Informal WCAG 2.1 AA and EN 301 549 complete conformance audit results and accessibility remediation report for Accutive CWB deployment (Motive, Small Business, and Personal Self-service)

By David Berman CPWA, CPACC, WAS, ADS and our expert accessibility assessment team
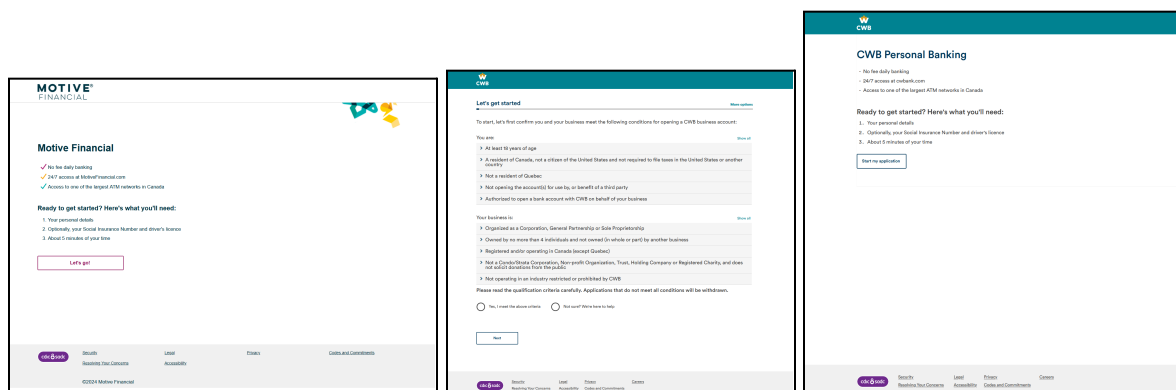
David Berman Communications

Headquarters: 340 Selby Avenue, Ottawa, Ontario, Canada K2A 3X6

Canada +1 613-728-6777 | US +1 617-917-4858 | North America toll-free 800-665-1809

www.davidberman.com

Client Project Lead: Neil Vany <neil.vany@accutive.com>, Accutive
Audit Timing: Started April 2024 | Report first shared with client 26 April 2024 (as per first delivery deadline of April 26 2024)

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Our typical best practice collaborative process

1. Following our ISO 17020 conformant version of the WCAG-EM methodology, Team Berman has identified all relevant WCAG issues and informally listed them below (with recommendations, including any repair suggestions, as appropriate). We list them in an order intended to make it easier for the development team to attack them (rather than by WCAG success criterion).

2. The development team sees this document for the first time, reviews the issues list, and optionally **bolds** any that require further guidance, clarity, coaching, or convincing from Team Berman (or adds comments containing any questions). The development team may also add their ticket numbers to our issue numbers if desired.

3. Optionally, the development team and Team Berman can have a screen-sharing video call where we walk through all those issues together until we're entirely on the same page. This is the best time for issues that will be actioned to now potentially become tickets within the client's ticketing system.

4. The development team remedies all the issues that are failures to the project's conformance target (and preferably other issues as well … such other issues are entirely in italics), typing a status code on each issue (using Issue Status Legend instructions below) and notifies berman@davidberman.com once they've done all they are going to do, or have nothing left but questions, so we can move forward with our next step (whether it be re-audit, formal reporting, and/or further coaching). We also encourage everyone to turn on Tools > Notifications Settings to their taste, so they'll know when there is new/changed content and/or comments in the document.

5. If needed and the client requests a re-audit, Team Berman re-audits. If so...

   a. The development team supplies a changelog of any changes made to the product (if there were any) aside from the accessibility remediation that was done so that Team Berman will add auditing of those features to the scope of the re-audit.

   b. The development team, when possible, restores or retains any test accounts that Team Berman was using in the new release that Team Berman will now test so that Team Berman can continue to use their existing setup.

   c. After re-auditing, Team Berman will add comment threads to any remaining issues. The development team can respond within those comment threads, conveniently keeping each conversation timestamped. Team Berman (not the client's dev team) will then resolve each thread once satisfied that the issue is entirely resolved.

6. When the product meets or exceeds compliance, Team Berman reports that the product is now compliant and moves on to generating a formal compliance report if the client desires.

Issue status legend

Development team: As you resolve each issue, please type a status code immediately before the word "Recommendation" within this very Googledoc (if you don't have full editing rights, please notify us so we can arrange that for you). Then, if you desire a re-audit (and thus potential certification), notify berman@davidberman.com once you've done all you are going to do, and it has been deployed to where we can see it (including the URL of where the new product to test is located). When there is nothing but questions, we can move forward with any next steps (whether it be further coaching, clarification, or re-audit).

- **[F?]** development is not finished fixing ... dev team wants further guidance from Team Berman and has indicated what part of the recommendation they find unactionable or unclear

- **[F0]** **[*insert reason not fixed*]** development team has decided never to fix this (or to have Team Berman no longer audit it within this engagement). Note: If an [F0] is applied to a conformance failure (for example, not a "potential" or "functional" accessibility issue) definitely include a reason the client is choosing not to remediate this issue (as it may block conformance of the entire product).

- **[F1]** development team thinks they have fixed, using a technique recommended by Team Berman

- **[F2]** **[*insert how fixed*]** dev team thinks they have fixed, using a different technique, and that technique is [_____] (for example, "**[F2]** We used an aria-describedby attribute instead of aria-label because it worked better for bilingual rollout")

- **[F3]** **[*insert how fixed*]** dev team is not sure if they have fixed or not, and so needs Team Berman to make a determination (for example, "**[F3]** We tried doing what you recommended, but we weren't certain what an archtable is, so instead we…")

- ~~**Strikethrough through the entire issue**~~ (by Team Berman only): indicates that Team Berman agrees the issue has been resolved

- Google Doc **Comment thread**: started by Team Berman, if the issue is **still an issue**

- **[NEW]** (by Team Berman only) if a new issue is discovered during a re-audit

Executive summary

Current conformance / compliance summary statement

At present, the product substantially fails to conform to any conformance level of the WCAG standard targeted. At least some, if not all, people living with disabilities will have no or low likelihood of succeeding in using some or all of the features of the product. However, we are confident that all of the issues we discovered can be remediated using known techniques.

Technical conformance

The tested products, after the first full assessment, failed to conform to the conformance target, thus falling short of compliance with the regulatory target.

WCAG 2.0: To reach WCAG 2.0 Level A conformance, a product must comply with 25 Level A success criteria. To reach WCAG 2.0 Level AA compliance, a product must comply with the Level A success criteria as well as the 13 Level AA success criteria. To reach WCAG 2.0 Level AAA compliance, a product must comply with the Level A and AA success criteria as well as the 23 Level AAA success criteria.

WCAG 2.1: To reach WCAG 2.1 Level A conformance, a product must comply with 30 Level A success criteria. To reach WCAG 2.1 Level AA compliance, a product must comply with all the Level A success criteria as well as the 20 Level AA success criteria. To reach WCAG 2.1 Level AAA compliance, a product must comply with the Level A and AA success criteria as well as the 30 Level AAA success criteria.

Functional conformance

Regarding conformance with EN 301 549 functional performance statements, the product only supports 6 of the 11 criteria, as follows:

4.2.1 **Usage without vision:** Does not support

4.2.2 **Usage with limited vision**: Does not support

4.2.3 **Usage without perception of colour:** Does not support

4.2.4 **Usage without hearing:** Supports

4.2.5 **Usage with limited hearing**: Supports

4.2.6 **Usage without vocal capability**: Supports

4.2.7 **Usage with limited manipulation or strength:** Does not support

4.2.8 **Usage with limited reach**: Does not support

4.2.9 **Minimize photosensitive seizure triggers:** Supports

4.2.10 **Usage with limited cognition:** Supports

4.2.11 **Privacy:** Supports

Scope and target

Scope of the tested product

The mandate of this audit covers the native desktop browser experience limited to audience view (including responsive layouts), of the test pages identified within the "Tested product" section below, as observed in April 2024.

Natural languages in scope: English

Conformance target (standards/legislation to meet or exceed, and at what level)

Minimum standards (and level) targeted by this audit:

- W3C WCAG 2.0 Level A and Level AA

    a. 25 WCAG 2.0 Level A success criteria

    b. 13 additional WCAG 2.0 Level AA success criteria

- W3C WCAG 2.1 Level A and Level AA

    - 30 WCAG 2.1 Level A success criteria, as applicable

    - 20 additional WCAG 2.1 Level AA success criteria, as applicable

- where we saw any relevance to the client's strategic goals, we also informally explored from among the WCAG 2.0 and WCAG 2.1 Level AAA success criteria, informally reporting any low-effort ones discovered as optional functional accessibility issues
- Web Accessibility Initiative – Accessible Rich Internet Applications (WAI-ARIA) 1.0 for web content (if relevant)
- PDF/UA (ISO 14289-1:2012), according to the Matterhorn Protocol

The above standards are designated by (or potentially relevant to):

- British Columbia Accessibility Act (Bill M 219, 2018)
- Manitoba's Accessibility for Manitobans Act (AMA)
- Ontario's AODA Integrated Accessibility Standards Regulation (IASR) Section 14 (WCAG 2.0 AA with AODA exceptions)

