

JPMC TPP WCAG STANDARD

JPMorganChase and/or one or more of its subsidiaries or affiliates, including JPMorgan Chase Bank, N.A., collectively referred to as “**JPMC**,” has an agreement with a Third Party Provider (TPP) (henceforth referred to as “**supplier**”) for services and/or goods (the “**TPP Agreement**”) that incorporates this JPMC TPP Web Content Accessibility Guidelines (WCAG) Standard (“**Supplier WCAG Standard**”). This Supplier WCAG Standard outlines the requirements for [Digital Content](#) to comply with the [WCAG](#), the [Twenty-First Communications and Video Accessibility Act \(CVAA\)](#) and the [Portable Document Format/Universal Accessibility \(PDF/UA\) Standard](#).

In the event of a conflict between the TPP Agreement and this Supplier WCAG Standard, the TPP Agreement shall prevail. If a supplier identifies a conflict between the TPP Agreement and this Supplier WCAG Standard, the supplier must promptly report the conflict in writing to the JPMC Relationship (Delivery) or Product Manager overseeing the TPP Agreement. Otherwise, the terms of the TPP Agreement will be considered consistent with this Supplier WCAG Standard.

Applicability

This Supplier WCAG Standard applies to suppliers when they interact with actual or potential JPMC customers and/or employees via Digital Content offered through applicable JPMC internet, web and mobile properties, or by JPMC Digital Content delivered via supplier's internet, web and mobile properties. It also applies as indicated by the TPP Agreement and/or JPMC Relationship or Product Manager, as applicable. Additionally, this Supplier WCAG Standard applies to any design guidelines or related materials that may be used as a basis for Digital Content production at a later date.

General Conformance Requirements

1. All customer-facing and employee-facing Digital Content (excluding PDFs) must meet the [WCAG 2.1](#) Levels A and AA success criteria, or future versions of WCAG, as detailed in paragraph 4.
2. Suppliers producing certain video content are required to conform with the [CVAA](#) by meeting the following WCAG success criteria applicable to videos:
 - 1.2.1: Audio-only and Video-only (Prerecorded)
 - 1.2.2: Captions (Prerecorded)
 - 1.2.3: Audio Description or Media Alternative (Prerecorded)
 - 1.2.4: Captions (Live)
 - 1.2.5: Audio Description (Prerecorded)
 - 1.3.3: Sensory Characteristics
 - If the video includes instructions for understanding its content, such as referencing graphics or people.
 - 1.4.1: Use of Color Level A
 - If the video conveys visual information, such as charts.
 - 1.4.3: Contrast (Minimum)
 - For open captions, subtitles, titles, blocks of text, etc.
 - 1.4.11: Non-text Contrast
 - If the video has informational charts or graphs.
 - 2.3.1: Three Flashes or Below Threshold
 - If the video has strobing content.

For dynamic or interactive videos, additional success criteria may be required to achieve conformance. This list does not cover success criteria applicable when the supplier also provides a web page and/or media player. In such instances, all WCAG 2.1 Levels A and AA success criteria would apply to the video being produced. It is the supplier's responsibility to identify and adhere to all relevant success criteria for videos.

3. All customer-facing and employee-facing documents published in Portable Document Format (PDF) and accessed through digital channels must conform to the [PDF/UA-1 Standard](#).
4. JPMC reserves the right to seek conformance with future versions of the WCAG and PDF/UA in response to new developments, including, but not limited to regulatory guidance, amended relevant statute(s), and/or Department of Justice (DOJ) settlement agreements or other international regulatory requirements, as applicable.
5. When a Supplier cannot fully conform to this Supplier WCAG Standard, they must first obtain express written approval of a risk acceptance from the JPMC Relationship or Product Manager. For customer-facing Digital Content, the risk acceptance must also **confirm that such conformance variants have been approved by JPMC Risk and Controls**.

Specific Conformance Requirements for Customer-facing Content

1. JPMC requires a [Satisfactory Accessibility Conformance Report \(ACR\)](#) as evidence of the supplier's product conformance. This must be provided within 30 calendar days of JPMC's request and/or prior to production implementation of new or updated content that impacts the [User](#) experience. Suppliers may engage a third party, at their own expense, to perform an assessment and complete an ACR.
 - a. For Digital Content (excluding PDF), a completed WCAG [Voluntary Product Accessibility Template \(VPAT®\)](#), using the latest WCAG version available on [ITIC.org](#), is required.
 - b. For PDFs, a document outlining all [PDF/UA-1](#) requirements and the conformance status for each requirement is required.
2. If supplier Digital Content requires remediation, it must be completed according to the timelines below, unless otherwise agreed. Timelines for defect resolution are driven by the applicable [Priority Levels](#) of a defect as determined by JPMC.
 - a. Critical priority defects for WCAG or PDF/UA found prior to production must be remediated prior to production implementation.
 - b. Critical priority defects for WCAG or PDF/UA discovered in production must be remediated with the next production release or within 30 calendar days, whichever is sooner.
 - c. High priority defects for WCAG or PDF/UA must be remediated within 120 calendar days after the release in which the defect is identified.
 - d. Medium and low priority defects for WCAG or PDF/UA must be remediated within 240 calendar days after the release in which the defect is identified.
3. If the supplier identifies a WCAG or PDF/UA defect in its Digital Content, they must notify JPMC of each defect in writing within 15 calendar days of discovery.
4. JPMC may periodically conduct the supplier's accessibility maturity and ongoing conformance support capability. Suppliers must respond to feedback within 30 calendar days, unless otherwise agreed.

