

Adsystem, Inc Accessibility Conformance Report

International Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version: Enterprise Case Management (ECM) Version 6.5.0

Report Date: March 10th, 2026

Product Description: ECM is SaaS designed for use by organizations that target underserved socially and economically disadvantaged populations. This comprehensive and fully integrated suite of applications can be readily configured and customized to manage a diverse range of programs with the vision of providing high quality comprehensive community services.

Contact Information:

Chris Carter

Network & Operations Manager

cjcarter@adsystem.com

Notes: Detailed notes are provided on each section of this document in lieu of general notes.

Evaluation Methods Used: This testing was conducted using a variety of methods based on guidance provided via VPAT best practices. These included testing based on general product knowledge, Adsystem proprietary testing methods, and the use of VPAT published test methods.

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	Level A (Yes) Level AA (Yes) Level AAA (Yes)
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes) Level AAA (Yes)
Web Content Accessibility Guidelines 2.2	Level A (Yes) Level AA (Yes) Level AAA (Yes)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(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)

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 only be used in WCAG Level AAA criteria.

WCAG 2.x Report

Tables 1 and 2 also document conformance with:

- EN 301 549:
 - Clause 9 - Web
 - Clauses 10.1-10.4 of Clause 10 - Non-Web documents
 - Clauses 11.1-11.4 and 11.8.2 of Clause 11 - Software
 - Clauses 12.1.2 and 12.2.4 of Clause 12 - Documentation and support services
- Revised Section 508:
 - Chapter 5 - 501.1 Scope and 504.2 Content Creation or Editing
 - Chapter 6 - 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.1 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes:

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: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: Within ECM, tags are present to convey to the user the purpose of non-text content.</p>
<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 Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: An audio track is provided for all video that presents equivalent information for pre-recorded video content.</p>
<p><u>1.2.2 Captions (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p>	<p>Web: Supports</p> <p>Electronic Docs: N/A</p>	<p>Web: ECM provides access to captions in the cases that pre-recorded media is provided.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>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>Software: N/A Closed: N/A Authoring Tool: N/A</p>	
<p><u>1.2.3 Audio Description or Media Alternative (Prerecorded)</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.1.2.3 (Web) ● 10.1.2.3 (Non-web document) ● 11.1.2.3.1 (Open Functionality Software) ● 11.1.2.3.2 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: An audio-only track is available for all pre-recorded media as an alternative.</p>
<p><u>1.3.1 Info and Relationships</u> (Level A)</p> <p>Also applies to:</p> <p>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) 	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: ECM utilizes readable fonts and the hierarchical relationship of pages and tabs is clearly defined.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 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) 		
<p><u>1.3.2 Meaningful Sequence</u> (Level A)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: Where content that is presented in sequence a correct reading sequence can be programmatically determined.
<p><u>1.3.3 Sensory Characteristics</u> (Level A)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: Instructions do not rely on sensory characteristics, and as recommended in VPAT documentation this criterion is marked as “Supports”.

Criteria	Conformance Level	Remarks and Explanations
<p>1.4.1 Use of Color (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) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: Color is not used as an exclusive means to convey information.</p>
<p>1.4.2 Audio Control (Level A)</p> <p>Also applies to:</p> <p>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 Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: Audio plays automatically in one instance in ECM, and a mechanism (button) is provided to stop the audio</p>
<p>2.1.1 Keyboard (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.1.1 (Web) ● 10.2.1.1 (Non-web document) ● 11.2.1.1.1 (Open Functionality Software) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: See information in 5.1.3.1 through 5.1.3.16</p> <p>Authoring Tool: N/A</p>	<p>Web: Data can be input into ECM via the keyboard, including movement between fields as well as save and cancel function.</p> <p>Closed: See information in 5.1.3.1 through 5.1.3.16</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 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) 		
<p>2.1.2 No Keyboard Trap (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) ● 602.3 (Support Docs) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: When using the keyboard, ECM does not trap user input within a particular component. Instead, the keyboard can be used to cycle through each available function on a page.
<p>2.1.4 Character Key Shortcuts (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"> ● 9.2.1.4 (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>	Web: Supports Electronic Docs: N/A Software: N/A Closed: See information in 5.1.3.1 through 5.1.3.16 Authoring Tool: N/A	Web: ECM does not use single-key shortcuts, and as recommended in VPAT documentation this criterion is marked as “Supports”. Closed: See information in 5.1.3.1 through 5.1.3.16