- anticipated regulations in other Canadian provinces, such as the Nova Scotia Accessibility Act (2017) and evolving regulatory situations in Newfoundland and Saskatchewan
- Treasury Board of Canada's *Guideline on Making Information Technology Useable by All*
- anticipated regulations related to the Government of Canada's Accessible Canada Act
- Canadian Human Rights Act
- U.S. Revised Section 508
- U.S. Americans with Disabilities Act (ADA) multiple Titles (by precedent, complies with known legal interpretations as it applies to online products
- New York Human Rights Law (NYHRL)
- California's AB 343
- EN 301 549 (2018), EN 301 549 (2019), EN 301 549 (2021)
- EU's Web Accessibility Directive (WAD)
- EU's European Accessibility Act (EAA)
- UK's Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 (PSBAR), and possible post-Brexit engagement with aspects of the European Accessibility Act
- Australia's DDA (Disability Discrimination Act, 1992)
- Israel's Equal Rights for Persons with Disabilities Standard (S5568)
- Korea's KWCAG (all versions)
- Norway's UU Section 14
- Qatar's eAccessibility Policy
- Japan's JIS X 8341-3, JIS X 3241-3
- New Zealand's NZG WS 2.0

Methodology

Accessibility support baseline

Accutive has declared support for only these browser/user agents (which we tested with various screen readers):

■ Apple Safari (current version) on macOS, with and without VoiceOver

■ Google Chrome (current version) on Windows (NVDA, JAWS) and macOS (VoiceOver)

■ Microsoft Edge (current version) on Windows 10 and 11 without and without both NVDA and JAWS)

■ Mozilla Firefox (current version) on Windows (without and without NVDA and JAWS)

■ Adobe Reader (various platforms)

Tools

The audit was completed using the following tools:

■ Screen readers (see Accessibility Support Baseline section above)

■ Screen magnifiers (see Functional Methods section below)

■ Automated testing and discovery tools for browser-based experience: Colour Contrast Analyser, Deque axe

■ Automated testing and discovery tools for documents: PAC (latest version), Adobe Acrobat Pro Accessibility Checker (latest version)

■ Additional manual testing tools we use, as required, include:

    a. Dragon Naturally Speaking Professional

    b. JAWS Inspect

    c. Kurzweil 1000 and 3000

    d. PEAT

e. Zimmerman Low Vision Simulation Kit

f. ZoomText

Functional methods

The audit included a comprehensive human (manual) review step for each success criterion, including (but not limited to) these functional methods:

- using the keyboard only (or keyboard-only equivalents)

- muting sound controls

- screen magnification (using each OS control set, using the user agent's overall zoom function, using the user agent's "zoom text only" functionality)

- navigation following top tasks as per discussion with the client, as well as the overall framework

- examination of:

    a. font treatments, sizing, and spacing

    b. hue usage and contrast (with and without high contrast display)

    c. content layouts, flow, and structure

    d. semantic (for example, HTML) layout and structure

    e. content flow, and navigability via non-keyboard input

    f. interactive patterns for comprehension and readability

    g. error situations and recovery

    h. predictability and outcomes

    i. responsive design scenarios (including mobile device breakpoints and desktop breakpoints)

    j. built-in accessibility features of each targeted operating system

- application of Universal Design for Learning principles, where/if appropriate

■ observations via spot testing by users with lived experience where/if appropriate

Our best practice audit methodology

B. orientation to assets, and requirements analysis

C. accessibility auditing testing, led by our ISO 17020 conformant implementation of the WCAG-EM evaluation methodology, to the conformance standards for the technical standards identified by the compliance target (regulatory and/or policy)

D. functional accessibility testing, to the conformance standards for the functional performance criteria (for example, EN 301 549, U.S. Revised Section 508) identified by the compliance target (regulatory and/or policy)

E. identify all relevant WCAG issues/deficiencies, as well as functional issues discovered

F. provide recommendations (repair suggestions) within a proposed corrective action plan within this accessibility remediation report (ARR), including techniques (or code examples) where appropriate/requested

G. encourage the client to assign remediation to appropriate ecosystem members, guided by W3C ARRM, and be available to coach and consult on techniques in the pursuit of conformance and subsequent conformance declaration as per W3C standards and the WCAG-EM audit methodology

Tested products

The pages/flows/processes contemplated in this audit were supplied by the client and/or selected by our team to fulfill the sampling criteria of the [WCAG-EM evaluation methodology](). The remediation team is expected to apply our recommendations across all similar pages and structures throughout the product.

Credentials

Base URL of the staging site:

- **Motive**

  https://test.cwb.avoka-transact.com/motivebank/servlet/SmartForm.html?formCode=dcompmotive&tmFormVersion=2.6.0-develop
- **Business Self-Serve (BSS)**

  https://test.cwb.avoka-transact.com/cwbank/servlet/SmartForm.html?formCode=cwb-business-init&tmFormVersion=2.5.0-develop
- **Personal Self-Serve (PSS)**

  https://test.cwb.avoka-transact.com/cwbank/servlet/SmartForm.html?formCode=cwb-pers-dco&tmFormVersion=3.2.0-develop

User: Bert Sampleson and Sandra King

Password: Accutive2022! / Accutive (for secret question answers)

Pages tested

All pages that can be navigated to from the start point of each product page without leaving the host domain, and provided by the client to be included in the test path.

Web technology

HTML, CSS, WAI-ARIA, JavaScript, SVG, PDF

Issues list

Following our ISO 17020 conformant version of the WCAG-EM methodology, David Berman Communications' expert digital accessibility team has identified all relevant WCAG issues and informally listed them below (with recommendations, including any repair suggestions, as appropriate). They are intentionally listed in an order intended to make it easier for the development team to attack them, rather than ordered by the WCAG success criterion.

Issue glossary

"Failures": Unless marked as a *"Functional accessibility issue"*, every issue in this report constitutes a strict "Fail" regarding the WCAG success criterion of the conformance target. All failures must be repaired for the product to meet the targeted WCAG level. Because all failures are of equal priority for reaching WCAG conformance, we have organized them in an order that we anticipate will be efficient for remediation.

"Issue": Unless marked as a *"Functional accessibility issue"* or *"Potential violation"*, every issue constitutes a strict "Fail" regarding the WCAG success criterion being considered. (WCAG 2.1 issues have the wording **"WCAG 2.1 Issue:"** at the beginning of the issue.)

"Functional accessibility issue": Not a WCAG 2 failure; however, an optional impactful way to improve accessibility nonetheless. *Functional accessibility issues are emphasized in italics.*

"No isolated issues": There are issues on this page; however, they will all be corrected by resolving the sitewide issues via the recommendations already reported earlier in the report.

Common issues across more than one website

Note regarding common issues: Although there may also be instances of "Common Issues" listed later in this report with respect to individual pages or flows, remedying any such individual issues does not constitute a complete list of instances of the common issue; rather, they are instances of the common issue that we felt may merit a specific mention. Therefore, remediators must still examine all site components for all instances of each common issue.

## Common issues throughout one or more products

1. The timeout extension mechanism fails to offer a simple way to activate the extension (e.g., using the spacebar or Enter key) rather than forcing the user to tab to the "Continue" button after the alert is displayed and announced.
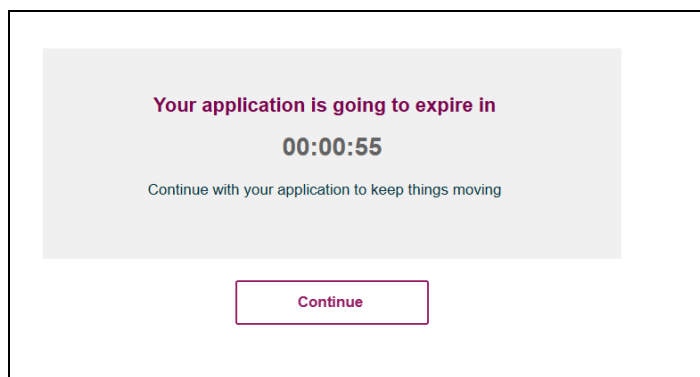
   - ■ Recommendation: Ensure the user can activate the extension with minimum effort within the time allotted and display and announce the method (e.g., "Press the spacebar to continue"). Optionally, also allow the user to extend the session by ten times the default and/or turn off the timeout altogether.

2. When logging into existing accounts, the password field contains a show password control that cannot be actioned using a keyboard only. The control fails to gain keyboard focus (due to <span> elements not getting native keyboard focus).
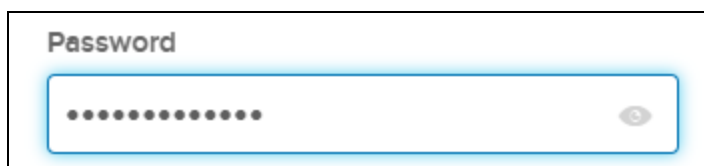
   - ■ Recommendation: Ensure that all controls can be actioned using a keyboard only.

3. The show password user interface component has contrast between foreground and background that is insufficient (1.5:1); falling short of the 3:1 contrast ratio required.
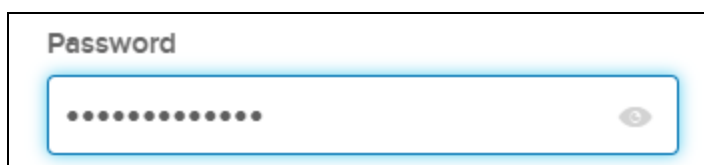
■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum of 3:1 for informational icons.

4. Multiple pages have a heading order that starts with an <h3>, skipping heading levels.

■ Recommendation: Do not use headings for layout and instead use them semantically to control document flow.