Specific Conformance Requirements for Employee-facing Content

1. JPMC reserves the right to perform accessibility assessments in a representative, nonproduction testing environment using a combination of automated, manual and assistive technology focused techniques.
 - a. JPMC will provide the supplier with test results and a list of identified accessibility defects with assigned [Priority Levels](#).
 - b. Suppliers must provide progress reports during remediation.
2. If supplier Digital Content requires remediation, it must be completed according to the timelines below, unless otherwise agreed. Timelines for defect resolution are driven by the applicable Priority Level of a defect as determined by JPMC.
 - a. Critical priority defects for WCAG or PDF/UA found prior to production must be remediated prior to production implementation.
 - b. Critical priority defects for WCAG or PDF/UA discovered in production must be remediated no later than 30 calendar days from when the test report including the defect is shared.
 - c. High priority defects for WCAG or PDF/UA must be remediated within 120 calendar days from when the test report including the defect is shared.
 - d. Medium and low priority defects for WCAG or PDF/UA must be remediated within 240 calendar days from when the test report including the defect is shared.
3. JPMC may request a ACR as evidence of the supplier's product conformance, in addition to JPMC's internal testing.
 - a. This report should be created using the latest INT or WCAG versions of the [VPAT®](#) available on [ITIC.org](#).

Software for Testing

To ensure consistency, testing for accessibility should be performed using the currently supported versions of the manufacturer's assistive technology applications, platforms, mobile devices and web browsers.

WCAG User Experience Testing Pairs

- Chrome and JAWS
- Mozilla Firefox and NVDA
- JAWS for Window Desktop Applications
- VoiceOver for Mac Applications
- Chrome and TalkBack for Android devices
- Safari and VoiceOver for iOS and macOS devices

PDF/UA User Experience Testing

- JAWS
- NVDA
- TalkBack for Android devices
- VoiceOver for iOS and macOS devices

Priority Levels

Priority levels are applied to defects based on their impact on Users. JPMC requires suppliers to use the guidelines below for defect prioritization.

Priority Level	Guideline
Critical	Any accessibility issue caused by a failure of any of the requirements listed below is automatically prioritized as critical priority. WCAG Success Criteria: • 1.3.4 Orientation • 1.4.2 Audio Control • 2.1.2 No Keyboard Trap • 2.2.2 Pause, Stop, Hide • 2.3.1 Three Flashes or Below Threshold • 3.3.4 Error Prevention PDF/UA • 7.19 Actions • 7.1-5 General (flickering, blinking, or flashing content should not be used)
Critical	Any accessibility issue which does all of the following: • Fails to conform to required accessibility standards • Limits a User's ability to access and use the product • Has no Workaround (see Definitions for further detail)
High	Any accessibility issue which does all of the following: • Fails to conform to required accessibility standards • Limits a User's ability to access and use the product • Has a Workaround
Medium	Any accessibility issue which does all of the following: • Does not fail to conform to required accessibility standards • May limit a User's ability to access and use the product Note: Medium priority defects may result in complaints because they may limit (but do not prevent) a User's ability to access and use the product.
Low	Any accessibility issue which does all of the following: • Does not fail to conform to required accessibility standards • Does not limit a User's ability to access and use the product Note: Low priority defects are not WCAG or PDF/UA usability issues that have an accessibility impact.

Priority Level Examples

For guidance, examples of each type of priority defect are provided. While not exhaustive, these examples assist in determining categorization and prioritize remediation efforts.

