



Autumn 2020 Section 508 Program Maturity Report

Executive Summary

Section 508 and the Program Maturity Report



- Law: 1998 Amendments strengthened Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d)
- Requires access to electronic and information technology provided by the Federal government to employees and the public.
 - 2017 final rule - jointly updated requirements for information and communication technology covered by Section 508 of the Rehabilitation Act and Section 255 of the Communication Act.
 - The 21st Century Integrated Digital Experience Act (IDEA) (2019) re-emphasized web and digital service accessibility

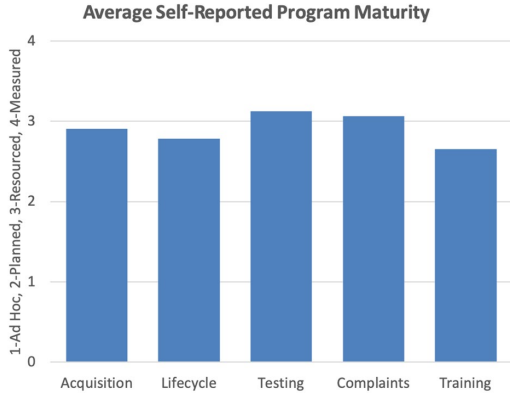


The OMB Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act requires that Executive Branch agencies assess and self-report biannually on the maturity of their Section 508 Programs. Several other agencies voluntarily participate.



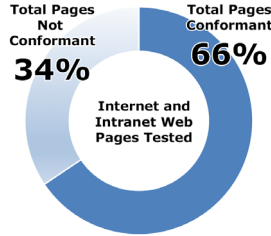
- Bi-Annually Executive Branch agencies self-report on:
- the maturity level of the Section 508 Program across five performance metrics
 - the number of Internet and Intranet websites tested for compliance
 - the percentage of those websites tested which were found to be conformant
 - the number of federal and contractor staff supporting the Section 508 Program

Report Summary: At-a-Glance



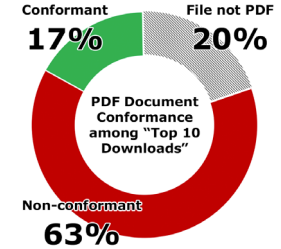
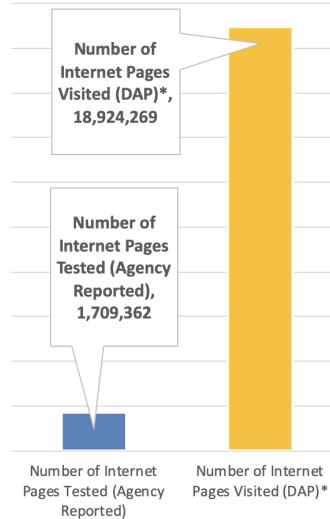
Over the last 8 cycles, agencies have generally reported that they are *'resourced'* to manage Section 508.

However, very few report *'measuring'* their program's performance, which results in reduced ability to maintain an accessible ICT portfolio.



Of all the websites reported as tested, 1/3 of them are inaccessible to people with disabilities, and...

