L9 and Website Accessibility for Credit Unions

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Talk of credit union website accessibility is in the air. While the idea of website accessibility isn't new, the forthcoming U.S. Department of Justice website accessibility rule for public accommodations under Title III of the Americans With Disabilities Act brings a sharper focus to discussions about ensuring credit union websites are accessible to all people.

> "We need to change the way we talk about accessibility... Web accessibility means that *people* can use the web. Not "people with disabilities." Not "blind people and deaf people." Not "people who have cognitive disabilities" or "men who are color blind" or "people with motor disabilities." People. People who are using the web. People who are using what you're building."
>
> —Gibson, Anne. "Reframing Accessibility for the Web." February 03, 2015. http://alistapart.com/article/reframing-accessibility-for-the-web.

The goal with website accessibility is that, no matter what input/output devices people use, they can successfully interact with your credit union's site and all the content on it. Creating an accessible site goes far beyond simple steps, such as your web specialist specifying a text alternative to be read when an image isn't visible. There is much more to consider.

When it comes to understanding and meeting accessibility standards, we're fortunate that credit unions can benefit from the work of the World Wide Web Consortium (W3C), an international community that develops open standards to ensure the long-term growth of the Web. In 1997, the W3C started the Web

Accessibility Initiative (WAI), and it's from the WAI that we have a framework for how to approach the accessibility of your credit union's website. The WAI guidelines are regarded as the international standard for Web accessibility.

The primary set of guidelines is the Web Content Accessibility Guidelines 2.0, usually abbreviated as WAI-WCAG 2.0. The other set that may apply to your site is the Accessible Rich Internet Applications Suite, or WAI-ARIA. We'll look at each in more detail on the following pages, but you're encouraged to review the full guidelines— we've whittled them down considerably in this paper.

More: Links to the latest, full versions of WAI-WCAG 2.0 and WAI-ARIA are in **Appendix C: Information Sources**.

WAI–WCAG 2.0 Guidance

In the WAI-WCAG 2.0 document, there are several layers of guidance, including overall principles, general guidelines, and success criteria. A web page on your credit union's site conforms to WIA-WCAG 2.0 if it meets the guidelines for one of the Conformance Levels — either Level A, Level AA, or Level AAA — and if it meets that level for the full page and the full range of processes on that page.

At L9, we believe that targeting Level AA conformance is the most realistic approach that balances accessibility for a wide range of people visiting your site with the attainability of that accessibility. Level A sets a minimum level of accessibility that doesn't achieve wide accessibility for many situations. On the other end of the spectrum, Level AAA is not recommended because it is likely not possible to satisfy all Level AAA success criteria for some content on your site. The WAI-WCAG 2.0 document suggests that Level AAA conformance not be required as a general policy for entire sites for this reason.

We'll look next at the four high-level principles in WAI-WCAG 2.0: Perceivable, Operable, Understandable, and Robust (or POUR).

More: To get an idea of the scope of the WAI-WCAG 2.0 success criteria for Level AA, refer to the WAI's Quick Reference checklist. Find the link in **Appendix C: Information Sources**.

Principles of Accessibility in WAI-WCAG 2.0

People visiting your credit union's website want to read, interact, and have a good experience with it. We all want them to! For you to build a site that allows anyone to use it successfully, regardless of the devices being used, you'll need to consider the four principles of accessibility in WAI-WCAG 2.0. Your content must be:

- Perceivable
- Operable
- Understandable
- Robust

Those four POUR principles help organize the guidelines and success criteria in WAI-WCAG 2.0. Let's look at them a little closer. The next few pages will give you an idea of how the POUR principles relate to your site. The examples shown for each principle are a small sample of the accessibility issues that you might find with your credit union's site.

More: For a complete list of guidelines for each POUR principle, see **Appendix A: WAI-WCAG 2.0 Principles & Guidance Tables.**

Perceivable

Does your credit union's site present information that can be seen, heard, and felt? Does your site support a wide range of output devices? Does your content retain its meaning regardless of how it's presented to your visitor?

Success — Perceivable

- Provide text alternatives for non-text content.
- Provide captions and other alternatives for multimedia.
- Create content that can be presented in different ways, including by assistive technologies, without losing meaning.
- Make it easier for users to see and hear content.

Common Accessibility Failures — Perceivable

- An image on your page does not have a text alternative (alt attribute). It may be unclear to some readers if the image is important or not.
  Success: Every image should have an alt attribute. It can be empty if output devices can ignore the image with no loss to meaning.

- Some links or elements on your page can only be identified due to their color; there is no other visual indicator.
  Success: Color is not used as the only method to differentiate elements or convey meaning.

