



**U.S. Department
of Justice**



**U.S. General Services
Administration**

SECTION 508 REPORT TO CONGRESS AND THE PRESIDENT

Accessibility of Federal Electronic and Information Technology





Section 508 Report to the President and Congress: Accessibility of Federal Electronic and Information Technology

The Department of Justice and the General Services Administration submit this *Section 508 Report to the President and Congress: Accessibility of Federal Electronic and Information Technology* to Congress and the President pursuant to the reporting requirement in 29 U.S.C. § 794d(d)(2).

Section 508 of the Rehabilitation Act requires federal agencies to ensure that their information and communication technology (ICT) is accessible to people with disabilities, unless certain exceptions apply. Specifically, Section 508 requires federal agencies to ensure that ICT they develop, procure, maintain, or use allows employees with disabilities and individuals with disabilities who are members of the public to have access to and use of information and data. This access should be comparable to that available to employees and members of the public without disabilities.¹

Section 508 requires the Attorney General to submit to the President and Congress reports containing information on and recommendations regarding the state of federal department and agency compliance with Section 508.² The last such report was submitted by the Department of Justice in 2012. Since 2013, however, the Office of Management and Budget (OMB) and the General Services Administration (GSA) have led a program to track federal agency efforts to maintain accessible ICT and improve management of Section 508 programs. Beginning in December 2013 and continuing every six months thereafter, GSA has collected and analyzed data provided by all 24 Chief Financial Officers (CFO) Act federal agencies, which are required to participate, as well as additional agencies that choose to participate, concerning the accessibility of their ICT.³

The Department of Justice and GSA have worked together to submit this report based on data from February, 2021 through August, 2022 that was collected and analyzed by GSA. This

¹ 29 U.S.C. § 794d(a)(1). Although the Rehabilitation Act uses the term “electronic and information technology (EIT),” the current Section 508 regulations use the term “information and communication technology (ICT)” to broadly encompass information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include, but are not limited to: computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; web sites; videos; and, electronic documents.

² *Id.* § 794d(d)(2).

³ Pursuant to OMB’s [Strategic Plan for Improving Management of Section 508](#), GSA collects data from all CFO Act agencies. These agencies comprise 90% of the federal executive branch workforce and account for the vast majority of public content put out by federal agencies. Accordingly, data from these agencies provides a useful picture of the state of federal agency compliance with Section 508.

information sheds light on the degree to which federal agencies are making progress on compliance with Section 508.

GSA collects four types of information concerning the accessibility of federal agencies' ICT: (1) Agency Information, (2) Self-Reported Program Maturity, (3) Self-Testing of Agency Webpages, and (4) GSA-Led Testing of Agency Web Resources. Taken together, these four elements offer a strong understanding of ICT accessibility across federal agencies.

(1) Agency Information

Every six months, OMB requires each CFO Act agency to provide agency information including the number of federal employees and contractors (also known as Full Time Equivalents, or FTEs) responsible for supporting the agency's Section 508 program.

(2) Self-Reported Program Maturity

Every six months, OMB requires each CFO Act agency to provide information to GSA about the maturity and effectiveness of their IT accessibility and Section 508 program. This provides an understanding of the extent to which agencies have put into place practices, policies, and procedures that are likely to lead to accessible ICT. It also creates a clear roadmap for agencies as they work to improve accessibility.

To assess maturity and effectiveness, GSA looks at:

Acquisition	The extent to which an agency reviews and validates that contract language in procurement documents (e.g., Statements of Work) addresses IT accessibility/Section 508 compliance.
Agency EIT Lifecycle Activities	The extent to which an agency validates that Section 508 requirements are incorporated into technology lifecycle activities such as enterprise architecture, design, development, testing, deployment, and ongoing maintenance.
Testing & Validation	The extent to which an agency conducts testing and validation of Section 508 conformance claims.
Complaints Process	The extent to which an agency tracks and resolves incoming Section 508 complaints.
Training	The extent to which an agency trains stakeholders on roles and responsibilities related to Section 508 compliance.

Maturity levels are characterized as:

Ad Hoc (1): No formal policies, processes, or procedures defined. The agency has not established a framework for the consistent management of Section 508 compliance requirements for the technology it buys, builds, maintains, and uses.

Planned (2): Policies, processes, and procedures defined and communicated. The agency's approach to ensuring technology is Section 508 compliant is defined and integrated into its policies and procedures. Section 508 policies and procedures sufficiently address all technology the agency buys, builds, maintains, and uses, as scoped by the Section 508 standards.