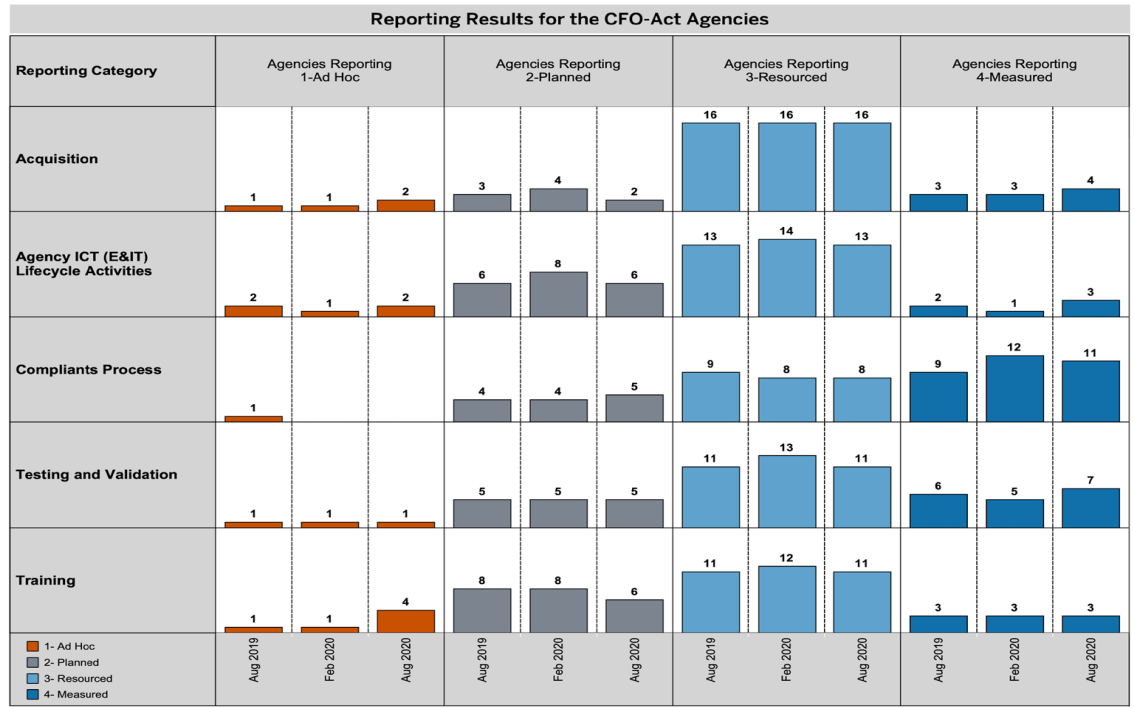
... less than 10% of the number of webpages visited during the reporting period are being reported as tested.



A large percentage of agency PDFs are non-conformant. Agency publishing procedures should be updated to ensure conformance.

Program Maturity

Self-Reported Results for CFO Act Agencies



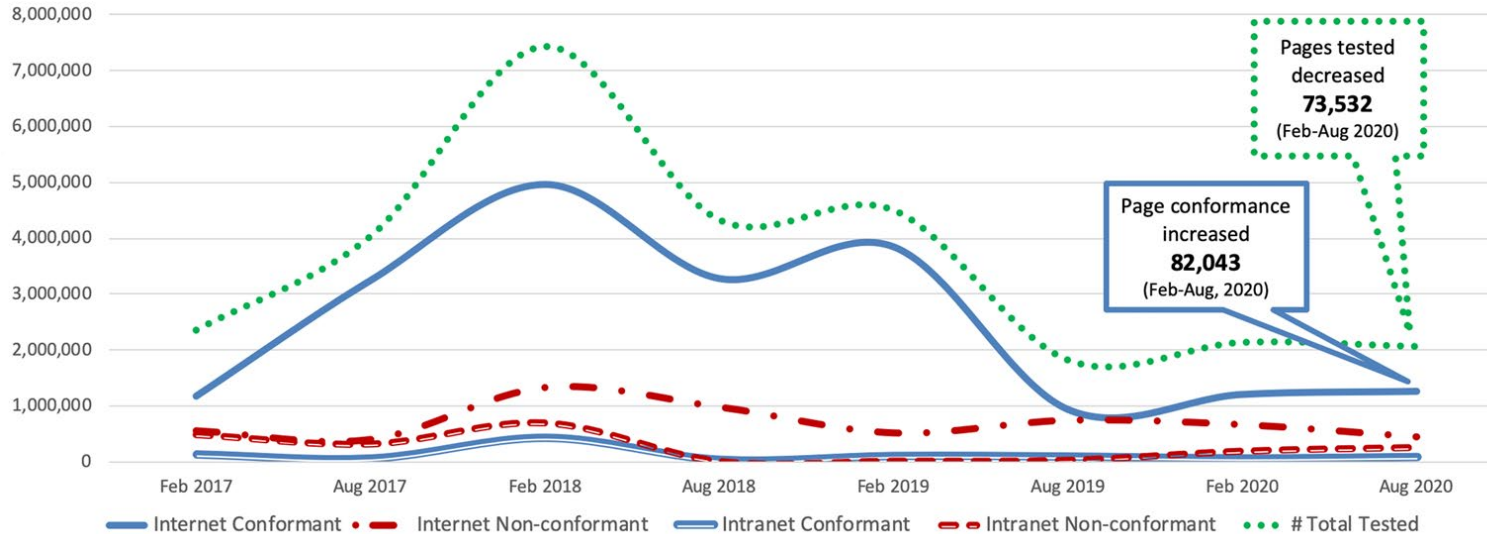
- Agency Maturity remains largely unchanged from prior reporting periods
- 20 years have passed since the release of the standards and some agencies are still unplanned and unresourced
- *'Measured'* Complaints Processes may be due to the record keeping of agency Civil Rights offices rather than the Section 508 Program
- Only five reporting agencies (15%) consider themselves *'measured'* in three or more of the five categories