- Heading phrases on your site are styled to look like headings, but are not marked up as structural headings.
  Success: Information, structure, and relationships must be available to devices or as text, usually via markup.

Operable

When a visitor to your credit union's website wishes to engage with it, is the full site built to be keyboard accessible, which in turn allows the use of other input devices? Does your site allow for finding, navigation, and orientation, regardless of the device used? Does it allow people to bypass repeated navigation elements? Do visitors have enough time to interact with your content? Is it visually safe?

Success — Operable

- Make all functionality available from a keyboard.
- Give users enough time to read and use content.
- Do not use content that causes seizures.
- Help users navigate and find content.

Common Accessibility Failures — Operable

- Parts of your site cannot be navigated or operated using a keyboard or the keyboard action requires specific timing for individual keystrokes.
  Success: All functions on your site should be available to people using keyboards only. There are some exceptions for input, such as free-hand drawing.

- Link text on your site is often "click here," "learn more," or similar non-specific phrases.
  Success: The purpose of each link must be clear from the link text itself or together with its context.

- Some elements on your page automatically move, blink, or scroll and cannot be stopped.
  Success: A visitor to your site must be able to pause, stop, or hide any element that starts automatically, lasts more than five seconds, and is presented along other content.

Understandable

Are uncommon words or phrases defined? Are acronyms expanded? Can output devices correctly present the language and direction of the text to the visitor? Are the placement, identification, and function of page elements and navigation consistent? Does error handling allow your visitor to correct mistakes?

Success — Understandable

- Make text readable and understandable.
- Make content appear and operate in predictable ways.
- Help users avoid and correct mistakes.

Common Accessibility Failures — Understandable

- Navigation on your site changes from page to page; repeated navigation links are in varying order throughout your site.
  Success: Consistent navigation must be presented in the same relative order each time it is repeated.

- Blocks of text on your page that are in a different language than the default language are not identified in the markup.
  Success: With some exceptions, the human language of a passage must be coded so that output devices can identify it.

- Forms on your site have some fields that are not labeled and instructions aren't thorough.
  Success: Help users avoid and correct mistakes by giving sufficient instruction and cues to how to successfully use the form; detect input errors and provide descriptive error handling steps to the user.

Robust

Is your site's code valid? Have names and roles been set for user interface components? Is information in your content available to people using a wide range of input/output devices in ways that allow them to recognize and interact with it?

Success — Robust

- Maximize compatibility with current and future user tools.

Common Accessibility Failures — Robust

- Your code doesn't validate.

  Success: Stay up to date with markup specifications to keep compatibility with devices today and tomorrow.

WAI – Accessible Rich Internet Applications Suite

A credit union and its web developers should approach WAI-ARIA conformance with the same determination as with WAI-WCAG 2.0 conformance.

WAI-ARIA defines methods to improve accessibility of site features using dynamic content and advanced user interface controls, including elements such as expandable menus, calendar functions, drag-and-drop features, buttons, drop-down lists, etc. WAI-ARIA provides a technical framework that allows typically non-accessible code to provide data to assistive technology.

WAI-ARIA roles, states, and properties supplement the markup associated with page elements. Role values pass information to assistive technologies about how to process the elements; states and properties reflect the current state of rich Internet application components. WAI-ARIA also includes methods for establishing focus on an element when standard markup does not.

Now What? Next Steps.

Start now. The U.S. Department of Justice web accessibility rules have been delayed more than once and are now expected in 2018. Until then (assuming the DOJ meets the date), credit unions and other places of public accommodation remain in a position of addressing website accessibility without definitive legal standards or regulations to follow. Lawsuits filed in 2015 against high-profile companies— such as Home Depot, J. C. Penney, the NBA, and Patagonia— alleging that their sites are in violation of Title III of the ADA are a clear call to other companies to take action on website accessibility now.

L9 encourages credit unions to take steps now to conform to WAI-WCAG 2.0, Level AA and to WAI-ARIA 1.0.

Steps to Consider Now

Step 0. Before you dive into the technical details, understand the scope of this undertaking. Included in this paper are links to source documents and other information. Explore beyond those, too.

1. Conduct a risk assessment/audit of your existing website. An automated, application-based approach will need to be complemented by a human, user-based approach.
2. If weaknesses are found, fix them to conform to guidelines.

3. Encourage users to submit reports of website accessibility issues and make it easy for them to do so via your site and other communication channels.
4. Draft website accessibility policies for your credit union with the intent to manage accessibility now and in the future. Write supplemental documentation, such as procedures or best practices, to assist with implementing the policies.
5. Train the appropriate staff.
6. Integrate accessibility into the management of the credit union and into decision-making processes.

