SPRING 2019 SECTION 508 PROGRAM MATURITY REPORT: EXECUTIVE SUMMARY

August 2019

Executive Summary

The [OMB Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act](#) (OMB Strategic Plan) requires executive branch agencies to assess and self-report biannually on the maturity of their Section 508 IT Accessibility programs. Reaffirming their commitment to equal access, on December 20, 2018, Congress passed the [21st Century Integrated Digital Experience Act](#) (21st Century IDEA), which requires agencies to ensure that new websites and digital services are accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d).

In general, CFO Act agencies assess their Section 508 program maturity as "Planned" or "Resourced" across all four of the reporting categories[1]. Most of these agencies report adequate planning in place, but lack the resources to carry out the plans. Only a few agencies consider themselves adequately resourced and measured. Reviewing trends from the past three reporting cycles, data from GSA's Digital Dashboard, and the recently-released Solicitation Review Tool pilot, work remains to meet the goals of the OMB Strategic Plan.

As agencies work to create and redesign websites and digital services in accordance with 21st Century IDEA, coupled with increased mobile use and other emerging technologies - such as Artificial Intelligence, Augmented Reality and Virtual Reality - the risk of digital inequality increases when agencies fail to adopt a proactive strategy to address accessibility across the IT portfolio.

Overview of Section 508 Program Maturity Report

The Section 508 Program Maturity Report asks CFO Act agencies to self-report on five *program maturity metrics,* as well as *website compliance metrics* on certain web pages tested for compliance, and the percentage of tested pages which were found to be in conformance with the technical standards. To support these objectives, this report includes a compilation of the self-reported Section 508 Program Maturity metrics (Appendix C).
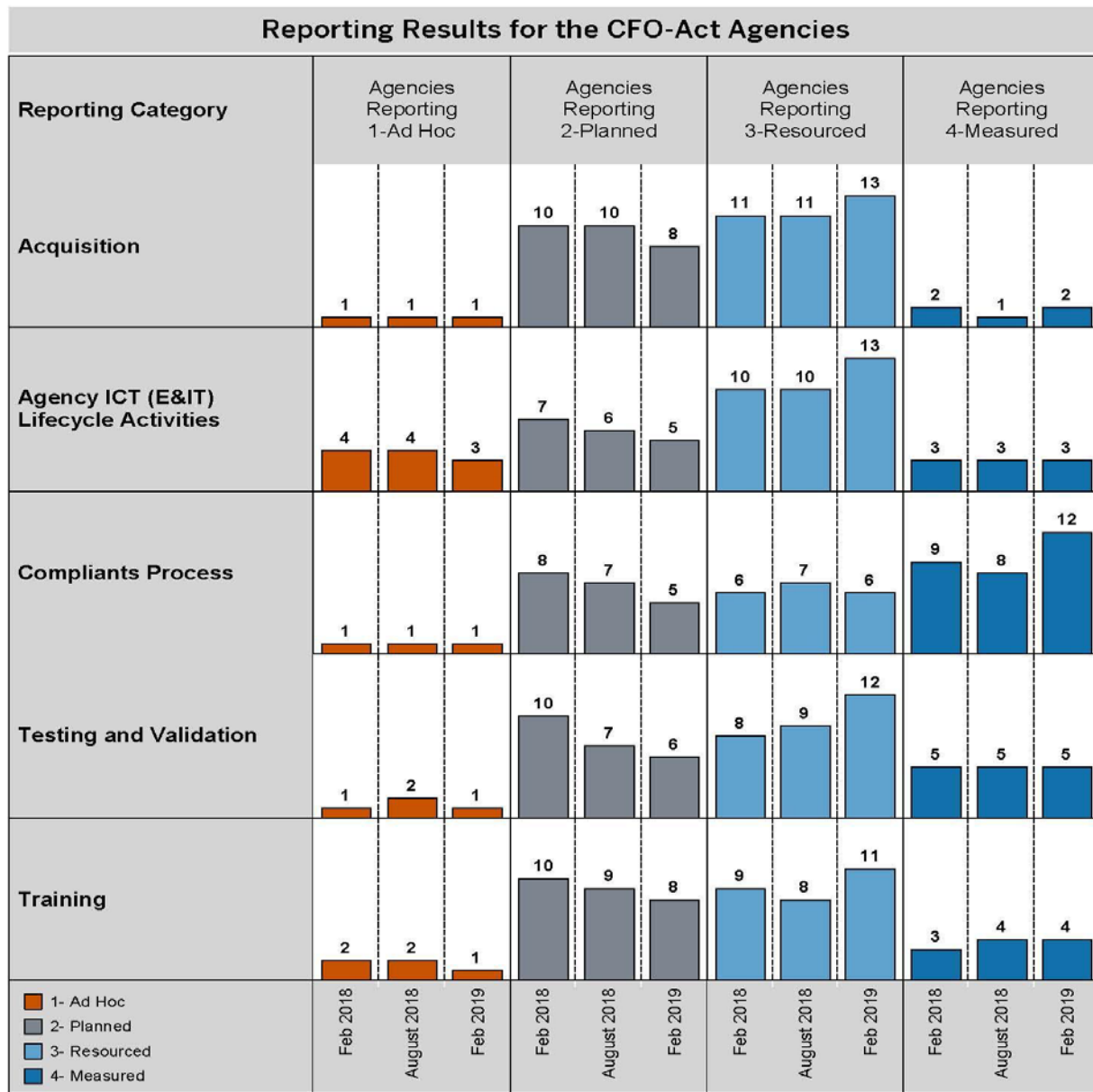
Summary of Section 508 Program Maturity