Resourced (3): Resources committed and/or staff trained to implement policies, processes, and procedures. The agency's leadership and staff understand and support the Section 508 policies and procedures, and know how to implement them. The agency has dedicated sufficient resources to implement its Section 508 policies and procedures.

Measured (4): Validation is performed; results are measured and tracked. The agency tests and validates agency digital services and technology solutions to ensure they conform to the Section 508 standards. It is able to determine whether its policies and procedures are actually being followed. It measures the effectiveness of its Section 508 policies and procedures, and is able to use its measures to manage risk and prioritize opportunities for improving its compliance program.

(3) Self-Testing of Agency Webpages

Every six months, OMB requires each CFO Act agency to provide quantitative data related to their own internal testing of internet and intranet pages. Specifically, every CFO Act agency reports on:

- The total number of internet web pages the agency evaluated
- The percent (%) of internet web pages the agency found to be conformant
- The total number of intranet web pages the agency evaluated
- The percent (%) of intranet web pages the agency found to be conformant

This assessment tool provides quantitative information on whether an agency's practices, policies, and procedures are translating into accessible ICT. It also offers data about how extensive any given agency's testing practices are relative to the total number of internet web pages that have been visited during the reporting period.

(4) GSA-Led Testing of Agency Web Resources

Finally, GSA performs its own testing of a subset of ICT of each CFO Act agency. Specifically, GSA samples the "top ten downloads" from each agency. When those downloaded files are PDFs, GSA tests those PDFs for accessibility issues. This assessment tool acts as a uniform, illustrative testing methodology across all CFO Act agencies. It also provides another way to

assess how well an agency's practices, policies, and procedures are translating into accessible ICT.

The following pages show the results of the analysis of the reporting agencies' ICT accessibility in the areas described above for the period February, 2021 through August, 2022. If you have any questions about this Section 508 Report, please do not hesitate to contact our agencies.

Respectfully submitted,



Merrick B. Garland
United States Attorney General



Robin Carnahan
Administrator of the United States
General Services Administration

January 2023



Department of Justice



General Services Administration

Section 508 Report to the President and Congress

Accessibility of Federal Information and Communication Technology

The Department of Justice and General Services Administration | January 2023

Section 508 Data Collection



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 becoming 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



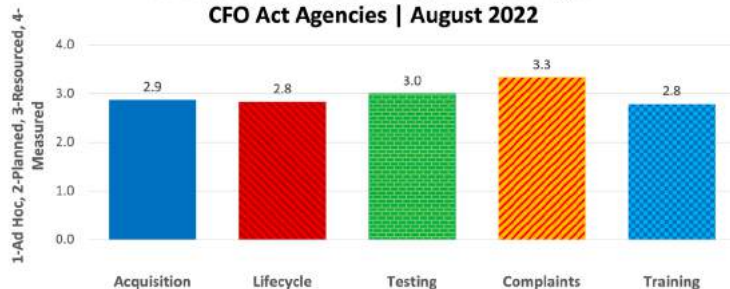
Semi-annually, Executive Branch agencies self-report on:

