

# ADA Compliance for Websites

The Impact of Americans with  
Disabilities Act (ADA) and Web  
Accessibility on the Mortgage Industry

**EllieMae**<sup>®</sup>



# Equal Access to the Web: What you Need to Know

When the Americans with Disabilities Act was signed in 1990, it became one of the first civil rights laws that focused on the needs of persons with disabilities. A big part of the legislation was ensuring that individuals weren't denied access to public accommodations, for example, if they couldn't navigate the stairs at the library or the turnstile at the subway.

The burden was on the facility or business to make physical adjustments or provide the required equipment to ensure access for all.

## Enter the Digital Age.

Because so many people buy goods and services online, the Americans with Disabilities Act (ADA) has been interpreted by courts to extend to website accessibility—a change that hasn't gone unnoticed.

The number of lawsuits around web access has steadily risen, with many garnering settlements in the millions. Pizza delivery chains, online retailers, and financial institutions have already taken substantial financial hits.

With so many borrowers now applying for mortgages online, lenders who aren't already thinking about accessibility could be putting their companies at risk.

Although the World Wide Web Consortium has put together Web Content Accessibility Guidelines 2.0 (WCAG 2.0) that define specific accessibility standards for ADA compliance, there is still a lot of confusion around what digital accessibility actually means—and what mortgage lenders should be doing right now.

This eBook was created to cut through the clutter. Its goal is to give you a clear picture of what an accessible website really is, why inclusion matters, and what Ellie Mae is doing to help you offer a world-class online experience to everyone.



# A quick reality check: Debunking the most common myths of digital accessibility

## **Myth #1: Making a site accessible means updating the graphic design**

It's a common belief that accessibility only revolves around a website's specific design elements—the font, the colors, the icons that populate the pages; that making the site work for everyone is largely a cosmetic adjustment that can be handled by a web designer.

## **Reality: Accessibility has to be written in as part of the code**

While there are some visual requirements, to meet WCAG 2.0 guidelines the website has to be architected from the ground up to provide:

### **Perceivable information and user interface components**

This means content also has to offer text alternatives for images, objects and symbols. For example, a magnifying glass that means “search” should also have information that describes what an individual uses it for. Links have to have more description, like “Select to (do X thing)” instead of a simple underline. Multimedia presentations need captions and transcripts.

**The goal is making it easy for different users to consume the content.**

### **Operable user interface and navigation**

All of the website functionality has to work using only a keyboard, with adequate time allowed to read content and complete tasks. Title pages and headings have to adequately describe their purpose. And flashing content has to be eliminated, as this could cause seizures among those with epilepsy or similar conditions.



## Understandable information and structure

The text has to be readable, with the right contrast ratio, resizable without distortion, and contextually clear, whether it is read aloud, transcribed or translated. Navigation should happen, predictably, from page-to-page, with consistently identified links, labels and text alternatives.

**The goal is to have no surprises. The user should know what's coming.**

## Robust content that works with assistive technologies

The site has to be set up with various landmarks, so it can be fully utilized by things like screen readers, magnifiers, text readers, speech input software or alternative input devices, like head pointers or motion trackers—anything a human might need to fully interact with it. It's important to note that this is not something that a user navigating the site without using a device can see or notice. The capabilities are engineered into the software itself.

**The bottom line: In an ADA-compatible site, nearly every part of the site architecture and content presentation is impacted, so it is not a simple, cosmetic change.**

## Myth #2: Accessibility doesn't impact that many of my customers or prospects.

If you believe accessibility only impacts a sliver of the home buying market, or that the people who need an accessible online loan application are few and far between, just look at the numbers.

## Reality: One in four adults in the U.S. have a disability

According to a recent report developed by the Centers of Disease Control and Prevention (CDC), 25 percent of all adults in the United States—that's 61 million people—have a disability\*.

That number doesn't even factor in the individuals with temporary limitations, like a broken arm, eye surgery, carpal tunnel surgery or anything that might prevent them from navigating your online application.

Consider the visually impaired person wants to apply for a mortgage online. Because she can't see site navigation, or the different pages and forms, she uses a screen reader that verbally communicates the information on the page.

Your website has to be coded with accessibility characteristics in order for the screen reader to supply accurate information to the user, like identifying which field is for "name," and which is for "address."