The results of the self-assessments provide an aggregate view across the executive branch, offering insight into how agencies allocate resources for training, tools, events, and subject-matter expertise. The chart below, "Section 508 Program Maturity Analysis - February 2019,"

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[1][Assessing Program Maturity - Section 508.gov](#)

shows the status of the executive branch agencies' Section 508 program maturity over the last three bi-annual reporting cycles.

Reporting Results for the CFO-Act Agencies

Reporting Category	Agencies Reporting 1-Ad Hoc	Agencies Reporting 2-Planned	Agencies Reporting 3-Resourced	Agencies Reporting 4-Measured
Acquisition	1, 1, 1	10, 10, 8	11, 11, 13	2, 1, 2
Agency ICT (E&IT) Lifecycle Activities	4, 4, 3	7, 6, 5	10, 10, 13	3, 3, 3
Compliants Process	1, 1, 1	8, 7, 5	6, 7, 6	9, 8, 12
Testing and Validation	1, 2, 1	10, 7, 6	8, 9, 12	5, 5, 5
Training	2, 2, 1	10, 9, 8	9, 8, 11	3, 4, 4

Legend:
- 1- Ad Hoc
- 2- Planned
- 3- Resourced
- 4- Measured

(Reporting periods per group: Feb 2018, August 2018, Feb 2019)

Figure 1: Section 508 Program Maturity Analysis - February 2019

Agencies are increasingly reporting that they have policies, processes, or procedures defined and communicated (*planned*) with resources committed and/or staff trained to implement (*resourced*), yet few report that they are performing, tracking and reporting validations (*measured*) in four of the five reporting categories. Moreover, none of the twenty-four agencies reports being measured in all five reporting categories, and only:

- 8% of agencies (2) report measuring their acquisitions process

- 13% of agencies (3) report measuring their life-cycle activities
- 50% of agencies (12) report measuring their complaints process
- 20% of agencies (5) report measuring their testing and validation activities
- 17% of agencies (4) report measuring their training activities

Summary of Website Accessibility

The aggregate number of reported internet and intranet web pages evaluated for compliance by agencies (Figure 1) continues to increase despite data showing that:

- 20% of agencies are reporting that they not evaluating Internet websites,
- 33% of agencies are reporting that they not evaluating Intranet websites, and
- 16% of agencies are reporting that they not evaluating Internet and Intranet websites.
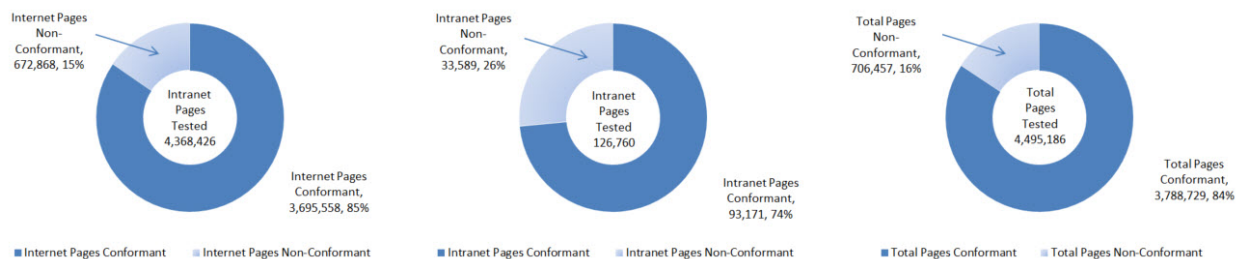

Figure 2: Number of CFO-Act Agency webpages found to be conformant/non-conformant among those tested.