5. Some interface items lack sufficient contrast (e.g., more information icons).

Examples:

I am not opening this account(s) for use by or benefit of a third party. ⓘ

■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

6. The application occasionally enters a "waiting state" with no progress feedback to non-visual users. This state often lasts more than 5 seconds.
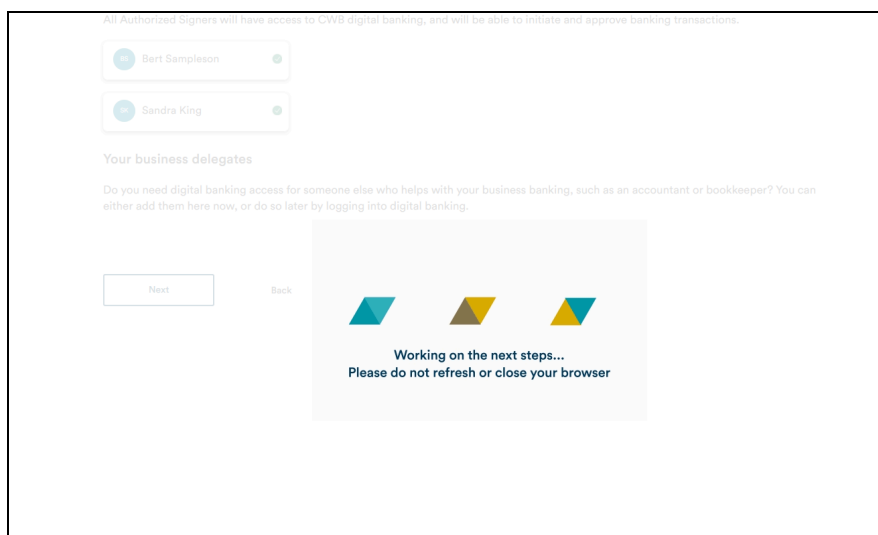
■ Recommendation: In order to ensure that non-visual users also get feedback when the system is "loading" or is in a busy state, use WAI-ARIA aria-busy="true" during these times so that screen readers will announce that the system is doing something. Reference: aria-busy - Accessibility | MDN (mozilla.org)

7. *Functional accessibility issue: Each product contains a visual progress bar showing the current progress of the current flow, yet provides no programmatic feedback to screen reader users.*

   ■ *Recommendation: Use a <progress> element to control the progress bar and then implement the associated WAI-ARIA attributes that will provide the feedback to screen reader users; accessible name: aria-label, minimum value: aria-valuemin, maximum value: aria-valuemax, current value: aria-valuenow. Reference: [ARIA: progressbar role - Accessibility | MDN (mozilla.org)](#)*

Motive Financial

Common footer

8. Footer links inject an alert for each anchor indicating that the link opens in a new window. Your use of alert for this feedback causes a lot of interruption to screen reader users.

```
▼ <div class="av-optional id-security sb-contrast-font col-xs-12 col-sm-6 col-md-3 col-lg-3 av-item-container">
    <a class="wdg-link ng-binding" href="https://www.motivefinancial.com/en/about-us/security" target="_blank" data-ng-bind="'Security'">Security
    </a> == $0
  </div>
```

```
▼ <div data-ng-hide="Form.showMobileErrors" class="av-a11y-alert av-hidden">
  ▼ <div role="alert" aria-hidden="true"> == $0
      <span class="av-a11y-msg">main landmark Security opens in a new window clickable link</span>
    </div>
```

   ■ Recommendation: Change the alert implementation to instead use WAI-ARIA (such as an aria-label or aria-describedby) in order to explicitly state the anchor text and the new window feedback, ...*or* use hidden text within the anchor.

9. The anchor "cdic sadc" contains nested actionable controls, with the parent <div> containing a role="button" and a nested anchor element.

   ■ Recommendation: Remove the role="button", allowing the anchor to control the interaction naturally.
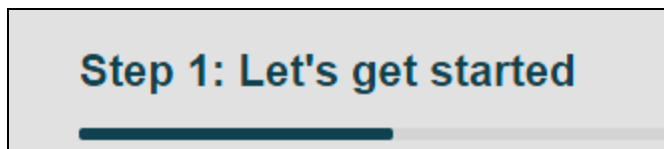
Start New Application-Happy Path

**Step 1:**

10. The page lacks an <h1> heading.

   ■ Recommendation: Ensure that the page has one and only one <h1> heading, being the main heading of the page.

11. The page often contains visual headings that are not part of the page's heading order (e.g., "Step 1: Let's get started").


   ■ Recommendation: Add such headings to the page's heading structure, at an appropriate heading level (in the case of this example, make it <h1>)..

12. The "More options" control fails to present a visible focus indicator when given focus.
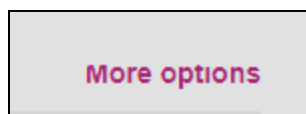
   ■ Recommendation: Ensure that all elements in focus present a visible focus indicator.

13. The radio button options fail to provide a visible focus indicator when in focus.
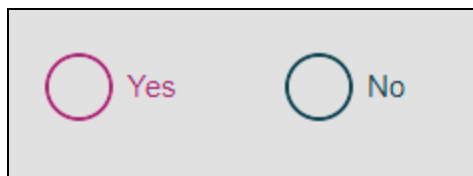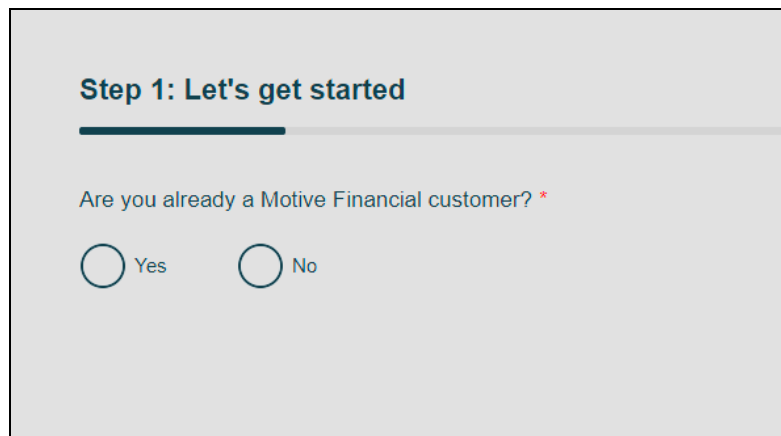
   ■ Recommendation: Ensure that all elements in focus present a visible focus indicator.

14. The "More options" control exists within a <div> with an invalid WAI-ARIA attribute "aria-label" and with no accompanying role.

   ■ Recommendation: Move the aria-label to the interactive control (the <button>) to solve this issue.

15. The significance of asterisks is not explained.

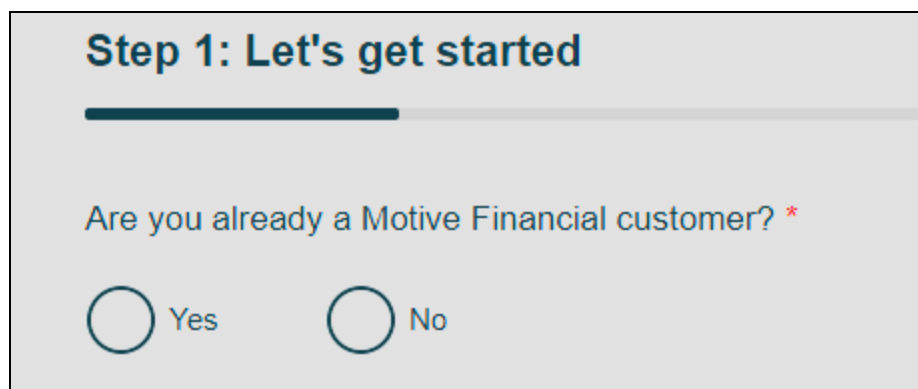- ■ Recommendation: Include an explanation to all users that asterisks indicate fields requiring a response, either before the first field of every form ... or at the very least on the first form that all users must experience (e.g., the "login" page or the "create account" page). The sentence that all users will perceive (i.e., both sighted and non-visual users) would be worded something like this: "* indicates a mandatory field."

16. Questions exist within a <fieldset> with a role="radiogroup". This causes the <legend> to no longer announce to screen reader users without the <fieldset> gaining focus (as we don't want it announced unless it is focussed).

Example:

- ■ Recommendation: Remove the radiogroup role on the <fieldset> elements, thus allowing the content structures within the <fieldset> to provide the interactive feedback naturally.
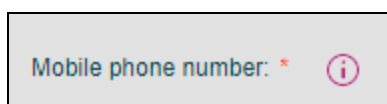
17. Question text is manually added to the focus order of the page using tabindex="0", adding undesirable additional keyboard tab stops and additional focus targets for keyboard only and screen reader users.

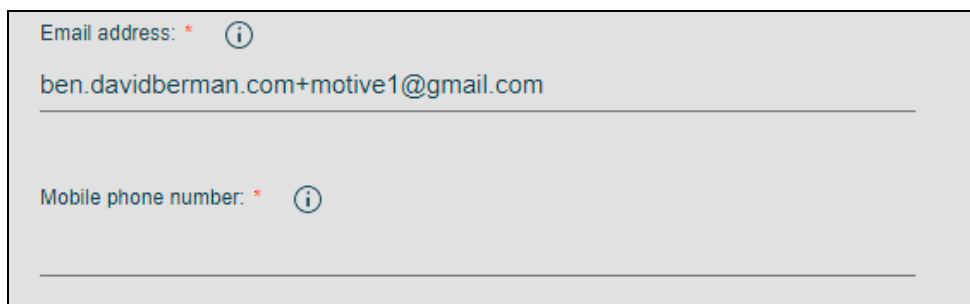■ Recommendation: Do not add content to the focus order that is not interactive.

