



# Autumn 2022 Section 508 Program Maturity Report

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## 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 federal agencies ensure equal access to electronic and information technology to employees and members of the public with disabilities
    - 2023 will be the **21st anniversary** of the Section 508 standards being enforceable
  - 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 IT accessibility
  - Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (2021)
  - Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government (2021)



The OMB Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act (Strategic Plan) requires that CFO Act agencies assess and report semi-annually on the maturity of their Section 508 Programs; small and independent agencies voluntarily participate



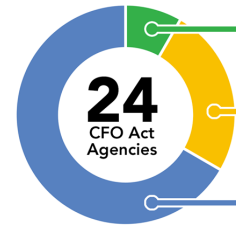
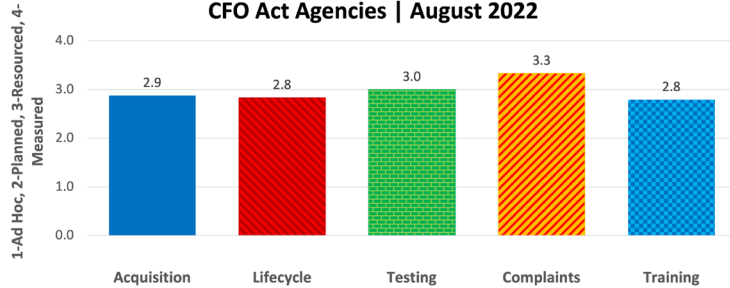
Semi-annually, Executive Branch agencies self-report on:

- the maturity level of their Section 508 Program across five performance metrics
- the number of Internet and Intranet websites that were tested for compliance
- the percentage of those websites tested which were found to be conformant
- the number of federal and contractor staff that directly supporting their Section 508 Program

# At-a-Glance: Measuring Maturity

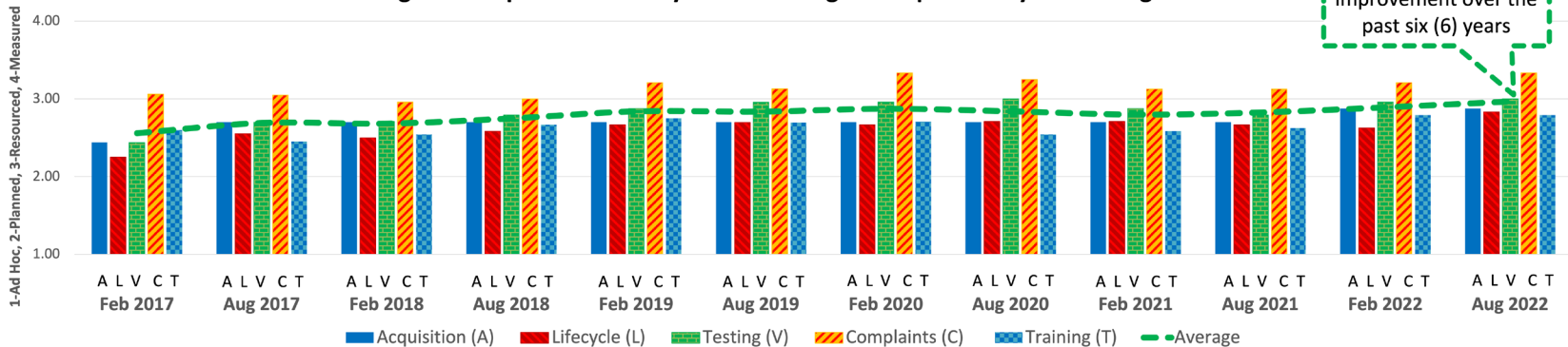
## Program Maturity of CFO Act Agencies

Average Self-Reported Program Maturity of CFO Act Agencies | August 2022



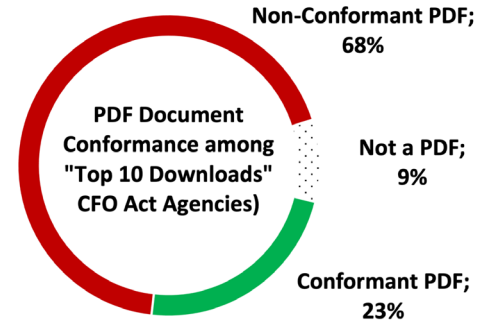
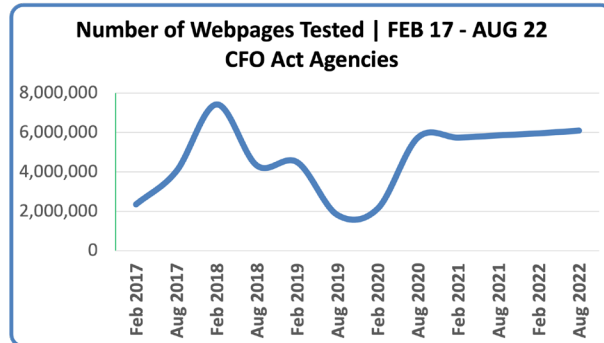
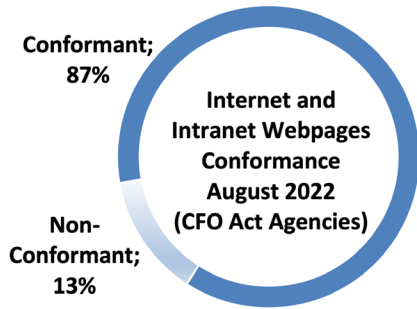
- 6** CFO Act agencies reported an increase in overall maturity
- 2** CFO Act agencies reported a decrease in overall maturity
- 16** CFO Act agencies reported no change in overall maturity

