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IMPROVING WEBSITE ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

- I. Use Compliance Review Committee¹ and/or attorney to direct an investigation
- II. Investigate current status of bank's website for accessibility by persons with disabilities
 - Talk with existing vendors
 - Review existing vendor contracts²
 - Audit website for accessibility issues (but do not use a free, online test)
 - Consider whether there is existing insurance coverage
- III. Work on enhancing bank's website accessibility
 - Adopt a policy that reflects an ongoing commitment to make web-based technologies accessible to disabled individuals, including those who are blind and otherwise vision impaired
 - Appoint "point person" (senior staff) and team to oversee website
 - Hire third-party vendor/consultant to assist in improving accessibility
 - Focus first on resolving issues with the greatest impact (*e.g.*, address accessibility issues in template components such as headers, footers, etc.; create convenient means for individuals to report/overcome website access problems)
 - Train personnel
- IV. If bank receives a demand letter, in addition to the steps above:
 - Consider if information in demand letter is inaccurate and/or unclear
 - Prepare to present details on existing accessibility attributes and steps being taken to enhance accessibility (focused on demands presented in letter)
 - Let bank's counsel interact with law firm making demand

¹ See MD Code Ann., Fin. Inst. §1-205.

² Work on language to include in future contracts to ensure ADA accessibility is adequately addressed.