- 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

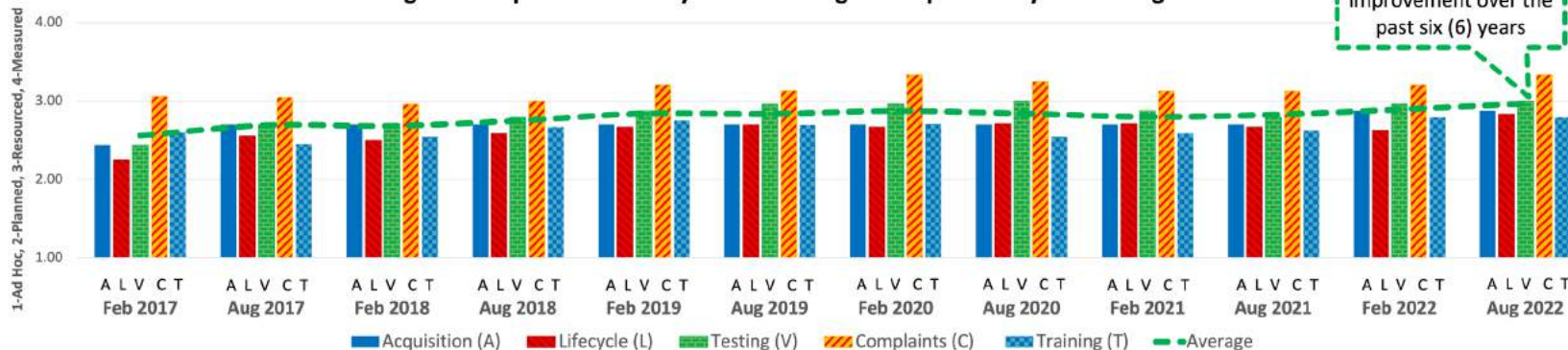
Program Maturity of CFO Act Agencies

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



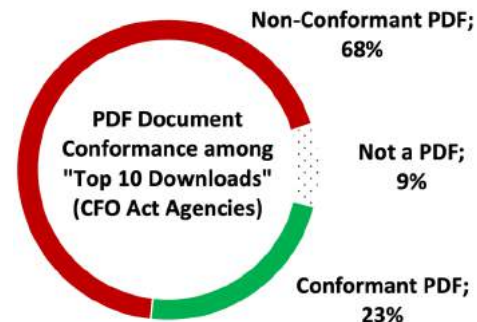
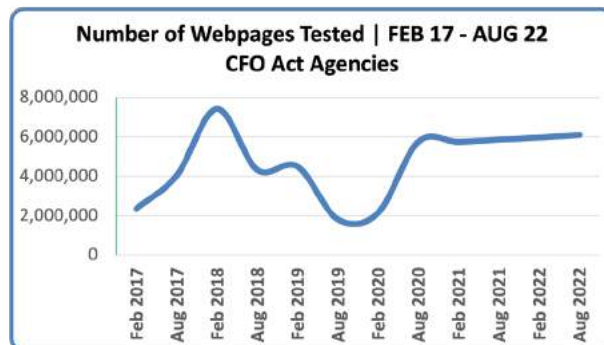
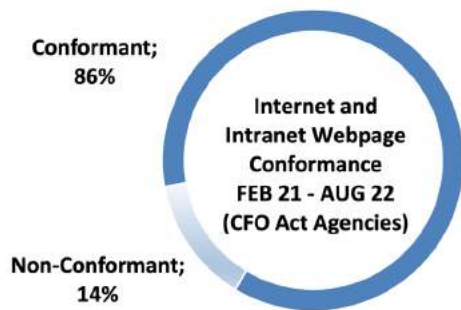
- 6** CFO Act agencies reported an increase in overall maturity
- 2** CFO Act agencies reported a decrease in overall maturity
- 16** CFO Act agencies reported no change in overall maturity

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



At-a-Glance: Measuring Testing

Web Conformance of CFO Act Agencies



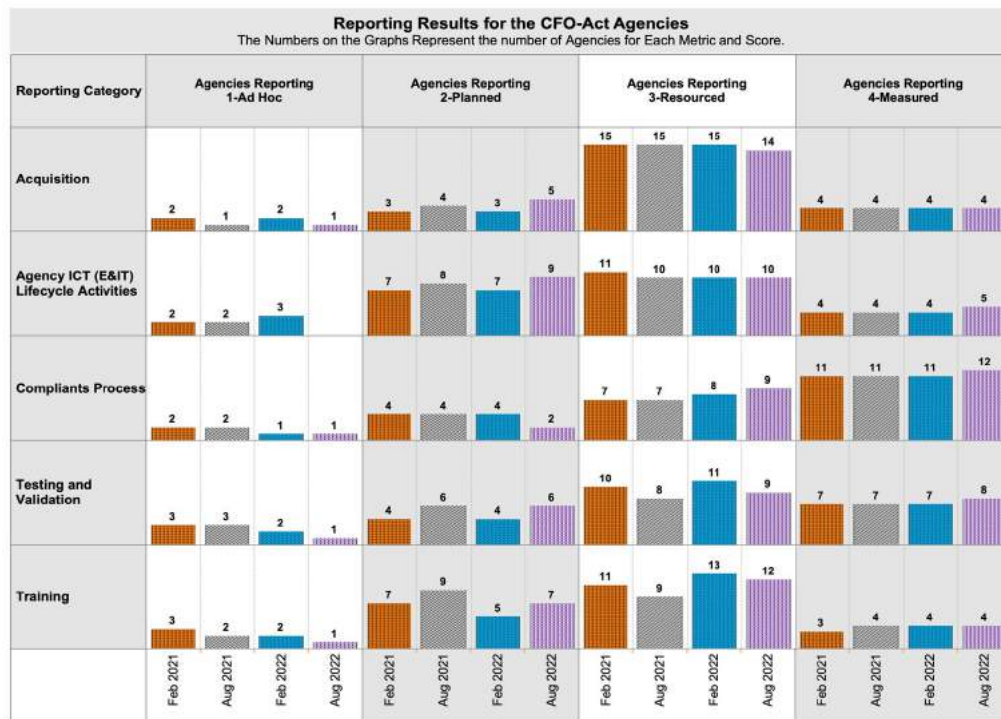
Four (13%) agencies report that they are not testing Intranet (internal) webpages