Step 2:

18. The "additional information" controls fail to present a visible focus indicator when given keyboard focus.

Example:
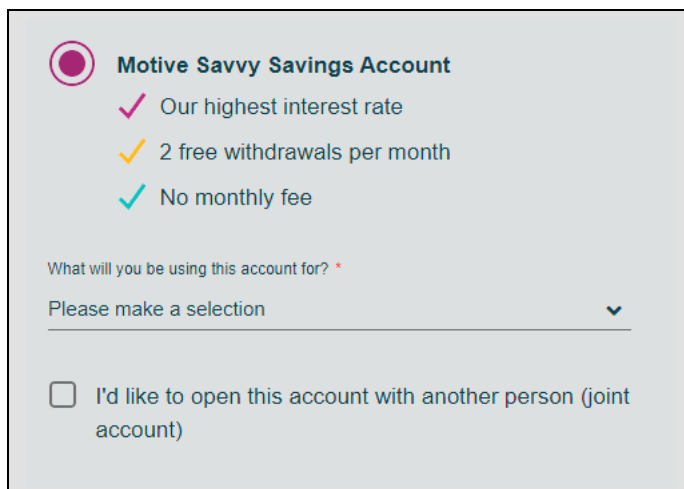
■ Recommendation: Ensure that all elements in focus present a visible focus indicator when given keyboard focus.

19. [WCAG 2.1] Input fields lack proper input identification (as defined in WCAG 2.1 Success Criterion 1.3.5 Identify Input Purpose).

■ Recommendation:

i. Email address field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**email**" to indicate the email address field programmatically.

ii. Mobile phone number field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**tel-national**" to indicate the phone number field programmatically.

Step 3:

20.   The "Motive Savvy Savings Account" control is a checkbox styled to look like a radio button.

   ■ Recommendation: Be sure to consistently identify controls in a familiar fashion. Do not change the look of native controls to make them appear as another type of control (e.g., treat all radio buttons with the same styles, and all checkboxes with the same styles).

21.   When selecting the checkbox to make a joint account, the "No, go back" control within the modal fails to present a visible focus indicator when given focus.
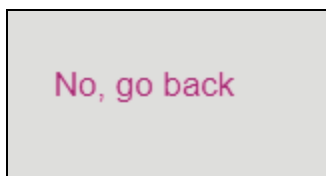
   ■ Recommendation: Ensure that all controls gain a visible focus indicator when given keyboard focus.

Step 4:

22.   A visual list exists on the page that is not programmatically implemented as a list.

You are:

- At Least 18 years of age ⓘ

- A tax resident of Canada ⓘ

- Not a resident of Quebec ⓘ

- Not required to file taxes in any country other than Canada ⓘ

- Not opening the account(s) for use by, or benefit of a third party ⓘ

☐ Yes, I meet all of the above criteria. *

Please review the list above and confirm that you meet all of the conditions by checking this box. For more information, please contact Motive Financial at 1 (877) 441-2249.

■ Recommendation: Change the markup to use an unordered list with proper structure <ul> and <li>.

Step 5:

23. The example image is encapsulated in both a <div> with an aria-hidden attribute, as well as an anchor tag with no attributes causing the content to be ignored by screen reader users.

■ Recommendation: Do not use aria-hidden to hide content that is otherwise important to the user. Additionally, do not use <a> tags for content that is not for navigation.

Step 6:

24. [WCAG 2.1] Input fields lack proper input identification (as defined in WCAG 2.1 Success Criterion 1.3.5 Identify Input Purpose). Autocomplete attribute is set to "off".
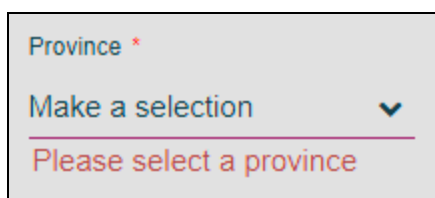

First name: *

Bert

Last name: *

Sampleson

- Recommendation:

    i.   First name address field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**given-name**" to indicate the First name field programmatically.

    ii. Last name number field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**family-name**" to indicate the Last name field programmatically.

Step 7:

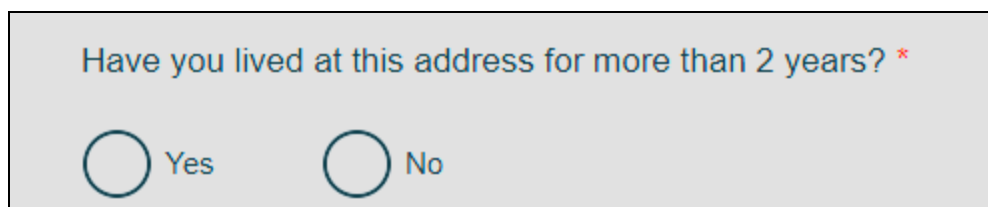25.   The "Select a province" dropdown control fails to present a visible focus indicator when given focus.

- Recommendation: Ensure all controls present a visible focus indicator when given keyboard focus.

26.   After entering the postal code field, the next tab stop is the "Next" control; however a new question was injected prior to the Next control.

- Recommendation: Ensure that the focus order of the page reflects the content visually on screen in that if new content is injected on blur of a previous question, then that new content gains keyboard focus instead of the "Next" control.

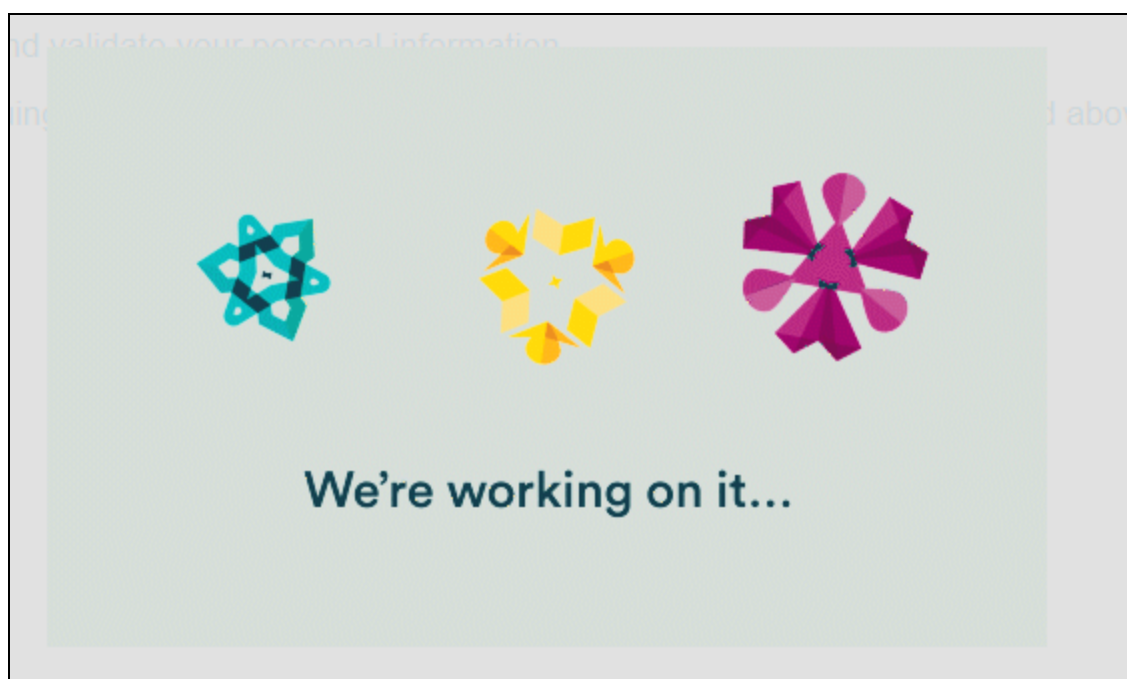**Step 8:**

No isolated issues

Step 9:

No isolated issues

Step 10:

No isolated issues

Step 11:

27.   The application occasionally enters a "waiting state" with no programmatic feedback to the user (thus non-visual users are not aware of the wait). This state lasts more than 5 seconds.

- ■ Recommendation: Provide feedback to screen reader users when the system is "loading" or is in a busy state. Use aria-busy="true" during these times to indicate that the system is doing something. Reference: aria-busy - Accessibility | MDN (mozilla.org)

28.   The confirmation message text lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (2.4:1), falling short of the 4.5:1 required for regular text.

We're reviewing your application.

■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

Step12:

No isolated issues.

Step 13:

No isolated issues.

Associated Emails:

29.   Within the emails, teal on grey text content exists as both general text and control text with insufficient contrast. The contrast between the foreground and background text colours is insufficient (2.4:1), falling short of the 4.5:1 required for regular text and 3:1 for large text (large text is defined as regular weight text that is 18 point or larger, or bold text that is 14 point or larger).

■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.
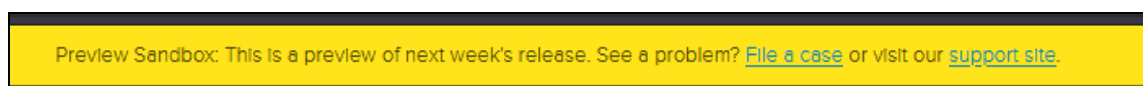
30. The display name in the email "From" line for all important emails is "Info".

■ Recommendation: Ensure the display name in the "From" line includes a meaningful name (such as the company and/or product name).

Account Activation from email

31. The landing page to activate your account contains multiple <h1> headings.

Examples:

■ Recommendation: Ensure that the page has one and only one <h1> heading, being the main heading of the page.

