



MEMBER EXCLUSIVE

Accessibility in banking: how finance actually fares when it comes to catering to customers with disabilities

Financial institutions are legally required to be ADA compliant but many are not.

Accessibility consultants say institutions need to do a better job of listening and responding to customers with disabilities.

SHEHZIL ZAHID | SEPTEMBER 03, 2021



Svetlana Kouznetsova, an accessibility consultant, always gets nervous when she has to travel. Her bank has blocked her card on valid transactions on a few occasions. Most often, the only way to resolve the issue is to talk to someone over the phone — but that solution doesn't take into consideration that Kouznetsova is deaf.

"It's a very frustrating experience," says Kouznetsova. "It's 2021! Everyone texts now. More businesses are offering other options to communicate than just via voice calls. But many still expect everyone to use the phone only."

The Americans with Disabilities Act requires financial institutions to provide accessible services to their customers in person and online. Today, U.S. courts apply ADA and its accessibility requirements to the websites and apps of financial institutions, too. Banks can be accessible with screen readers, online chats, and talking ATMs or ATMs with braille. However, many institutions have been running for decades, and for a lot of them, website accessibility compliance would require them to overhaul their application, product, or website code. This can be time-consuming and costly.

Some institutions have the juice to remediate accessibility issues and move forward with accessibility as an integral component of their products and features. For example, Bank of America says it offers ADA-compliant banking services through its mobile banking app and online banking chat. BofA's AI-driven virtual assistant, Erica, provides clients personalized, proactive financial guidance through voice, text, or on-screen gestures. BofA also introduced new ADA Specialty Centers staffed by trained employees, with tailored features like braille Better Money Habits, hearing induction loops, and American Sign Language-trained employees.

At Chase, Rohin Amin, CIO of JPMorgan Chase's consumer and community banking unit, says that when Chase builds systems and products, it begins with the customer and the customer journey for all abilities, so that accessibility is at the forefront of experiences. By doing that from the onset, Chase does not have to backtrack and add on or update pre-existing systems, products, or services.

For example, when Chase built and deployed its mobile check deposit feature, Chase QuickDeposit, the feature went to market as an accessible product. When using the feature, customers see a bottom navigation page that slides up to show their mobile deposit limit information. By default, a screen reader provides the navigational voice-over for the entire screen. To make it easier for its blind customers to deposit checks remotely, Chase developed custom code to make sure that only the relevant section of the screen is read by the screen reader.

Amin says that Chase.com and the Chase mobile app are ADA compliant — as noted, most institutions are required to be — but Kouznetsova says accessibility goes beyond ADA compliance. While she's never worked with a bank, Kouznetsova's personal experiences navigating her bank's financial services have been frustrating.

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Similarly, Michael Hinson, chief vision officer at accessiBe, an automated web accessibility solution for ADA and Website Content Accessibility Guidelines compliance, refers to his own experiences at a Wells Fargo bank branch. He

says when he wants to use their bank teller machines, he almost always needs assistance despite Wells Fargo's claim that it is ADA compliant. Being blind, he can neither read the screen nor plug in earphones to hear information from the screens, so someone always has to come out and read the information for him at the automated teller.

In fact, in 2011, Wells Fargo settled for \$16 million and a promise to remedy its services when an investigation by the Justice Department found that the bank failed to accept video phone calls from deaf customers. But Wells Fargo isn't alone when it comes to ADA non-compliance. In 2016, a mortgage holder with Bank of America filed against the bank alleging its mortgage documents did not comply with certain web accessibility standards. In 2018, Morgan Stanley settled with Albert Rizzi, founder of an NYC-based accessibility advocacy group, when he sued the firm for violating ADA compliance. Just last year, a case was filed against American Express, alleging that the Amex website was not accessible by WCAG 2.0 standards.

In 2018, the Bureau of Internet Accessibility conducted an accessibility analysis of banking industry websites. When banks or other institutions' websites are tested for accessibility, they are tested across four principles:

- **Perceivable** – are the content and user interface information presented in a way that all users can perceive?
- **Operable** – are there any interfaces and navigation components that users are not able to use?
- **Understandable** – can users understand the information as presented and operate the user interface?
- **Robust** – can users access the content as technologies evolve or update?

Upon completing its analysis of 15 banks' websites, BoIA reported that the average failure rate was 58%. Across the banks, the failure rate was 37% based on the perceivable principle; 67% on operable; 70% on understandable; and 90% on the robust principle. In 2018, when the analysis was published, Chase.com specifically failed 5 out of 12 checkpoints on the perceivable guideline; 6 out of 9 on operable, and completely failed on the understandable and robust guidelines.

A spokesperson for Chase says that third-party platforms like BoIA which use automated scanning are often prone to error and inaccuracy. They also added that in 2019, Chase self-identified that it could improve the accessibility of its website and established a team dedicated to remediating web content accessibility guideline issues.

While BoIA's automated testing only identified 20%-30% of the actual issues, Navin Thadani, CEO and founder of web accessibility software company Evincd, says most automated accessibility testing isn't very good at identifying a broad range of accessibility issues. Companies rely on manual testing to identify problems but manual testing can't scale accordingly when companies integrate and deploy new products and features continuously.

Thadani says ideally, institutions should be able to test for most issues automatically and go over their products and systems with a fine-toothed comb manually once the majority of issues have been identified. Thadani says that Evincd leverages a different technological approach than legacy automatic testing. When it worked with Capital One to improve the bank's website accessibility, Capital One was able to identify 10 times more accessibility issues than it did previously.

However, Kouznetsova says technology does not solve accessibility issues 100% and that creating awareness and developing accessibility training is key. She says that the most important thing is to listen to disabled people and to ask for advice instead of making wrong assumptions and decisions for them.

She says that many non-disabled people assume that there are technologies that can solve all accessibility issues quickly and easily. In her experience, people often add accessibility in the end when it's too late, which can lead to a bad experience for disabled customers and it can cost businesses more time and money to remediate accessibility issues.

"Accessibility is not a one-time thing or to be used as an afterthought," says Kouznetsova. "It's not a charity. It's the cost of doing business."

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