1/3 of PDFs are Accessible
among top 10 downloaded files for CFO Act agencies

Program Maturity

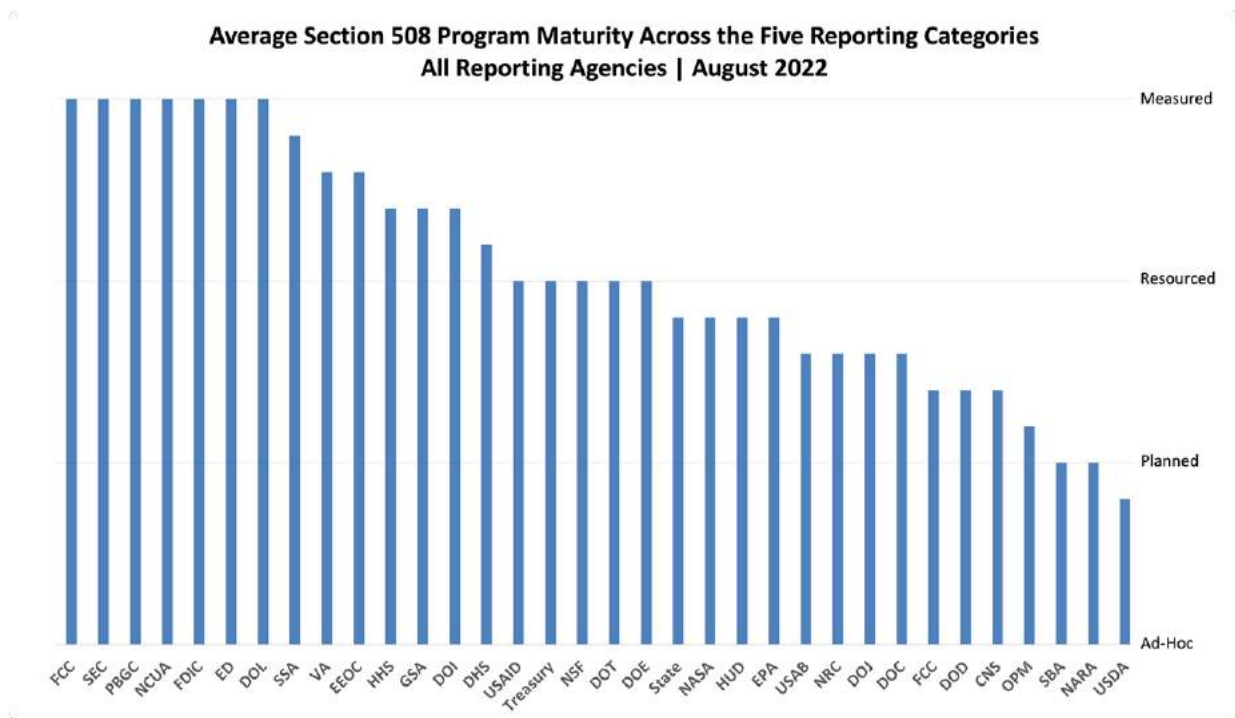
Self-Reported Results for CFO Act Agencies



- **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
- High occurrence of Complaints Processes reported as '*Measured*' 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.

Program Maturity by Agency

Accessibility Maturity After 21 Years of Enforcement

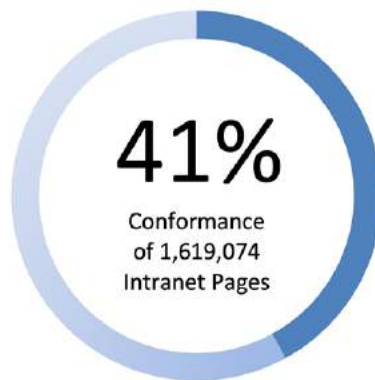


20
of 34 agencies report
a general lack of data
necessary for
decision making

Webpage Conformance: Snapshot

Self-Reported Results for CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested
CFO Act Agencies | February 2021 - August 2022

