



Spring 2020 Section 508 Program Maturity Report

Executive Summary

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On August 7, 1998, the Rehabilitation Act Amendments of 1998 strengthened Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d) which requires access to electronic and information technology provided by the Federal government to employees and the public



On January 24, 2013, The OMB Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act (OMB Strategic Plan) requires that Executive Branch agencies assess and self-report biannually on the maturity of their Section 508 Programs



On January 18, 2017, the Access Board published a final rule that jointly updates requirements for information and communication technology covered by Section 508 of the Rehabilitation Act and Section 255 of the Communication Act.



On December 20, 2018, Congress passed the 21st Century Integrated Digital Experience Act (21st Century IDEA), which reasserts the requirement for agencies to ensure that websites, forms, signatures and digital services are accessible to individuals with disabilities in accordance with the Revised Section 508 Standards for Information and Communications Technology (ICT)



In 2020, the disparity between the number of staff dedicated to support a Section 508 Program and webpage conformance may suggest an inadequacy in planning, resourcing and/or measuring, and that agencies are over-estimating program maturity

Executive Summary

Disability in America



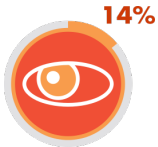
Roughly

1 out of **5**

Americans has some kind of disability

That's **68**
million
people!

What types of disabilities are included in this number?



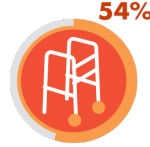
Blind or
limited vision



Deaf or Hard of
Hearing

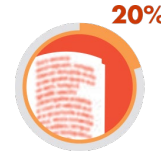


Limited reach,
strength,
manipulation

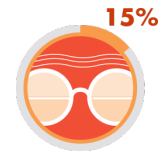


Limited
mobility

Who else needs digital accessibility?



People with
learning
disabilities



Senior citizens

Overview



The Section 508 Program Maturity Report asks Executive Branch agencies to 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



Out of the four maturity levels (*ad hoc*, *planned*, *resourced*, or *measured*) CFO Act agencies generally continue to assess their overall Section 508 program maturity as “planned” or “resourced” (See Appendix B for definitions of terms)



Only two reporting agencies (6%) consider themselves *measured* in three or more of the five categories (*acquisition*, *lifecycle activities*, *complaints*, *testing/validation*, and *training*)



Data trend lines over the past seven reporting cycles along with data from GSA’s Digital Dashboard, indicate that work must still be done by agencies to meet the goals of the OMB Strategic Plan



In total, 32 Executive Branch agencies, including all 24 CFO Act agencies, submitted data for this February 2020 report (Appendix A)

Program Maturity

Self-Reported Results for CFO Act Agencies

Reporting Category	Agencies Reporting 1-Ad Hoc			Agencies Reporting 2-Planned			Agencies Reporting 3-Resourced			Agencies Reporting 4-Measured		
Reporting Period	Feb 2019	Aug 2019	Feb 2020	Feb 2019	Aug 2019	Feb 2020	Feb 2019	Aug 2019	Feb 2020	Feb 2019	Aug 2019	Feb 2020
Acquisition	1	1	1	8	3	4	13	16	16	2	3	3
Agency ICT (E&IT) Lifecycle Activities	3	2	1	5	6	8	13	13	14	3	2	1
Compliance Process	1	1	0	5	4	4	6	9	8	12	9	12
Testing and Validation	1	1	1	6	5	5	12	11	13	5	6	5
Training	1	1	1	8	8	8	11	11	12	4	3	3

