

FreeWill QCD Accessibility Conformance Report WCAG Edition

(Based on VPAT® Version 2.5Rev)

Name of Product/Version:

FreeWill Qualified Charitable Distribution (QCD)

Report Date:

April 29, 2024

Product Description:

FreeWill QCD is a web-based product that helps users donate to nonprofits from their individual retirement accounts (IRAs).

Contact Information:

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Notes:

This report only covers the donor-facing portions of FreeWill QCD. It does not cover the nonprofit-facing Partner Portal. Pages in scope:

- <https://www.freewill.com/qcd/:slug> (QCD Home)
- <https://www.freewill.com/qcd/:slug/learn> (QCD Guide)
- <https://www.freewill.com/qcd/:slug/give> (Make a QCD)
- <https://www.freewill.com/qcd/a/preliminary/personal> (QCD Step 1 of 4: Personal)
- <https://www.freewill.com/qcd/a/qcd/:id/rmd> (QCD Step 2 of 4: RMD estimator)
- <https://www.freewill.com/qcd/a/qcd/:id/charity> (QCD Step 3 of 4: Gift Details)
- <https://www.freewill.com/qcd/a/qcd/:id/final> (QCD Step 4 of 4: Download your documents)
- <https://www.freewill.com/qcd/:slug/tax> (Request your QCD tax acknowledgment letter)
- <https://www.freewill.com/qcd/:slug/tax/:id/review> (QCD tax acknowledgment letter requested)
- <https://www.freewill.com/qcd/:slug/manual> (Complete your QCD manually or by phone)
- <https://www.freewill.com/qcd/:slug/manual/:id/review> (Complete your QCD distribution)

The following platform-wide pages are also considered in scope because they are used by all FreeWill donor-facing products:

- <https://www.freewill.com/terms> (Terms)
- <https://www.freewill.com/privacy> (Privacy)
- <https://www.freewill.com/login> (Login)
- <https://www.freewill.com/signup> (Signup)
- https://www.freewill.com/password_recovery (Recover Password)
- https://www.freewill.com/password_reset (Reset Password)

Evaluation Methods Used:

NVDA, VoiceOver, Google Lighthouse, aXe™, manual testing, code review, and consultation with an Accessibility expert.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes) Level AAA (No)
Web Content Accessibility Guidelines 2.2	Level A (Yes) Level AA (Yes) Level AAA (No)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.

- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG Level AAA criteria.

WCAG 2.2 Report

Note: When reporting on conformance with the WCAG 2.2 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.2 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports	All non-text content includes alternative text.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	There is no pre-recorded audio-only or video-only content.
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	There is no pre-recorded synchronized media.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not Applicable	There is no pre-recorded video content.
1.3.1 Info and Relationships (Level A)	Supports	Information, structure, and relationships can all be determined programmatically.
1.3.2 Meaningful Sequence (Level A)	Supports	A correct reading sequence can be determined programmatically for all content.
1.3.3 Sensory Characteristics (Level A)	Supports	Instructions do not rely solely on shape, size, location, orientation, or sound.
1.4.1 Use of Color (Level A)	Supports	Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing elements.
1.4.2 Audio Control (Level A)	Not Applicable	No audio plays automatically for more than 3 seconds.
2.1.1 Keyboard (Level A)	Supports	All functionality is operable using only a keyboard.
2.1.2 No Keyboard Trap (Level A)	Supports	No components trap keyboard focus.
2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2)	Not Applicable	There are no keyboard shortcuts.
2.2.1 Timing Adjustable (Level A)	Not Applicable	There is no content with a timeout.
2.2.2 Pause, Stop, Hide (Level A)	Supports	There is no moving, blinking, or scrolling information that starts automatically, lasts more than five seconds, and is presented in parallel with other content. Loading indicators are full screen and block user interaction. There is no auto-updating information.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	There is no content that flashes more than three times per second.
2.4.1 Bypass Blocks (Level A)	Supports	“Skip to main content” links allow users to bypass repeated navigation controls.
2.4.2 Page Titled (Level A)	Supports	All pages have unique titles that describe the topic or purpose.
2.4.3 Focus Order (Level A)	Supports	Focusable components receive focus in an order that preserves meaning and operability, including when dialogs or