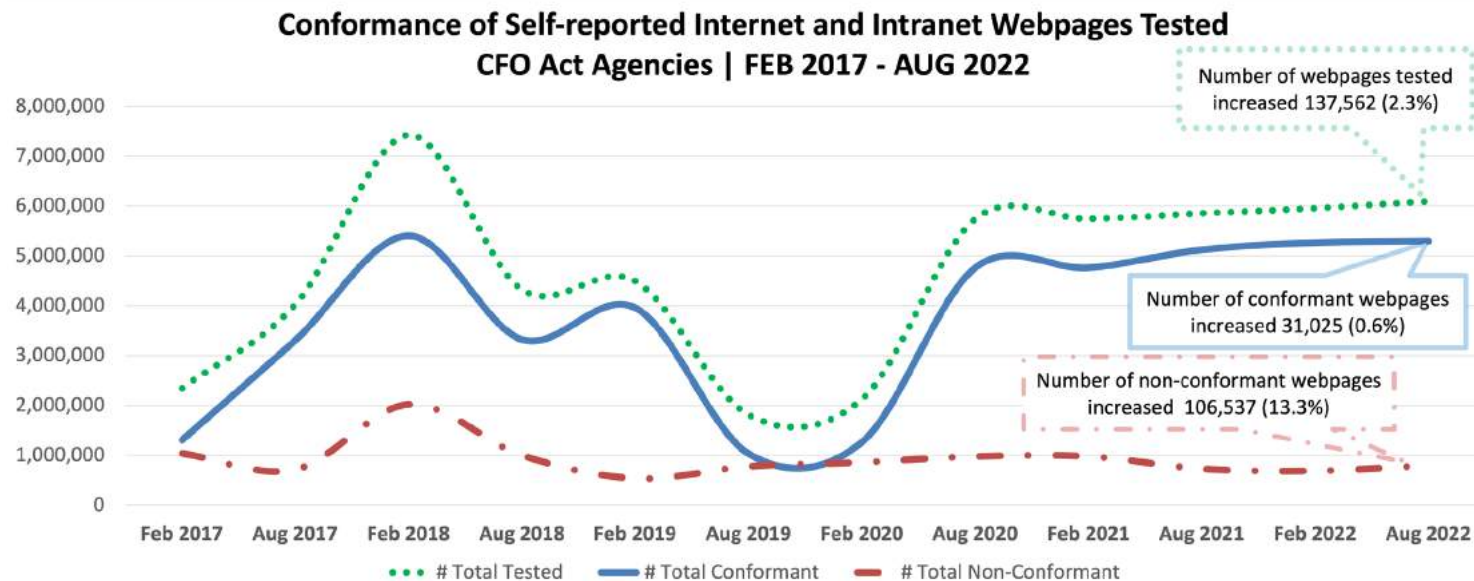


Risks as reported:

- 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 (86%) 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 | August 2022

- 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

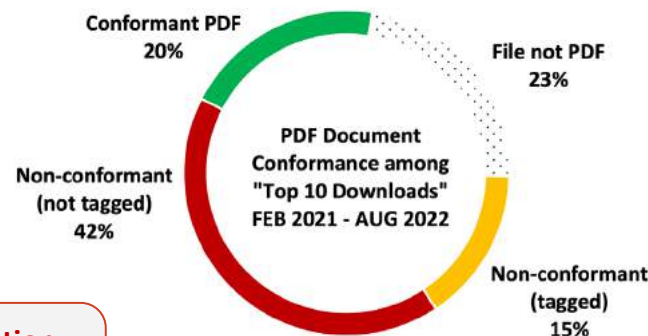


PDF Document Conformance: Snapshot

CFO Act Agencies | February 2021 - August 2022

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,” 77% were PDFs
- Among the PDF documents, 20% were conformant
- Among the 57% non-conformant PDFs*
 - 27% were found to contain at least one issue
 - 73% of the PDF documents were **untagged**



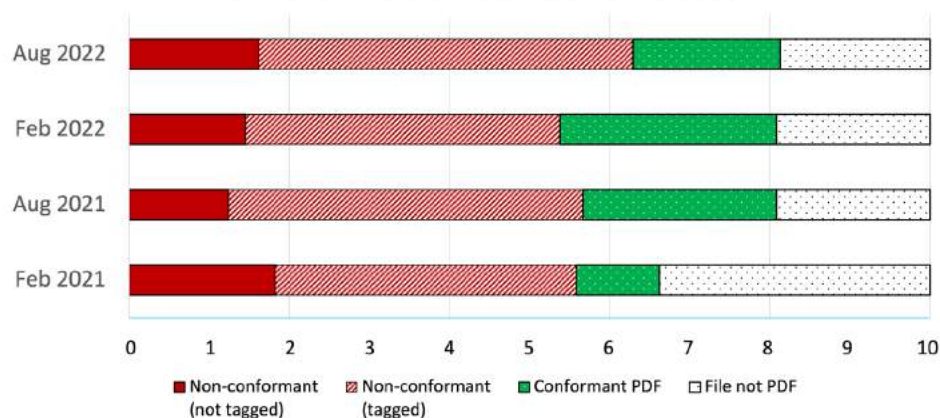
“Untagged” PDF documents lack any kind of markup information that helps make content accessible to people who rely on assistive technologies to access the written and visual information