Average Self-Reported Maturity of CFO Act Agencies | February 2017 - August 2022

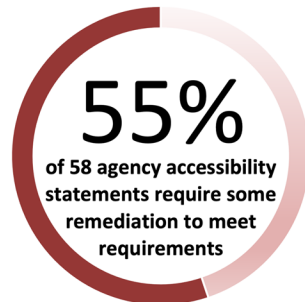


# At-a-Glance: Measuring Testing

## Web Conformance of CFO Act Agencies



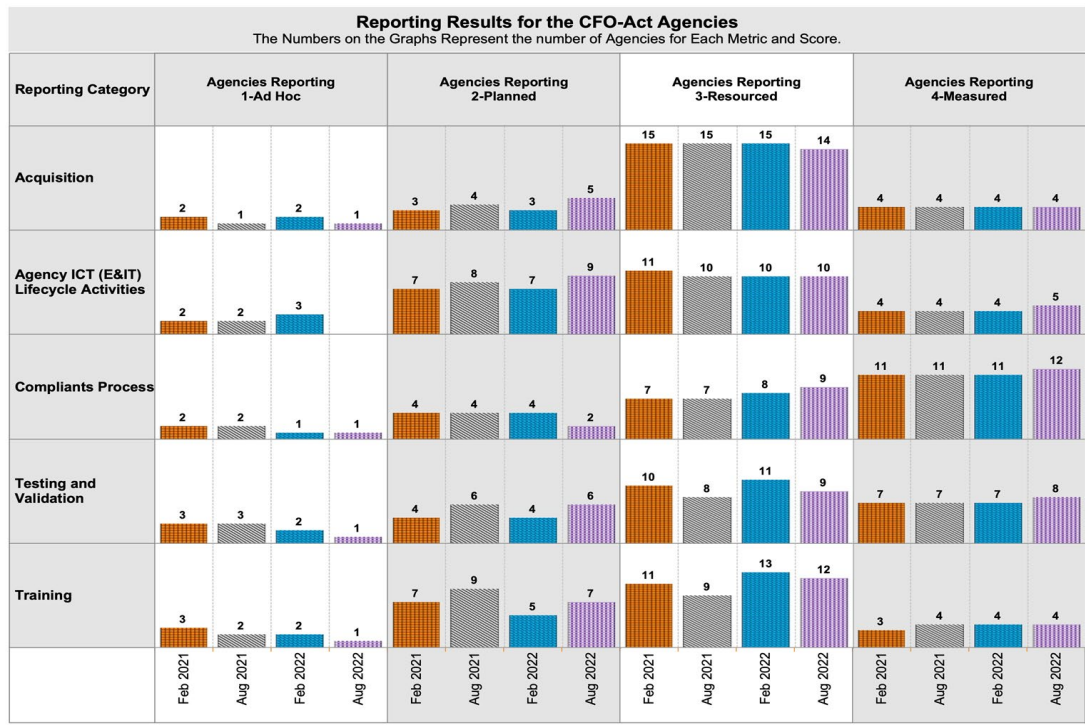
**Four (13%) agencies report that they are not testing Intranet (internal) webpages**



**1/4 of PDFs are Accessible** among top 10 downloaded files for CFO Act agencies

# Program Maturity

## Self-Reported Results for CFO Act Agencies



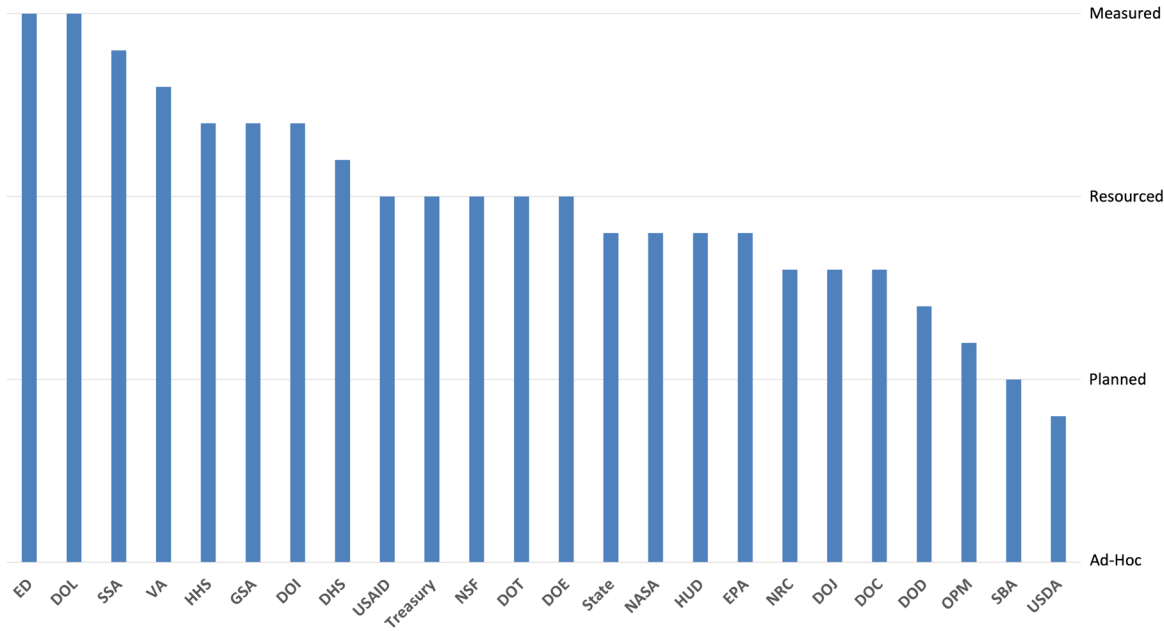
- Only 6 CFO Act agencies (25%) consider themselves 'Measured' in three or more of the five categories
- Only 2 CFO Act agencies (8%) consider themselves 'Measured' in all five maturity categories
- Agency maturity remains largely **unchanged** from prior reporting
- **21 years have passed** since the release of the standards and three agencies remain "Ad Hoc" within one or more reporting categories
- may reflect general complaint record keeping of agency Civil Rights offices rather than communication of process for filing Section 508 complaints and record keeping for such complaints

(See Appendix B for definition of terms)

# Program Maturity by Agency

## Accessibility Maturity After 21 Years of Enforcement

Average Section 508 Program Maturity Across the Five Reporting Categories  
CFO Act Agencies | August 2022

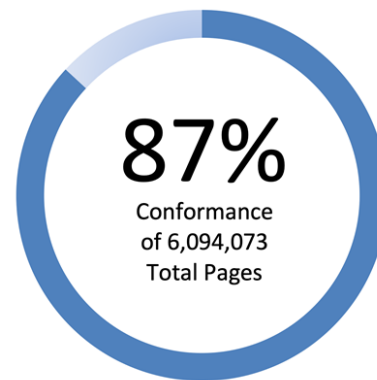
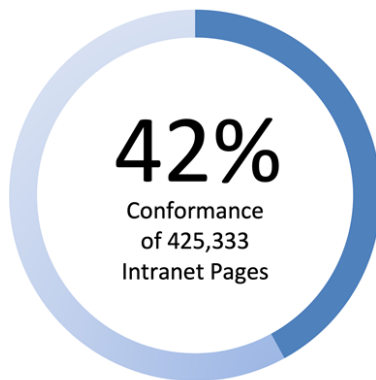
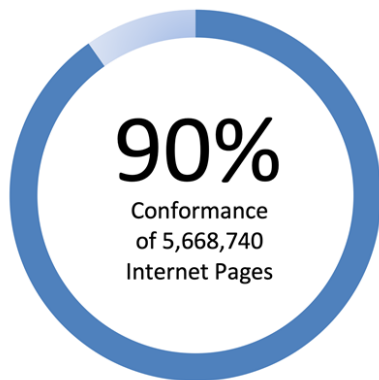


**16**  
of 24 agencies report  
a general lack of data  
necessary for  
decision making

# Webpage Conformance: Snapshot

## Self-Reported Results for CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested  
CFO Act Agencies | August 2022