(See Appendix B for definition of terms)

Webpage Conformance: Trend Line

CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested over 8 Reporting Cycles
CFO Act Agencies | Feb 2017 - Aug 2020

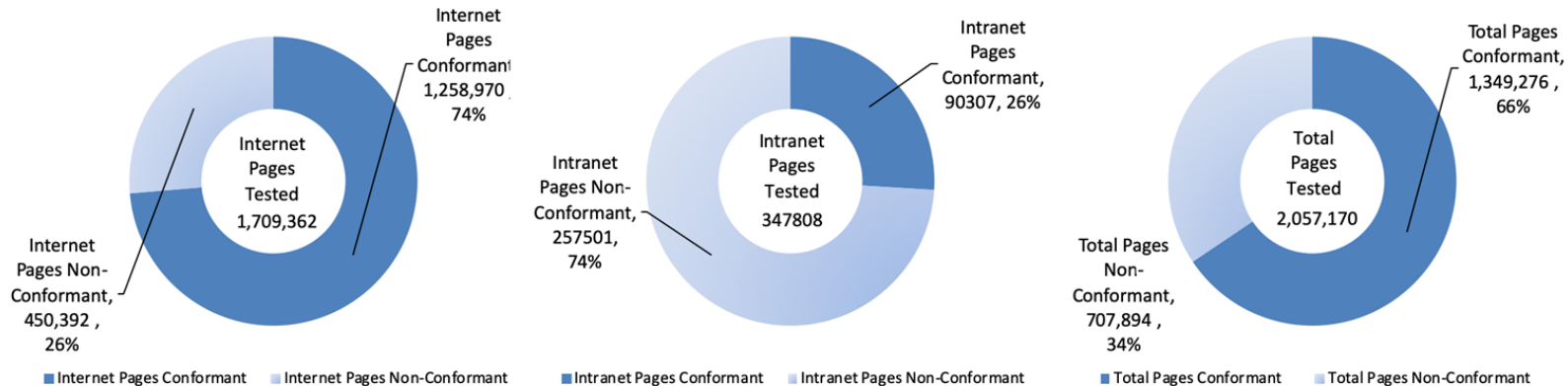


NOTE: When evaluating the trends over the last eight reporting cycles, agencies inconsistently test and measure web page conformance. As a result, agencies may lack sufficient data to determine program maturity and identify gaps in agency policy, development, testing, change management, and content creator testing. See link: [Technology Accessibility Playbook » Play 10](#)

Webpage Conformance: Snapshot

Self-Reported Results for CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested
CFO Act Agencies | August 2020

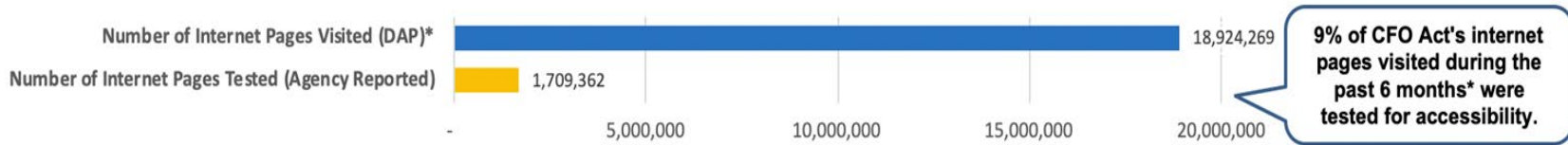


Risks as reported:

- Agencies tested 72% fewer Internet and Intranet pages since Feb 2018 (7,425,035 vs 2,057,170)
- Agency conformance of Intranet pages dropped 49% (YoY) from 75% to 26%
- $\frac{3}{4}$ of million of agency tested web pages contain known issues which may make them inaccessible to some customers