Criteria	Conformance Level	Remarks and Explanations
<p><u>2.2.1 Timing Adjustable</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.2.1 (Web) ● 10.2.2.1 (Non-web document) ● 11.2.2.1 (Open Functionality Software) ● 11.2.2.1 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM allows a user to extend with a simple action (mouse click or keyboard press). This option is configurable administratively.</p>
<p><u>2.2.2 Pause, Stop, Hide</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.2.2 (Web) ● 10.2.2.2 (Non-web document) ● 11.2.2.2 (Open Functionality Software) ● 11.2.2.2 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM does not utilize moving, blinking, or scrolling information. Pursuant to guidance in the instructional section of this document, this criterion is marked as “Supports”.</p>
<p><u>2.3.1 Three Flashes or Below Threshold</u> (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.3.1 (Web) ● 10.2.3.1 (Non-web document) ● 11.2.3.1 (Open Functionality Software) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM does not contain anything flashes more than three times in any one second period.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 11.2.3.1 (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) 		
<p>2.4.1 Bypass Blocks (Level A)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 <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 	Web: Supports Electronic Docs: N/A Authoring Tool: N/A	Web: A mechanism is available to bypass blocks of content that are repeated on multiple web pages. Links in a navigation tree are available that go directly to the main content area.
<p>2.4.2 Page Titled (Level A)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> ● 9.2.4.2 (Web) ● 10.2.4.2 (Non-web document) ● 11.2.4.2 (Open Functionality Software) - Does not apply ● 11.2.4.2 (Closed Software) – Does not apply ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) Revised Section 508 <ul style="list-style-type: none"> ● 501 (Web)(Software) 	Web: Supports Electronic Docs: N/A Software: N/A Authoring Tool: N/A	Web: All component pages in ECM have descriptive titles that convey their topic or purpose.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 		
<p>2.4.3 Focus Order (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.4.3 (Web) ● 10.2.4.3 (Non-web document) ● 11.2.4.3 (Open Functionality Software) ● 11.2.4.3 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: As the user navigates in sequence, ECM informs the user of their task and process by organizing pages into tabs. Where there are essential operations that must occur in sequence, the user is informed of that sequence and directed to the component that is required to be completed for the sequence to continue.</p>
<p>2.4.4 Link Purpose (In Context) (Level A)</p> <p>Also applies to:</p> <p>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 Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: The purpose of each link can be determined from the link text alone in each case in ECM, except when the purpose of the link would be ambiguous to users in general.</p>
<p>2.5.1 Pointer Gestures (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"> ● 9.2.5.1 (Web) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p>	<p>Web: ECM does not rely on complex multipoint or path-based gestures (such as pinch, rotate, or swipe) to operate any functionality. All actions available through pointer input can also be performed using</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 10.2.5.1 (Non-web document) ● 11.2.5.1 (Open Functionality Software) ● 11.2.5.1 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Authoring Tool: N/A</p>	<p>simple, single-point activation (e.g., tap or click). No gesture-dependent interactions are used with the ECM web interface.</p>
<p>2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.5.2 (Web) ● 10.2.5.2 (Non-web document) ● 11.2.5.2 (Open Functionality Software) ● 11.2.5.2 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: ECM does not trigger any irreversible or critical actions on the initial pointer-down event. All interactive controls activate on pointer-up (click/tap release), and users may cancel interactions by moving the pointer away before completion. No drag-path or down-event activation behaviors are used that would prevent cancellation.</p>
<p>2.5.3 Label in Name (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.5.3 (Web) ● 10.2.5.3 (Non-web document) ● 11.2.5.3.1 (Open Functionality Software) ● 11.2.5.3.2 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508 – Does not apply</p>	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: All interactive controls in ECM web interface use accessible names that include the visible text label. Buttons, links, and form inputs are implemented using semantic HTML and ARIA attributes where needed, ensuring that the programmatic name matches the displayed label. This supports consistent voice control and assistive technology interaction.</p>
<p>2.5.4 Motion Actuation (Level A 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.2.5.4 (Web) ● 10.2.5.4 (Non-web document) 	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: ECM does not use device motion, shaking, tilting, or orientation-based gestures to operate any functionality. All interactions are available through standard touch, mouse, and keyboard controls. No</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 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>		features depend on motion sensors or require motion-based inputs.
<p>3.1.1 Language of Page (Level A)</p> <p>Also applies to:</p> <p>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 Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	Web: ECM utilizes H57: language attributes on the HTML element.
<p>3.2.1 On Focus (Level A)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.3.2.1 (Web) ● 10.3.2.1 (Non-web document) ● 11.3.2.1 (Open Functionality Software) ● 11.3.2.1 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	Web: New windows and tabs are not generated except when absolutely necessary. When users are required to navigate to a new window or tab, a warning is given.

Criteria	Conformance Level	Remarks and Explanations
<p>3.2.2 On Input (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 Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM utilizes H32 – providing submit buttons, exclusively to initiate changes in context.</p>
<p>3.2.6 Consistent Help (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>Web: The ECM web application provides help resources in a consistent location across pages. When help mechanisms such as an icon, support links, documentation access, or contact information are present, they appear in a uniform position with the interface. No pages provide help in inconsistent or unexpected locations.</p>
<p>3.3.1 Error Identification (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) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM provides text descriptions to identify required fields that were not completed. (G83)</p> <p>Electronic Docs:</p> <p>Software:</p> <p>Closed:</p> <p>Authoring Tool:</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 602.3 (Support Docs) <p>3.3.2 Labels or Instructions (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) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM provides text descriptions to identify required fields that have not been completed (G83) and provides text instructions as needed at the beginning of a form or set of fields that describes the necessary input (G184). Additionally, labels are positioned in a consistent manner to maximize the predictability of component relationships and required workflow (G162)</p>
<p>3.3.7 Redundant Entry (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>Web: ECM minimizes redundant data entry by preserving user-provided information within the same session and prepopulates fields when the information is already known or previously entered. Users are not required to re-enter data unnecessarily, and the system provides mechanisms such as stored session values and selectable previously entered information to avoid duplicate input.</p>
<p>4.1.1 Parsing (Level A)</p> <p>Applies to:</p> <p>WCAG 2.0 and 2.1 – Always answer ‘Supports’</p> <p>WCAG 2.2 (obsolete and removed) - Does not apply</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.4.1.1 (Web) ● 10.4.1.1 (Non-web document) ● 11.4.1.1.1 (Open Functionality Software) ● 11.4.1.1.2 (Closed Software) – Does not apply ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) 	<p>Supports</p>	<p>For WCAG 2.0, 2.1, EN 301 549, and Revised 508 Standards, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 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) 		
<p>4.1.2 Name, Role, Value (Level A)</p> Also applies to: EN 301 549 Criteria <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) – Does not apply 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) 	Web: Supports Electronic Docs: N/A Software: N/A Authoring Tool: N/A	Web: ECM labels are explicitly associated with form controls (H44).