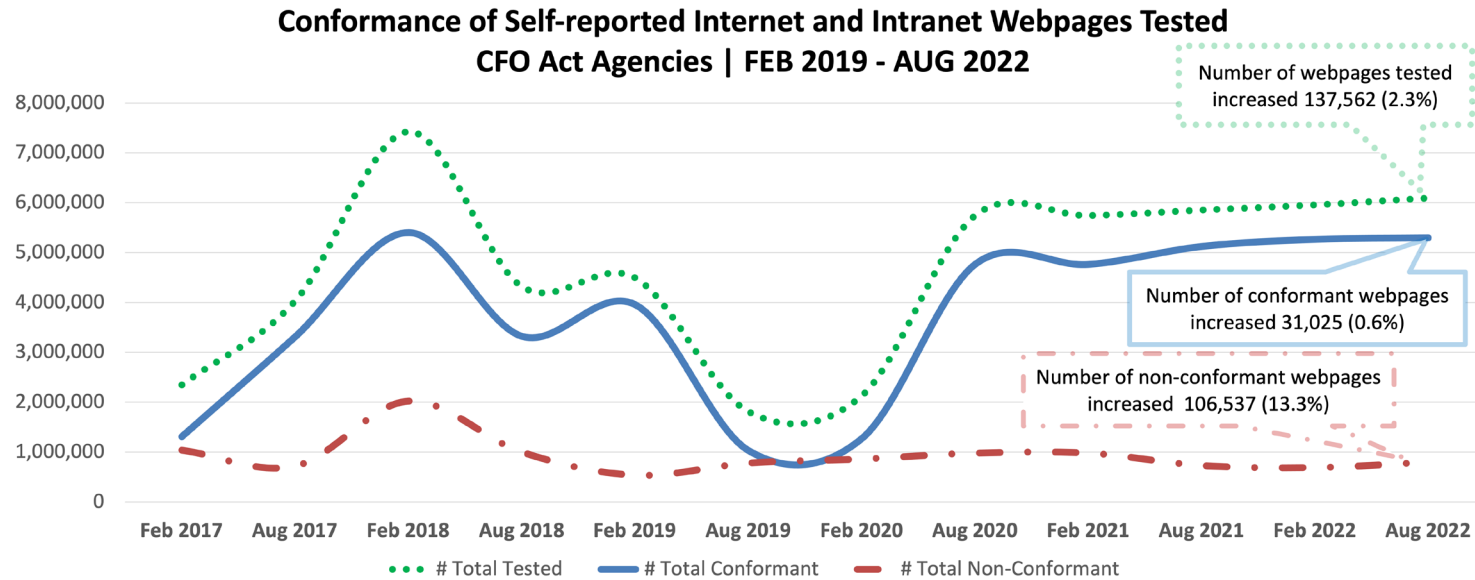


### Risks as reported:

- Agencies tested only 2.3% more Internet and Intranet pages since February 2022
- 3 CFO Act agencies (12.5%) are not testing Intranet pages
- Volatility of testing remains a barrier to accessible customer interactions and employee inclusion
- Data is not available to understand the testing sample size compared to the number of federal web pages

# Webpage Conformance: Trend Line

## CFO Act Agencies



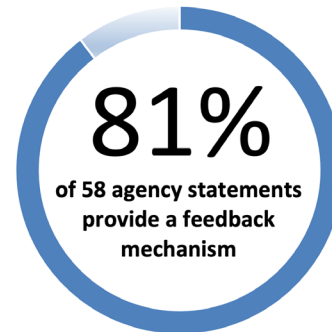
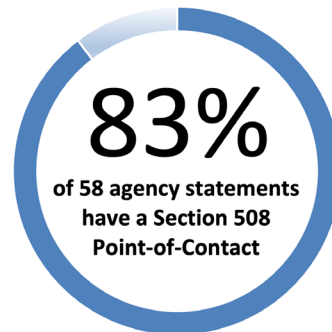
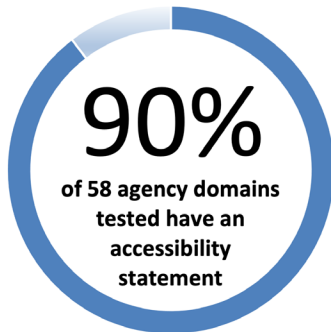
**NOTE:** Consolidated data in the above trend line suggest that agencies have tested more consistently and while maintaining a high level (87%) conformance over the last two years. However, this view of agency performance obscures differences in agency testing methodologies, test sample sizes and conformance rates when compared to viewing individual agency data.



# Webpage Accessibility Statements

## Increase Transparency

- In accordance with OMB's Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act, federal agencies must maintain an accessibility statement on all internet and intranet websites that includes contact information for the agency Section 508 program, date the page was last updated, and a way for visitors to provide feedback.
- Fifty-eight (58) federal domains were recently audited for conformance with the requirements
- 32 (55%) of the accessibility statements tested require remediation to meet requirements



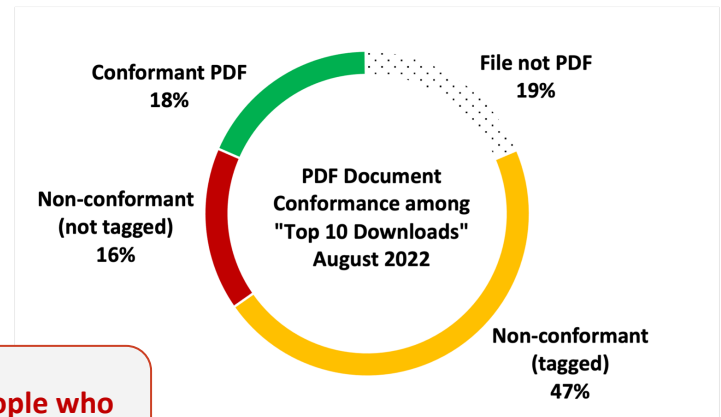
\* PDF document testing followed the CIO Council's Accessible Electronic Document Community of Practice (AED COP) guidance.

# PDF Document Conformance: Snapshot

## CFO Act Agencies

Based on Digital Analytics Program “Top Downloads Yesterday” data, PDF documents among the 10-most downloaded files were tested for conformance with the Revised Section 508 Standards.

- Among the “top 10 downloads,” 80% were PDFs
- Among the PDF documents, 34% were conformant
- Among the 66% non-conformant PDFs\*
  - 73% were found to contain at least one issue
  - 27% of the PDF documents were **untagged**

