

JPMC TPP WCAG Standard

JPMorgan Chase Bank, National Association and/or one or more of its affiliates (“**JPMC**”) has an agreement with a third party provider (“**TPP**”) for services and/or goods (the “**TPP Agreement**”) that implicates this JPMC Third Party Provider WCAG Standard (“**TPP WCAG Standard**”).

In the event of a conflict between the TPP Agreement and this TPP WCAG Standard, the TPP Agreement shall control. In the event a TPP identifies a conflict between the TPP Agreement and this TPP WCAG Standard, the TPP shall promptly report such conflict in writing to the JPMC Relationship Manager of the TPP Agreement. Otherwise, the terms of the TPP Agreement shall be deemed consistent with this TPP WCAG Standard.

Applicability

This TPP WCAG Standard applies to a TPP where the TPP interacts via digital and/or electronic content offered via applicable JPMC online and mobile properties, or as otherwise indicated by the TPP Agreement and/or JPMC Relationship Manager (or Delivery Manager as the case may be) as being applicable.

Definitions

1. “**Section 508**” means Section 508 of the Rehabilitation Act of 1973, as amended in January 2018.
2. “**Voluntary Product Assessment Template or VPAT**” means a tool used to document a product’s conformance with Section 508 accessibility standards.
3. “**WCAG**” means Web Content Accessibility Guidelines, Version 2.0, Level A and AA (ISO/IEC 40500) including PDF/UA.
4. “**PDF/UA**” means Portable Document Format/ Universal Accessibility (ISO 14289-1) as a mechanism for encoding instructions to be rendered, played, or executed by user agents to retrieve or present content to users.

Requirements

1. Without limiting the requirements of WCAG conformance generally, TPP shall confirm that each applicable deliverable and/or service of the TPP Agreement includes the following:
 - a. user interface design specifications that account for use of accessible user interface components;
 - b. usability test case scenarios that consider the use of assistive technology products (screen readers, screen magnifiers, alternative pointing devices, alternative keyboards, etc.);
 - c. documentation of product features that presents information in multiple ways (visual, auditory, electronic, etc.).
2. In the event TPP does not conform to these TPP WCAG Standards, TPP shall first obtain express written approval from the JPMC Relationship Manager confirming that such conformance variants have been approved by LOB Risk and Control.
3. To the extent TPP experiences a defect with WCAG testing, TPP shall:
 - a. notify JPMC, in writing, of each defect and the plan to correct it;
 - b. obtain JPMC’s written approval of the plan to correct;
 - c. correct and retest each defect promptly within thirty (30) days, unless otherwise agreed;

The following is an illustration of the types of criteria and associated evidence that JPMC uses to assess WCAG compliance.

Evidence Requirements		
1	Evidence of WCAG Implementation, Test Strategy, and Defect Resolution	<p>TPP will be provided with list of evidence requirements including the following as applicable:</p> <ul style="list-style-type: none"> Name of engaged third-party accessibility specialist/consultant Gap analysis completed by specialist/consultant Gap analysis completed by vendor Remediation plan (Timelines & Milestones) Plan to embed accessibility knowledge in project development life cycle Remediation Methodology (How will you address WCAG requirements) Testing methodology addressing accessibility Testing defects identified and resolution status Combination of tools, browsers & hardware used for development / testing Final detailed statement of support by WCAG 2.0 Level A & AA success criteria (can be a VPAT) Certification of conformance from accessibility specialist
2	Assessment	JPMC may require, at its sole discretion, a TPP to undergo an independent assessment of WCAG conformance at the TPP's sole cost and expense.
3	Section 508 VPAT	TPP shall test to confirm that applications that are subject to or conform to Section 508 are also WCAG compliant and shall provide a VPAT on an annual basis.
4	Accessibility Quick Review	JPMC, at its sole discretion, may periodically assess WCAG conformance through manual and/or automated processes using assistive technologies and accessibility verification software of JPMC's choice, including, but not limited to, screen readers such as JAWS, NVDA, popular web browsers, and mobile browsers including native screen readers

TPP shall apply the following taxonomy for the severity of defects unless otherwise amended at: <http://www.w3.org/TR/WCAG20/>

Severity	WCAG Success Criteria	Level	Brief Description	Notes
Critical	1.4.2	A	Audio control (3 second rule)	
	2.1.2	A	No keyboard trap	
	2.2.2	A	Pause, stop, hide (blinking/ changing content)	
	2.3.1	A	Three flashes or below threshold	
	3.3.4	AA	Error prevention (Legal, Financial, Data)	

Severity	WCAG Success Criteria	Level	Brief Description	Notes
High	1.1.1	A	Non-text content (Text alternatives)	NOTE: JPMC does not support the use of CAPTCHA. All instances should be replaced with a different, accessible solution.
	1.2.1	A	Audio-only and Video-only (Prerecorded) [Time based Media]	
	1.2.2	A	Captions (Prerecorded)	
	1.2.3	A	Audio Description or Media Alternative (Prerecorded)	
	1.2.4	AA	Captions (Live)	
	1.2.5	AA	Audio Description (Prerecorded)	
	1.3.1	A	Info and relationships	
	1.3.2	A	Meaningful sequence	
	1.3.3	A	Sensory Characteristics	
	1.4.1	A	Use of Color (Color Alone used to visually convey meaning)	
	1.4.3	AA	Contrast (minimum)	
	1.4.4	AA	Resize text	
	1.4.5	AA	Images of text	
	2.1.1	A	Keyboard (control)	
	2.2.1	A	Timing adjustable (time limits)	
	2.4.1	A	Bypass blocks	
	2.4.2	A	Page titled	
	2.4.3	A	Focus order	
	2.4.4	A	Link purpose (in context)	
	2.4.5	AA	Multiple ways	
	2.4.6	AA	Headings and labels	
	2.4.7	AA	Focus visible	
	3.1.1	A	Language of the page	

High	3.1.2	AA	Language of parts	
	3.2.1	A	On focus (no change of context)	
	3.2.2	A	On input (no change of context without being informed earlier)	
	3.2.3	AA	Consistent navigation	
	3.2.4	AA	Consistent identification	
	3.3.1	A	Error identification	
	3.3.2	A	Labels or instructions	
	3.3.3	AA	Error suggestion	
	4.1.1	A	Parsing (well formatted code)	
	4.1.2	A	Name, role, value	

Severity	WCAG Success Criteria	Level	Brief Description	Notes
Medium / Low	All AAA Success Criteria	AAA	Level AAA guidelines are not listed in this table because they are not included in the JPMC TPP WCAG Standard.	Level AAA is not included in the JPMC TPP WCAG Standard