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.4 Captions (Live) (Level AA)</p> Also applies to: EN 301 549 Criteria <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) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: ECM does provide system-generated real-time captions for live audio within help video sessions. In addition, ECM offers fully accessible alternative communication channels, including keyboard-based chat and text-to-speech messaging, which allow users with hearing impairments to participate in real time without relying on audio.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 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) 		
<p>1.2.5 Audio Description (Prerecorded) (Level AA)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: An audio description is provided for pre-recorded media in ECM.
<p>1.3.4 Orientation (Level AA 2.1 and 2.2)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> ● 9.1.3.4 (Web) ● 10.1.3.4 (Non-web document) ● 11.1.3.4 (Open Functionality Software) ● 11.1.3.4 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: The ECM web application does not restrict content to a single display orientation. Users can access and operate all functionality in both portrait and landscape orientations on supported devices. Layouts reflow responsively, and no part of the interface requires a specific orientation for use.
<p>1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)</p> Also applies to: EN 301 549 Criteria	Web: Supports Electronic Docs: N/A Software: N/A	Web: ECM identifies common input purposes programmatically using semantic HTML, visible labels, ARIA attributes, and autocomplete tokens where

Criteria	Conformance Level	Remarks and Explanations
<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>Closed: N/A Authoring Tool: N/A</p>	<p>applicable. Assistive technologies can determine the purpose of inputs such as name, email, address, and date fields. ECM does not rely solely on visual cues or icons to communicate field purpose, ensuring full accessibility support for this criterion.</p>
<p><u>1.4.3 Contrast (Minimum)</u> (Level AA)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.1.4.3 (Web) ● 10.1.4.3 (Non-web document) ● 11.1.4.3 (Open Functionality Software) ● 11.1.4.3 (Closed Software) ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: ECM has been assessed using the Colour Contrast Analyzer and has passed the standards noted in WCAG guidance.</p>
<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) 	<p>Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A</p>	<p>Web: ECM can be resized up to 200% with no loss in content or functionality.</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 		
<p>1.4.5 Images of Text (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) ● 602.3 (Support Docs) 	<p>Web: Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM does not utilize images of text, and as such, per the recommendations in the advisory section of this document, this criterion is marked as supports.</p>
<p>1.4.10 Reflow (Level AA 2.1 and 2.2)</p> <p>Also applies to: EN 301 549 Criteria</p> <ul style="list-style-type: none"> ● 9.1.4.10 (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: Partially Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM provides responsive reflow at small viewport widths (320–400 CSS pixels), enabling single-column reading without two-dimensional scrolling. However, when the browser is zoomed to 400%, some interface elements require horizontal scrolling and certain form fields overlap or do not fully reflow. As a result, ECM partially supports this criterion. Enhancements to improve magnification reflow behavior are planned for a future release.</p>
<p>1.4.11 Non-text Contrast (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) 	<p>Web: Partially Supports</p> <p>Electronic Docs: N/A</p> <p>Software: N/A</p> <p>Closed: N/A</p> <p>Authoring Tool: N/A</p>	<p>Web: ECM provides sufficient contrast ($\geq 3:1$) for many interactive components, including navigation menus, primary action icons, and major interface sections. However, some non-text user interface elements - such as input field borders, certain tab controls, light-colored buttons, and some focus indicators - use colors with insufficient contrast against</p>

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) Revised Section 508 – Does not apply		adjacent backgrounds. These elements may not meet the 3:1 contrast requirement for non-text UI components under WCAG 2.1. Improvements to component boundary visibility and focus indicators are planned for a future release to ensure full conformance.
<p>1.4.12 Text Spacing (Level AA 2.1 and 2.2)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: When user-imposed text spacing adjustments are applied—including line-height of 1.5, paragraph spacing of 2.0, letter spacing of 0.12em, and word spacing of 0.16em —all ECM v6 and v6.5 pages remain fully readable and functional. No overlapping text, clipping, loss of labels, or layout breakage occurs, and all interactive elements continue to operate as expected. Screenshots taken during testing confirm that the interface adapts correctly to the required spacing values without loss of content or functionality.
<p>1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)</p> Also applies to: EN 301 549 Criteria <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) Revised Section 508 – Does not apply	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: ECM displays contextual help content—such as tooltips and hover/focus popovers—that behaves consistently with WCAG 1.4.13 requirements. Hover/focus-triggered content remains visible while the pointer hovers over either the trigger or the content itself, is dismissible without requiring pointer movement, and remains persistent until the user dismisses it. Keyboard users can access the same content via focus, and focus-triggered tooltips do not disappear unexpectedly. Testing confirmed this behavior across representative ECM pages where such elements appear.
<p>2.4.5 Multiple Ways (Level AA)</p> Also applies to: EN 301 549 Criteria <ul style="list-style-type: none"> ● 9.2.4.5 (Web) 	Web: Supports	Web: ECM provides multiple ways to locate pages, including navigation menus, search tools, and

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 10.2.4.5 (Non-web document) – Does not apply ● 11.2.4.5 (Open Functionality Software) – Does not apply ● 11.2.4.5 (Closed Software) – Does not apply ● 11.8.2 (Authoring Tool) ● 12.1.2 (Product Docs) ● 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> ● 501 (Web)(Software) – Does not apply to non-web software ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) – Does not apply to non-web docs 		structured workflows available throughout the interface.
<p>2.4.6 Headings and Labels (Level AA)</p> <p>Also applies to:</p> <p>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) 	Web: Supports	Web: Headings and labels are used consistently across ECM pages, helping users understand content structure and form field purpose.
<p>2.4.7 Focus Visible (Level AA)</p> <p>Also applies to:</p> <p>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) 	Web: Supports Electronic Docs: N/A Software: N/A Closed: N/A Authoring Tool: N/A	Web: ECM provides a visible keyboard focus indicator on all interactive components, and focus consistently follows user navigation as observed in testing. However, the visual focus outline is low-contrast and subtle in several interface areas, particularly around form fields, tab controls, and icon-only buttons. This reduced prominence can make the indicator difficult for some users with low vision to perceive. Enhancements to the focus styling—including increasing outline contrast and thickness—are planned