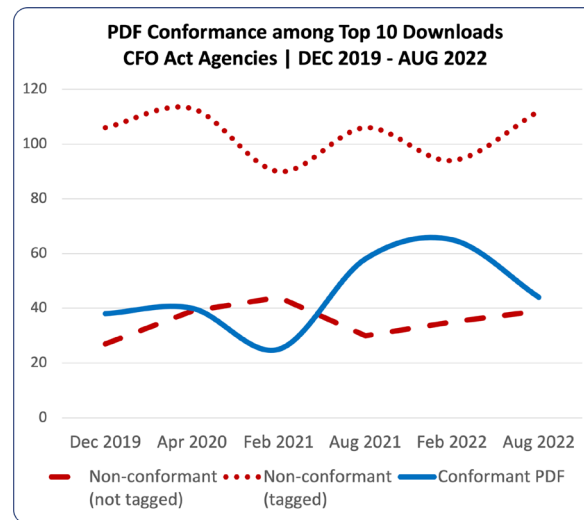
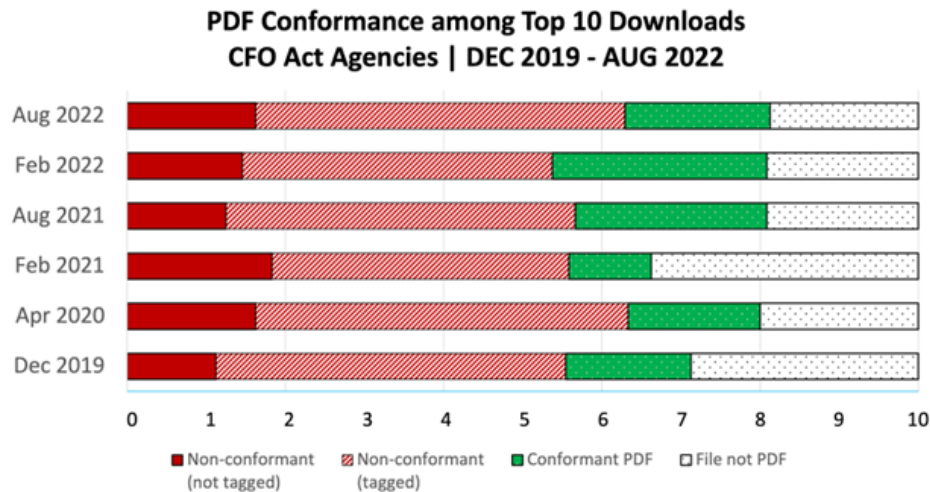


**“Untagged” PDF documents appear as blank images for people who rely on screen readers to access the written and visual information**

\* PDF document testing followed the CIO Council’s Accessible Electronic Document Community of Practice (AED COP) guidance.

# PDF Document Conformance: Trend Line

## CFO Act Agencies



- 63% of all documents among the “top downloads” contain one or more accessibility issue
- 77% of PDF documents downloaded contain one or more accessibility issue requiring remediation
- PDF documents are consistently non-conformant, with a high rate of untagged documents (27%)
- Volatility of PDF document conformance over time suggests poor policy and process controls

# Webpage Conformance: Summary

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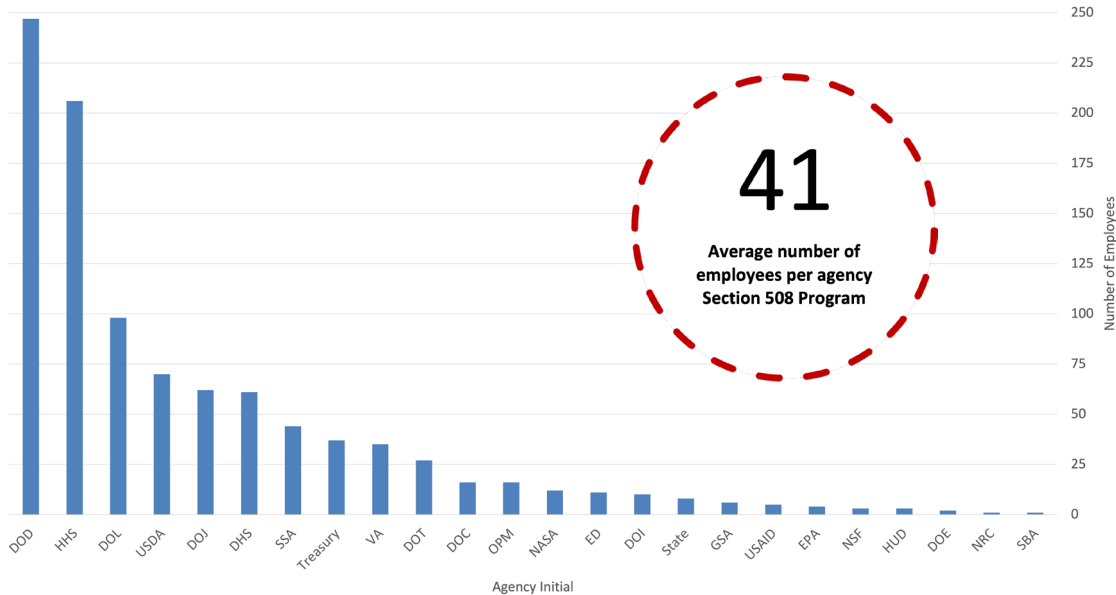
## CFO Act Agencies

- Government-wide web conformance data, when consolidated, may **distort actual performance** in meeting Section 508 requirements, e.g.:
  - While not verified, anecdotal information indicates that the majority of reported test results come from automated testing, which only reflects a small portion (25-30%) of the standards
  - 90% of Internet webpages tested are reported as conformant, but with the removal of only **one** agency's automated test results, conformance drops to 70%
  - 38% of CFO Act agencies tested 50,000 or more pages during the reporting period (6-mo)
  - 16% of CFO Act agencies tested 50 or fewer pages during the reporting period (6-mo)
  - Internet pages are tested at significantly higher rates than Intranet pages;
    - Internet pages are 94% of the total number of web pages tested
    - Intranet pages are 6% of the total number of web pages tested
    - 3 of 24 (12.5%) CFO Act agencies are **not testing** Intranet pages
- Current guidance does not stipulate testing methods nor sampling approaches, which decreases our confidence and ability to draw conclusions about government-wide accessibility performance

# Program Support Staff: Snapshot

## CFO Act Agencies

Number of Federal and Contract Employees Directly Supporting Section 508 Programs  
CFO Act Agencies | August 2022



**25 New Program Managers**  
 29 PMs have departed since Sept 1  
 4-year average tenure of active PMs  
 1.7-year median tenure of active PMs



**24 Program Manager Vacancies**  
 1 Department-level vacancy 2.8 years  
 15 sub-agency vacancies > 1 year

# Program Support Staff: Summary

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## CFO Act Agencies

- Section 508 Program staffing levels may not be commensurate with agency size, mission and scope of accessibility-related work as illustrated by the variation in agency staff sizes, where a single CFO Act agency reports 247 FTEs and two agencies report 1 FTE, with a median of 14 FTE
- 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**
  - 6 agencies reported a decrease in program staff; 7 reported an increase; and 11 unchanged
  - 3 agencies report having no (0) contract staff; 6 report 1-2 (25%); and 1 reports 104
  - 1 agency reported an increase of program staff by 11 (42%) FTEs
- Section 508 Program Manager designation survey\* data from 157 respondents indicates that:
  - 44% have a grade-level equivalent of between GS-11 and GS-13 (56% as GS-14-15)
  - 25% have additional duties assigned, only committing an average of 8-hours per week towards agency-wide Section 508 Program activities
  - 30% are organizationally positioned outside of the Office of the Chief Information Officer

\*Survey initiated June 2021. Is requested of all Section 508 Program Managers when newly designated by Chief Information Officers as per OMB Strategic Plan; work status data not available for all active Program Managers.