Further, GSA's ongoing scanning of dot-gov domains (top-level websites) reveals only small improvements in addressing the three most common website errors, See DigitalDashboard.gov accessibility reports. We recommend CIOs pay more attention to website accessibility, not only because it's the right thing to do for the American public, but because non-compliance could lead to costly lawsuits for agencies.

Summary of Section 508 Program Resources

The number of people responsible for supporting Section 508 Programs has increased overall from the previous reporting period. However, when compared to the August 2018 reporting period six months prior, the data shows that CFO Act agencies experienced a turnover rate near 17% (107 people lost, 134 added). Ten agencies had a net increase in Section 508 Program staff, seven agencies experienced a net reduction, and seven agencies remain unchanged.

Interesting facts about staffing for 508 Programs at CFO Act agencies (FTE includes both federal and contract employees):

- 652 - Number of 508 Program FTEs across all agencies
- 119 - Highest number of 508 Program FTEs reported by a single agency
- 10.5 - Median number of FTEs per agency

- 27 - Average number of FTEs per agency
- 1 - Lowest number of 508 Program FTEs reported by three agencies
- 92% of FTEs work for the twelve largest agencies
- 70% of FTEs work for the six largest agencies
- 40% of FTEs work for the three largest agencies

Contributing to this volatility is a tendency for agencies to assign accessibility duties as temporary or collateral in nature, and often to individuals with little to no experience as accessibility professional. Part-time assignments and high turnover rates can result in lower productivity and sub-par quality of work in the short-term, with inexperience and constant retraining inhibiting program maturity and development of a culture of inclusion in the long-term.

A quick analysis of this data reveals a mix-match of agency needs for accessibility programs and size of accessibility teams. For example, the largest agency (DoD) serving 2.87 million employees, does not have a dedicated Section 508 Program Manager at the Office of the Secretary of Defence (OSD) level.

Government-wide Maturity Assessment and Recommendations

Generally speaking, agencies lack the ability to perform, track and report on their program activities and may not be aware of the full scope of work in each report category; policies, resources and measurement. Agency IT accessibility programs lack sufficient subject matter professionals and the tools necessary to perform, track and report validation which could provide for data-driven analysis needed to understand the scope of work, and influence management and development decisions.

It is worth noting that the self-reported "resourced" designation is not always representative of whether an agency Accessibility program is sufficiently resourced. While these are not new claims, we do encourage agencies to take advantage of the wealth of information, guidance, tools, and training available to them at no cost on Section508.gov.

Federal agencies can improve the accessibility of their IT product portfolios by understanding the current state of their 508 program, and focusing on the following program maturity Evaluation Factors (Appendix B):

Acquisition – In line with previous reporting, and an analysis of FedBizOps solicitation data, few agencies regularly include accessibility requirements in IT solicitations (with some notable exceptions), and agencies lack the capacity to monitor the accessibility of official

communications, software and mobile devices. This continues to leave the U.S. Government open to legal liability in two areas: failure to provide an inclusive workplace for all federal employees, and failure to make government information available to all citizens.

Agencies must proactively specify accessibility requirements in all IT solicitations, including those for commercial software and in-house development projects. While agencies report 'good' planning and resourcing for acquisition accessibility, a previous GSA pilot provided evidence that a majority of all IT solicitations posted on [FedBizOpps](#) do not adequately address Section 508 requirements. Noteworthy, those agencies that regularly review IT solicitations for inclusion of accessibility requirements show very high rates of compliant solicitations.

Lifecycle Activities – Agencies report the number of web pages that they have tested for conformance, however, few are currently able to quantify the total number of web pages which they currently host, and that require testing. This gap in data includes other common ICT such as web-based and software applications, images, audio and video media, electronic documents, and online training. Furthermore, agencies may lack the ability to track IT acquisition review and other change management activities. In brief, agencies often lack the qualitative and quantitative data necessary to ensure that user needs are addressed.

Recommend that agencies establish and maintain methods for tracking agency-wide accessibility compliance management to enable data-driven analysis to influence management and development decisions through all phases of the product lifecycle.

Complaints Process – One-half of all CFO-Act agencies report measuring the Section 508 Complaints process. Agencies should consider partnering with the agency Equal Rights office, to share complaint data and evaluate alongside other non-Section 508 accessibility issues or civil rights complaint covered under Section 501, Section 504 and other laws.