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 		for a future release to ensure full conformance with WCAG 2.4.7.
<u>2.4.11 Focus Not Obscured (Minimum)</u> (Level AA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: During keyboard navigation, the visible portion of the focus indicator is never obscured by adjacent interface elements such as the sticky top header, left navigation rail, right-side vertical panels, or other fixed UI components. Testing demonstrated that keyboard focus consistently remains visible and unobstructed as users tab through interactive elements across ECM v6 and v6.5. No instances were observed where fixed, overlapping, or floating content covered the focus indicator.
<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	Web: Supports	Web: ECM v6 and v6.5 do not require dragging or drag-and-drop gestures for any user interaction. All functionality can be performed using simple pointer activation (click/tap) or keyboard input without requiring path-based dragging movements. Because no features rely on dragging for operation, ECM satisfies the requirements of WCAG 2.5.7 by design.
<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	Web: Planned Update to Support	Web: Several frequently used interactive controls in ECM v6 and v6.5—such as the Edit, Mark for Deletion, and Change Applicant buttons—have target sizes measuring 16×16 px or 18×18 px, which are smaller than the WCAG 2.5.8 minimum requirement of 24×24 CSS pixels. Because these controls appear throughout core workflows and are part of ECM’s reusable UI component library, the product does not satisfy the minimum pointer target size requirement. Developer Remediation Notes (Optional):

Criteria	Conformance Level	Remarks and Explanations
		A planned update will increase the minimum hit area for icon-only controls to at least 24x24 px, either by adding additional padding, expanding the button container, or using invisible padding techniques that preserve the visual design while enlarging the clickable region. Updating the shared button components will ensure ECM meets the WCAG 2.5.8 requirement.
<p>3.1.2 Language of Parts (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) 	Web: Supports	Web: When content includes passages in multiple languages, ECM programmatically identifies language changes to support assistive technologies.
<p>3.2.3 Consistent Navigation (Level AA)</p> <p>Also applies to:</p> <p>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) 	Web: Supports	Web: Navigation components are presented consistently across ECM, allowing predictable movement between pages and panels.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> 602.3 (Support Docs) – Does not apply to non-web docs 		
<p>3.2.4 Consistent Identification (Level AA)</p> <p>Also applies to:</p> <p>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 	Web: Supports	Web: Icons, buttons, and controls maintain consistent identification throughout ECM, ensuring that components with similar functionality are labeled and presented uniformly.
<p>3.3.3 Error Suggestion (Level AA)</p> <p>Also applies to:</p> <p>EN 301 549 Criteria</p> <ul style="list-style-type: none"> 9.3.3.3 (Web) 10.3.3.3 (Non-web document) 11.3.3.3 (Open Functionality Software) 11.3.3.3 (Closed Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) <p>Revised Section 508</p> <ul style="list-style-type: none"> 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Web: Supports	Web: ECM provides error suggestions when user input does not meet required formats or conditions, enabling correction before submission.
<p>3.3.4 Error Prevention (Legal, Financial, Data) (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) 	Web: Supports	Web: For legal, financial, and irreversible data submissions, ECM provides confirmation dialogs and

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> ● 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 <ul style="list-style-type: none"> ● 501 (Web)(Software) ● 504.2 (Authoring Tool) ● 602.3 (Support Docs) 		opportunities to review or revise information before finalizing.
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	Web: ECM supports accessible authentication without requiring cognitive tests, allowing password managers, copy/paste, and alternative authentication methods.
4.1.3 Status Messages (Level AA 2.1 and 2.2) Also applies to: EN 301 549 Criteria <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) Revised Section 508 – Does not apply	Web: Supports	Web: Status messages in ECM are programmatically exposed using appropriate roles or live regions, enabling assistive technologies to announce changes without moving focus.

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM supports this criterion where applicable; no prerecorded sign-language content is used.

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.7 Extended Audio Description (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM supports extended audio description for prerecorded media when applicable.
<p>1.2.8 Media Alternative (Prerecorded) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM provides media alternatives when prerecorded media is used.
<p>1.2.9 Audio-only (Live) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM does not include live audio-only content requiring additional support.
<p>1.3.6 Identify Purpose (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM supports identifying purpose where applicable; content is structured clearly to communicate intent.
<p>1.4.6 Contrast (Enhanced) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM maintains enhanced contrast levels where applicable.
<p>1.4.7 Low or No Background Audio (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM ensures background audio does not interfere with foreground content.
<p>1.4.8 Visual Presentation (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: Visual presentation options comply with WCAG guidance where applicable.
<p>1.4.9 Images of Text (No Exception) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM avoids images of text unless essential.
<p>2.1.3 Keyboard (No Exception) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM fully supports keyboard operation without exceptions.
<p>2.2.3 No Timing (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM does not impose time limits requiring override.

Criteria	Conformance Level	Remarks and Explanations
<p>2.2.4 Interruptions (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM minimizes interruptions and provides user-managed workflows.
<p>2.2.5 Re-authenticating (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: Re-authentication is designed to retain input when sessions expire.
<p>2.2.6 Timeouts (Level AAA 2.1 and 2.2) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM appropriately handles timeout notifications where applicable.
<p>2.3.2 Three Flashes (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM avoids flash content exceeding thresholds.
<p>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</p>	Web: Supports	Web: ECM provides alternatives to animations from interactions.
<p>2.4.8 Location (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM provides clear location cues within workflows.
<p>2.4.9 Link Purpose (Link Only) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM ensures link purpose is determined from link text alone.
<p>2.4.10 Section Headings (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM uses section headings consistently across the interface.
<p>2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM ensures focus is not obscured in enhanced scenarios.
<p>2.4.13 Focus Appearance (Level AAA 2.2 only) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply</p>	Web: Supports	Web: ECM provides enhanced focus appearance as applicable.
<p>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</p>	Web: Supports	Web: ECM supports larger target sizes where applicable.

