncorrected OCR and the OCR text may have variable quality.

Criteria	Conformance Level	Remarks and Explanations
1.4.10 Reflow (Level AA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Partially 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.  EPUBs format supports reflow, titles available only in PDF do not support reflow.

Criteria	Conformance Level	Remarks and Explanations
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic documents: Not applicable	The presentation of user interface components and graphical objects have a contrast ratio of at least 3:1.

Criteria	Conformance Level	Remarks and Explanations
1.4.12 Text Spacing (Level AA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic documents: Partially 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.  Most ebooks follow the above text display guidelines, however a small portion of ebooks may not.

Criteria	Conformance Level	Remarks and Explanations
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria  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)  Revised Section 508 – Does not apply	Web: Supports  Electronic documents: Not applicable	Fulcrum drop-down buttons, menus, and nonmodal components are dismissable, hoverable, and persistent when receiving and then removing pointer hover or keyboard focus.

Criteria	Conformance Level	Remarks and Explanations
2.4.5 Multiple Ways (Level AA)  Also applies to: EN 301 549 Criteria  9.2.4.5 (Web)  10.2.4.5 (Non-web document) – Does not apply  11.2.4.5 (Open Functionality Software)  – Does not apply  11.2.4.5 (Closed Software) – Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software) – Does not apply to nonweb software  504.2 (Authoring Tool)  602.3 (Support Docs) – Does not apply to nonweb docs	Web: Supports  Electronic Documents: Not Applicable	The Fulcrum platform provides navigation links, search functions, table of contents, embedded media, and links to media from the Fulcrum E-Reader and from monograph catalog pages.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA)  Also applies to: EN 301 549 Criteria  9.2.4.6 (Web)  10.2.4.6 (Non-web document)  11.2.4.6 (Open Functionality Software)  11.2.4.6 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Supports  Electronic Documents: Partially Supports	Fulcrum pages and functions use headings and labels to describe topics or purpose.  Exceptions: Quality of headings and labels may vary by publisher. EPUB publications include descriptive headings.  PDF publications (scanned books) do not include heading tags but do include bookmarks for chapter headings and navigation.  See additional exceptions to labels at 1.3.3 and 2.4.4.

Criteria	Conformance Level	Remarks and Explanations
2.4.7 Focus Visible (Level AA)  Also applies to: EN 301 549 Criteria  9.2.4.7 (Web) 10.2.4.7 (Non-web document) 11.2.4.7 (Open Functionality Software) 11.2.4.7 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Supports  Electronic Documents: Supports	Visual changes are applied to elements to indicate the current position of focus.
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)  EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Not applicable	Components are not hidden when receiving keyboard focus.

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

Criteria	Conformance Level	Remarks and Explanations
3.1.2 Language of Parts (Level AA)  Also applies to: EN 301 549 Criteria  9.3.1.2 (Web)  10.3.1.2 (Non-web document)  11.3.1.2 (Open Functionality Software)  - Does not apply  11.3.1.2 (Closed Software) - Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Partially supports  Electronic Documents: Does not support	While Fulcrum supports tagging of language attributes for all elements except for some metadata fields, the publications in this collection do not include language of parts tagging.

Criteria	Conformance Level	Remarks and Explanations
3.2.3 Consistent Navigation (Level AA)	Web: Supports	Navigation mechanisms are consistent across pages.
Also applies to: EN 301 549 Criteria  9.3.2.3 (Web)  10.3.2.3 (Non-web document) – Does not apply  11.3.2.3 (Open Functionality Software)  – Does not apply  11.3.2.3 (Closed Software) – Does not apply  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software) – Does not apply to nonweb software  504.2 (Authoring Tool)  602.3 (Support Docs) –  Does not apply to non-web docs	Electronic Documents: Not Applicable	

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

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

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)  Also applies to: EN 301 549 Criteria  9.3.3.4 (Web)  10.3.3.4 (Non-web document)  11.3.3.4 (Open Functionality Software)  11.3.3.4 (Closed Software)  11.8.2 (Authoring Tool)  12.1.2 (Product Docs)  12.2.4 (Support Docs)  Revised Section 508  501 (Web)(Software)  504.2 (Authoring Tool)  602.3 (Support Docs)	Web: Not Applicable  Electronic Documents: 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.
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)  EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Not applicable	Cognitive function tests in authentication processes provide mechanisms to assist the user in completing the test.