If the site isn't coded correctly, the reader could see the "name" field as "address," or contain some other inaccuracy that would prevent the prospective borrower from submitting her application.



Or, consider the prospective customer with arthritis, who has to navigate your site with an ergonomic keyboard. If the only way to change fields in your application is with a right mouse click, he will move on to another, more accommodating lender.

Or, the hearing-impaired person who needs translation of the nifty how-to video that helps other customers zip through the application process.

Or, the color-blind prospect who can't see your alerts, because they are in red text. So, he doesn't know why things aren't working.

**Do you really want to exclude all of these people from becoming your customers?**



**Myth #3:** An accessible site negatively impacts the experience for my able-bodied customers.

No question, making a consumer-facing website accessible in compliance with the ADA and WCAG guidelines takes a lot of work. With so much coding going on, some mortgage lenders worry that making their sites accessible will also make them less appealing to their able-bodied users, both visually and from a performance level.

In fact, the opposite is true.

**Reality:** An accessible site actually improves the user experience—for everyone

Accessibility is at the heart of innovation. It challenges engineers to find new ways to improve functionality, clarify every instruction, and problem solve in a way that's going to ensure that more people have an easier time using the interface.

That means visitors will stay on your site longer, and there will be a better customer experience for all.

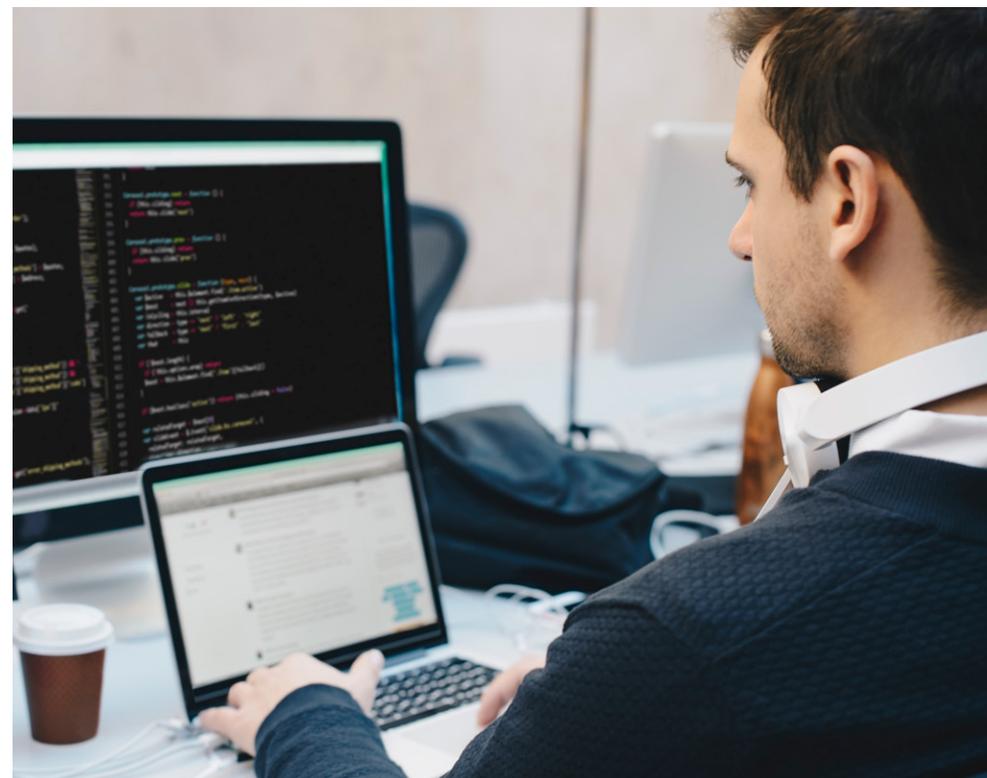
## **Myth #4:** If you have a coder on staff, making your site accessible is a one-time, do-it-yourself project.

While it's true that a coder can make your website comply with accessibility standards, that's only one part of the equation.

## **Reality:** If you recode the front end, you have to recode the back end

Even if you have a designer who can code your website, that's only the beginning. All of the information gathered on the site has to map to your LOS correctly, so it triggers the right emails, populates the right fields and serves up the right information to your loan officers.

Any change or new release means remapping everything again.