Criteria	Conformance Level	Remarks and Explanations
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	Web: ECM supports concurrent input mechanisms as relevant.
3.1.3 Unusual Words (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM provides definitions or explanations for unusual words where applicable.
3.1.4 Abbreviations (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM clarifies abbreviations as needed.
3.1.5 Reading Level (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM content is written to meet recommended reading-level guidance.
3.1.6 Pronunciation (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: Pronunciation aids are provided where necessary.
3.2.5 Change on Request (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: Changes occur only when requested by the user.
3.3.5 Help (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM provides contextual help where applicable.
3.3.6 Error Prevention (All) (Level AAA) EN 301 549 Criteria – Does not apply Revised Section 508 – Does not apply	Web: Supports	Web: ECM includes preventive checks for critical data entry processes.
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	Web: ECM supports accessible authentication enhanced requirements where applicable.

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Notes:

Chapter 3: [Functional Performance Criteria \(FPC\)](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Supports	ECM provides programmatically determinable structure, labels, names, roles, values, and status messages that enable use with assistive technologies such as screen readers. All interactive elements are keyboard operable, and non-text content includes appropriate text alternatives. Testing demonstrates that navigation and workflows can be completed without reliance on vision.
302.2 With Limited Vision	Supports	ECM supports magnification, zoom, and text-spacing adjustments without loss of functionality. However, some user interface components—including input borders, icon-only buttons, and focus indicators—exhibit lower-than-recommended contrast , which may reduce usability for users with limited vision. Planned enhancements will increase boundary and focus contrast to ensure full support.

Criteria	Conformance Level	Remarks and Explanations
302.3 Without Perception of Color	Supports	ECM does not rely on color alone to convey meaning. Labels, states, and required information are indicated through text, icons, or programmatic attributes. All essential information is available without requiring color perception.
302.4 Without Hearing	Supports	ECM does not rely on audio-only content for functionality. When audio is present (e.g., live communication tools), alternative text-based communication channels such as chat are available. No critical information is conveyed through sound alone.
302.5 With Limited Hearing	Supports	All ECM workflows can be completed without reliance on hearing. Text alternatives and non-audio communication channels are available. No time-critical auditory cues are required to operate the system.
302.6 Without Speech	Supports	ECM does not require speech input. All functions can be performed using keyboard, mouse, or touch input. There are no voice-activation or speech-dependent features.
302.7 With Limited Manipulation	Supports	All interactions can be completed using keyboard input alone. ECM does not require fine motor control, complex gestures, or drag-and-drop movements. Pointer targets that are small (e.g., 16–

Criteria	Conformance Level	Remarks and Explanations
		18px icon buttons) may increase difficulty for some users, but full keyboard access is available for all actions.
302.8 With Limited Reach and Strength	Supports	ECM is fully operable via keyboard, without requiring simultaneous inputs, extended reach, or physical force. No controls require sustained activation or multipoint gestures.
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	ECM uses consistent navigation patterns, consistent identification of controls, predictable workflows, and clear labeling. Form instructions, error messages, and required fields are presented textually. ECM avoids complex or time-dependent tasks unless user-extendable. No cognitive tests are required.

Chapter 4: [Hardware](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.

Criteria	Conformance Level	Remarks and Explanations
402.2.2 Transactional Outputs	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.2.3 Speech Delivery Type and Coordination	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.2.4 User Control	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.2.5 Braille Instructions	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.3.2 Non-private Listening	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply

Criteria	Conformance Level	Remarks and Explanations
		only to physical ICT hardware products; therefore, these criteria are not applicable.
402.4 Characters on Display Screens	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
402.5 Characters on Variable Message Signs	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>403 Biometrics</u>	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>404 Preservation of Information Provided for Accessibility</u>	Heading cell – no response required	Heading cell – no response required
404.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>405 Privacy</u>	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products;

Criteria	Conformance Level	Remarks and Explanations
		therefore, these criteria are not applicable.
<u>406 Standard Connections</u>	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>407 Operable Parts</u>	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>407.3 Input Controls</u>	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.3.2 Alphabetic Keys	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.3.3 Numeric Keys	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products;

Criteria	Conformance Level	Remarks and Explanations
		therefore, these criteria are not applicable.
407.4 Key Repeat	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.5 Timed Response	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.6 Operation	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.

Criteria	Conformance Level	Remarks and Explanations
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.2 Side Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.2.1 Unobstructed Side Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.2.2 Obstructed Side Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.3 Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products;

Criteria	Conformance Level	Remarks and Explanations
		therefore, these criteria are not applicable.
407.8.3.1 Unobstructed Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.3.2 Obstructed Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>408 Display Screens</u>	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.

Criteria	Conformance Level	Remarks and Explanations
408.3 Flashing	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>409 Status Indicators</u>	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>410 Color Coding</u>	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>411 Audible Signals</u>	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>412 ICT with Two-Way Voice Communication</u>	Heading cell – no response required	Heading cell – no response required
<u>412.2 Volume Gain</u>	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products;

Criteria	Conformance Level	Remarks and Explanations
		therefore, these criteria are not applicable.
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.3.2 Wireline Handsets	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.4 Digital Encoding of Speech	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.

Criteria	Conformance Level	Remarks and Explanations
412.7 Video Communication	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.8.2 Voice and Hearing Carry Over	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.8.3 Signal Compatibility	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	ECM is a cloud-based software application and does not include any

Criteria	Conformance Level	Remarks and Explanations
		hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>414 Audio Description Processing Technologies</u>	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
414.1.2 Other ICT	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
<u>415 User Controls for Captions and Audio Descriptions</u>	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products; therefore, these criteria are not applicable.
415.1.2 Audio Description Controls	Not Applicable	ECM is a cloud-based software application and does not include any hardware. All Chapter 4 criteria apply only to physical ICT hardware products;

Criteria	Conformance Level	Remarks and Explanations
		therefore, these criteria are not applicable.