32. Blue anchor text on a yellow background lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (3.6:1), falling short of the 4.5:1 required for regular text.
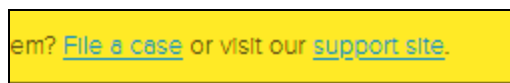
■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

33. The "Choose a forgot password question" and add phone number controls fail to present a visible focus indicator when given focus.
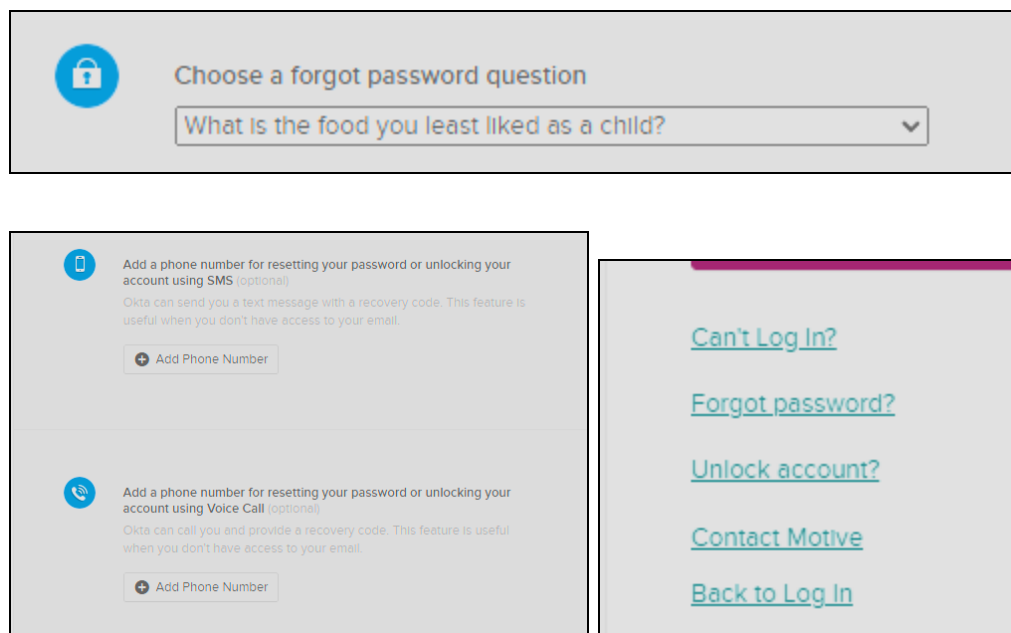
- Recommendation: Ensure that all controls in focus present a visible focus indicator.

34. The description information (grey on grey) below the add a phone number text lacks sufficient contrast, the contrast between the foreground and background text colours is insufficient (2.3:1), falling short of the 4.5:1 required for regular text.
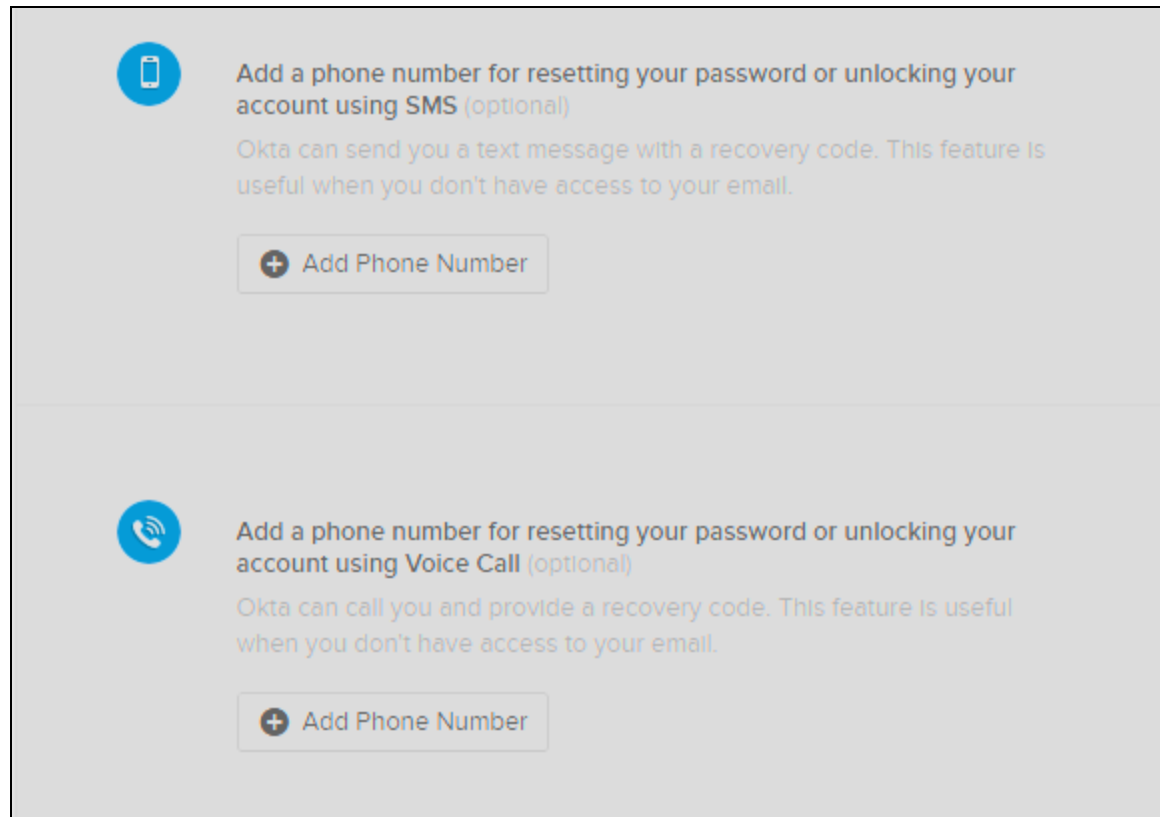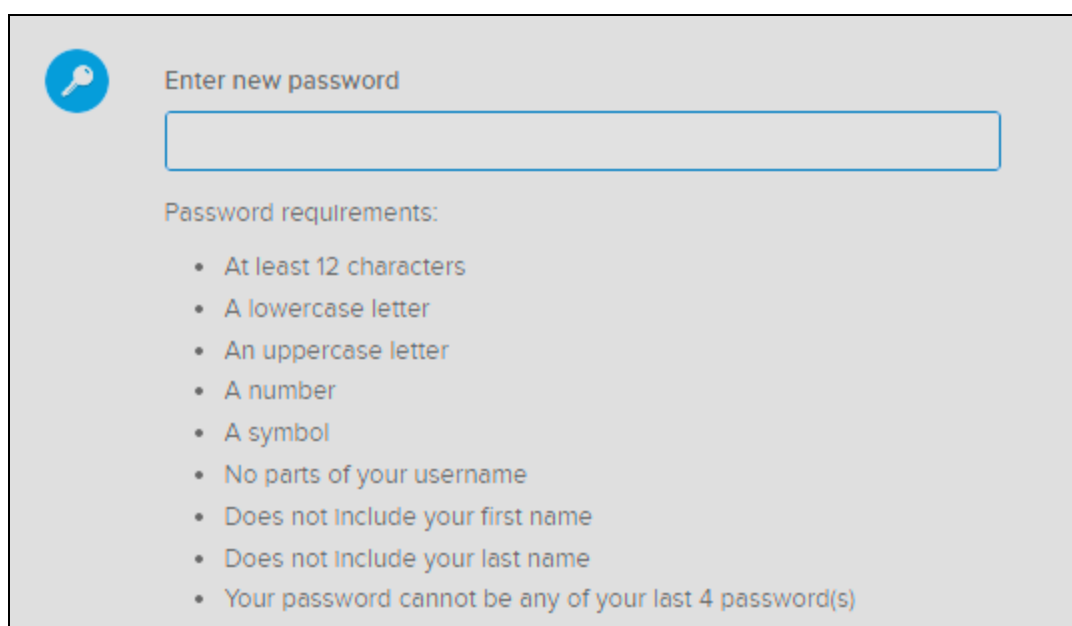
■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

35. [WCAG 2.1] Many input fields lack proper input identification (as defined in WCAG 2.1 Success Criterion 1.3.5 Identify Input Purpose).

■ Recommendation:

    i. New Password field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**new-password**" to indicate the new password field programmatically.

    ii. Phone number field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**tel-national**" to indicate the phone number field programmatically.

    iii. Phone extension field fails to indicate its input purpose due to the lack of an autocomplete attribute indicating the field's purpose. Add the autocomplete attribute with a value of "**tel-extension**" to indicate the phone extension field programmatically.

36. The new password field contains a series of password requirements that are not immediately made aware to screen reader users.


Enter new password

Password requirements:
- At least 12 characters
- A lowercase letter
- An uppercase letter
- A number
- A symbol
- No parts of your username
- Does not include your first name
- Does not include your last name
- Your password cannot be any of your last 4 password(s)

- Recommendation: Use aria-describedby to automatically include the password requirement to the user when they enter the field. Alternatively, move the password requirements to be located prior to the input field.

Set up multi-factor authentication

37. When setting up two-factor authentication using the security question option, the dropdown menu of security question options lacks a programmatically associated label.
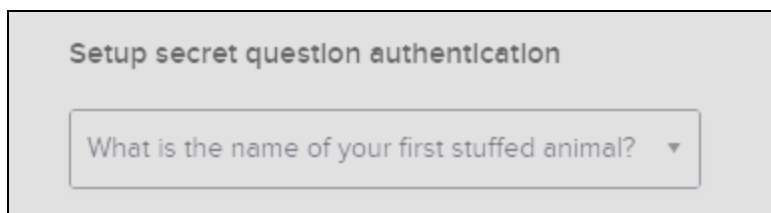
> Setup secret question authentication
>
> What is the name of your first stuffed animal?   ▾

- Recommendation: Ensure that each input field has a programmatically associated label describing the field's purpose. Use a <label> associated with the appropriate field using a "for" attribute, ... or nest the <input> within the <label> ... or you could instead use wai-aria (such as an aria-label or aria-labelledby) to provide a field label.