Now is an excellent time to begin making your website more accessible to all of the people who want to use it. There's no doubt that website accessibility regulations affecting credit unions and other public accommodations will be enacted; it's just a matter of when that happens. There's nothing to be lost by working on improvements in advance of the formal rule changes.

You've probably already employed some accessibility practices, but most credit unions will likely find they need to take accessibility to a higher level. This is not about a one-time exercise in polishing your website code. It's about an ongoing process to serve the widest range of people who want to do business with you.

L9 can help. Please get in touch for more details.

About L9

L9 has provided website design and development services to credit unions since 2001 and to other businesses since 1995.

We tailor our web management systems to fit the needs of financial institutions and develop them from the ground up to best support our clients' growth and goals. Our custom web application development matches your ideas with our expertise to let us create something great!

Together, we make the most beautiful, functional, and usable websites for credit unions and their members.

For more information, please contact:

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L9 is a full-service web design and development company. *Since 1995.*

Appendices

Appendix A: WAI-WCAG 2.0 Principles & Guidance Tables

Appendix B: Input and Output Devices

Appendix C: Information Sources

Appendix A: WAI-WCAG 2.0 Principles & Guidance Tables

Perceivable

Principle	Guideline
Principle 1: Perceivable Information and user interface components must be presentable to users in ways they can perceive.	Guideline 1.1 Text Alternatives Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.
	Guideline 1.2 Time-based Media Provide alternatives for time-based media.
	Guideline 1.3 Adaptable Create content that can be presented in different ways (for example simpler layout) without losing information or structure.
	Guideline 1.4 Distinguishable Make it easier for users to see and hear content including separating foreground from background.

Operable

Principle	Guideline
Principle 2: Operable User interface components and navigation must be operable.	Guideline 2.1 Keyboard Accessible Make all functionality available from a keyboard.
	Guideline 2.2 Enough Time Provide users enough time to read and use content.
	Guideline 2.3 Seizures Do not design content in a way that is known to cause seizures.
	Guideline 2.4 Navigable Provide ways to help users navigate, find content, and determine where they are.

Understandable

Principle	Guideline
Principle 3: Understandable Information and the operation of user interface must be understandable.	Guideline 3.1 Readable Make text content readable and understandable.
	Guideline 3.2 Predictable Make Web pages appear and operate in predictable ways.
	Guideline 3.3 Input Assistance Help users avoid and correct mistakes.

Robust

Principle	Guideline
Principle 4: Robust Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.	Guideline 4.1 Compatible Maximize compatibility with current and future user agents, including assistive technologies.

Appendix B: Input and Output Devices

This is how people might interact with your site today.

Input Devices	Output Devices
3D mouse	Braille embosser
Eye tracker	Colorblind palette on monitor
Game controller	Computer monitor
Keyboard	Haptic device
Microphone/Voice	Light signaler alerts
Mouse	Screen enlargers/magnifiers
Sip-and-puff system	Screen reader
Touch screen	Speakers
Trackball	
Wands and stick	
Webcam	

More: To learn more about input and output devices, refer to these sources.

Input Device
https://en.wikipedia.org/wiki/Input_device

Input Methods
http://webaim.org/articles/pour/operable#input

Output Device
https://en.wikipedia.org/wiki/Output_device

Reframing Accessibility as a Technology Challenge
http://alistapart.com/article/reframing-accessibility-for-the-web#section3

Sight, Hearing, Touch, and Transformability
http://webaim.org/articles/pour/perceivable#sight

Types of Assistive Technology Products
https://www.microsoft.com/enable/at/types.aspx

Appendix C: Information Sources

World Wide Web Consortium

Home	https://www.w3.org

Web Accessibility Initiative

Home	https://www.w3.org/WAI/

Web Accessibility Initiative – Web Content Accessibility Guidelines 2.0

Overview	https://www.w3.org/WAI/intro/wcag.php
Latest Version	https://www.w3.org/TR/WCAG20/
Quick Reference	https://www.w3.org/WAI/WCAG20/quickref/

Web Accessibility Initiative – Accessible Rich Internet Applications Suite

Overview	https://www.w3.org/WAI/intro/aria
Latest Version	https://www.w3.org/TR/wai-aria/

Section 508 Standards for Electronic and Information Technology

(For comparison to WAI-WCAG 2.0)

Section 508 applies to Federal departments and agencies, but it does not regulate the private sector. Section 508 standards are comparable with the older WAI-WCAG 1.0. The United States Access Board, a Federal agency, develops and maintains a wide range of accessibility standards, including those for information and communication technology.

Access Board	https://www.access-board.gov