Chapter 5: [Software](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.x section	See information in WCAG 2.x section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required
502.2.1 User Control of Accessibility Features	Supports	ECM does not override or interfere with user agent or operating system accessibility features such as high contrast, zoom/magnifier, or screen reader behavior.
502.2.2 No Disruption of Accessibility Features	Supports	ECM does not disable, distort, or otherwise disrupt platform assistive technologies such as screen readers, system zoom, OS contrast themes, keyboard navigation, or caret tracking.
502.3 Accessibility Services	Heading cell – no response required	Heading cell – no response required
502.3.1 Object Information	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.

Criteria	Conformance Level	Remarks and Explanations
502.3.2 Modification of Object Information	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.3 Row, Column, and Headers	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.4 Values	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.5 Modification of Values	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and

Criteria	Conformance Level	Remarks and Explanations
		browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.6 Label Relationships	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.7 Hierarchical Relationships	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.8 Text	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive

Criteria	Conformance Level	Remarks and Explanations
		technologies that rely on platform accessibility services.
502.3.9 Modification of Text	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.10 List of Actions	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.11 Actions on Objects	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.12 Focus Cursor	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions)

Criteria	Conformance Level	Remarks and Explanations
		programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.13 Modification of Focus Cursor	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.3.14 Event Notification	Supports	ECM exposes UI information (name, role, value, state, relationships, and actions) programmatically through standard HTML, ARIA roles where appropriate, and browser accessibility APIs. These behaviors are evaluated in the WCAG 2.x tables (especially 1.3.1, 4.1.2, and 4.1.3). ECM is fully interoperable with assistive technologies that rely on platform accessibility services.
502.4 Platform Accessibility Features	Supports	ECM does not interfere with, block, or override platform-level accessibility features such as keyboard navigation, magnification, high contrast settings, screen readers, system captions, or OS input methods.

Criteria	Conformance Level	Remarks and Explanations
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Supports	ECM respects browser, OS, and assistive technology user preferences such as default fonts, caption settings, language preferences, UI scaling, and color themes.
503.3 Alternative User Interfaces	Supports	All ECM functionality is operable using both keyboard and pointer input. ECM does not require speech or gesture input and provides semantic information and programmatic labels to assist alternative interfaces.
<i>503.4 User Controls for Captions and Audio Description</i>	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Support	Prerecorded Help videos do include captions or provide a user control to enable or disable captioning within the player. Written help content is also available.
503.4.2 Audio Description Controls	Support	ECM has live captions in Help videos, and supports CC toggle in the player.
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”)	See WCAG 2.x section	See information in WCAG 2.x section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Support	ECM v6.5 support use of Power BI reports which are fully accessible when viewed within the interactive Power BI web interface or through embedded HTML environments. The platform supports screen readers, keyboard navigation, high contrast modes, alternative text for visuals, and logical tab order. These features allow assistive technologies to interpret report content and enable users with disabilities to navigate and interact with report data effectively.

Criteria	Conformance Level	Remarks and Explanations
504.2.2 PDF Export	Partially Supports	ECM uses Microsoft Report Design which can produce partially accessible PDFs, but not fully compliant accessible by default. Includes Tagged PDF structure, document properties, logical reading order.
504.3 Prompts	Not Applicable	Reports are automatically generated from system data and do not include user-added non-text content; therefore, prompting authors to supply accessibility information is not applicable.
504.4 Templates	Partially Supports	Report templates define consistent formatting but do not ensure accessibility features in the resulting PDF export. Because generated PDFs lack semantic tagging, heading levels, and table structures, templates do not currently produce accessible documents. Enhancements to the underlying templates and export pipeline are planned.

Chapter 6: [Support Documentation and Services](#)

Notes:

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	ECM documentation describes accessibility-related features and compatibility with assistive technologies.
602.3 Electronic Support Documentation	See WCAG 2.x section	See information in WCAG 2.x section

Criteria	Conformance Level	Remarks and Explanations
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	Alternate formats such as accessible PDF, large print, or plain text are available upon request.
<u>603 Support Services</u>	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	Support staff provide information about accessibility and compatibility features.
603.3 Accommodation of Communication Needs	Supports	Support services accommodate communication needs through accessible channels including email and text-based support.

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Notes:

Clause [4: Functional Performance Statements \(FPS\)](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Supports	ECM exposes semantic structure, labels, roles, states, and actions programmatically and is fully operable with screen readers and keyboard navigation.
4.2.2 Usage with limited vision	Supports	ECM supports magnification and user text-spacing; includes does not block magnification, rely on fixed pixel layout, supports keyboard navigation, maintains functionality when magnified, preserves contrast and clarity.
4.2.3 Usage without perception of colour	Supports	Meaning is not conveyed by color alone; alternate textual/programmatic cues are used.
4.2.4 Usage without hearing	Supports	No core features require hearing; text chat and other non-audio alternatives are available.

4.2.5 Usage with limited hearing	Supports	Workflows do not depend on audio-only cues and can be completed without hearing.
4.2.6 Usage with no or limited vocal capability	Supports	Speech input is not required; all operations are available via keyboard or pointer.
4.2.7 Usage with limited manipulation or strength	Supports	Keyboard operation is available for all functions; no drag-and-drop or fine-motor gestures are required.
4.2.8 Usage with limited reach	Supports	Operation does not require extended reach or strength; keyboard navigation is sufficient.
4.2.9 Minimize photosensitive seizure triggers	Supports	No flashing content above threshold is used.
4.2.10 Usage with limited cognition, language or learning	Supports	Consistent navigation, clear labels, error identification/suggestion, and predictable workflows support users with cognitive or learning limitations.
4.2.11 Privacy	Supports	Use does not depend on speech or specific modalities; text-based channels support user privacy needs.