# Standout Agencies from our Autumn Cycle

## *CFO Act Agency Kudos*

In recognition of the agencies who have made great strides in Section 508 conformance, we would like to recognize:

- Department of Labor and Department of Education for achieving 'Measured' in all five categories
- Department of Energy and Department of the Interior for the largest # increase in web pages tested
- Department of Housing and Urban Development for the largest % increase in web pages tested
- Office of Personnel Management and Department of Veterans Affairs for having the two highest PDF conformance rates among 'Top 10 Downloads'



# Recommendations



# Recommendations to Agencies

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## *Assess, Educate, Implement and Measure*



### Assess

- Ensure that the Section 508 Program Manager is in a position of authority sufficient to manage legal compliance risk on behalf of the agency - see [Technology Accessibility Playbook » Play 1](#)
- Assess your Section 508 Program's maturity - see [Technology Accessibility Playbook » Play 2](#)
- Verify that policy and procedure ensure that accessible information is the default output
- Establish a **goal of being Measured** in all 5 performance categories by Q1 FY2024 and develop a plan to achieve that goal
- Assess and right-size **staff designated** to support Section 508 Program activities and sufficiently train your workforce - see: [Technology Accessibility Playbook » Play 5](#)
- Evaluate all agency domains for accessibility statements that conform to requirements



### Measure

- Identify and track the number of pages published on all agency website domains to best understand the **scope of testing**, tools and resources needed to maintain conformance
- Revise guidance on testing web pages to improve consistency and standardization of both testing methodologies and sampling approaches
- Identify and record conformance metrics for web pages, documents and other ICT CIO/CAO should require **regular briefings** on accessibility performance metrics
- Incorporate accessibility into executive and key workforce annual **performance plans**

# Recommendations (Continued)

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## *Assess, Educate, Implement and Measure*



### Implement

- Include Section 508 requirements language in all ICT acquisitions
  - Use the [Accessibility Requirements Tool](#) (ART) to create solicitation language
  - Use the [Solicitations Review Tool](#) (SRT) to monitor solicitation language
- Require Accessibility Conformance Reports (ACR) for all ICT procurement
- Implement an agency-wide testing process for consistent, actionable results for all ICT
- Require **agency-wide web testing processes** align with the [ICT Testing Baseline](#)
- Require test results in decision making/change management and procurement reviews
- Implement controls that **prohibit** individuals from publishing or distributing inaccessible content



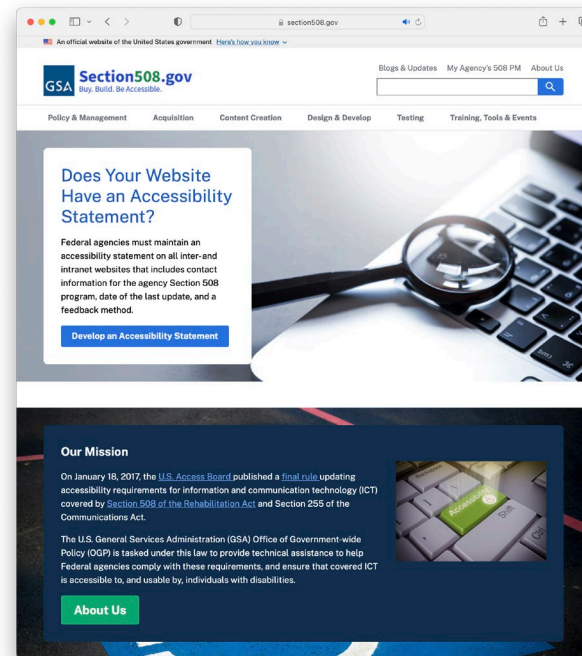
### Educate

- **Require** onboarding *and* annual Section 508 awareness training for employees and contractors
- Identify and **train all individuals** responsible for ensuring the accessibility of applications in the technology portfolio, and the publication of electronic content
- Increase the cadre of **certified testers** and subject matter experts within product teams
- Invest in workforce development through CIOC Accessibility Community of Practice (ACOP) supported conferences, webinars, training and collaboration
- Establish procedures for filing and processing of Section 508 complaints and clearly communicate those procedures internally and externally.

# Online Resources

## Section508.gov – One-stop source for Section 508

1. [Executive Guide to Federal IT Accessibility](#)
2. [Technology Accessibility Playbook](#)
3. [Accessibility Training](#)
4. [Buy & Sell Accessible Products and Services](#)
  - a. [Accessibility Requirements Tool \(ART\)](#)
  - b. [Solicitation Review Tool \(SRT\)](#)
5. [Create Accessible Digital Products](#)
  - a. [Documents](#)
  - b. [PDFs](#)
  - c. [Presentations](#)
  - d. [Software and Websites](#)
  - e. [Spreadsheets](#)
  - f. [Virtual and Hybrid Meetings](#)
  - g. [Video, Audio, and Social Media](#)
  - h. [Synchronized Media \(Multimedia\)](#)
6. [Developing a Website Accessibility Statement](#)
7. Contact the [GSA Government-wide Policy IT Accessibility Program](#) for technical assistance