Criteria	Conformance Level	Remarks and Explanations
4.1.3 Status Messages (Level AA 2.1 and 2.2) Also applies to:  EN 301 549 Criteria	Web: Supports  Electronic documents: Not applicable	Page content updates on search results are announced to assistive technology.

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not applicable	Video player supports sign language translation in a separate video player synchronized with the main player.  There is no video or audio content in this collection.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Does Not Support Electronic Documents: Not applicable	Extended audio description is not supported.  There is no video or audio content in this collection.
1.2.8 Media Alternative (Prerecorded) (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not applicable	Video and audio player supports text-based audio description and transcript.  There is no video or audio content in this collection.
1.2.9 Audio-only (Live) (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 is no live audio content.

Criteria	Conformance Level	Remarks and Explanations
1.3.6 Identify Purpose (Level AAA 2.1 and 2.2)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Partially supports  Electronic Documents: Not applicable	See 1.3.3 for exceptions.
1.4.6 Contrast Enhanced (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Partially Supports  Electronic Documents: Partially Supports	Main text content of platform and most publications meets enhanced contrast ratio (black on white).  Text in some of the headings, labels, buttons and indicators does not meet enhanced contrast ratio.  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.
1.4.7 Low or No Background Audio (Level AAA) Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Not Applicable Electronic Documents: Not Applicable	There is no audio content in this collection

Criteria	Conformance Level	Remarks and Explanations
1.4.8 Visual Presentation (Level AAA)  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.  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web:  1. Does not support 2. Supports 3. Supports 4. Supports 5. Supports Electronic Documents: 1. Does not support 2. Partially Supports 3. Partially Supports 4. Partially Supports 5. Partially Supports 5. Partially Supports 5. Partially Supports	<ol> <li>Foreground and background colors cannot be selected by the user, except through operating system or browser settings.</li> <li>Paragraphs of text do not exceed 80 characters in width by default.</li> <li>Text is not justified in the web interface but is justified in the Fulcrum EReader in PDFs.         Justification in EPUB downloads can be modified if supported by the EPUB reading system.</li> <li>Line spacing is under 1.5 and paragraph spacing is equal to the line spacing. Some EPUB reading systems may allow line and paragraph spacing to be modified for EPUB downloads.</li> <li>For reflowable EPUB publications (less than 10% of the collection), text can be resized without assistive technology (through operating system or browser settings or extensions, and through the zoom settings in the reader) up to 200 percent</li> </ol>

Criteria	Conformance Level	Remarks and Explanations
		in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. PDF publications and PDF downloads, text cannot be resized without assistive technology in a way that doesn't require the user to scroll horizontally.
1.4.9 Images of Text (No Exception) Control (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Partially Supports	The Fulcrum platform does not use images of text, with the exception of logos which are properly identified as logos to assistive technology.  80% of PDFs are images of text but all PDFs contain OCR.
2.1.3 Keyboard (No Exception) (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Partially Supports	Fulcrum supports keyboard navigation and input functions (such as pressing [Tab] to move between input fields, pressing the arrow keys to move between list items, and pressing [Space] or [Enter] to make selections).

Criteria	Conformance Level	Remarks and Explanations
		See 2.1.1 for exceptions.
2.2.3 No Timing (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents:  Supports	Webpages, documents, and features do not require timing, except for non-interactive video and audio.
2.2.4 Interruptions (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	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.

Criteria	Conformance Level	Remarks and Explanations
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.
2.4.8 Location (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic Documents: Supports	Press, monograph catalog, and media pages contain a breadcrumb trail at the top of each page. Navigation within monograph catalog pages is organized through tabs, with the selected tab clearly indicated. Each page provides a link to the Fulcrum home page, the press page, and the main monograph catalog page as well as a navigation footer.  Books in the Fulcrum EReader indicate location numbers and/or page numbers. EPUB downloads provide a clickable table of contents as well as location numbers. PDF downloads provide chapter locations via bookmarks and page numbers and a footer on each page with information about the book.

Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply Revised Section Headings Electronic Documents: Partially Supports  Section headings are used to organize HTML content and Fulcrum EReader has capable for chapters and subheadings. Exceptions: For some EPUBs in the Fulc EReader, chapter headings or chapter number and a separ heading for the name of the chapter). Quality of heading structure varies by publisher PDFs do not include heading.  2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does  Web: Supports  User interface components not hidden when receiving keyboard focus.	Criteria	Conformance Level	Remarks and Explanations
AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply Rough Serviced Section 508 – Does not apply Revised Section 508 – Does not apply  Revised Section 508 – Does not apply  Revised Section 508 – Does not apply  Revised Section 508 – Does not apply  Revised Section 508 – Does not apply  Exceptions:  For some EPUBs in the Fulce EReader, chapter headings of listed twice (one heading for chapter number and a separ heading for the name of the chapter). Quality of heading structure varies by publisher PDFs do not include heading  2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does  Electronic Documents: Partially Supports  For some EPUBs in the Fulce EReader, chapter headings of the name of the chapter). Quality of heading structure varies by publisher PDFs do not include heading structure varies by publ	(Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does	Electronic Documents:	Exceptions: Quality of link labels will vary by publication and book. Some books include links that are not
(Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does not hidden when receiving keyboard focus.	AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does	Electronic Documents:	headings.  Exceptions:  For some EPUBs in the Fulcrum EReader, chapter headings are listed twice (one heading for the chapter number and a separate heading for the name of the
not apply	(Enhanced) (Level AAA 2.2 only)	Web: Supports	User interface components are not hidden when receiving keyboard focus.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 – Does not apply	Electronic Documents: Not applicable	
2.4.13 Focus Appearance (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not applicable	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.
2.5.5 Target Size (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Partially supports  Electronic Documents: Partially supports	Most targets for pointer inputs are larger than 44 x 44 pixels.  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	Web: Supports  Electronic  Documents: Not  applicable	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	Web: Not applicable  Electronic  Documents:  Partially Supports	Ebook content may use unusual words, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.

Criteria	Conformance Level	Remarks and Explanations
3.1.4 Abbreviations (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Not applicable  Electronic  Documents:  Partially Supports	The platform does not use abbreviations.  Ebook content may use abbreviations, and presence of mechanisms for identifying definitions (such as glossaries) will vary by publication.
3.1.5 Reading Level (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Not applicable  Electronic  Documents:  Partially Supports	Reading level varies by publication.
3.1.6 Pronunciation (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Not applicable  Electronic Documents: Partially Supports	Presence of mechanisms for identifying pronunciation of words will vary by publication.
3.2.5 Change on Request (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not  Applicable	Changes of context are initiated only by user request.

Criteria	Conformance Level	Remarks and Explanations
3.3.5 Help (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not  Applicable	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.
3.3.6 Error Prevention (All) (Level AAA)  Also applies to: EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not  Applicable	Submissions of text input are reversible.
3.3.9 Accessible Authentication (Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports  Electronic  Documents: Not  Applicable	Authentication methods that use cognitive function test of remembering password provides a mechanism to assist the user.

## **Revised Section 508 Report**

## **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 WCAG 1.1.1, 1.3.2, 1.3.3, 1.4.5, 2.4.4, 2.4.6 for exceptions.
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 WCAG 1.3.1, 1.4.3 and 1.4.5 for exceptions.
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.