Priority Level	Example
Critical (no workaround is available)	A PDF of an annual report contains crucial statistics on stock performance, organized into two columns of text. Visually, the content is read down the left column first, then to the next column. However, due to the PDF missing a logical tag tree structure, a screen reader reads across the entire page, moving from the first line of the left column directly to the first line of the next column, making the content unusable for screen reader Users. Additionally, the page from which the User downloaded the PDF does not provide links to accessible alternative versions.
Critical (no workaround is available)	During the account opening process, a dialog appears with a button the User must click to accept the account terms. For visual Users, the dialog and button are clearly visible and actionable. However, the screen reader focus does not shift to the dialog as soon as it opens and instead remains at the top of the page's document order. The content beneath the dialog remains navigable by the screen reader. As a result of the incorrect focus order, the button for accepting terms is not discoverable, preventing screen reader Users from completing the process without visual assistance.
High (workaround available)	While a screen reader User is on the account transfer screen, a message appears at the top indicating the transfer service is temporarily unavailable. However, this message is not conveyed by the screen reader. When the User attempts to activate the button, nothing occurs. By exploring the screen, the User eventually discovers and reads the service outage announcement at the top.
Medium	Columns in a table of account transactions are sortable. However, the button to initiate sorting only becomes visible when you hover or focus on the table header cells. Once sorted, an icon button appears, indicating whether the column is sorted in ascending or descending order. The buttons and their programmatic states—unsorted, sorted ascending, and sorted descending—are accessible to screen reader Users. However, some Users may not locate the sort buttons unless they are always present visually, even when a column is in an unsorted state.

Priority Level	Example
Low	A web page contains several minor and subtle animations lasting less than five seconds, including: • Accordions where panel regions expand and collapse with a slight ease-out/ease-in quarter-second animation. • A menu icon that transitions from a three-bar "hamburger" appearance to an "X." • Links that cause a smooth scroll to anchored content elsewhere on the page, rather than an abrupt jump. These animations may induce vertigo in individuals with vestibular disorders.

Definitions

1. **Accessibility Conformance Report (ACR):** A document that outlines how a product or service meets specific accessibility standards and guidelines.
2. **Digital Content:** Text, images, sounds, videos and animations encountered as part of the User experience presented through various digital and electronic platforms and interfaces, including but not limited to websites, [Social Media](#), desktop or mobile applications, ATM interfaces, webinars, text messages, emails, Quick Response (QR) codes, electronic documents (such as PDFs) and plug-ins.
3. **PDF/UA Standard:** A Portable Document Format (PDF) designed for Universal Accessibility (UA) in accordance with the ISO 14289-1 standard, which specifies requirements for accessible PDF documents as published by the International Organization for Standardization (ISO).
4. **Satisfactory:** Acceptable evaluation result that must be achieved prior to production implementation.
 - Satisfactory – No further action required:
 - i. All applicable requirements documented as "Supports", or
 - ii. An acceptable explanation has been provided for any applicable success criteria documented as "Partially Supports" or "Does not Support" with no remediation required given a product's features and functionality.
 - Satisfactory – Some action still required
 - i. No issues identified for success criteria classified as critical functionality.
 - ii. There are success criteria not classified as critical functionality documented as "Partially Support" or "Does Not Support" that require remediation and will be resolved according to the Conformance Requirements section of this Supplier WCAG Standard.
5. **Social Media:** An interactive online communication in which Users can generate and share content through text, images, audio, and/or video. Social Media can take many forms including, but not limited to:
 - micro-blogging sites (e.g., Facebook, Twitter)
 - forums
 - blogs
 - customer review websites
 - bulletin boards
 - photo and video sites (e.g., Flickr, Giphy, YouTube)

- sites that enable professional networking (e.g., LinkedIn)
 - virtual worlds (e.g., Metaverse)
 - social games
6. **Twenty-First Century Communications and Video Accessibility Act (CVAA):** A U.S. law ensuring that modern communication and video technologies are accessible to people with disabilities.
 7. **User:** A person who engages with a product, service, or system by using it, interacting with, or consuming it.
 8. **Voluntary Product Accessibility Template (VPAT®):** A reporting format published by the Information Technology Industry Council (ITI) used to document a product's conformance with applicable standards. The word "voluntary" within the title is not indicative that the VPAT® is an optional requirement.
 9. **Web Content Accessibility Guidelines (WCAG):** A set of guidelines developed by the World Wide Web Consortium (W3C) to ensure digital content is accessible to people with disabilities.
 10. **Workaround:** Within the same product and/or workflow, there is an alternative means of accomplishing the same task, using the same device, browser, application, or assistive technology. This alternative means must be available on the same page or screen (or referenced on the same page or screen) in a manner that is easily discoverable. Workarounds should not require a User to disable assistive technology, switch devices, browsers, applications, or assistive technology or seek assistance from others.

Links

1. **CVAA:** <https://www.fcc.gov/cvaa>
2. **ITIC:** <https://www.itic.org/policy/accessibility/vpat>
3. **PDF/UA-1 Standard:** <https://pdfa.org/resource/iso-14289-pdfua/>
4. **WCAG 2.1:** <https://www.w3.org/TR/WCAG21/>