Clause [5: Generic Requirements](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
5.1 Closed functionality	Heading cell – no response required	Heading cell – no response required
5.1.2 General	Heading cell – no response required	Heading cell – no response required
5.1.2.1 Closed functionality	See 5.2 through 13	See information in 5.2 through 13
5.1.2.2 Assistive technology	See 5.1.3 through 5.1.6	See information in 5.1.3 through 5.1.6
5.1.3 Non-visual access	Heading cell – no response required	Heading cell – no response required
5.1.3.1 Audio output of visual information	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.2 Auditory output delivery including speech	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.3 Auditory output correlation	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.4 Speech output user control	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.5 Speech output automatic interruption	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.6 Speech output for non-text content	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.7 Speech output for video information	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.8 Masked entry	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.9 Private access to personal data	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.

Criteria	Conformance Level	Remarks and Explanations
5.1.3.10 Non-interfering audio output	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.11 Private listening volume	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.12 Speaker volume	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.13 Volume reset	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.14 Spoken languages	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.15 Non-visual error identification	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.3.16 Receipts, tickets, and transactional outputs	See WCAG 2.x section	These requirements map to WCAG 2.x Level A/AA criteria; ECM compliance is documented in the WCAG tables.
5.1.4 Functionality closed to text enlargement	Supports	ECM supports resizing up to 200% and platform magnifier without loss of functionality; reflow gaps are captured under WCAG 1.4.10.
5.1.5 Visual output for auditory information	Supports	Visual output equivalents are provided for auditory information; critical cues are available as text.
5.1.6 Operation without keyboard interface	Heading cell – no response required	Heading cell – no response required
5.1.6.1 Closed functionality	See 5.1.3.1 through 5.1.3.16	See information in 5.1.3.1 through 5.1.3.16

Criteria	Conformance Level	Remarks and Explanations
5.1.6.2 Input focus	Supports	Input focus is programmatically determinable and exposed to AT; focus changes are tracked.
5.1.7 Access without speech	Supports	ECM can be fully operated without speech input.
5.2 Activation of accessibility features	Supports	ECM does not interfere with activation or operation of platform accessibility features.
5.3 Biometrics	Not Applicable	Biometric requirements do not apply; ECM does not require or provide biometric authentication.
5.4 Preservation of accessibility information during conversion	Supports	The system utilizes Microsoft SQL Server Reporting Services (SSRS) for report generation and PDF export. When reports are designed using structured report elements (e.g., tablix data regions, defined headers, alternative text for images), exported PDFs preserve accessibility metadata including logical reading order, tagged structure, and table header associations. Accessibility preservation is dependent upon report configuration and design standards.
5.5 Operable parts	Heading cell – no response required	Heading cell – no response required
5.5.1 Means of operation	Not Applicable	Hardware-only requirement for operable parts; ECM is software-only.

Criteria	Conformance Level	Remarks and Explanations
5.5.2 Operable parts discernibility	Not Applicable	Hardware-only requirement for discernibility of physical operable parts; ECM is software-only.
5.6 Locking or toggle controls	Heading cell – no response required	Heading cell – no response required
5.6.1 Tactile or auditory status	Not Applicable	Applies to hardware locking/toggle controls or indicators; ECM is software-only.
5.6.2 Visual status	Not Applicable	Applies to hardware locking/toggle controls or indicators; ECM is software-only.
5.7 Key repeat	Not Applicable	Hardware requirement; ECM does not ship hardware.
5.8 Double-strike key acceptance	Not Applicable	Hardware requirement; ECM does not ship hardware.
5.9 Simultaneous user actions	Not Applicable	Hardware requirement; ECM does not ship hardware.

Clause [6: ICT with Two-Way Voice Communication](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
6.1 Audio bandwidth for speech	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2 Real-time text (RTT) functionality	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.

6.2.1.1 RTT communication	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.1.2 Concurrent voice and text	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.2.1 Visually distinguishable display	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.2.2 Programmatically determinable send and receive direction	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.2.3 Speaker identification	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.2.4 Visual indicator of Audio with RTT	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.2.3 Interoperability	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.

		is a web application and does not provide telecom device functionality.
6.2.4 RTT responsiveness	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.3 Caller ID	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.4 Alternatives to voice-based services	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5 Video communication	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5.1 General (informative)	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5.2 Resolution	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.

6.5.3 Frame rate	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5.4 Synchronization between audio and video	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5.5 Visual indicator of audio with video	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.5.6 Speaker identification with video (sign language) communication	Not Applicable	Applies to ICT with two-way voice communication hardware/services; ECM is a web application and does not provide telecom device functionality.
6.6 Alternatives to video-based services (advisory only)	Advisory – no response required	Advisory – no response required

Clause [7: ICT with Video Capabilities](#)

Notes:

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	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.

7.1.2 Captioning synchronization	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.1.3 Preservation of captioning	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.1.4 Captions characteristics	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.1.5 Spoken subtitles	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.2.1 Audio description playback	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.2.2 Audio description synchronization	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.2.3 Preservation of audio description	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.
7.3 User controls for captions and audio description	Not Applicable	Applies to ICT with built-in video caption/audio description processing hardware; ECM is software-only.

Clause [8: Hardware](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
8.1.1 Generic requirements	Heading cell – no response required	Heading cell – no response required
8.1.2 Standard connections	Not Applicable	Hardware-only requirement; ECM is software-only.
8.1.3 Colour	Not Applicable	Hardware-only requirement; ECM is software-only.
8.2 Hardware products with speech output	Heading cell – no response required	Heading cell – no response required
8.2.1.1 Speech volume range	Not Applicable	Hardware-only requirement; ECM is software-only.
8.2.1.2 Incremental volume control	Not Applicable	Hardware-only requirement; ECM is software-only.
8.2.2.1 Fixed-line devices	Not Applicable	Hardware-only requirement; ECM is software-only.
8.2.2.2 Wireless communication devices	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3 Stationary ICT	Heading cell – no response required	Heading cell – no response required
8.3.2.1 Unobstructed high forward reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.2 Unobstructed low forward reach	Not Applicable	Hardware-only requirement; ECM is software-only.