Criteria	Conformance Level	Remarks and Explanations
	Partially Supports	See WCAG <u>1.4.1</u> for exceptions.
302.4 Without Hearing	Web: Supports  Electronic Documents: Not applicable	The collection does not include any audio content.
302.5 With Limited Hearing	Web: Supports  Electronic  Documents: Not applicable	The collection does not include any audio content.
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	Fulcrum supports keyboard navigation. See <u>WCAG 2.1.1</u> for exceptions.
	Electronic Documents: Partially Supports	Usage of the product does not require fine motor controls nor simultaneous actions.
302.8 With Limited Reach and Strength	Web: Partially Supports	Fulcrum supports keyboard navigation. See WCAG 2.1.1 for exceptions.
	Electronic Documents: Partially Supports	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	Fulcrum uses a logical focus order. The interface is consistent, intuitive, and simple to navigate.
	Electronic Documents: Partially Supports	Reading level of publications varies.

## **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: Partially Supports	The 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, though 90% of collection is PDF, and these PDF downloads do not allow resizing or modification of text.
502.2.2 No Disruption of Accessibility Features	Web: 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
	Electronic Documents: Supports	
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.

Criteria	Conformance Level	Remarks and Explanations
502.3.3 Row, Column, and Headers	Web: Supports  Electronic Documents: Partially Supports	Platform does not use tables.  Tables include correct row, column, and header tags in reflowable EPUBs (less than 10% of the collection) but not in PDF publications.
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.

Criteria	Conformance Level	Remarks and Explanations
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>" elements and "aria-labelledby" and "aria-label" attributes.</label>
502.3.7 Hierarchical Relationships	Web: Supports  Electronic Documents: Partially Supports	Fulcrum uses standard HTML markup to express hierarchical relationships.  See WCAG <u>2.4.6</u> and <u>2.4.10</u> for exceptions to hierarchical heading and subheading structures.
502.3.8 Text	Web: Supports  Electronic Documents: Partially Supports	Fulcrum renders most strings as plain text values in HTML. 90% of the collection is PDF page images rendered as OCR text.

Criteria	Conformance Level	Remarks and Explanations
502.3.9 Modification of Text	Web: Supports  Electronic Documents: Not Applicable	All user-set input is capable of being set programmatically, including through assistive technologies.
502.3.10 List of Actions	Web: Supports  Electronic Documents: Not Applicable	Fulcrum uses standard HTML and ARIA object attributes for actions such as search and filter.
502.3.11 Actions on Objects	Web: Supports  Electronic Documents: Supports	Fulcrum allows assistive technology to programmatically execute available actions.
502.3.12 Focus Cursor	Web: Supports	Fulcrum uses visual changes to elements to indicate the current position of focus.

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Not Applicable	
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.
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 E-Reader.
502.4 Platform Accessibility Features  A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;  B. Section 9.3.4 Provide	A. Not Applicabl e B. Not Applicabl e	<ul> <li>A. Simultaneous keystrokes not required.</li> <li>B. Not applicable.</li> <li>C. Not applicable.</li> <li>D. No audio or video content in the collection.</li> <li>E. No video content in the collection.</li> </ul>
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Criteria	Conformance Level	Remarks and Explanations
adjustment of delay before key acceptance;  C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance;  D. Section 10.6.7 Allow users to choose visual alternative for audio output;  E. Section 10.6.8 Synchronize audio equivalents for visual events;  F. Section 10.6.9 Provide speech output services; and  G. Section 10.7.1 Display any captions provided.	C. Not Applicabl e D. Web: Supports Electroni c Documen ts: Not Applicabl e E. Web: Supports Electroni c Documen ts: Not Applicabl e F. Web: Supports Electroni c Documen ts: Not Applicabl e F. Web: Supports Electroni c Documen ts: Partially Supports G. Web: Supports Electroni c Documen ts: Partially Supports Coupocumen ts: Partially Supports Coupocumen ts: Not	F. Fulcrum does not provide a built-in text-to-speech feature but is accessible to screen readers. EPUB and PDF downloads are accessible to screen readers.  G. No video content in the collection.

Criteria	Conformance Level	Remarks and Explanations
	applicabl e	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 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 in EPUBs. EPUB downloads allow for modification of font size, contrast, spacing, and other features, but PDFs and PDF downloads do not.

Criteria	Conformance Level	Remarks and Explanations
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: Not Applicable	No video content in collection.
503.4.2 Audio Description Controls	Web: Supports  Electronic Documents: Not Applicable	No video content in collection.