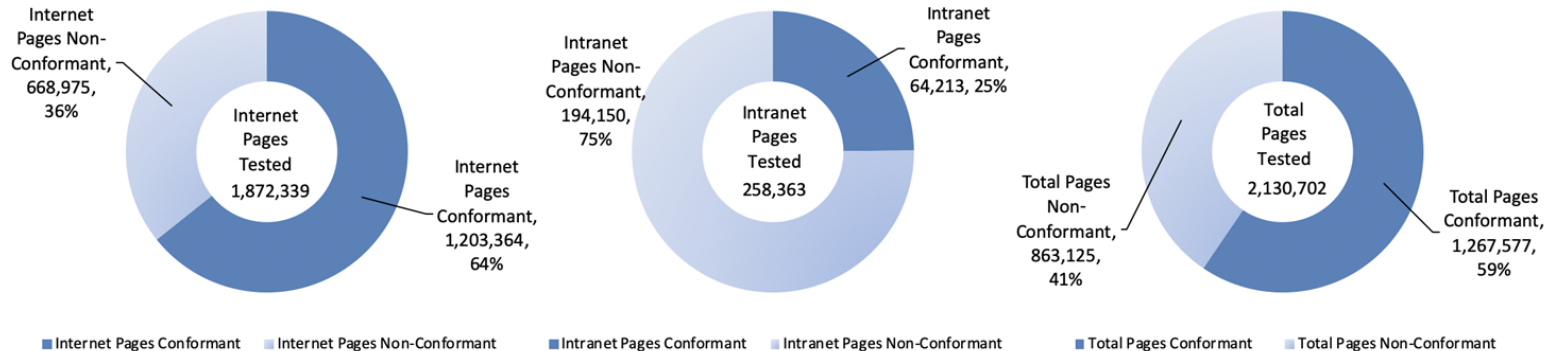
- Agency Maturity remains largely unchanged from prior reporting periods
- 20 years since the release of the standards and some agencies are still unplanned and unresourced
- Measured Compliance Processes may be due to the record keeping of agency Civil Rights offices rather than the Section 508 Program

(See Appendix B for definition of terms)

Webpage Conformance: Snapshot

Self-Reported Results for CFO Act Agencies

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

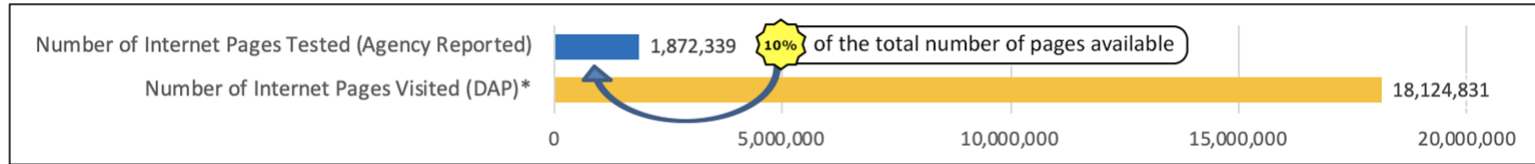


Risks as reported:

- Agencies are testing over 70% fewer pages since Feb 2018 (7,425,035 vs 2,130,702)
- The percentage of conformant total webpages has decreased by 9% since Aug 2019
- The percentage of conformant Intranet pages is 25% compared to 75% in Aug 2019
- Overall, CFO Act agencies web conformance is on a downward trend

Web Pages Tested vs Number of Pages

RISK: Only 10% of CFO Act Internet Pages Tested for Conformance



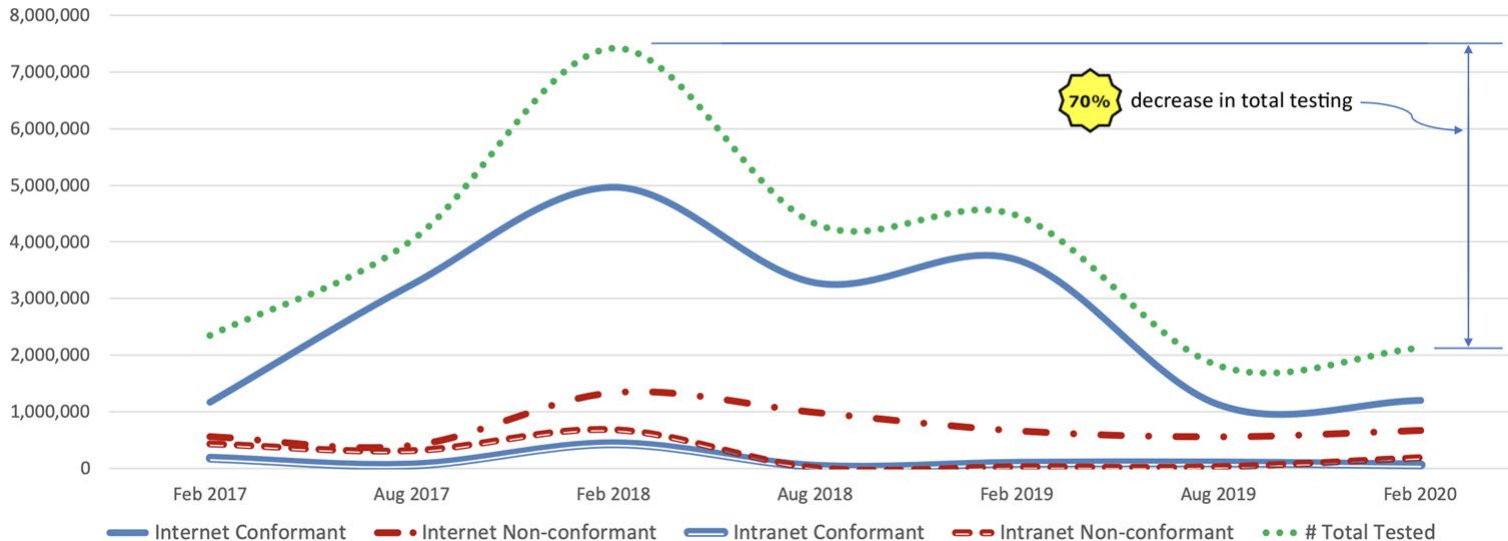
*Number of pages visited between Sep 01, 2019 through Feb 29, 2020 available from the [Digital Analytics Program](#) (Appendix E)