## **Myth #5: None of this really impacts my company.**

If you believe that you're too small to be the subject of a lawsuit, or that accessibility doesn't pertain to your business, think again.

## **Reality: No matter what size lender you are, accessibility matters.**

First, there's a liability risk. Discrimination lawsuits are on the rise, targeting everything from e-commerce and pizza delivery applications to online banking sites. As the digital mortgage becomes mainstream, mortgage lenders could emerge as the next wave of defendants.

Not only are these lawsuits costing companies millions of dollars, they also cost dearly in long-term reputational damage.

Finally, offering platforms that are accessible for all kinds of users is fundamentally the right thing to do. If you can show people that you've created a website and applications that are easy to use, regardless of situation or life stage, isn't that a differentiator?

More importantly, isn't that the kind of lender you want to be?

## How do you know if your website meets WCAG 2.0 standards?

There are a number of ways to assess your existing website, borrower portal and online loan application against WCAG 2.0.

The most extensive, and most expensive option is hiring a web accessibility auditing and remediation firm to evaluate your site and recommend changes—a process that could cost tens of thousands of dollars. These firms have a compliance engine that measures your website against specific guidelines and identifies how compliant you are by percentage. They can also create an audit plan to ensure ongoing compliance.

A number of companies offer online testing tools, as well, although these don't provide the accuracy of a certified auditor.

### If you want to take a quick, high-level compliance self-test first, you can:

- **Check the color contrast between your text and background and compare it WCAG 2.0. standards.**
- **Confirm with your web designer that all images on your site have descriptions of those images, called "Alt text," so these can be read by screen readers and speech-to-text software.**
- **See if your site contains scanned PDFs or is presenting any important information in picture form—both of which are accessibility "don'ts."**
- **Look at your site animation for any content that flashes more than three times in a second, or tables that have design elements that don't actually represent data. These are out of compliance as well.**

Most importantly, have your staff sit down and try to navigate the site, and submit a completed application using nothing more than the keyboard.

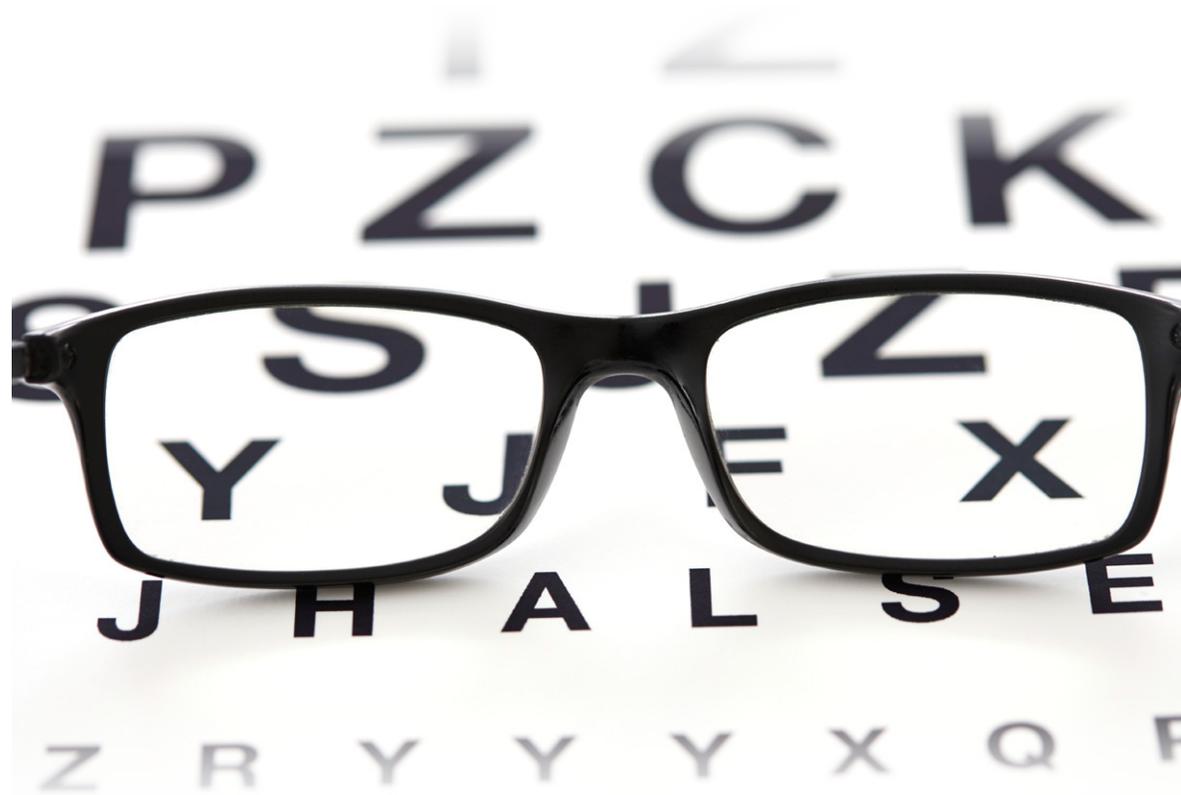
If they can, you probably have the basics in place and can adjust from there. If they can't, you have some decisions to make.