Web Pages Tested vs Number of Pages

RISK: Only 9% of CFO Act Internet Pages Tested for Conformance



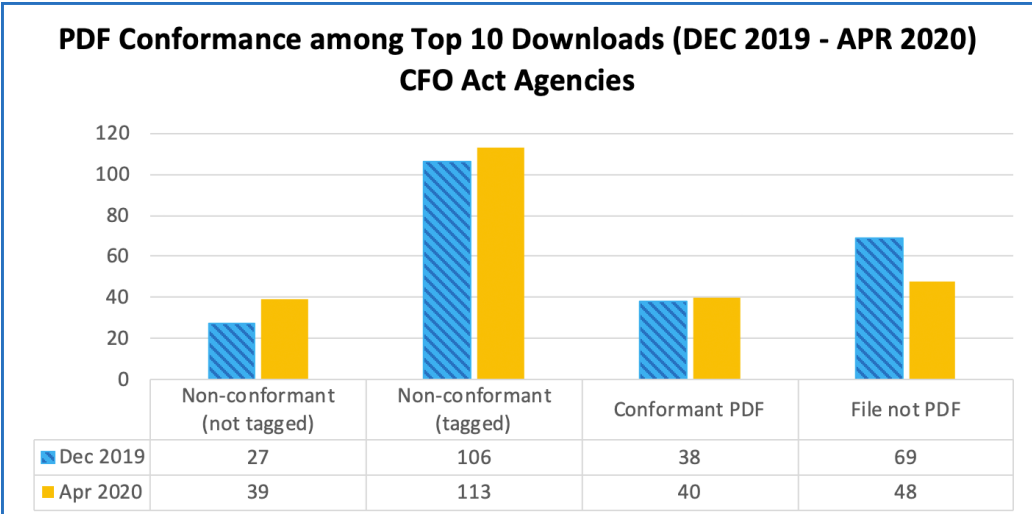
- On average, agencies are testing only 9% of pages available on their public-facing Internet websites
- Only 10 (33%) of reporting agencies** are testing *more than* 3% of their visited internet web pages
- The reported number of pages tested could include repeated tests of a given webpage, and thus the actual number of unique pages tested could be lower

*Number of unique pages visited between Mar 1, 2020 through Aug 31, 2020 available from the [Digital Analytics Program](#).

** Agencies that use the [Digital Analytics Program](#)

PDF Document Conformance: Snapshot

CFO Act Agencies



- Between Oct 2019 and Apr 2020 the number of PDF documents, among the “top 10 internet downloads”*, increased as did the number of non-conformant PDFs documents
- In April 2020, among the possible 240 “top 10 downloads” from the 24 CFO Act agencies, 192 (80%) were PDF documents
- Among those 192 PDF documents, 40 (21%) were found to be conformant.
- Of the remaining 152 (79%) PDFs
 - 113 (74%) were found to contain at least one issue; creating a possible barrier access
 - 39 (26%) of the PDF documents were untagged; preventing access by individuals using text-to-speech and other assistive technologies

*Snapshot comparison of CFO Act agency PDF documents conformance (among “Top 10 Downloads”) between October 23, 2019 and March 31, 2020. Data obtained from publicly available [Digital Analytics Program \(DAP\)](#). Testing followed CIOC ACOP AED COP guides.

Webpage Conformance: Summary

Government-wide

- Agency-specific web page testing data highlights inconsistent testing, poor quality controls, change management, and publishing procedures. This has resulted in:
 - Agencies testing 9% of pages available on their public-facing Internet websites
 - 1/3 of web pages tested being non-conformant
 - 2/3 of top PDF documents downloads contain one or more accessibility issue
- Internet pages have a significantly higher testing and conformance rate than Intranet pages;
 - Internet pages represent 83% of the total number of web pages tested; with a conformance rate of 74%
 - Intranet pages represent 17% of the total number of web pages tested; with a conformance rate of 26%
 - 5 CFO Act agencies (21%) are not testing Intranet pages
 - 2 CFO Act agencies (8%) are not testing either Internet or Intranet pages