Recommend that agencies track complaints of Section 508 non-compliance as a subset of other accessibility complaints to enable more accurate reporting of Section 508-specific complaints.

Testing and Evaluation – According to agency reporting for this period, nearly 4.4 million internet web pages and another 126 thousand intranet web pages were evaluated for conformance. Approximately 16% of those pages tested contained accessibility issues.

Recommend that agencies incorporate accessibility testing into IT development methodologies to ensure that qualified accessibility testing resources are available to continually evaluate websites, software, mobile applications and other ICT for conformance to standards, prior to

each deployment. To benefit from standardization and commonalities, agencies should integrate the [ICT Testing Baseline and Trusted Tester Program](#) for testing web-based applications, and the electronic authoring guidelines and checklists developed by the [Accessible Electronic Document (AED) Community of Practice (CoP)](#) into their development processes and procedures.

Training – While in FY2018 there was good participation in GSA and ACoP hosted training, agencies should ensure accessibility training reaches beyond just the accessibility program managers to include other professional disciplines (e.g.,acquisition, design, development, testing, change management, content development, multimedia) to ensure that accessibility is fully incorporated into acquisition and development lifecycle processes.

Agencies should ensure that adequate resources are made available for accessibility training, and leverage the free training available to agency staff from GSA and the ACoP.

- Educate the acquisition community on how to review and verify accessibility requirements in solicitations, and ensure they understand that accessibility is a core requirement of Federal acquisitions.
- Identify staff (e.g., web designers, developers, testers, content managers, customer and user experience staff) that have a key role in accessibility; train them in design thinking and universal design, and incorporate accessibility into their normal business processes.
- Train agency staff to understand their responsibility to make all "agency official communications" accessible. Agencies have not reported much progress in this area since the revision to Section 508 became an agency liability.

Standardization and Commonalities – Building on existing standards and commonalities, the Federal IT Accessibility community can enable a future of centralized shared services in accordance with 21st Century IDEA. Collaboration, and the establishment of a common set of performance metrics, would increase the accessibility conformance of federal IT portfolios while simultaneously reducing remediation and rework, duplication of testing and training, and the burden of reporting.

Appendix A

These reports are collected and analyzed by GSA, and the findings are communicated to the Office of Management and Budget (OMB) Office of the Chief Information Officer (OFCIO), the Federal Chief Information Officer Council (CIOC), and the Chief Acquisition Officer Council (CAOC). This report offers ideas for improving IT accessibility, and also addresses the value of, and reporting requirements for, this information collection.

This reporting and data analysis supports the following activities:

- GSA and the CIOC Accessibility Community of Practice (ACoP) use the findings to develop solutions and recommendations to improve Section 508 program management across the federal government.

- OMB uses the agency reporting data during agency PortfolioStat reviews, to foster an imperative to manage agency IT portfolios for accessibility.

- The ACoP uses information to inform their annual strategic agenda, which supports vendor outreach, development of effective education programs, and elevation of agency best practices.

- GSA OGP uses these reports to develop guidance for Section 508 Program Managers such as online and classroom training, technical assistance, and best practices documented on Section508.gov.

- Federal agencies use this exercise as an opportunity to benchmark with other agencies, and share best practices to improve the accessibility of their IT portfolio.

The ACoP and GSA recognize the burden imposed by mandatory reporting, and we welcome the opportunity to work with OMB to improve the reporting process for this information collection, to deliver greater value, increase usability, and reduce the reporting burden for agencies.

Appendix B

Program Maturity Evaluation Factors

- **Acquisition:** Validate that solicitations incorporate Section 508 language in procurement documentation (e.g., statement of work, performance work statement).

- **Agency ICT:** Validate that IT accessibility requirements are built into standard business processes, including enterprise architecture, design, development, content creation, testing, deployment, and ongoing maintenance activities.

- **Testing and Validation:** Test and validate Section 508 conformance claims.

- **Complaints Process:** Track and resolve incoming Section 508 complaints.

- **Training**: Train stakeholders on roles and responsibilities related to Section 508 compliance.

Maturity Level Legend

- **Ad-Hoc**: No formal policies, processes, or procedures defined.

- **Planned**: Policies, processes, or procedures defined and communicated.

- **Resourced**: Resources committed and/or staff trained to implement policies, processes, and procedures.

- **Measured**: Validation is performed: results are measured and tracked.