## Weighing your options

What to do next is really a business decision based on company philosophy, potential risk, budget and potential impact on revenue.

### Consider these options:

- Make some small cosmetic changes
- Commit to 80-100 percent compliance
- Try to update the site you have, by checking it against the WCAG guidelines
- Find a consumer-facing site that meets current accessibility guidelines
- Hire a professional web accessibility auditing and remediation service





## What Ellie Mae has done to help

As a company, Ellie Mae has invested time and resources in not only helping our clients navigate web accessibility standards but ensuring that Encompass Consumer Connect® can be used by everyone.

Our mission is to do more than what is mandated to meet accessibility standards. Instead of just checking off the required boxes, we chose, instead, to think outside the box, and focus our efforts on developing products with inclusive design.

We've taken meeting WCAG 2.0 guidelines as our baseline and expanded those standards to include a broader swath of people. We want to make sure that elderly people, individuals who need a little more time to complete steps because of language barriers, and people at home with injuries can still interact with our Encompass Consumer Connect. We don't want anyone to be excluded, regardless of limitation.

## Step one: We rewrote the rules

To accomplish the goal, we assembled an internal user experience team comprised of engineers, designers and proven accessibility experts. They used WCAG 2.0 as their baseline, interpreting those guidelines in meticulous detail.

Then, they took a deeper look into site functionality and determined what it would take to make that functionality easier for every, single human who uses it.



## Step two: We rewrote Encompass Consumer Connect®

We started with a third-party assessment to get a full understanding of what we needed to do to ensure our product worked for everyone.

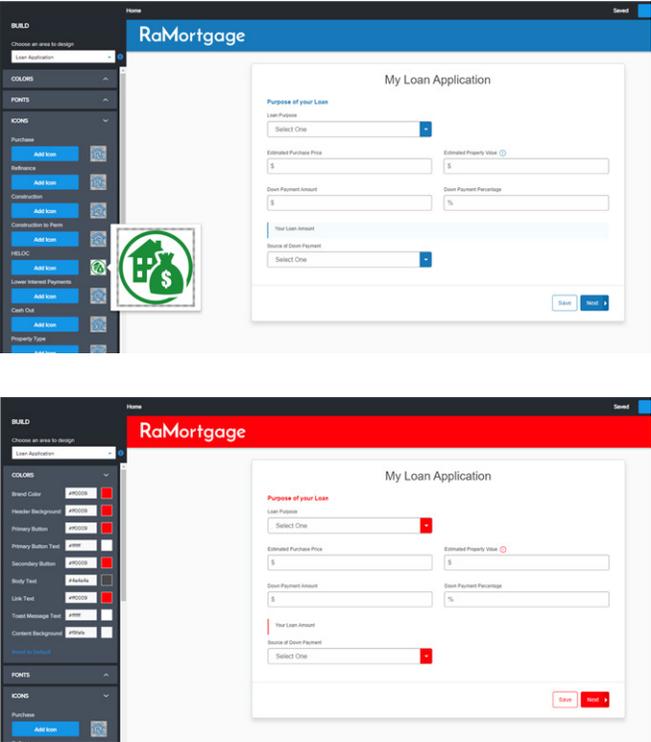
### Then, we went to work.

Nearly every element in Encompass Consumer Connect has been touched to ensure people with permanent disabilities, temporary disabilities, as well as those simply dealing with the minor physical inconveniences of life, can still successfully use the features.

Inclusive design is built into the architecture of the product.

