

## **ADA COMPLIANCE:**

# A Financial Institution's Roadmap



# Can you afford to bet \$17 million on your website's ADA compliance?

If that number sounds too high to be accurate, consider these facts (source: [BankSITE Services](#)):

1. In 2011, the U.S. Department of Justice investigated reports that Wells Fargo locations weren't ADA compliant. Wells Fargo settled the case by agreeing to pay \$17 million to the affected customers, along with a \$55,000 civil fine to the U.S. government.
2. In 2016, the case of Robles vs. Domino's Pizza established that ADA requirements stretch to digital properties as well as physical. The Ninth Circuit Court of Appeals of California ruled that the "ADA applies to the services of a public accommodation, not services in a place of public accommodation" and that "the website and app connected customers to the goods and services" of the physical restaurant.

These lawsuits have set a precedent. The ADA applies to your digital assets, such as websites and mobile apps, as well as your physical locations. Those with disabilities may sue you, and will likely win if those assets are not compliant.

Revenue is another compelling argument for making your sites ADA compliant. Millions of people all around the world live with disabilities. If your website or mobile app isn't compliant, they'll move on to another company that cares enough to make sure everyone can receive services.

[According to ADA.gov](#), more than one in six people in this country are potential customers for businesses that are accessible to people with disabilities. In fact, according to [a study by the American Institute for Research](#), the total after-tax disposable income for working-age people with disabilities is about \$490 billion, which is similar to that of other significant market segments, such as African Americans (\$501 billion) and Hispanics (\$582 billion).

Lawsuits and fines will cost you money. But you're also missing out on revenue by not making sure your site is usable by potential customers who are disabled.

We've put together a roadmap to help financial institutions to become ADA compliant across all of their digital assets. Let's present the plan to help you reach compliance.



# A Roadmap to ADA Compliance

We advise a four-step process for getting your ADA compliance on track. If you're not compliant right now, you can't expect it to happen overnight. Follow this process, and you'll build ADA compliant systems along with the culture required to maintain it over time.

## Create an Inventory of Your Web Properties

The first step in compliance is knowing your current state. You've built up many digital assets over the years, and trying to make all of them ADA compliant at once is overwhelming.

Take inventory of all of your digital assets. Record all websites, mobile applications, and online portals your customers or partners access.

With an inventory of systems in hand, you'll be ready to prioritize. Create a risk matrix and focus first on high priority applications that are easy to update.

For example, an online banking portal may be hosted and managed by a third party company and shared with other tenants, so this would be harder to update. You'll need to work with them to get it done.

On the other hand, you can update a website you've created on your timetable. If both a banking portal and your site need to be updated to be compliant, start with the site you control while you work with any third-parties to update the portal.

With a risk matrix in hand, you can set priorities and start projects to begin transforming your company's digital assets. But more is required to ensure ADA compliance is sustainable.





# Create a Culture of Compliance

Culture is more than a collection of rules or a series of development projects. It defines how your employees think and act daily. It is the guidepost your staff uses to make decisions.

Building a culture of ADA compliance ensures that your employees think about those with disabilities when making decisions about your digital products. Having such a culture sounds excellent in theory, but how can you develop it?

The first step is to identify ambassadors within your company. Find those who are enthusiastic about helping people with disabilities so that their enthusiasm rubs off on others.

The ambassadors will have the vital role of helping others within the company to understand the importance of accessibility and ADA compliance. Have them present to their teams the history of the ADA and how it's positively affected people with disabilities.

By the way, 2020 is the 30th anniversary of the ADA. So now is a great time to start educating your teams.

Once you've chosen a set of ambassadors, it's time to get down to the details. Develop a maturity model for ADA compliance and steadily work toward the highest level. A combination of educating your employees about the importance of ADA and practical developer training on how to implement accessible applications will help move your organization forward.

To summarize, here are the steps to develop an ADA-friendly culture:

1. Identify ADA ambassadors
2. Use the ambassadors to promote and educate ADA compliance
3. Develop an ADA maturity model
4. Educate developers on how to develop accessible applications. You can start with the [WCAG 2.1](#) or [Mozilla's extensive guides](#).