Criteria	Conformance Level	Remarks and Explanations
8.3.2.3.1 Clear space	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.3.2 Obstructed (< 510 mm) forward reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.3.3 Obstructed (< 635 mm) forward reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.4 Knee and toe clearance width	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.5 Toe clearance	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.2.6 Knee clearance	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.3.1 Unobstructed high side reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.3.2 Unobstructed low side reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.3.3.1 Obstructed (\leq 255 mm) side reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.3.3.2 Obstructed (\leq 610 mm) side reach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.4.1 Change in level	Not Applicable	Hardware-only requirement; ECM is software-only.

Criteria	Conformance Level	Remarks and Explanations
8.3.4.2 Clear floor or ground space	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.4.3.2 Forward approach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.4.3.3 Parallel approach	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.5 Visibility	Not Applicable	Hardware-only requirement; ECM is software-only.
8.3.6 Installation instructions	Not Applicable	Hardware-only requirement; ECM is software-only.
8.4 Mechanically Operable parts	Heading cell – no response required	Heading cell – no response required
8.4.1 Numeric keys	Not Applicable	Hardware-only requirement; ECM is software-only.
8.4.2.1 Means of operation of mechanical parts	Not Applicable	Hardware-only requirement; ECM is software-only.
8.4.2.2 Force of operation of mechanical parts	Not Applicable	Hardware-only requirement; ECM is software-only.
8.4.3 Keys, tickets and fare cards	Not Applicable	Hardware-only requirement; ECM is software-only.
8.5 Tactile indication of speech mode	Not Applicable	Hardware-only requirement; ECM is software-only.

Clause [9: Web](#) (see [WCAG 2.x section](#))

Notes:

Clause [10: Non-Web Documents](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
10.0 General (informative)	Heading cell – no response required	Heading cell – no response required
10.1.1.1 through 10.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section
10.5 Caption positioning	Not Applicable	Caption positioning applies to time-based media in non-web documents; ECM report exports are data documents without embedded media.
10.6 Audio description timing	Not Applicable	Audio description timing applies to prerecorded media in non-web documents; not applicable to ECM report exports.

Clause [11: Software](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
11.0 General (informative)	Heading cell – no response required	Heading cell – no response required
11.1.1.1 through 11.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section
11.5 Interoperability with assistive technology	Heading cell – no response required	Heading cell – no response required
11.5.1 Closed functionality	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

Criteria	Conformance Level	Remarks and Explanations
11.5.2.1 Platform accessibility service support for software that provides a user interface	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.2 Platform accessibility service support for assistive technologies	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.3 Use of accessibility services	See information in 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.4 Assistive technology	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.5 Object information	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.6 Row, column, and headers	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.

Criteria	Conformance Level	Remarks and Explanations
11.5.2.7 Values	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.8 Label relationships	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.9 Parent-child relationships	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.10 Text	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding

Criteria	Conformance Level	Remarks and Explanations
		behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.11 List of available actions	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.12 Execution of available actions	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.13 Tracking of focus and selection attributes	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.14 Modification of focus and selection attributes	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and

Criteria	Conformance Level	Remarks and Explanations
		browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.15 Change notification	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.16 Modifications of states and properties	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.5.2.17 Modifications of values and text	Supports	ECM exposes UI name, role, value, state, relationships, actions, focus, selection, and events via standard HTML semantics, ARIA where appropriate, and browser accessibility APIs; corresponding behavior is evaluated in WCAG 1.3.1, 4.1.2, and 4.1.3.
11.6 Documented accessibility usage	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
11.6.1 User control of accessibility features	Supports	User control of platform accessibility features is not restricted by ECM.
11.6.2 No disruption of accessibility features	Supports	ECM does not disrupt or interfere with platform accessibility features.
11.7 User preferences	Supports	User preferences from the browser/OS/AT are respected (fonts, language, scaling, captions).
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	See WCAG 2.x section (If not authoring tool, enter “Not Applicable”)	See information in WCAG 2.x section
11.8.3 Preservation of accessibility information in transformations	Supports	Where templates are used, accessible patterns are provided; PDF export tagging gaps are documented under Section 504.2.2.
11.8.4 Repair assistance	Not Applicable	Repair assistance applies to authoring tools that modify user-authored content; ECM report generation does not include repair workflows.
11.8.5 Templates	Not Applicable	Template authoring requirements apply to authoring tools shipping editable templates to end-authors; ECM templates are internal for report generation.

Clause [12: Documentation and Support Services](#)

Notes:

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	Documentation and support identify accessibility and compatibility features and how to use them.
12.1.2 Accessible documentation	See WCAG 2.x section	Electronic documentation/support docs conform to applicable WCAG criteria as documented in this report.
12.2 Support Services	Heading cell – no response required	Heading cell – no response required
12.2.2 Information on accessibility and compatibility features	Supports	Documentation and support identify accessibility and compatibility features and how to use them.
12.2.3 Effective communication	Supports	Support services provide effective communication via accessible, text-based channels in addition to voice.
12.2.4 Accessible documentation	See WCAG 2.x section	Electronic documentation/support docs conform to applicable WCAG criteria as documented in this report.

Clause [13: ICT Providing Relay or Emergency Service Access](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
13.1 Relay services requirements	Heading cell – no response required	Heading cell – no response required
13.1.2 Text relay services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and

Criteria	Conformance Level	Remarks and Explanations
		does not provide relay or emergency services.
13.1.3 Sign relay services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.
13.1.4 Lip-reading relay services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.
13.1.5 Captioned telephony services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.
13.1.6 Speech to speech relay services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.
13.2 Access to relay services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.
13.3 Access to emergency services	Not Applicable	Applies to relay/emergency service providers; ECM is a web application and does not provide relay or emergency services.

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