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")	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	Accessibility and compatibility features are explained on the Fulcrum Accessibility Page.
		Additional accessibility information on content is available at <a href="https://humanitiesebook">https://humanitiesebook</a> .org/accessibility
602.3 Electronic Support Documentation	See WCAG 2.2 section	See information in WCAG section

Criteria	Conformance Level	Remarks and Explanations
602.4 Alternate Formats for Non- Electronic Support Documentation	Not Applicable	Support documentation is provided in electronic format.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Information on accessibility and compatibility is provided at https://www.fulcrum.org/accessibility/ and information specific to content is available at https://humanitiesebook.org/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, 1.3.2, 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 standard operating system contrast adjustments and provides sufficient color contrast.  See WCAG 1.3.1, 1.4.3 and 2.4.6, 4.1.2 for exceptions.
4.2.3 Usage without perception of colour	Web: Partially Supports	Color is only used as a decorative or supplemental attribute of user interface elements.

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Partially Supports	See WCAG <u>1.4.1</u> for exceptions.
4.2.4 Usage without hearing	Web: Supports  Electronic Documents: Not Applicable	No audio content in the collection.
4.2.5 Usage with limited hearing	Web: Supports  Electronic Documents: Not Applicable	No audio content in the collection.
4.2.6 Usage without vocal capability	Web: Not Applicable  Electronic Documents: Not Applicable	Fulcrum does not require speech input

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Criteria	Conformance Level	Remarks and Explanations
4.2.7 Usage with limited manipulation or strength	Web: Partially Supports Electronic	Fulcrum supports keyboard navigation. See <u>WCAG 2.1.1</u> for exceptions.
	Documents: Partially Supports	Usage of the product does not require fine motor controls nor simultaneous actions.
4.2.8 Usage with limited reach	Web: Partially Supports	Fulcrum supports keyboard navigation. See <u>WCAG 2.1.1</u> for exceptions.
	Electronic Documents: Partially Supports	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	Fulcrum does not include visual features with flashing that could trigger seizures

Criteria	Conformance Level	Remarks and Explanations
4.2.10 Usage with limited cognition	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.
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**

Notes: The ACLS Humanities Ebook Collection does not include any video content and is therefore not subject to the criteria described in this chapter.

### **Chapter 8: <u>Hardware</u>**

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** 

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	Not Applicable	No videos in electronic documents
10.6 Audio description timing	Not Applicable	No video or audio in electronic documents

### **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	Tables include correct row, column, and header tags in reflowable EPUBs (less than 10% of the collection) but not in PDFs.
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>" elements and "aria-labelledby" and "aria-label" attributes.</label>

Criteria	Conformance Level	Remarks and Explanations
11.5.2.9 Parent-child relationships	Web: Supports  Electronic Documents: Partially Supports	Fulcrum uses standard HTML markup to express hierarchical relationships.  See WCAG <u>2.4.6</u> and <u>2.4.10</u> 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 publications 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	Fulcrum allows assistive technology to programmatically

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Supports	execute available actions on objects.
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	Fulcrum notifies screen reader users when switching between tabs in monograph catalog pages. Screen reader users are notified

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Not Applicable	when moving between pages in the Fulcrum EReader.
11.5.2.16 Modifications of states and properties	Web: Supports  Electronic Documents: Not Applicable	All user-set states and properties are capable of being set programmatically, including through assistive technologies.
11.5.2.17 Modifications of values and text	Web: Supports  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	The Fulcrum platform allows user control of accessibility features, including text zoom in the reader.

Criteria	Conformance Level	Remarks and Explanations
	Electronic Documents: Partially Supports	EPUB and PDF downloads can be opened with any document reader, though 90% of PDF downloads are image scans and do not allow resizing or modification of text.
11.6.2 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.
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 type in EPUBs. EPUB downloads allow for modification of font size, contrast,

Criteria	Conformance Level	Remarks and Explanations	
		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	
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.	

Criteria	Conformance Level	Remarks and Explanations
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.