Program Support Staff

Summary

- Based on the self-reported metrics, CFO Act agency Section 508 Programs continue to experience volatility in staffing - impacting the ability to operate an effective program
 - 1 agency reported an increase in staff by 20 people in total
 - 8 other agencies reported an increase in staff by 22 people in total
 - 5 agencies reported a decreased in staff by 21 people in total
- Section 508 Program staffing levels do not appear to be commensurate with agency size and mission. The erratic pattern of web page and document non-conformance across agencies may suggest an inadequacy in planning, resourcing and measuring
 - 1 agency reported 154 employees dedicated to their Section 508 Program (22% of all Section 508 staff reported)
 - 12 smallest agencies reported 54 employees dedicated to their Section 508 Program (8% of all Section 508 staff reported, average of 4.5 staff per agency)
 - 6 smallest agencies reported 14 employees dedicated to their Section 508 Program (2% of all Section 508 staff reported, average of 2.3 staff per agency)

Recommendations

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Assess, Educate, Implement and Measure



- Assess your Section 508 Program Maturity - Guidance available from the link: [Technology Accessibility Playbook » Play 2](#)
- Assess and right-size staff dedicated to support Section 508 Program activities in order to sufficiently train your workforce for their individual conformance responsibilities - see: [Technology Accessibility Playbook » Play 5](#)



- Require Section 508 awareness training for all employees and contractors during staff onboarding, and annually
- Identify and train all individuals responsible for ensuring the accessibility of applications in the technology portfolio and publication of electronic content
- Increase the cadre of certified testers within programs and teams

Recommendations (Continued)

Assess, Educate, Implement and Measure



- Require Section 508 language be included in all IT acquisitions
 - Use the [Accessibility Requirements Tool](#) (ART) to create solicitation language
 - Use the [Solicitations Review Tool](#) (SRT) to monitor your solicitations for language
- Implement an agency-wide testing process for consistent, actionable results
- Increase testing across websites, software, documents, multimedia and other ICT
- Require test results in decision making/change management procedures



- Identify and track how many webpages are published on each of your websites
- Identify and record conformance metrics for webpages and other ICT testing
- Identify and record conformance metrics for documents and other published media
- CIO/CAO should be frequently briefed on accessibility performance metrics

Online Resources

Section508.gov

1. [Executive Guide to Federal IT Accessibility](#)
2. [Technology Accessibility Playbook](#)
3. [Accessibility Training](#)
4. [Buy & Sell Accessible Products and Services](#)
5. [Accessibility Requirements Tool \(ART\)](#)
6. [Create Accessible Digital Products](#)
 - a. [Documents](#)
 - b. [PDFs](#)
 - c. [Presentations](#)
 - d. [Software and Websites](#)
 - e. [Spreadsheets](#)
 - f. [Video, Audio, and Social Media](#)
7. [GSA Office of Government-wide Policy IT Accessibility Program](#)
Available to provide technical assistance to individual Executive Branch agencies (Email)