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

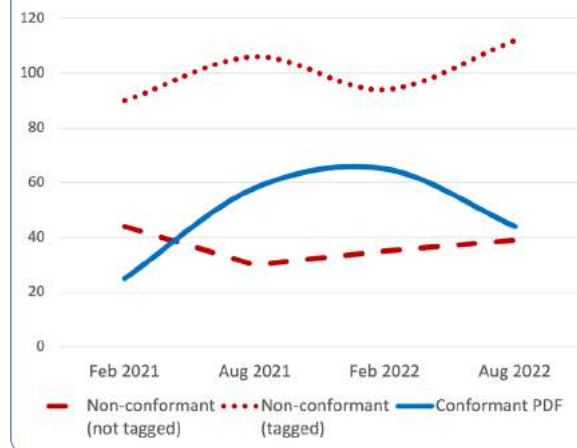
PDF Document Conformance: Trend Line

CFO Act Agencies | 2021-2022

PDF Conformance among Top 10 Downloads
CFO Act Agencies | FEB 2021 - AUG 2022



PDF Conformance among Top 10 Downloads
CFO Act Agencies | FEB 2021 - AUG 2022



- 57% of all documents among the “top downloads” contain one or more accessibility issue
- 74% of PDFs documents downloaded contain one or more accessibility issue requiring remediation
- PDF documents are consistently non-conformant, with a high rate of untagged documents (73%)
- Volatility of PDF document conformance over time suggests poor policy and process controls

Webpage Conformance: Summary

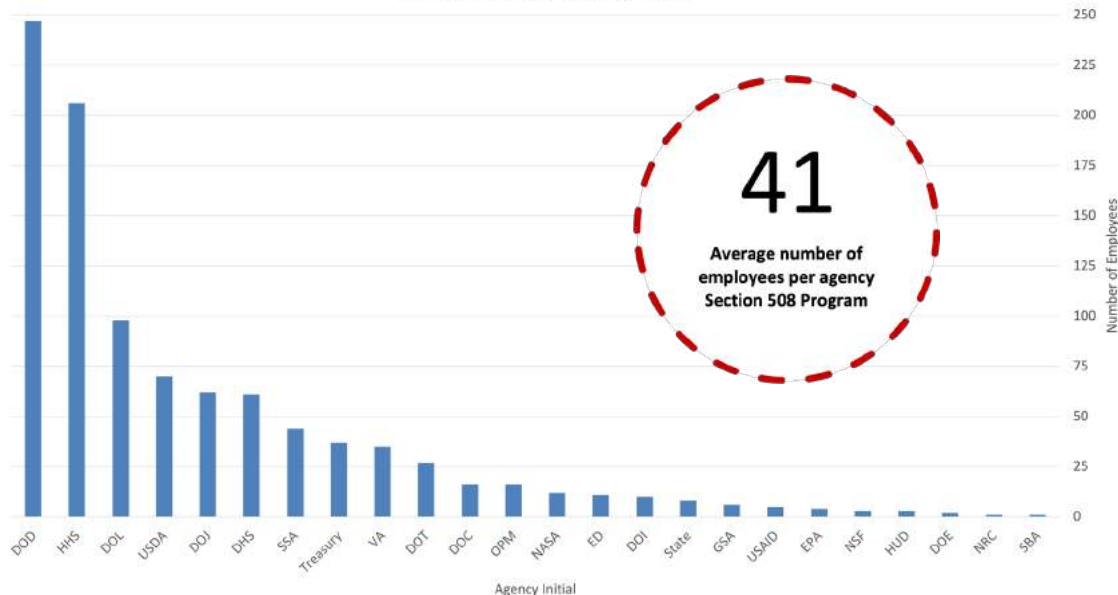
CFO Act Agencies

- 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

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 which may impact and agency's 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 from 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

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 policies and procedures 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)