- On average, agencies are testing **10%** of the pages available on their public-facing Internet websites (Number of Intranet pages is not available)
- Testing sample sizes may be insufficient to ensure conformance of webpages
- The reported number of pages tested could include repeated tests of a given webpage(s), and thus the actual number of unique pages tested could be lower

Webpage Conformance: Trend Line

CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested over 7 Reporting Cycles
CFO Act Agencies | Feb 2017 - Feb 2020



NOTE: Standardized, agency-wide testing procedures should be in place and used by all development teams when evaluating webpages for conformance. This consistent data will create trend lines which can be used to identify gaps in Section 508 Program maturity, development, or content creator testing. See link: [Technology Accessibility Playbook » Play 10](#)

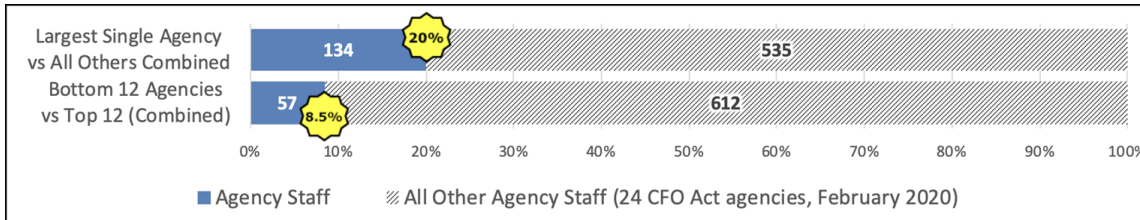
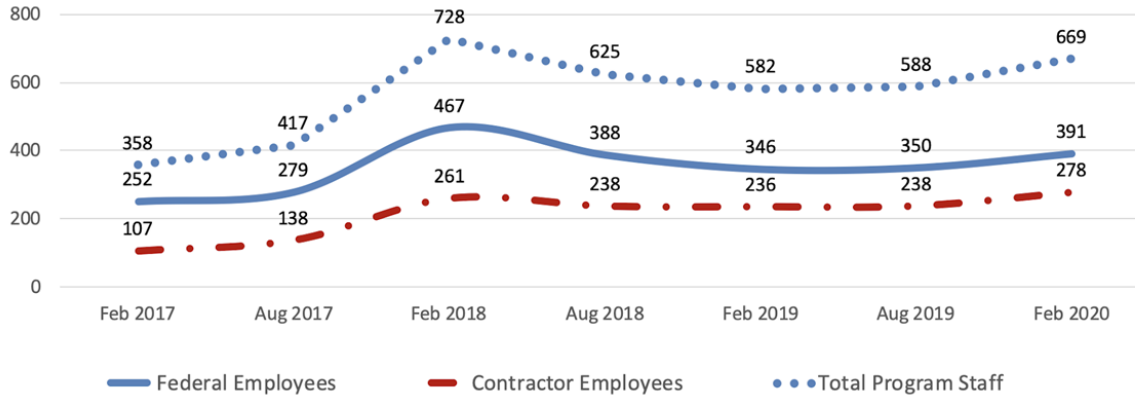
Webpage Conformance: Summary