That means, the templates provided out-of-the-box have all of the key components and the core structure that enables you to provide your customers with a functional, delightful experience, whether they are applying for a loan using an enablement device or a traditional keyboard and mouse. And, we have the certification to prove it.

But keep in mind, even though Encompass Consumer Connect templates are accessible out-of-the-box, you need to ensure that any future changes that are made to the online application and borrower portal meet the latest [WCAG guidelines found on the W3C website](#).



The image displays two side-by-side screenshots of the RaMortgage website's 'My Loan Application' form. The top screenshot shows the original design with a blue header and a green house icon. The bottom screenshot shows the updated design with a red header and a red house icon, illustrating changes made to meet WCAG guidelines.

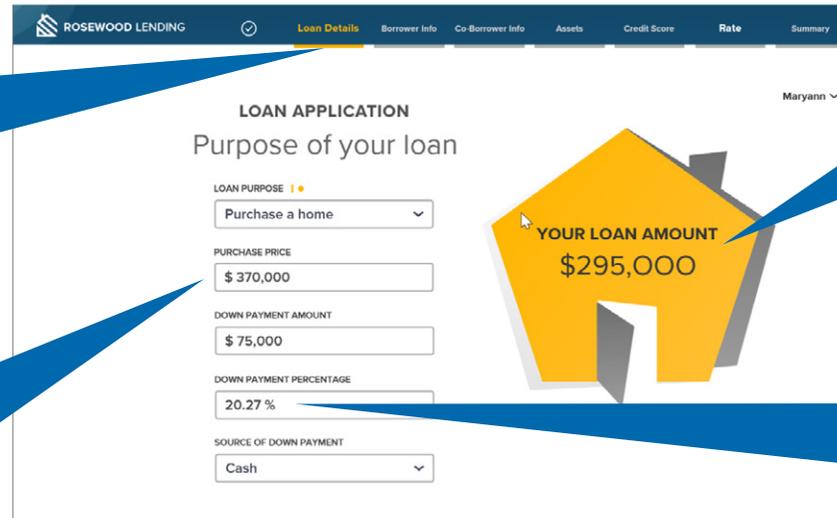
### Website updates should meet the latest WCAG guidelines:

For example, when adding an icon or changing a background color, you'll need to ensure the icon image has a description (Alt text) and that you choose a color that meets or exceeds the color contrast guidelines for accessibility.

## Some of the biggest changes you won't see include:

All labels are encoded with the correct **color contrast ratios**.

Every **form element** is encoded with labels, so the screen reader knows it's a **data entry field**.



The screenshot shows a web form titled "LOAN APPLICATION" under the heading "Purpose of your loan". The form includes several input fields: "LOAN PURPOSE" (dropdown menu with "Purchase a home" selected), "PURCHASE PRICE" (text input with "\$370,000"), "DOWN PAYMENT AMOUNT" (text input with "\$75,000"), "DOWN PAYMENT PERCENTAGE" (text input with "20.27%"), and "SOURCE OF DOWN PAYMENT" (dropdown menu with "Cash" selected). To the right of the form is a yellow house icon with the text "YOUR LOAN AMOUNT \$295,000" inside it. The top navigation bar includes "ROSEWOOD LENDING" and several menu items: "Loan Details", "Borrower Info", "Co-Borrower Info", "Assets", "Credit Score", "Rate", and "Summary". The user's name "Maryann" is visible in the top right corner. Four blue callout boxes with white text point to specific elements: one to the "Loan Purpose" dropdown, one to the house icon, one to the "Down Payment Percentage" input field, and one to the "Your Loan Amount" text.

All images are encoded with **alt tags** so the screen reader can recognize it's an image.

**Tab order is well-defined**, so the user can tab between fields easily.

Everything maps back to Encompass for a total, end-to-end experience that flows as easily as it does today, whether the application came in from a borrower using a screen reader or one using a mobile device. When there are new releases, everything upgrades automatically.

It's all a part of Encompass Consumer Connect, and all available to Encompass customers as part of their existing investment. To find out more about Encompass Consumer Connect, visit [elliemae.com/consumer](http://elliemae.com/consumer).

To find out more about ADA 508 compliance, download Ellie Mae's *Keeping Your Encompass Consumer Connect® Website Accessible According to WCAG Requirements*, visit [ellie.me/2HT17jF](http://ellie.me/2HT17jF).



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