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



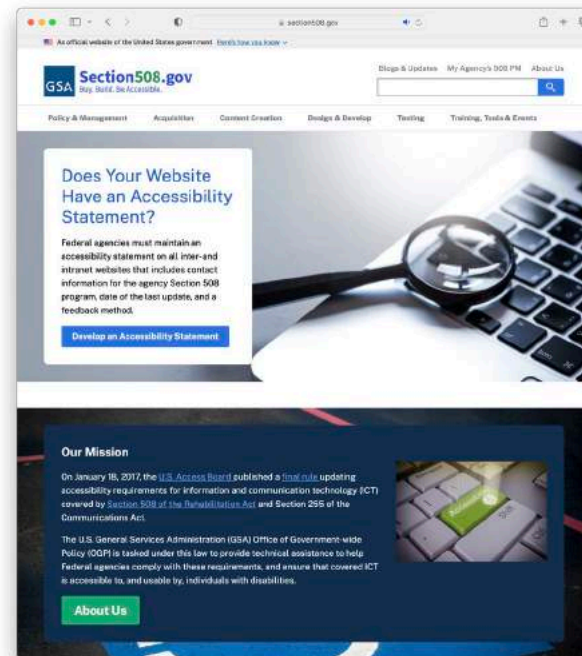
Educate

- **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, including 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 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 All Reporting Agencies | FEB 2017 – AUG 2022

Test Category	Aug 2020	Feb 2021	Aug 2021	Feb 2022
Internet Tested	5,321,354	5,609,385	5,756,136	5,823,480
Internet Conformant	4,658,898	5,077,375	5,196,002	5,249,551
Internet Non-conformant	662,456	532,010	560,134	573,929
Intranet Tested	434,817	402,805	362,793	428,045
Intranet Conformant	113,278	174,639	200,745	181,148
Intranet Non-conformant	321,539	228,166	162,048	246,897
# Total Tested	5,756,171	6,012,190	6,118,929	6,251,525
# Total Conformant	4,772,176	5,252,014	5,396,747	5,430,699
# Total Non-Conformant	983,995	760,176	722,182	820,826
% Total C	82.9%	87.4%	88.2%	86.9%
% Total NC	17.1%	12.6%	11.8%	13.1%

Appendix D: Number of Self-reported Accessibility Program Staff for CFO Act Agencies | FEB 2021 - AUG 2022