Appendix C: Agency-provided Metrics and 508 Conformance Metrics (February 2019)

Agency	Annual IT Budget	Federal Employee	Contractor Employee	Acquisition	Lifecycle	Testing	Complaints Process	Training	# Internet Webpages Evaluated	% Internet Webpages Conformant	# Intranet Webpages Evaluated	% Intranet Webpages Conformant
DHS	$7,400,000,000	28	32	Measured	Measured	Resourced	Measured	Measured	68220	64	0	0
DOC	$2,700,000,000	5	2	Planned	Planned	Planned	Resourced	Resourced	100	98	25	100
DOD	$36,000,000,000	34	38	Resourced	Resourced	Resourced	Measured	Resourced	5734	43	967	50
DOE	$2,200,000,000	1	1	Resourced	Resourced	Resourced	Measured	Resourced	3067487	99	5088	93
DOI	$1,100,000,000	9	0	Resourced	Planned	Measured	Measured	Measured	163043	86	4744	84
DOJ	$2,900,000,000	24	13	Resourced	Resourced	Resourced	Planned	Planned	179	98.32	159	37.11
DOL	$732,000,000	49	21	Planned	Planned	Planned	Planned	Planned	23500	48	2000	19
DOT	$3,700,000,000	13	1	Resourced	Resourced	Resourced	Resourced	Resourced	322545	74	19347	58
ED	$730,000,000	3	3	Planned	Measured	Measured	Ad Hoc	Ad Hoc	61	52	9	56
EEOC	-	1	1	Resourced	Planned	Measured	Resourced	Resourced	23	98	24	99
EPA	$407,000,000	3	3	Planned	Planned	Planned	Measured	Measured	0	0	0	0
GSA	$664,000,000	4	0	Resourced	Resourced	Measured	Measured	Resourced	5348	80	944	96
HHS	$6,200,000,000	81	38	Resourced	Resourced	Resourced	Measured	Resourced	0	0	0	0

HUD	$281,000,000	1	0	Resourced	Planned	Planned	Planned	Resourced	100	96	65	90
NASA	$2,300,000,000	10	2	Resourced	Resourced	Measured	Measured	Resourced	1006	32.4	2236	36.8
NCUA	-	1	3	Planned	Planned	Measured	Planned	Resourced	5270	96	5463	12
NRC	$157,000,000	1	0	Planned	Ad Hoc	Ad Hoc	Measured	Planned	0	0	0	0
NSF	$119,000,000	2	1	Resourced	Resourced	Resourced	Measured	Planned	25	95	0	0
OPM	$159,000,000	7	13	Planned	Ad Hoc	Planned	Planned	Planned	2668	99	163	99
SBA	$112,000,000	1	0	Ad Hoc	Ad Hoc	Planned	Measured	Planned	0	0	0	0
SSA	$1,900,000,000	34	10	Measured	Resourced	Resourced	Resourced	Resourced	31905	92	83549	80
State	$2,200,000,000	2	2	Planned	Resourced	Resourced	Resourced	Planned	0	0	35	30
TREASURY	$4,600,000,000	36	22	Resourced	Resourced	Resourced	Resourced	Planned	7245	91	1060	22
USAID	$195,000,000	1	1	Resourced	Resourced	Resourced	Resourced	Resourced	36678	8	0	0
USDA	$2,300,000,000	20	8	Resourced	Resourced	Resourced	Planned	Resourced	249078	70	6369	51
VA	$4,800,000,000	22	45	Planned	Measured	Measured	Measured	Measured	383504	0.4	0	0

Appendix D – Figure 1: Section 508 Program Maturity Assessment – February 2019

Reporting Category	Acquisition	Agency ICT (E&IT) Lifecycle Activities	Complaints Process	Testing and Validation	Training
# of Agencies Reporting 1-Ad Hoc Feb 2018	1	4	1	1	2
# of Agencies Reporting 1-Ad Hoc Aug 2018	1	4	1	2	2
# of Agencies Reporting 1-Ad Hoc Feb 2019	1	3	1	1	1
# of Agencies Reporting 2-Planned Feb 2018	10	7	8	10	10
# of Agencies Reporting 2-Planned Aug 2018	10	6	7	9	9
# of Agencies Reporting 2-Planned Feb 2019	8	5	6	8	8
# of Agencies Reporting 3-Resourced Feb 2018	11	10	6	8	9
# of Agencies Reporting 3-Resourced Aug 2018	11	10	7	9	8
# of Agencies Reporting 3-Resourced Feb 2019	13	13	6	12	11
# of Agencies Reporting 4-Measured Feb 2018	2	3	9	5	3
# of Agencies Reporting 4-Measured Aug 2018	1	3	8	5	4
# of Agencies Reporting 4-Measured Feb 2019	2	3	12	5	4