Criteria	Conformance Level	Remarks and Explanations
		menus open and close.
2.4.4 Link Purpose (In Context) (Level A)	Supports	All links provide text to clearly describe their purpose.
2.5.1 Pointer Gestures (Level A 2.1 and 2.2)	Not Applicable	There are no multipoint or path-based gestures for operation.
2.5.2 Pointer Cancellation (Level A 2.1 and 2.2)	Supports	All pointer interactions can be canceled.
2.5.3 Label in Name (Level A 2.1 and 2.2)	Supports	All controls have accessible names that contain their entire visible labels.
2.5.4 Motion Actuation (Level A 2.1 and 2.2)	Not Applicable	There is no motion actuation.
3.1.1 Language of Page (Level A)	Supports	All pages specify their default language in the HTML code.
3.2.1 On Focus (Level A)	Supports	Context is never changed when a component receives focus.
3.2.2 On Input (Level A)	Supports	Entering data or selecting a form control has predictable effects.
3.2.6 Consistent Help (Level A 2.2 only)	Not Applicable	There is no consistent help across pages.
3.3.1 Error Identification (Level A)	Supports	If an input error is detected, the item is identified and the error is described to the user in text.
3.3.2 Labels or Instructions (Level A)	Supports	All user inputs have labels or instructions.
3.3.7 Redundant Entry (Level A 2.2 only)	Supports	Information carries over across pages, including upon back navigation.
4.1.1 Parsing (Level A)	Supports	For WCAG 2.0 and 2.1, the September 2023 errata update indicates this criterion is always supported. See the WCAG 2.0 Editorial Errata and the WCAG 2.1 Editorial Errata .
4.1.2 Name, Role, Value (Level A)	Supports	Appropriate names, roles, and values are provided for all interactive elements.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	There is no live synchronized media.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	There is no pre-recorded video content.
1.3.4 Orientation (Level AA 2.1 and 2.2)	Supports	All content is viewable and operable in both portrait and landscape orientations.
1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2)	Supports	The purpose of each input field can be determined programmatically.
1.4.3 Contrast (Minimum) (Level AA)	Supports	All text has sufficient color contrast.
1.4.4 Resize text (Level AA)	Supports	Text can be resized without assistive technology using browser-native zoom. No content or functionality is lost when resizing up to 200 percent.

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1.4.5 Images of Text (Level AA)	Supports	Images of text are not used to convey information unless those images are essential to the information being conveyed (e.g. logos).
1.4.10 Reflow (Level AA 2.1 and 2.2)	Supports	A mobile-friendly view ensures that content is presented without a loss of information or functionality and without requiring two-dimensional scrolling on viewports as small as 320 CSS pixels wide by 256 CSS pixels high.
1.4.11 Non-text Contrast (Level AA 2.1 and 2.2)	Supports	All interface components, component states, and graphical objects have sufficient color contrast.
1.4.12 Text Spacing (Level AA 2.1 and 2.2)	Supports	Text spacing can be adjusted without loss of content or functionality.
1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2)	Supports	Content that appears on hover or focus is dismissible, hoverable, and persistent.
2.4.5 Multiple Ways (Level AA)	Partially Supports	All pages have links to navigate to related pages, and the QCD homepage contains links to all other pages, but not all pages contain links back to the homepage. There is no Table of Contents, site map, search function, or list of links to all other pages.
2.4.6 Headings and Labels (Level AA)	Supports	All headings and labels describe topic or purpose.
2.4.7 Focus Visible (Level AA)	Supports	Focus indicators are visible on all interactive elements.
2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only)	Supports	Focus indicators are visible and unobscured.
2.5.7 Dragging Movements (Level AA 2.2 only)	Not Applicable	No dragging interactions present.
2.5.8 Target Size (Minimum) (Level AA 2.2 only)	Supports	All interactive targets are larger than 24px x 24px.
3.1.2 Language of Parts (Level AA)	Not Applicable	There are no passages or phrases in a language other than the main language of the page.
3.2.3 Consistent Navigation (Level AA)	Supports	Navigation is clear and consistent across pages.
3.2.4 Consistent Identification (Level AA)	Supports	Components with the same functionality and consistently identified.
3.3.3 Error Suggestion (Level AA)	Supports	Suggestions are provided when input errors have known possible corrections. For example, @gamil.com email addresses prompt a suggestion for correction to @gmail.com.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not applicable	No legal commitments or financial transactions occur directly.
3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only)	Supports	Authentication occurs via user/password, which is assisted by password manager software.
4.1.3 Status Messages (Level AA 2.1 and 2.2)	Supports	Status messages are presented to assistive technologies without receiving focus.

Table 3: Success Criteria, Level AAA

Notes: Not applicable. FreeWill QCD was not evaluated for WCAG 2.2 Level AAA conformance.

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