# Appendix

## Appendix A: Self-Reporting Results for by Reporting Agency

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
CNS	-	4.00	3.00	Resourced	Planned	Planned	Resourced	Planned	1,067	37.0	-	0.0
DHS	\$7.3B	35.00	26.00	Resourced	Resourced	Resourced	Measured	Resourced	87,691	73.0	-	0.0
DOC	\$3.7B	10.00	6.00	Resourced	Planned	Planned	Resourced	Resourced	100	85.0	100	92.0
DOD	\$37.0B	143.00	104.00	Planned	Planned	Planned	Measured	Planned	56,159	93.0	7,879	86.0
DOE	\$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	3,564,508	99.0	28,392	56.0
DOI	\$1.4B	8.00	2.00	Resourced	Planned	Measured	Measured	Measured	791,321	85.0	4,972	88.0
DOJ	\$3.1B	28.00	34.00	Resourced	Resourced	Resourced	Planned	Planned	173	91.0	193	32.0
DOL	\$779M	62.00	36.00	Measured	Measured	Measured	Measured	Measured	53,798	50.5	16,017	31.2
DOT	\$3.6B	24.00	3.00	Resourced	Resourced	Resourced	Resourced	Resourced	711,652	74.8	122,607	84.2
ED	\$844M	4.00	7.00	Measured	Measured	Measured	Measured	Measured	47	83.0	41	100.0
EEOC	-	1.00	0.00	Measured	Measured	Measured	Resourced	Resourced	25	97.0	25	97.0
EPA	\$370M	3.00	1.00	Resourced	Resourced	Resourced	Resourced	Planned	91,381	73.0	-	0.0
FCC	-	1.00	6.00	Planned	Planned	Resourced	Planned	Resourced	10	75.0	-	0.0
FDIC	-	1.00	2.00	Resourced	Resourced	Measured	Measured	Measured	25	97.0	25	95.0
GSA	\$729M	6.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	30,048	81.2	4,557	82.9
HHS	\$6.6B	139.00	67.00	Measured	Measured	Measured	Planned	Resourced	98,861	90.0	1,430	71.0
HUD	\$437M	2.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	175	100.0	130	100.0
NARA	-	1.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	10	100.0	10	100.0
NASA	\$2.3B	9.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	735	62.0	1,996	63.0
NCUA	-	1.00	2.00	Measured	Measured	Measured	Measured	Measured	6,096	98.0	172	18.0
NRC	\$163M	1.00	0.00	Planned	Planned	Planned	Measured	Resourced	20	95.0	20	100.0
NSF	\$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	27	91.7	25	89.2
OPM	\$147M	6.00	10.00	Planned	Planned	Planned	Resourced	Planned	2,331	98.0	17	100.0
PBGC	-	9.00	0.00	Planned	Resourced	Planned	Measured	Measured	4,977	88.0	-	0.0
SBA	\$117M	1.00	0.00	Ad Hoc	Planned	Ad Hoc	Measured	Planned	3,914	64.0	-	0.0
SEC	-	1.00	4.00	Measured	Measured	Measured	Measured	Measured	8	93.4	29	94.1
SSA	\$2.0B	30.00	14.00	Measured	Measured	Measured	Measured	Resourced	9,498	100.0	44,069	71.0
State	\$2.4B	1.00	7.00	Resourced	Planned	Planned	Measured	Resourced	27	45.0	88	35.0
Treasury	\$4.8B	23.00	14.00	Resourced	Resourced	Resourced	Resourced	Resourced	28,969	82.0	3,839	74.0
USAB	-	3.00	0.00	Resourced	Planned	Resourced	Planned	Resourced	1,569	98.0	1	0.0
USAID	\$217M	3.00	2.00	Resourced	Resourced	Resourced	Resourced	Resourced	4,945	54.0	346	40.0
USDA	\$2.4B	60.00	10.00	Planned	Planned	Planned	Ad Hoc	Planned	49,201	33.4	15,737	15.8
USITC	-	2.00	0.00	Resourced	Resourced	Measured	Measured	Measured	140,953	86.0	2,450	95.0
VA	\$6.1B	23.00	12.00	Planned	Measured	Measured	Measured	Measured	83,159	0.4	172,878	0.1

## Appendix B: Reporting Results for CFO Act Agencies | FEB 21- AUG 22

Reporting Category	Acquisition	Agency ICT (E&IT) Lifecycle Activities	Complaints Process	Testing and Validation	Training
# of Agencies Reporting 1-Ad Hoc FEB 2021	2	2	3	4	4
# of Agencies Reporting 1-Ad Hoc AUG 2021	1	2	3	4	3
# of Agencies Reporting 1-Ad Hoc FEB 2022	2	3	2	2	3
# of Agencies Reporting 1-Ad Hoc AUG 2022	1	0	1	2	2
# of Agencies Reporting 2-Planned FEB 2021	6	9	6	4	8
# of Agencies Reporting 2-Planned AUG 2021	8	11	8	15	11
# of Agencies Reporting 2-Planned FEB 2022	5	9	6	5	9
# of Agencies Reporting 2-Planned AUG 2022	7	8	13	17	9
# of Agencies Reporting 3-Resourced FEB 2021	21	15	11	10	12
# of Agencies Reporting 3-Resourced AUG 2021	21	15	11	10	12
# of Agencies Reporting 3-Resourced FEB 2022	22	16	14	11	15
# of Agencies Reporting 3-Resourced AUG 2022	19	13	12	11	15

### 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 Web Pages Tested for CFO Act Agencies | FEB 2017 – AUG 2022

Test Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020	Feb 2021	Aug 2021	Feb 2022	Aug 2022
Internet Tested	1,731,362	3,648,457	6,303,666	4,267,616	4,368,426	1,682,127	1,872,339	5,308,124	5,308,124	5,453,413	5,596,600	5,668,740
Internet Conformant	1,171,947	3,245,807	4,965,901	3,280,361	3,847,427	933,486	1,202,547	4,646,876	4,646,876	4,948,004	5,065,435	5,115,972
Internet Non-conformant	559,415	402,650	1,337,765	987,255	520,999	748,641	669,792	661,248	661,248	505,409	531,165	552,768
Intranet Tested	617,551	379,895	1,121,369	54,536	126,760	131,395	258,363	434,039	434,039	399,791	359,911	425,333
Intranet Conformant	135,480	62,539	434,483	39,742	107,866	97,915	64,686	112,953	112,953	172,124	198,216	178,704
Intranet Non-conformant	482,071	317,356	686,886	14,794	18,894	33,480	193,677	321,086	321,086	227,667	161,695	246,629
# Total Tested	2,348,913	4,028,352	7,425,035	4,322,152	4,495,186	1,813,522	2,130,702	5,742,163	5,742,163	5,853,204	5,956,511	6,094,073
# Total Conformant	1,307,426	3,308,346	5,400,385	3,320,103	3,955,293	1,031,401	1,267,233	4,759,829	4,759,829	5,120,128	5,263,651	5,294,675
# Total Non-Conformant	1,041,487	720,006	2,024,650	1,002,049	539,893	782,121	863,469	982,334	982,334	733,076	692,860	799,398
% Total C	55.7%	82.1%	72.7%	76.8%	88.0%	56.9%	59.5%	82.9%	82.9%	87.5%	88.4%	86.9%
% Total NC	44.3%	17.9%	27.3%	23.2%	12.0%	43.1%	40.5%	17.1%	17.1%	12.5%	11.6%	13.1%

## Appendix D: Number of Self-reported Accessibility Program Staff for CFO Act Agencies | FEB 2017 - AUG 2022

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Section 508 Program Staff Type	FEB 2017	AUG 2017	FEB 2018	AUG 2018	FEB 2019	AUG 2019	FEB 2020	AUG 2020	FEB 2021	AUG 2021	FEB 2022	AUG 2022
Federal Employees	252	279	467	388	346	350	391	0	443	504	587	624
Contractor Employees	107	138	261	238	236	238	278	0	264	272	357	361
Total Program Staff	358	417	728	625	582	588	669	0	707	776	944	985
Average Program Staff	15	17	30	26	24	25	28	0	29	32	39	41