38. *Functional accessibility issue: The "Next / Call" controls within the two factor authentication setup fail to adequately distinguish focus. The control when in focus removes the underline under the button text with no additional focus indication.*

Examples:

Not in focus:
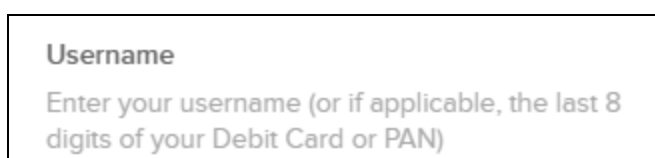
Call

Next

In focus:

Call
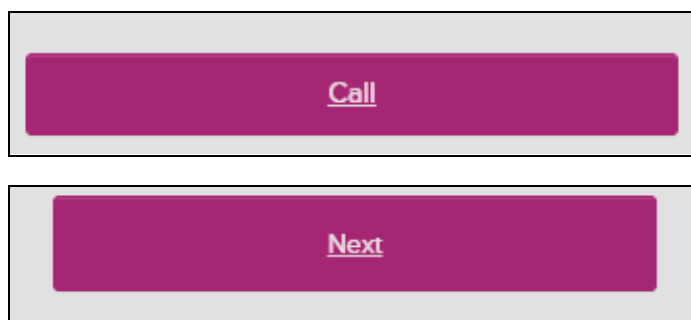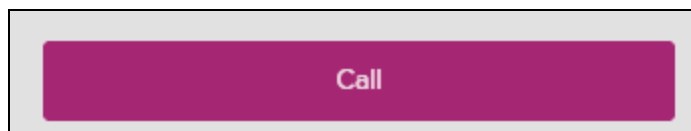
- *Recommendation: Add a far stronger visible focus indicator (such as an outline around the control) in order to reinforce that the user has given the control focus.*

Concurrent Application Check

No isolated issues

Already Authenticated Customer Applying for GIC in Joint with NTB Customer

39.   The "Username" label contains a description that lacks sufficient contrast with grey-on-white text. the contrast between the foreground and background text colours is insufficient (2.4:1), falling short of the 4.5:1 required for regular text.
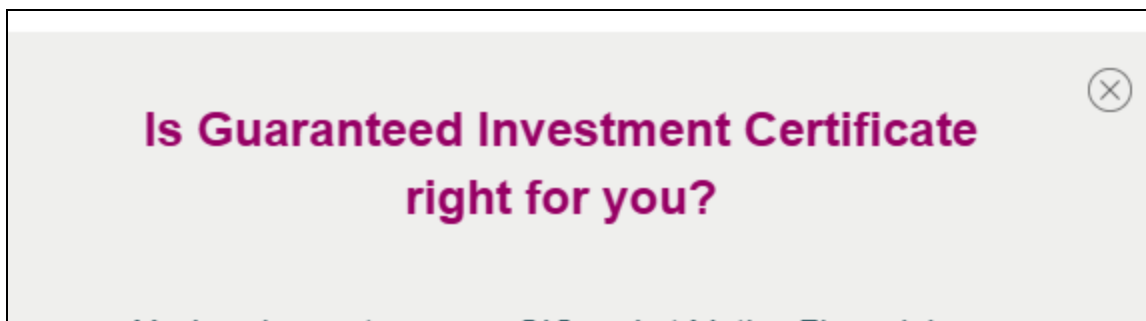
> Username
>
> Enter your username (or if applicable, the last 8 digits of your Debit Card or PAN)

- Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

40.   The dropdowns on the form fail to present a visible focus indicator.

Example:

> Investment Purpose? *
>
> Saving for the future   ⌄

- Recommendation: Ensure that all controls in focus present a visible focus indicator.

41.   The close action on the popup modal announces to screen reader users as "button", lacking any associated label.

> ⊗
>
> ## Is Guaranteed Investment Certificate right for you?
>
> You've chosen to open a GIC and at Motive Financial we

■ Recommendation: Ensure all controls contain a label describing their purpose or action.

42. The close control on the popup modal fails to present a visible focus indicator.
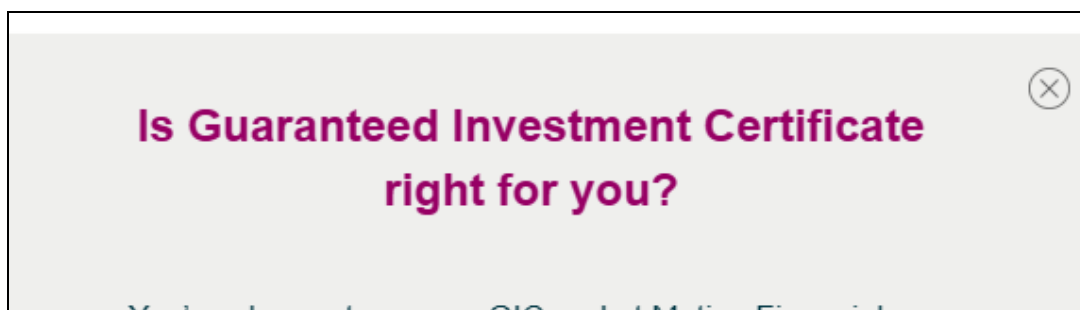
■ Recommendation: Ensure that all controls in focus present a visible focus indicator.
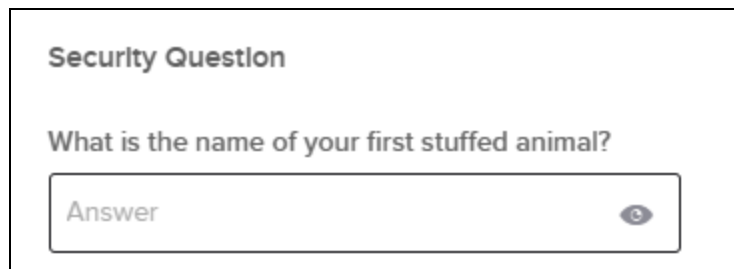
Already Authenticated Customer Applying for GIC in Joint with Authenticated Customer

43. When logging into the existing account screen, the security question input field lacks a programmatically associated label.

■ Recommendation: Ensure that each input field has a programmatically associated label describing the field's purpose. Use a <label> associated with the appropriate field using a "for" attribute, ... or nest the <input> within the <label> ... or you could instead use wai-aria (such as an aria-label or aria-labelledby) to provide a field label.

44. *Functional accessibility issue: The security question input field contains placeholder text that lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (2.3:1), falling short of the 4.5:1 required for regular text.*

Security Question

What is the name of your first stuffed animal?

Answer 👁

- *Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.*

Personal Self-Serve

Common issues

45.   All pages lack an <h1> heading.

- Recommendation: Ensure that the page has one and only one <h1> heading, being the main heading of the page.

46.   Pages often share identical page titles (CWB Personal DCO).

- Recommendation: Give each page a page title that is both unique and mentions the site/product name, preferably in a consistent format (e.g., "CWB Personal DCO - Step 1: Let's get started"). *Note: Motive seems to be doing this correctly.*

Start New Application-Happy Path

47.   The "more options" modal contains a close action that fails to present a visible focus indicator when given keyboard focus.
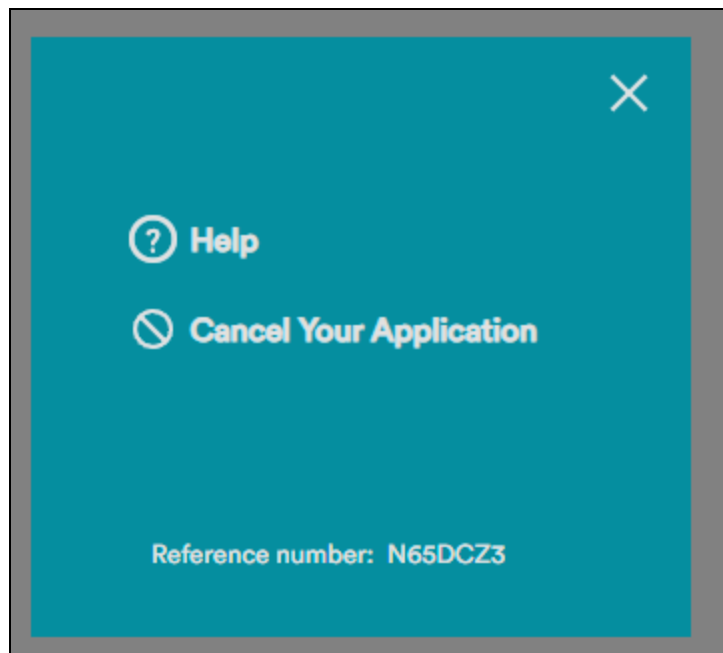
■ Recommendation: Ensure that all controls present a visible focus indicator when given focus.

48. [WCAG 2.1] When selecting the "resend token" during the 2-factor authentication phase, the notification message is not presented to screen reader users.
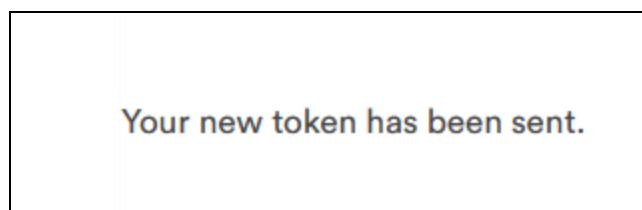
■ Recommendation: Use role="alert" on the container when the message is presented to notify screen reader users about the status message.