Appendix

Appendix A: Self-Reporting Results for CFO Act Agencies

Agency Initial	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	Total # Employee	# Internet Conformant	# Intranet Conformant
DHS	\$7.3B	18.00	32.00	Resourced	Resourced	Resourced	Planned	Resourced	95,309	66.84	0.0	0.00	50	63,704.54	0.00
DOC	\$3.7B	10.00	4.00	Resourced	Planned	Planned	Measured	Planned	100	95.00	100	92.00	14	95.00	92.00
DOD	\$37.0B	42.00	42.00	Resourced	Resourced	Resourced	Measured	Resourced	49,661	63.00	6,372	86.00	84	31,286.43	5479.92
DOE	\$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	98,322	75.00	9,843	73.00	2	73,741.50	7185.39
DOI	\$1.4B	8.00	1.00	Resourced	Planned	Measured	Measured	Measured	501,443	94.00	4,882	88.00	9	471,356.42	4296.16
DOJ	\$3.1B	20.00	11.00	Resourced	Resourced	Resourced	Resourced	Ad Hoc	141	100.00	172	25.00	31	141.00	43.00
DOL	\$779M	59.00	33.00	Measured	Measured	Measured	Measured	Measured	22,744	48.00	2,000	23.00	92	10,917.12	460.00
DOT	\$3.6B	22.00	2.00	Resourced	Resourced	Resourced	Resourced	Resourced	452,750	80.00	22,000	67.00	24	362,200.00	14740.00
ED	\$844M	4.00	5.00	Measured	Measured	Measured	Resourced	Resourced	9	100.00	30	97.00	9	9.00	29.10
EPA	\$370M	3.00	0.00	Ad Hoc	Ad Hoc	Ad Hoc	Planned	Ad Hoc	-	0.00	-	0.00	3	-	0.00
GSA	\$729M	4.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	20,275	97.40	9,558	87.28	4	19,747.85	8342.22
HHS	\$6.6B	100.00	54.00	Resourced	Resourced	Measured	Planned	Resourced	-	0.00	-	0.00	154	-	0.00
HUD	\$437M	3.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	100	97.00	65	90.00	4	97.00	58.50
NASA	\$2.3B	10.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	851	55.50	1,981	59.80	13	472.31	1184.64
NRC	\$163M	1.00	0.00	Resourced	Planned	Planned	Measured	Planned	5	0.00	10	0.00	1	-	0.00
NSF	\$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	73.00	-	0.00	3	18.25	0.00
OPM	\$147M	5.00	5.00	Planned	Ad Hoc	Planned	Planned	Planned	2,245	97.00	50	100.00	10	2,177.65	50.00
SBA	\$117M	1.00	1.00	Ad Hoc	Planned	Planned	Measured	Ad Hoc	935	30.00	10	20.00	2	280.50	2.00
SSA	\$2.0B	31.00	9.00	Measured	Resourced	Resourced	Measured	Resourced	25,009	99.00	49,054	88.00	40	24,758.91	43167.52
State	\$2.4B	2.00	1.00	Measured	Planned	Planned	Measured	Planned	12	100.00	12	100.00	3	12.00	12.00
Treasury	\$4.8B	21.00	12.00	Resourced	Resourced	Resourced	Resourced	Resourced	11,826	94.00	3,131	61.00	33	11,116.44	1909.91
USAID	\$217M	3.00	1.00	Resourced	Resourced	Resourced	Resourced	Planned	48	47.00	0	0.00	4	22.56	0.00
USDA	\$2.4B	31.00	6.00	Resourced	Resourced	Resourced	Planned	Resourced	249,087	75.00	6,258	52.00	37	186,815.25	3254.16
VA	\$6.1B	25.00	39.00	Planned	Measured	Measured	Measured	Measured	178,465	0.00	232,280	0.00	64	-	0.00
EEOC	-	1.00	1.00	Resourced	Measured	Measured	Resourced	Resourced	25	99.00	25	98.00	2	24.75	24.50
FCC	-	1.00	6.00	Resourced	Resourced	Resourced	Resourced	Resourced	-	0.00	-	0.00	7	-	0.00
FDIC	-	1.00	3.00	Planned	Resourced	Measured	Measured	Measured	40	94.00	40	93.00	4	37.60	37.20
NARA	-	1.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	10	100.00	10	100.00	1	10.00	10.00
NCUA	-	1.00	1.00	Resourced	Resourced	Measured	Resourced	Measured	6,324	96.00	635	12.00	2	6,071.04	76.20
SEC	-	2.00	4.00	Resourced	Measured	Measured	Planned	Resourced	8	93.75	28	93.42	6	7.50	26.16
USAB	-	1.00	0.00	Resourced	Planned	Planned	Ad Hoc	Resourced	50	99.00	10	100.00	1	49.50	10.00
USITC	-	2.00	0.00	Resourced	Resourced	Measured	Resourced	Resourced	3,948	96.00	185	70.00	2	3,790.08	129.50

Appendix B: Reporting Results for CFO Act Agencies

Reporting Category	Acquisition	Agency ICT (E&IT) Lifecycle Activities	Complaints Process	Testing and Validation	Training
# of Agencies Reporting 1-Ad Hoc AUG 2019	1	2	1	1	2
# of Agencies Reporting 1-Ad Hoc FEB 2020	1	1	0	1	3
# of Agencies Reporting 1-Ad Hoc AUG 2020	2	2	1	2	5
# of Agencies Reporting 2-Planned AUG 2019	3	6	4	5	8
# of Agencies Reporting 2-Planned FEB 2020	4	8	4	5	8
# of Agencies Reporting 2-Planned AUG 2020	3	8	6	6	6
# of Agencies Reporting 3-Resourced AUG 2019	16	13	9	11	11
# of Agencies Reporting 3-Resourced FEB 2020	16	14	8	13	12
# of Agencies Reporting 3-Resourced AUG 2020	23	17	13	12	16
# of Agencies Reporting 4-Measured AUG 2019	3	2	9	6	4
# of Agencies Reporting 4-Measured FEB 2020	3	1	12	5	3
# of Agencies Reporting 4-Measured AUG 2020	4	5	12	12	5