## Appendix E: Webpage Accessibility Statement Conformance Data

Agency Initial	Website Domain	Address of Website Accessibility Statement	Has Statement?	Has §508 POC?	Has Last Updated Date?	Accepts Feedback?
CFPB	<a href="https://www.cfpb.gov/">https://www.cfpb.gov/</a>	<a href="https://www.consumerfinance.gov/accessibility/">https://www.consumerfinance.gov/accessibility/</a>	Y	Y	N	Y
CNS	<a href="https://americorps.gov/">https://americorps.gov/</a>	<a href="https://americorps.gov/about/agency-overview/disability-accessibility">https://americorps.gov/about/agency-overview/disability-accessibility</a>	Y	Y	N	Y
CPPBSD	<a href="https://www.abilityone.gov">https://www.abilityone.gov</a>	<a href="https://www.abilityone.gov/accessibility.html">https://www.abilityone.gov/accessibility.html</a>	Y	Y	N	Y
DHS	<a href="https://www.dhs.gov">https://www.dhs.gov</a>	<a href="https://www.dhs.gov/accessibility">https://www.dhs.gov/accessibility</a>	Y	Y	Y	Y
DNFSB	<a href="https://www.dnfsb.gov">https://www.dnfsb.gov</a>	N/A	N	N	N	N
DOC	<a href="https://www.doc.gov">https://www.doc.gov</a>	<a href="https://www.commerce.gov/about/policies/accessibility">https://www.commerce.gov/about/policies/accessibility</a>	Y	Y	Y	Y
DOD	<a href="https://www.dod.gov">https://www.dod.gov</a>	<a href="https://dodcio.defense.gov/DoDSection508/Std_Stmt.aspx">https://dodcio.defense.gov/DoDSection508/Std_Stmt.aspx</a>	Y	Y	Y	Y
DOE	<a href="https://www.doe.gov">https://www.doe.gov</a>	<a href="https://www.energy.gov/cio/office-chief-information-officer/services/assistive-technology/accessibility-standard-statement">https://www.energy.gov/cio/office-chief-information-officer/services/assistive-technology/accessibility-standard-statement</a>	Y	Y	Y	Y
DOI	<a href="https://www.doi.gov">https://www.doi.gov</a>	<a href="https://doi.gov/accessibility">https://doi.gov/accessibility</a>	Y	Y	N	Y
DOJ	<a href="https://www.justice.gov">https://www.justice.gov</a>	<a href="https://www.justice.gov/accessibility/accessibility-information">https://www.justice.gov/accessibility/accessibility-information</a>	Y	Y	Y	Y
DOL	<a href="https://www.dol.gov">https://www.dol.gov</a>	<a href="https://www.dol.gov/general/aboutdol/accessibility">https://www.dol.gov/general/aboutdol/accessibility</a>	Y	Y	N	Y
DOT	<a href="https://www.dot.gov">https://www.dot.gov</a>	<a href="https://www.transportation.gov/accessibility">https://www.transportation.gov/accessibility</a>	Y	N	Y	N
EAC	<a href="https://www.eac.gov">https://www.eac.gov</a>	<a href="https://www.eac.gov/main/privacy-statement">https://www.eac.gov/main/privacy-statement</a>	Y	Y	Y	Y
ED	<a href="https://www.ed.gov">https://www.ed.gov</a>	<a href="https://www2.ed.gov/notices/accessibility/index.html?src=ft">https://www2.ed.gov/notices/accessibility/index.html?src=ft</a>	Y	Y	Y	Y
EEOC	<a href="https://www.eeoc.gov">https://www.eeoc.gov</a>	<a href="https://www.eeoc.gov/accessibility">https://www.eeoc.gov/accessibility</a>	Y	Y	N	Y
EOP	<a href="https://www.whitehouse.gov">https://www.whitehouse.gov</a>	<a href="https://www.whitehouse.gov/accessibility/">https://www.whitehouse.gov/accessibility/</a>	Y	Y	N	Y
EPA	<a href="https://www.epa.gov">https://www.epa.gov</a>	<a href="https://www.epa.gov/accessibility/epa-accessibility-statement">https://www.epa.gov/accessibility/epa-accessibility-statement</a>	Y	Y	Y	Y
FCA	<a href="https://www.fca.gov">https://www.fca.gov</a>	<a href="https://www.fca.gov/about/accessibility">https://www.fca.gov/about/accessibility</a>	Y	Y	Y	Y
FCC	<a href="https://www.fcc.gov">https://www.fcc.gov</a>	<a href="https://www.fcc.gov/accessibility/program">https://www.fcc.gov/accessibility/program</a>	Y	Y	Y	Y
FDIC	<a href="https://www.fdic.gov">https://www.fdic.gov</a>	<a href="https://www.fdic.gov/accessibility/index.html">https://www.fdic.gov/accessibility/index.html</a>	Y	Y	Y	Y
FEC	<a href="https://www.fec.gov">https://www.fec.gov</a>	<a href="https://www.fec.gov/about/equal-employment-opportunity/">https://www.fec.gov/about/equal-employment-opportunity/</a>	Y	Y	N	Y
FERC	<a href="https://www.ferc.gov">https://www.ferc.gov</a>	<a href="https://www.ferc.gov/administrative-policies">https://www.ferc.gov/administrative-policies</a>	Y	Y	Y	Y
FHFA	<a href="https://www.fhfa.gov">https://www.fhfa.gov</a>	<a href="https://www.fhfa.gov/AboutUs/Policies/Pages/Accessibility.aspx">https://www.fhfa.gov/AboutUs/Policies/Pages/Accessibility.aspx</a>	Y	Y	N	Y
FLRA	<a href="https://www.flra.gov">https://www.flra.gov</a>	N/A	N	N	N	N
FMSHRC	<a href="https://www.fmsrc.gov">https://www.fmsrc.gov</a>	N/A	N	N	N	N
FRB	<a href="https://www.federalreserve.gov">https://www.federalreserve.gov</a>	<a href="https://www.federalreserve.gov/accessibility.htm">https://www.federalreserve.gov/accessibility.htm</a>	Y	Y	Y	Y
GAO	<a href="https://www.gao.gov">https://www.gao.gov</a>	<a href="https://www.gao.gov/accessibility">https://www.gao.gov/accessibility</a>	Y	Y	N	Y
GSA	<a href="https://www.gsa.gov">https://www.gsa.gov</a>	<a href="https://www.gsa.gov/website-information/accessibility-aids">https://www.gsa.gov/website-information/accessibility-aids</a>	Y	Y	Y	Y
HHS	<a href="https://www.hhs.gov">https://www.hhs.gov</a>	<a href="https://www.hhs.gov/web/section-508/index.html">https://www.hhs.gov/web/section-508/index.html</a>	Y	Y	Y	Y
HUD	<a href="https://www.hud.gov">https://www.hud.gov</a>	<a href="https://www.hud.gov/accessibility">https://www.hud.gov/accessibility</a>	Y	N	N	N