49. The account options appear visually as radio button style structures yet are actually checkboxes.
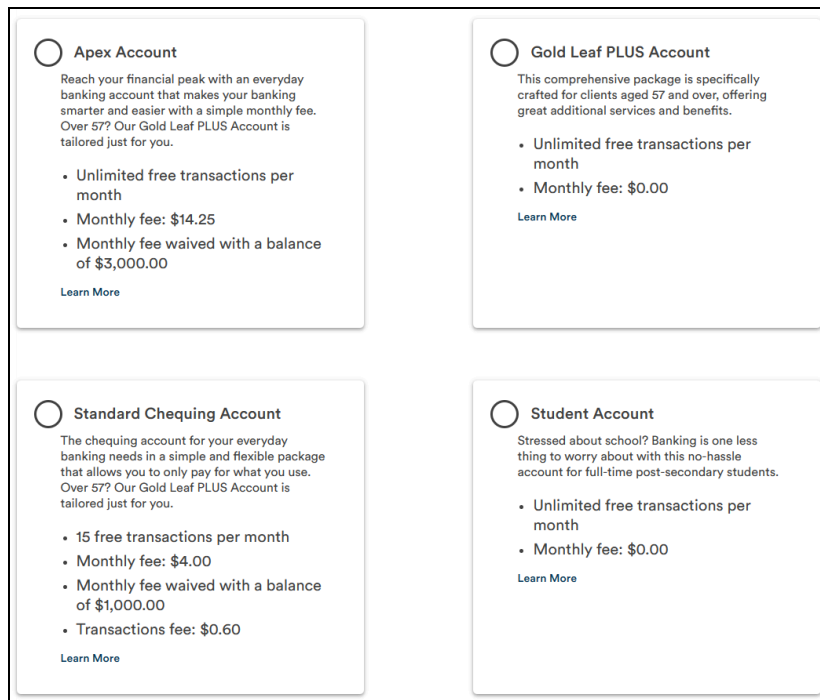
- Recommendation: Be sure to consistently identify controls in a familiar fashion. Do not change the look of native controls to make them appear as another type of control (e.g., treat all radio buttons with the same styles, and all checkboxes with the same styles.

Gold Lead Plus Account

50. The "more information" icon, the contrast between the foreground and background text colours is insufficient (4.2:1), falling short of the 4.5:1 required for regular text.

I am not opening this account(s) for use by or benefit of a third party. ⓘ

- Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

Start New Application - Review Path

No isolated issues.

Concurrent Application Check

No isolated issues.

Nice to see you again!

It looks like you've already started an application with us. You'll have to complete or cancel your other application before starting a new one.

Check your email for details about how to complete your previous application.

For assistance, please email Motive Financial at **Help@MotiveFinancial.com** ⬏, or call **1 (877) 441-2249** between the hours of 7:00 a.m. and 5:00 p.m. MST Monday to Friday.

Your reference number is:
N7HHY4T

Please include this number in any inquiries about your application.

Already Authenticated customer Applying for GIC in Joint with NTB Customer

51. The "interest rate" anchor text lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (4.4:1), falling short of the 4.5:1 required for regular text.
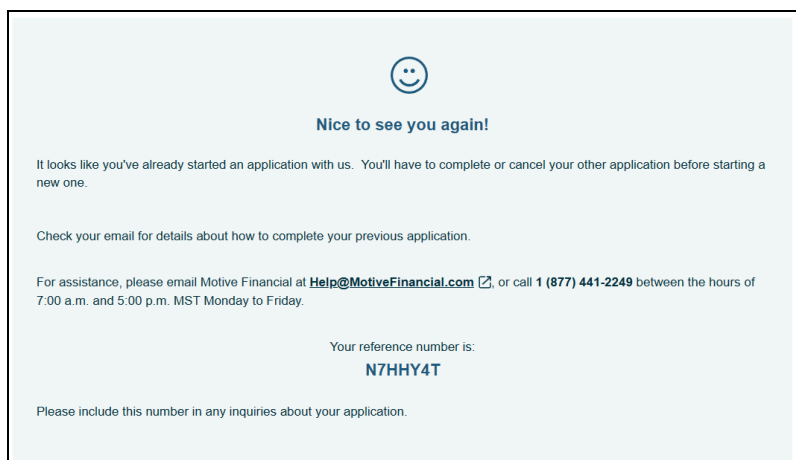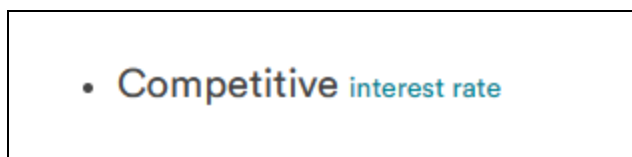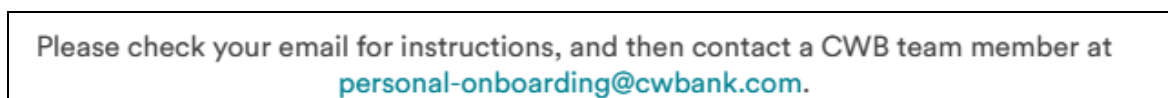

- Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

52. The "interest rate" anchor fails to present an underline below the anchor text until the user hovers on the anchor. This is inconsistent with other anchors on the page (e.g., the footer).

- Recommendation: Identify similar elements in a common fashion throughout the application.

53. The email address anchor on the "We're reviewing your application" page lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (4.4:1), falling short of the 4.5:1 required for regular text.

- Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

Already Authenticated customer Applying for GIC in Joint with Authenticated Customer Using Link:

No isolated issues.

Business Self-Serve

Common issues

54.   Emails associated with the "Business Self-Serve" products are delivered with a "From" line that fails to mention the product, stating "business-onboarding" as the "From" line for every email. *Note: Subject lines do include additional information.*

Example:

- Recommendation: Provide a clearer "From" line that includes CWB bank as part of the From designation.

55.   Anchors lack a visible focus indicator when given keyboard focus.

- Recommendation: Ensure that all elements in focus gain keyboard focus.

56.   Expandable content regions exist that cannot be actioned using a keyboard only. The controls fail to gain keyboard focus due to the use of <div> elements instead of native keyboard-supported elements.

- Recommendation: Change the markup of each expandable control to a keyboard-supported element such as <button>.

57. The expandable content controls fail to indicate the current state (expanded vs collapsed) of the control.

- Recommendation: Add aria-expanded="true | false" to each expandable control (e.g., <button>) indicating the current state of the control.

58. Pages often share identical page titles (CWB Business Multi Product).

- Recommendation: Give each page a page title that is both unique and mentions the site/product name, preferably in a consistent format (e.g., "CWB Business Multi Product - Step 1: Let's get started"). *Note: Motive seems to be doing this correctly.*

59. On the "With your permission" view in multiple views, the checkbox to accept the terms fails to include the bulleted points as part of the radio button label, causing a screen reader user to not be aware of what they are agreeing to prior to selecting the control.

Examples:

- Recommendation: Include all required content as part of the field label to ensure the information is provided to all users.

60. The "Close" button on "More options" fails to present a visible focus indicator.

- Recommendation: Ensure that all controls when given keyboard focus present a visible focus indicator.

61. *The* account type controls use checkboxes that visually appear as radio buttons.

- *Recommendation:* Be sure to consistently identify controls in a familiar fashion. Do not change the look of native controls to make them appear as another type of control (e.g., treat all radio buttons with the same styles, and all checkboxes with the same styles.

Start New Application-Happy Path with a joint

62. The "Let's get started" page contains no primary heading (<h1>). The page instead contains only an <h5> heading.

- Recommendation: Ensure that the page has one and only one <h1> heading, being the main heading of the page.

63. The "Let's get started" page contains a <fieldset> whose <legend> is not the first child descendant resulting in the legend not announcing to screen reader users.

- Recommendation: Ensure that the first child element within a <fieldset> is the <legend> describing the fieldset.

64. The Quantity controls that increase and decrease lack any associated labels announcing to screen reader users as "button".
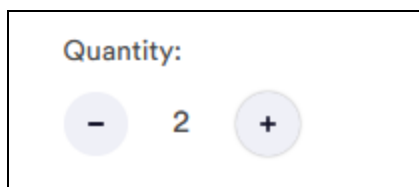

- Recommendation: Ensure each control contains a label describing the action or purpose of the control (e.g., "increase quantity / decrease quantity").

- *Functional accessibility enhancement: In addition, provide feedback to what the new quantity is after the user has selected the increase or decrease controls.*

65. The "Pre-fill your business information" screen contains a series of radio buttons with no programmatically associated labels.
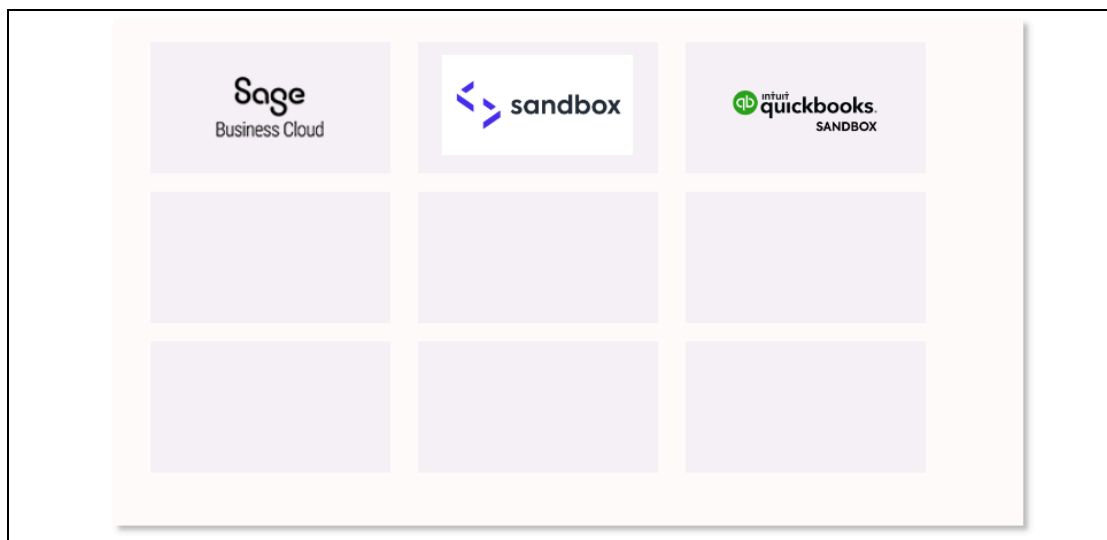
- Recommendation: Ensure that each input field has a programmatically associated label describing the field's purpose. Use a <label> associated with the appropriate field using a "for" attribute, ... or nest the <input> within the <label> ... or you could instead use wai-aria (such as an aria-label or aria-labelledby) to provide a field label.