Government-wide

- Agency-specific webpage testing trend lines may highlight inconsistent testing, poor quality controls, change management or publishing procedures
- Testing practices are often impacted as agencies experience change in general awareness, training, staffing, expertise, tools, policy and enforcement
- Internet pages have a significantly higher testing and conformance rate than Intranet pages; representing 88% of the total number of webpages tested
- Intranet pages are not being tested by 30% of CFO Act agencies

Section 508 Program Staff

Number of Self-reported Accessibility Program Staff over 7 Reporting Cycles
CFO Act Agencies | Feb 2017 - Feb 2020 Program Maturity Report



Less Than 1/10th
On average, the top 12 CFO Act agencies (by staff count) have over **11 times** the number of staff per agency Section 508 Program as do the bottom 12 agencies

Note: Some agencies have been using broader criteria for determining individuals considered as “supporting the Section 508 Program” and therefore this number is higher than actual Section 508 Program staff.

Program Support Staff

Summary

- Based on the self-reported metrics, CFO Act agency Section 508 Programs saw an overall increase of 41 Federal employees and 40 Contractors between August 2019 and February 2020
- The disparity between the number of staff dedicated to support a Section 508 Program and webpage conformance may suggest an inadequacy in planning, resourcing and/or measuring
- Section 508 Program staffing levels must be tailored to agency size and mission, yet sufficient resources and tools must be in place to ensure awareness and training to maintain a workforce properly trained for their individual responsibilities - see link: [Technology Accessibility Playbook » Play 5](#)

Recommendations

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 conformance responsibilities



- Require annual §508 awareness training for all employees and contractors
- 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 §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, media 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
- Periodically brief agency CIO/CAO 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 \(Email\)](#)

Appendix

Appendix A: Self-Reporting Results for CFO Act Agencies

Agency	Annual IT Budget (from Dashboard)	Federal Employee	Contractor Employee	Acquisition	Lifecycle	Testing	Complaints Process	Training	# Internet Webpages Evaluated	% Internet Webpages Conformant	# Intranet Webpages Evaluated	% Intranet Webpages Conformant
DHS	\$7.3B	19.00	36.00	Resourced	Resourced	Resourced	Resourced	Resourced	97,322	66	0	0
DOC	\$3.7B	10.00	4.00	Resourced	Planned	Planned	Measured	Planned	20	92	40	85
DOD	\$37.0B	42.00	37.00	Resourced	Resourced	Resourced	Measured	Resourced	28,544	28	836	7
DOE	\$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	59,594	76	6,370	84
DOI	\$1.4B	8.00	1.00	Resourced	Planned	Measured	Measured	Measured	547,048	94	4,873	87
DOJ	\$3.1B	22.00	13.00	Resourced	Resourced	Resourced	Planned	Planned	142	99	144	33
DOL	\$779M	59.00	33.00	Planned	Planned	Planned	Planned	Planned	94,290	47	11,733	27
DOT	\$3.6B	13.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	362,600	75	22,000	58
ED	\$844M	4.00	4.00	Resourced	Planned	Measured	Resourced	Resourced	14	70	13	99
EPA	\$370M	3.00	3.00	Planned	Planned	Planned	Measured	Measured	0	0	0	0
GSA	\$729M	2.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	6,970	97	502	89
HHS	\$6.6B	81.00	53.00	Resourced	Resourced	Resourced	Resourced	Resourced	0	0	0	0
HUD	\$437M	3.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	100	96	65	90
NASA	\$2.3B	10.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	903	47	2,045	55
NRC	\$163M	1.00	0.00	Resourced	Planned	Planned	Measured	Planned	5	0	5	0
NSF	\$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	92	0	0
OPM	\$147M	6.00	12.00	Planned	Ad Hoc	Planned	Planned	Planned	1,564	99	540	100
SBA	\$117M	1.00	1.00	Ad Hoc	Planned	Ad Hoc	Measured	Planned	2,283	44	0	0
SSA	\$2.0B	31.00	8.00	Measured	Resourced	Resourced	Measured	Resourced	24,843	99	42,323	71
State	\$2.4B	2.00	2.00	Measured	Resourced	Resourced	Measured	Planned	24	100	0	0
Treasury	\$4.8B	21.00	11.00	Resourced	Resourced	Resourced	Measured	Resourced	11,878	89	3,058	58
USAID	\$217M	2.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	1,229	66	0	0
USDA	\$2.4B	23.00	13.00	Measured	Resourced	Resourced	Planned	Resourced	269,578	76	7,605	66
VA	\$6.1B	25.00	39.00	Planned	Measured	Measured	Measured	Measured	363,363	1	156,211	0
CNS	-	1.00	0.00	Planned	Planned	Ad Hoc	Ad Hoc	Resourced	0	0	0	0
EEOC	-	1.00	1.00	Resources	Measured	Measured	Resourced	Resourced	25	99	25	98
FDIC	-	1.00	2.00	Planned	Resourced	Resourced	Measured	Resourced	53	79	53	83
NARA	-	2.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	20	97	20	95
NCUA	-	1.00	1.00	Resourced	Resourced	Measured	Resourced	Measured	6,084	95	2,330	12
SEC	-	1.00	0.00	Resourced	Measured	Measured	Ad Hoc	Resourced	1,246	100	618	100
USAB	-	1.00	0.00	Resourced	Resourced	Resourced	Planned	Resourced	1,546	100	7	100
USITC	-	1.00	0.00	Planned	Planned	Planned	Resourced	Resourced	4,804	100	195	79