Agency Initial	Website Domain	Address of Website Accessibility Statement	Has Statement?	Has §508 POC?	Has Last Updated Date?	Accepts Feedback?
IMLS	<a href="https://www.imls.gov">https://www.imls.gov</a>	<a href="https://www.imls.gov/about-us/policy-notice-website-accessibility">https://www.imls.gov/about-us/policy-notice-website-accessibility</a>	Y	Y	N	Y
MSPB	<a href="https://www.mspb.gov">https://www.mspb.gov</a>	<a href="https://www.mspb.gov/publicaffairs/accessibility.htm">https://www.mspb.gov/publicaffairs/accessibility.htm</a>	Y	Y	N	Y
NARA	<a href="https://www.archives.gov">https://www.archives.gov</a>	<a href="https://www.archives.gov/global-pages/accessibility">https://www.archives.gov/global-pages/accessibility</a>	Y	Y	Y	Y
NASA	<a href="https://www.nasa.gov">https://www.nasa.gov</a>	missing from home page	Y	N	N	N
NCUA	<a href="https://www.ncua.gov">https://www.ncua.gov</a>	<a href="https://www.ncua.gov/accessibility-statement">https://www.ncua.gov/accessibility-statement</a>	Y	Y	Y	Y
NEH	<a href="https://www.neh.gov">https://www.neh.gov</a>	<a href="https://www.neh.gov/accessibility">https://www.neh.gov/accessibility</a>	Y	Y	N	Y
NRC	<a href="https://www.nrc.gov">https://www.nrc.gov</a>	<a href="https://www.nrc.gov/site-help/access.html">https://www.nrc.gov/site-help/access.html</a>	Y	Y	Y	Y
NSA	<a href="https://www.nsa.gov">https://www.nsa.gov</a>	<a href="https://www.nsa.gov/nsa-accessibility/">https://www.nsa.gov/nsa-accessibility/</a>	Y	Y	Y	Y
NSF	<a href="https://www.nsf.gov">https://www.nsf.gov</a>	<a href="https://www.nsf.gov/policies/access.jsp">https://www.nsf.gov/policies/access.jsp</a>	Y	Y	N	Y
OPM	<a href="https://www.opm.gov">https://www.opm.gov</a>	missing from home page	Y	N	N	N
OSC	<a href="https://osc.gov">https://osc.gov</a>	<a href="https://osc.gov/Accessibility">https://osc.gov/Accessibility</a>	Y	Y	N	Y
PBGC	<a href="https://www.pbgc.gov">https://www.pbgc.gov</a>	N/A	N	N	N	N
PC	<a href="https://www.peacecorps.gov">https://www.peacecorps.gov</a>	<a href="https://www.peacecorps.gov/about/civil-rights-and-diversity/accessibility-statement/">https://www.peacecorps.gov/about/civil-rights-and-diversity/accessibility-statement/</a>	Y	Y	N	Y
RRB	<a href="https://rrb.gov">https://rrb.gov</a>	<a href="https://rrb.gov/Policy#accessibility">https://rrb.gov/Policy#accessibility</a>	Y	Y	N	Y
SBA	<a href="https://www.sba.gov">https://www.sba.gov</a>	<a href="https://www.sba.gov/about-sba/open-government/about-sbagov-website/accessibility">https://www.sba.gov/about-sba/open-government/about-sbagov-website/accessibility</a>	Y	Y	Y	Y
SEC	<a href="https://www.sec.gov">https://www.sec.gov</a>	<a href="https://www.sec.gov/disability/sec_access">https://www.sec.gov/disability/sec_access</a>	Y	Y	Y	Y
SSA	<a href="https://www.ssa.gov">https://www.ssa.gov</a>	<a href="https://www.ssa.gov/accessibility/index.html">https://www.ssa.gov/accessibility/index.html</a>	Y	Y	N	N
TVA	<a href="https://www.tva.com">https://www.tva.com</a>	<a href="https://www.tva.com/information/accessibility-information">https://www.tva.com/information/accessibility-information</a>	Y	Y	Y	Y
USAB	<a href="https://www.access-board.gov">https://www.access-board.gov</a>	<a href="https://www.access-board.gov/about/policy/accessibility.html">https://www.access-board.gov/about/policy/accessibility.html</a>	Y	Y	N	Y
USAID	<a href="https://www.usaid.gov">https://www.usaid.gov</a>	<a href="https://www.usaid.gov/accessibility">https://www.usaid.gov/accessibility</a>	Y	Y	Y	Y
USDA	<a href="https://www.usda.gov">https://www.usda.gov</a>	<a href="https://www.usda.gov/accessibility-statement">https://www.usda.gov/accessibility-statement</a>	Y	Y	N	Y
USDC-NI	<a href="https://www.iand.uscourts.gov">https://www.iand.uscourts.gov</a>	N/A	N	N	N	N
USDC-WDW	<a href="https://www.wiwd.uscourts.gov">https://www.wiwd.uscourts.gov</a>	N/A	N	N	N	N
USDOS	<a href="https://www.state.gov">https://www.state.gov</a>	<a href="https://www.state.gov/section-508-accessibility-statement/">https://www.state.gov/section-508-accessibility-statement/</a>	Y	Y	Y	Y
USDT	<a href="https://home.treasury.gov">https://home.treasury.gov</a>	<a href="https://home.treasury.gov/utility/accessibility/web-accessibility">https://home.treasury.gov/utility/accessibility/web-accessibility</a>	Y	Y	N	Y
USITC	<a href="https://www.usitc.gov">https://www.usitc.gov</a>	<a href="https://www.usitc.gov/accessibility.htm">https://www.usitc.gov/accessibility.htm</a>	Y	Y	Y	Y
USPS	<a href="https://www.usps.com">https://www.usps.com</a>	<a href="https://about.usps.com/who/legal/section-508/welcome.htm">https://about.usps.com/who/legal/section-508/welcome.htm</a>	Y	Y	N	Y
VA	<a href="https://www.va.gov">https://www.va.gov</a>	<a href="https://www.section508.va.gov/">https://www.section508.va.gov/</a>	Y	Y	Y	Y

## Appendix F: Average Self-Reported Section 508 Program Maturity of CFO Act Agencies | FEB 2017 – AUG 2022

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Maturity Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020	Feb 2021	Aug 2021	Feb 2022	Aug 2022
Acquisition (A)	2.44	2.70	2.70	2.70	2.70	2.70	2.70	2.70	2.70	2.70	2.88	2.88
Lifecycle (L)	2.25	2.55	2.50	2.58	2.67	2.70	2.67	2.71	2.71	2.67	2.63	2.83
Testing (V)	2.44	2.70	2.71	2.79	2.88	2.96	2.96	3.00	2.88	2.79	2.96	3.00
Complaints (C)	3.06	3.05	2.96	3.00	3.21	3.13	3.33	3.25	3.13	3.13	3.21	3.33
Training (T)	2.60	2.45	2.54	2.67	2.75	2.70	2.71	2.54	2.58	2.63	2.79	2.79
Average	2.56	2.69	2.68	2.75	2.84	2.84	2.87	2.84	2.80	2.83	2.89	2.97

## Appendix G: PDF Document Conformance Among “Top Downloads” CFO Act Agencies | December 2019 – August 2022

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Year of Test	# Files not a PDF	# PDF Files	# Conformant	# Non-Conformant	% Non-Conformant	# Non-conformant (tagged)	# Non-Conformant (not tagged)	% Not Tagged
Dec 2019	69	171	38	133	78%	27	106	62%
Apr 2020	48	192	40	152	79%	39	113	59%
Feb 2021	81	159	25	134	84%	44	90	57%
Aug 2021	46	194	58	136	70%	30	106	55%
Feb 2022	46	194	65	129	66%	35	94	48%
Aug 2022	45	195	44	151	77%	39	112	57%