# Identify Helpful Platforms and Software

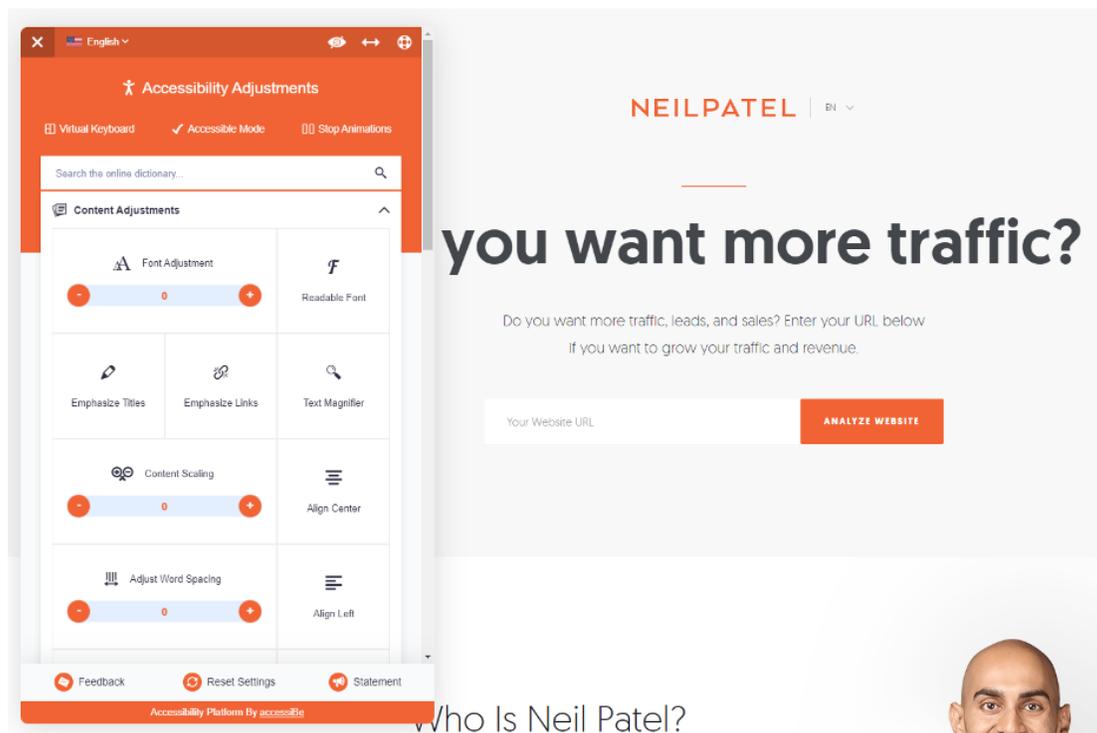
Keeping up with new standards is always a challenge. Every change requires development effort and may take away from other vital projects.

It may be wise to outsource some of the work to helpful platforms and software. Become familiar with the built-in accessibility features of popular operating systems, like [Windows 10](#) and [macOS](#). These features help you to understand the challenges faced by those with disabilities and how your site appears to them.

Another option is paid accessibility UX testing using people with specific disabilities. For example, Level Access offers [digital accessibility audits](#) where people, not computers, review your site and give feedback on how to improve it.

If you're using WordPress, the [Accessibility plugin from UserWay](#) will help boost the accessibility of your site without changing your site's existing code.

And if you're okay paying for some ADA help, [accessiBe](#) is an AI-powered platform that reads your site and figures out the best way to make it compliant with WCAG 2.1 and ADA. Then it automatically updates your site and adds an accessibility control panel. Check out the screenshot below from Neil Patel's website.





This panel gives your visitors complete control of their experience. It starts at \$490/year and could be a great way to save money on development and protect you from lawsuits.

And finally, don't forget about accessibility in your customer contact points like online chat or your branches. Make sure everyone has access to your services regardless of their situation.



## Future Proof Your Compliance Goals

The application inventory is complete. You've chosen your ambassadors. And you have a roadmap of changes you've decided to make. The next step is execution.

We suggest creating a small "ADA council" within your organization that meets regularly and tracks progress on an ongoing basis. The council can use a dashboard to track progress and hold accountable those in charge of making changes.

Use your ADA ambassadors to report to the council project status regularly. Use this information to track changes to the website and internal documents. These include providing captions for all videos or working with HR to outline internal documents for visually impaired employees.

Excellent planning, coordination, and accountability are the key to a successful ADA transformation. Ongoing oversight helps to cement an ADA culture in place and helps to keep accessibility in front of your employees' minds. You'll build a culture of accountability for the accessibility needs of others.

And once that is complete, turn your compliance into marketing and PR opportunities. Get the word out that your company takes accessibility seriously and works to create the best experience for people with disabilities.



# ADA Compliance Isn't a Gamble

You don't have to bet on your compliance.

Instead, build a plan to achieve compliance, both at your physical locations and within your digital assets. Remember, if you do get hit with a lawsuit, it will be important to show that you made a good-faith effort toward accommodation.

Take inventory of your products. Create a plan of action. Work to build a culture of accessibility. Then provide the oversight necessary to execute the strategy.

Most importantly, care about the people you serve. It's not about money or PR. Becoming compliant opens up the privilege of helping everyone get the services they need.