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 Feb 2019	1	3	1	1	1
# 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 2-Planned Feb 2019	8	5	5	6	8
# 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 3-Resourced Feb 2019	13	13	6	12	11
# 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 4-Measured Feb 2019	2	3	12	5	4
# of Agencies Reporting 4-Measured Aug 2019	3	2	9	6	4
# of Agencies Reporting 4-Measured Feb 2020	3	1	12	5	3

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 7 Reporting Cycles for CFO Act Agencies

Test Type	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020
Internet Tested	1,731,362	3,648,457	6,303,666	4,267,616	4,344,926	1,682,127	1,872,339
Internet Conformant	1,171,947	3,245,806	4,965,901	3,280,360	3,684,278	1,127,516	1,203,364
Internet Non-conformant	559,415	402,651	1,337,765	987,256	660,648	554,611	668,975
Intranet Tested	617,551	379,895	1,121,369	54,536	124,760	131,395	258,363
Intranet Conformant	181,671	62,538	434,483	39,742	92,791	97,891	64,213
Intranet Non-conformant	435,880	317,357	686,886	14,794	31,969	33,504	194,150
# Total Tested	2,348,913	4,028,352	7,425,035	4,322,152	4,469,686	1,813,522	2,130,702
# Total C	1,353,618	3,308,344	5,400,384	3,320,102	3,777,069	1,225,407	1,267,577
# Total NC	995,295	720,008	2,024,651	1,002,050	692,617	588,115	863,125
% Total C	58%	82%	73%	77%	85%	68%	59%
% Total NC	42%	18%	27%	23%	15%	32%	41%

Appendix D: Number of Self-reported Accessibility Program Staff over 7 Reporting Cycles - CFO Act Agencies

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

Appendix E: Number of Webpages Visited by Agency (Sep 01, 2019 - Feb 29, 2020)

Agency	Number of Internet Pages Visited Between Sep 01, 2019 - Feb 29, 2020 (DAP)	Reported Number of Webpages Tested by Agency	Percentage of Webpages Tested
DHS	998,205	97,322	9.75%
DOC	996,643	20	0.00%
DOD	999,036	28,544	2.86%
DOE	999,264	59,594	5.96%
DOI	997,351	547,048	54.85%
DOJ	710,868	142	0.02%
DOL	834,321	94,290	11.30%
DOT	999,138	362,600	36.29%
ED	539,739	14	0.00%
EPA	670,616	0	0.00%
GSA	997,392	6,970	0.70%
HHS	651,452	0	0.00%
HUD	72,328	100	0.14%
NASA	994,708	903	0.09%
NRC	39,372	5	0.01%
NSF	436,256	25	0.01%
OPM	999,947	1,564	0.16%
SBA	838,655	2,283	0.27%
SSA	195,282	24,843	12.72%
State	999,462	24	0.00%
Treasury	995,948	11,878	1.19%
USAID	163,641	1,229	0.75%
USDA	996,647	269,578	27.05%
VA	998,560	363,363	36.39%
CNS	N/A	0	N/A
EEOC	N/A	25	N/A
FDIC	N/A	53	N/A
NARA	988,684	20	0.00%
NCUA	N/A	6,084	N/A
SEC	N/A	1,246	N/A
USAB	4,776	1,546	32.37%
USITC	11,908	4,804	40.34%
Total of All Reporting Agencies	19,130,199	1,886,117	9.86%