Program Maturity Metrics

- **Acquisition:** Review procurement solicitations to ensure Section 508 contract language is incorporated into Statements of Work and Performance Work Statements.
- **Technology Lifecycle Activities:** Ensure 508 requirements are incorporated into technology lifecycle activities, including enterprise architecture, design, development, 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 Levels

- **Ad Hoc:** No formal policies, processes, or procedures defined.
- **Planned:** Policies, processes, and 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: Conformance of Self-reported Internet and Intranet Webpages Tested over 8 Reporting Cycles for CFO Act Agencies

Test Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020
Internet Tested	1,731,362	3,648,457	6,303,666	4,267,616	4,368,426	1,682,127	1,872,339	1,709,362
Internet Conformant	1,171,947	3,245,807	4,965,901	3,280,361	3,847,427	933,486	1,202,547	1,258,970
Internet Non-conformant	559,415	402,650	1,337,765	987,255	520,999	748,641	669,792	450,392
Intranet Tested	617,551	379,895	1,121,369	54,536	126,760	131,395	258,363	347,808
Intranet Conformant	135,480	62,539	434,483	39,742	107,866	97,915	64,686	90,307
Intranet Non-conformant	482,071	317,356	686,886	14,794	18,894	33,480	193,677	257,501
# Total Tested	2,348,913	4,028,352	7,425,035	4,322,152	4,495,186	1,813,522	2,130,702	2,057,170
# Total C	1,307,426	3,308,346	5,400,385	3,320,103	3,955,293	1,031,401	1,267,233	1,349,276
# Total NC	1,041,487	720,006	2,024,650	1,002,049	539,893	782,121	863,469	707,894
% Total C	56%	82%	73%	77%	88%	57%	59%	66%
% Total NC	44%	18%	27%	23%	12%	43%	41%	34%

Appendix D: Number of Self-reported Accessibility Program Staff over 8 Reporting Cycles - CFO Act Agencies

Staff Type	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020
Federal Employees	252	279	467	388	346	350	391	426
Contractor Employees	107	138	261	238	236	238	278	264
Total Program Staff	358	417	728	625	582	588	669	690
Average Program Staff	14.93	17.38	30.33	26.05	24.25	24.50	27.88	29

Appendix E: Number of Webpages Visited by Agency (Mar 01, 2020 – Aug 31, 2020)

Agency	Number of Internet Pages Visited Between Mar 01, 2020 - Aug 31, 2020 (DAP)	Reported Number of Webpages Tested by Agency	Percentage of Webpages Tested
DHS	996,841.00	95,309.00	9.56%
DOC	996,725.00	100.00	0.01%
DOD	999,270.00	49,661.00	4.97%
DOE	999,363.00	98,322.00	9.84%
DOI	997,126.00	501,443.00	50.29%
DOJ	786,764.00	141.00	0.02%
DOL	839,612.00	22,744.00	2.71%
DOT	999,218.00	452,750.00	45.31%
ED	701,017.00	9.00	0.00%
EPA	999,878.00	-	0.00%
GSA	998,313.00	20,275.00	2.03%
HHS	777,080.00	-	0.00%
HUD	85,207.00	100.00	0.12%
NASA	995,550.00	851.00	0.09%
NRC	43,521.00	5.00	0.01%
NSF	342,031.00	25.00	0.01%
OPM	999,942.00	2,245.00	0.22%
SBA	999,939.00	935.00	0.09%
SSA	216,924.00	25,009.00	11.53%
State	999,551.00	12.00	0.00%
Treasury	993,286.00	11,826.00	1.19%
USAID	161,930.00	48.00	0.03%
USDA	996,617.00	249,087.00	24.99%
VA	998,564.00	178,465.00	17.87%
EEOC	67,431.00	25.00	0.04%
FCC	-	-	0.00%
FDIC	122.00	40.00	32.79%
NARA	991,193.00	10.00	0.00%
NCUA	-	6,324.00	0.00%
SEC	999,065.00	8.00	0.00%
USAB	4,913.00	50.00	1.02%
USITC	12,649.00	3,948.00	31.21%
Total of All Reporting Agencies	20,999,642.00	1,719,767.00	8.19%