Section 508 Program Staff Type	FEB 2021	AUG 2021	FEB 2022	AUG 2022
Federal Employees	443	504	587	624
Contractor Employees	264	272	357	361
Total Program Staff	707	776	944	985
Average Program Staff	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	https://www.cfpb.gov/	https://www.consumerfinance.gov/accessibility/	Y	Y	N	Y
CNS	https://americorps.gov/	https://americorps.gov/about/agency-overview/disability-accessibility	Y	Y	N	Y
CPPBSD	https://www.abilityone.gov	https://www.abilityone.gov/accessibility.html	Y	Y	N	Y
DHS	https://www.dhs.gov	https://www.dhs.gov/accessibility	Y	Y	Y	Y
DNFSB	https://www.dnfsb.gov	N/A	N	N	N	N
DOC	https://www.doc.gov	https://www.commerce.gov/about/policies/accessibility	Y	Y	Y	Y
DOD	https://www.dod.gov	https://dodcio.defense.gov/DoDSection508/Std_Stmt.aspx	Y	Y	Y	Y
DOE	https://www.doe.gov	https://www.energy.gov/cio/office-chief-information-officer/services/assistive-technology/accessibility-standard-statement	Y	Y	Y	Y
DOI	https://www.doi.gov	https://doi.gov/accessibility	Y	Y	N	Y
DOJ	https://www.justice.gov	https://www.justice.gov/accessibility/accessibility-information	Y	Y	Y	Y
DOL	https://www.dol.gov	https://www.dol.gov/general/aboutdol/accessibility	Y	Y	N	Y
DOT	https://www.dot.gov	https://www.transportation.gov/accessibility	Y	N	Y	N
EAC	https://www.eac.gov	https://www.eac.gov/main/privacy-statement	Y	Y	Y	Y
ED	https://www.ed.gov	https://www2.ed.gov/notices/accessibility/index.html?src=ft	Y	Y	Y	Y
EEOC	https://www.eeoc.gov	https://www.eeoc.gov/accessibility	Y	Y	N	Y
EOP	https://www.whitehouse.gov	https://www.whitehouse.gov/accessibility/	Y	Y	N	Y
EPA	https://www.epa.gov	https://www.epa.gov/accessibility/epa-accessibility-statement	Y	Y	Y	Y
FCA	https://www.fca.gov	https://www.fca.gov/about/accessibility	Y	Y	Y	Y
FCC	https://www.fcc.gov	https://www.fcc.gov/accessibility/program	Y	Y	Y	Y
FDIC	https://www.fdic.gov	https://www.fdic.gov/accessibility/index.html	Y	Y	Y	Y
FEC	https://www.fec.gov	https://www.fec.gov/about/equal-employment-opportunity/	Y	Y	N	Y
FERC	https://www.ferc.gov	https://www.ferc.gov/administrative-policies	Y	Y	Y	Y
FHFA	https://www.fhfa.gov	https://www.fhfa.gov/AboutUs/Policies/Pages/Accessibility.aspx	Y	Y	N	Y
FLRA	https://www.flra.gov	N/A	N	N	N	N
FMSHRC	https://www.fmshrc.gov	N/A	N	N	N	N
FRB	https://www.federalreserve.gov	https://www.federalreserve.gov/accessibility.htm	Y	Y	Y	Y
GAO	https://www.gao.gov	https://www.gao.gov/accessibility	Y	Y	N	Y
GSA	https://www.gsa.gov	https://www.gsa.gov/website-information/accessibility-aids	Y	Y	Y	Y
HHS	https://www.hhs.gov	https://www.hhs.gov/web/section-508/index.html	Y	Y	Y	Y
HUD	https://www.hud.gov	https://www.hud.gov/accessibility	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	https://www.imls.gov	https://www.imls.gov/about-us/policy-notice/website-accessibility	Y	Y	N	Y
MSPB	https://www.mspb.gov	https://www.mspb.gov/publicaffairs/accessibility.htm	Y	Y	N	Y
NARA	https://www.archives.gov	https://www.archives.gov/global-pages/accessibility	Y	Y	Y	Y
NASA	https://www.nasa.gov	missing from home page	Y	N	N	N
NCUA	https://www.ncua.gov	https://www.ncua.gov/accessibility-statement	Y	Y	Y	Y
NEH	https://www.neh.gov	https://www.neh.gov/accessibility	Y	Y	N	Y
NRC	https://www.nrc.gov	https://www.nrc.gov/site-help/access.html	Y	Y	Y	Y
NSA	https://www.nsa.gov	https://www.nsa.gov/nsa-accessibility/	Y	Y	Y	Y
NSF	https://www.nsf.gov	https://www.nsf.gov/policies/access.jsp	Y	Y	N	Y
OPM	https://www.opm.gov	missing from home page	Y	N	N	N
OSC	https://osc.gov	https://osc.gov/Accessibility	Y	Y	N	Y
PBGC	https://www.pbgc.gov	N/A	N	N	N	N
PC	https://www.peacecorps.gov	https://www.peacecorps.gov/about/civil-rights-and-diversity/accessibility-statement/	Y	Y	N	Y
RRB	https://rrb.gov	https://rrb.gov/Policy#accessibility	Y	Y	N	Y
SBA	https://www.sba.gov	https://www.sba.gov/about-sba/open-government/about-sbagov-website/accessibility	Y	Y	Y	Y
SEC	https://www.sec.gov	https://www.sec.gov/disability/sec_access	Y	Y	Y	Y
SSA	https://www.ssa.gov	https://www.ssa.gov/accessibility/index.html	Y	Y	N	N
TVA	https://www.tva.com	https://www.tva.com/information/accessibility-information	Y	Y	Y	Y
USAB	https://www.access-board.gov	https://www.access-board.gov/about/policy/accessibility.html	Y	Y	N	Y
USAID	https://www.usaid.gov	https://www.usaid.gov/accessibility	Y	Y	Y	Y
USDA	https://www.usda.gov	https://www.usda.gov/accessibility-statement	Y	Y	N	Y
USDC-NI	https://www.iand.uscourts.gov	N/A	N	N	N	N
USDC-WDW	https://www.wiwd.uscourts.gov	N/A	N	N	N	N
USDOS	https://www.state.gov	https://www.state.gov/section-508-accessibility-statement/	Y	Y	Y	Y
USDT	https://home.treasury.gov	https://home.treasury.gov/utility/accessibility/web-accessibility	Y	Y	N	Y
USITC	https://www.usitc.gov	https://www.usitc.gov/accessibility.htm	Y	Y	Y	Y
USPS	https://www.usps.com	https://about.usps.com/who/legal/section-508/welcome.htm	Y	Y	N	Y
VA	https://www.va.gov	https://www.section508.va.gov/	Y	Y	Y	Y

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

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 | February 2021 – August 2022

Year of Test	# Files not a PDF	# PDF Files	# Conformant	# Non-Conformant	% Non-Conformant	# Non-conformant (tagged)	# Non-Conformant (not tagged)	% Not Tagged
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%