66. The example pictures showing "Legal entity name / Business number / Corporate Access Number etc" contains text that lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (2:1), falling short of the 4.5:1 required for regular text.
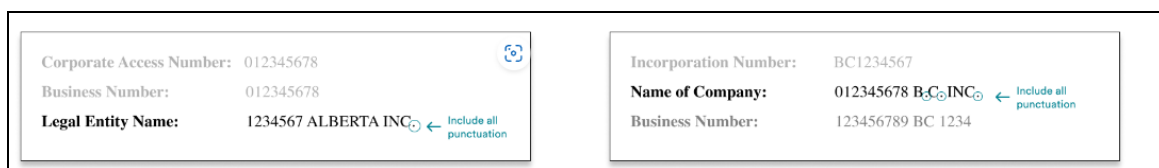
- Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

67. The "About your business" step contains a multitude of inconsistent heading levels jumping from <h5> to <h2> to <h6>.

- Recommendation: Change the heading order to use a consistent hierarchy for the page's heading order where headings nested within headings pertain to subtopics

of the parent heading (e.g., <h1> through <h6> should be used to indicate the hierarchy nested sub topics, not for the purpose of achieving a desire layout).

68. On the "With your permission" view, the checkbox to accept the terms fails to include the bulleted points as part of the radio button label, causing a screen reader user to not be aware of what they are agreeing to prior to selecting the control.

- ■ Recommendation: Include all required content as part of the field label to ensure the information is provided to all users.

69. The "About your Associates" contains a visual list of items that is not implemented programmatically as a list.

- ■ Recommendation: Use a programmatic list to implement list items (<ul> and <li>).

70. *Functional accessibility issue: The "Role(s)" grouping fails to indicate that the set of controls that follows is part of the roles grouping.*

- ■ *Recommendation: Use a <fieldset> and <legend> to create a relationship between the "Role(s)" label and the associated options.*

71. A user interface component (The "Role" option "Director") has contrast between foreground and background that is insufficient (2.0:1); falling short of the 3:1 contrast ratio required.
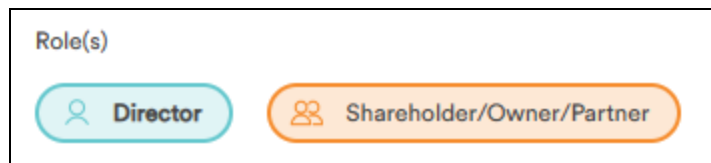
Role(s)

Director   Shareholder/Owner/Partner

■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

72.   The PDF file "CWBCashManagementOnlineServicesAgreement.pdf" fails to conform with accessibility standards, reporting multiple failures in a PAC test for PDF/UA conformance. All PDF files either need to conform with PDF/UA or WCAG Level AA, *or* the user needs to be warned that the file has limited accessibility and is offered where they may find the same content presented accessibly.

■ Recommendation**:**

Option 1 of 2: Make all the files fully PDF/UA or WCAG Level AA conformant; ... *or*

Option 2 of 2: Add wording both within the link to the document and within the file's metadata (and, if feasible, within the document content itself), explaining that the document is not accessible and how to get an accessible alternative (such as a webpage or other document type containing equivalent content).

Here's how to achieve Option 2:

a.   The link: Add a sentence, somewhere earlier in the reading order than the download control, visible to all, that declares something like "Our PDF download files do not fully comply with all applicable guidelines for accessible digital documents. For the most accessible experience, choose [link to accessible PDF or docx | link to equivalent web content | to call us at 000-000-0000]"; ... ***and***

b.   Append the filename: In the filename, change ".pdf" to "(limited-accessibility).pdf" *... **and***

c.   Within the document, if feasible: Add small, visible body text after the first heading within the document that reads: "This file does not fully conform with all applicable

guidelines for accessible digital documents. For the most accessible experience, visit [link to accessible PDF or docx | link to equivalent web content | to call us at 000-000-0000]" ... ***and,***

d. Metadata: In the Subject field of the file's metadata, add "This file does not fully conform with all applicable guidelines for accessible digital documents. For the most accessible experience, visit [link to accessible PDF or docx | link to equivalent web content | to call us at 000-000-0000]". (This is the only metadata field that must be touched.).

- ■ *Tip: For a complete recipe on how to either make documents accessible* or *to modify an inaccessible document to include all of these properties described above, please consider acquiring or guidance or attending our courses on creating accessible PDF files. Alternatively, our document remediation team can cost out doing the work for you.*

73. The "Let's get started" page for the joint account holder contains a visual list that is not programmatically implemented as a list.

- At least 18 years of age. ⓘ

- A resident of Canada not required to file taxes in another country. ⓘ

- Not a resident of Quebec. ⓘ

- Not opening the account(s) for use by, or benefit of a third party. ⓘ

☐ Yes, I meet all of the above criteria.*

- ■ Recommendation: Change the markup to use an unordered list with list items (<ul> and <li>).

74. The "Your associates will join us soon" page contains a series of anchors that lead nowhere within the "progress" frame" (e.g., "In progress" and "Complete").
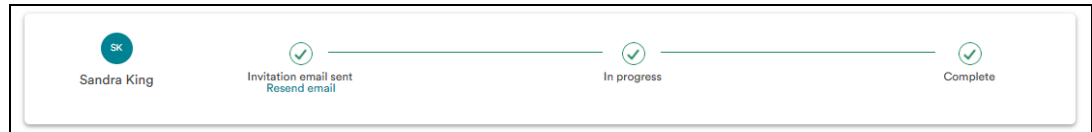
- Recommendation: If these anchors are not navigating the user somewhere meaningful, remove the anchors.

75. The field "How many people need to authorize transactions (cannot exceed the number of identified signers)" within the "Business Savings Account" region is marked as read-only yet the more information control associated with the question is not disabled: this causes a confusing tab focus for a non-sighted user.

- Recommendation: Also mark the information control as disabled while the associated fields are read-only.

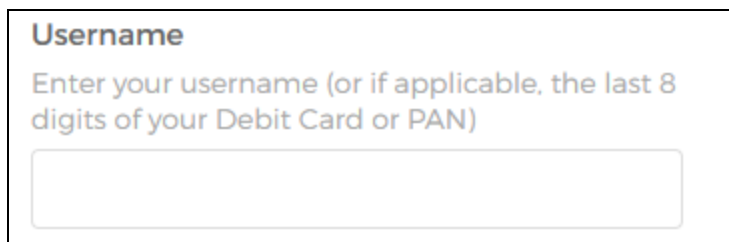**Start New Application - Review Path**

No isolated issues.

Concurrent Application Check

76. When an address from Quebec is entered, an error is visually presented below the field that is not made aware to screen reader users.

- Recommendation: Ensure that all errors are announced automatically to screen reader users.

Authenticated Customer applying for LOC with one NTB and One Authorized Signer flow
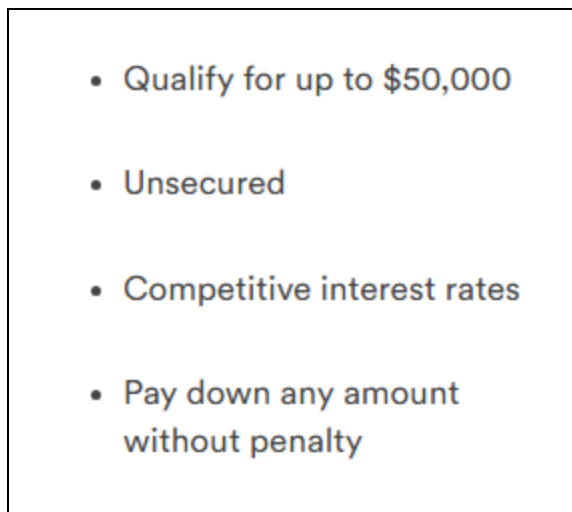
77.   The login page for existing users contains description text below the "username" label that lacks sufficient contrast. The contrast between the foreground and background text colours is insufficient (2.4:1), falling short of the 4.5:1 required for regular text.

  ■ Recommendation: Change all problematic foreground/background pairings to higher contrast ratios that meet or exceed the required minimum.

78.   The "Revolving Line Of Credit" contains a series of bulleted list items, each in their own unordered list.

  ■ Recommendation: Change the markup to use a single unordered list that encapsulates each bullet point (instead of 4 unique lists).

Our expertise and credentials

This audit was performed by our expert team under the leadership of David Berman, and he endorses its content within his professional certifications and the rules of professional conduct those certifications demand.

David Berman, CPWA, WAS, CPACC, ADS, RGD

With over 30 years of experience in design and communications, David has worked extensively in the field of accessible Web and software interface development. He is an International Advisor for G3ICT and holds CPWA, WAS, and CPACC certifications. David sits on the Global Council of the IAAP, is a member of the ISO committee for accessible PDF (PDF/UA), is an Invited Expert to the W3C (the publishers of WCAG), and serves on Ontario's AODA standards review committee for accessibility regulations. David has taken all available courses within the U.S. Trusted Tester Program, in support of U.S. Revised Section 508. David has advised the Government of Canada and a coalition of Canada's top accessibility organizations on the content of the Accessible Canada Act and its regulatory approach, including arguing for the international harmonized adoption of EN 301 549.

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