



AUTUMN 2019 SECTION  
508 PROGRAM MATURITY  
REPORT: EXECUTIVE  
SUMMARY

January 2020

## Executive Summary

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 IT Accessibility programs (Appendix A). Reaffirming their commitment to equal access, 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 and digital services are accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d).

In general, CFO Act agencies report adequate planning in place, but appear to lack sufficient resources to carry out those plans. As agencies develop and redesign websites, mobile and digital services, and transition to using electronic forms and signatures in accordance with 21st Century IDEA, the risk of digital inequality increases where agencies fail to adopt a proactive strategy to integrate accessibility across IT portfolios.

## Overview

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

Out of the four maturity levels (ad hoc, planned, resourced, or managed), CFO Act agencies generally continue to assess their overall Section 508 program maturity as “planned” or “resourced.”<sup>1</sup> Only two agencies consider themselves adequately resourced and measured in more than two of the five categories. Trends from the past three reporting cycles, data from GSA’s Digital Dashboard, and the recently-released Solicitation Review Tool pilot, show that work remains to meet the goals of the OMB Strategic Plan.

In total, 29 executive branch agencies submitted data for this report (Appendix D). However, it should be noted that only 23 of the 24 CFO Act agencies required to submit data for this report did so. Every effort has been made to mitigate the effects of the missing data on this report.

## Summary of Section 508 Program Maturity

The results of the self-assessments provide an aggregate view across the executive branch, offering insight into how agencies allocate resources for training, tools, events, and subject-matter expertise. The table below shows the status of CFO Act agencies’ Section 508 program maturity over the last three bi-annual reporting cycles.

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<sup>1</sup> [Assessing Program Maturity - Section 508.gov](#)

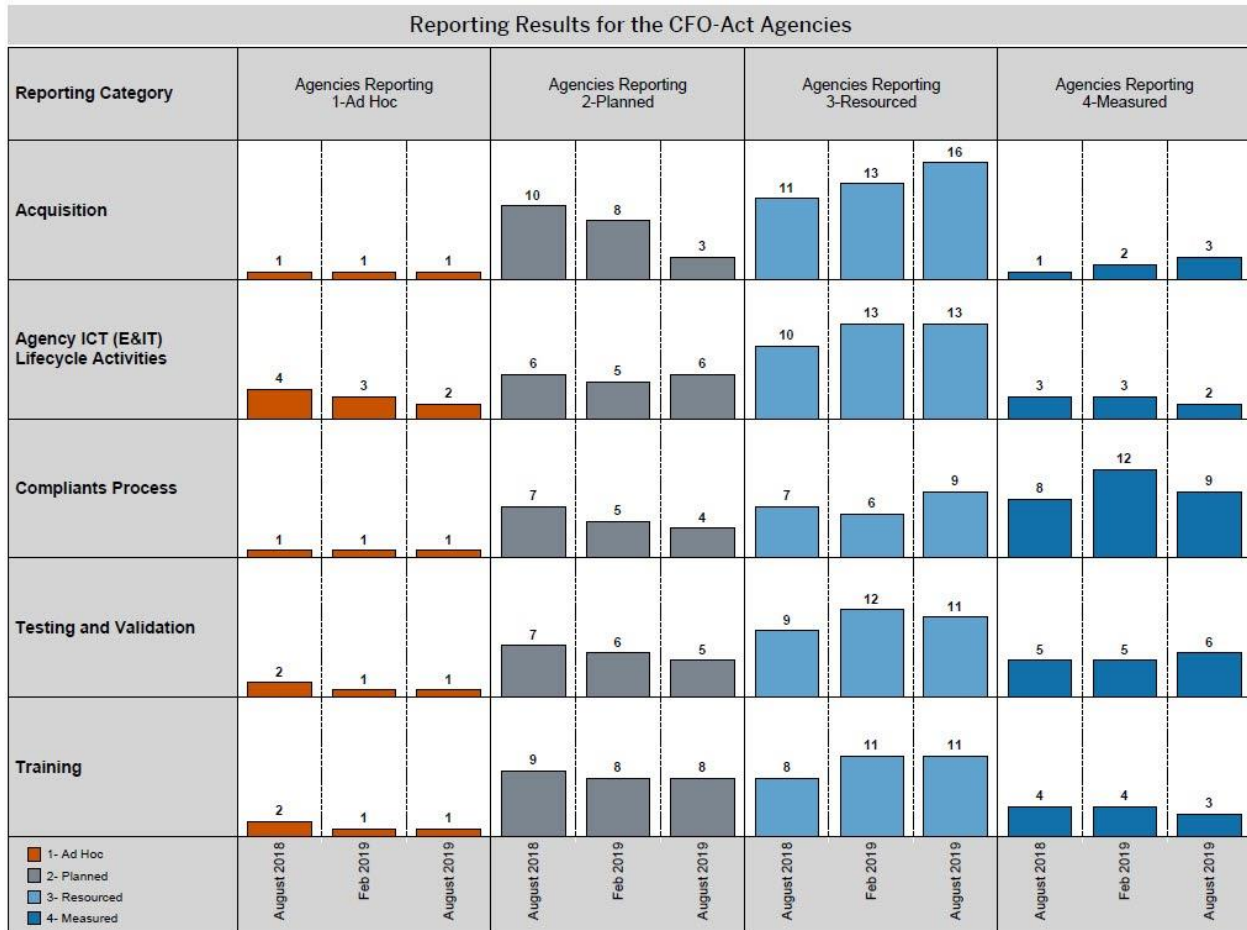


Table 1: Section 508 Program Maturity Analysis - August 2019 (Data view in Appendix C)

CFO Act agencies are increasingly reporting that policies, processes, or procedures are defined and communicated (*planned*) with resources committed and/or staff trained to implement (*resourced*), yet during this reporting period fewer agencies reported that they were measured in one or more category.

- Of concern, four agencies of the 12 who previously reported measuring their complaint processes, in the August 2019 cycle, reported that they were no longer measuring their complaint process.
- While only 10 agencies (34%) measured their testing and validation activities, this is up 14% from the previous reporting cycle.

### Summary of Website Accessibility

The total number of reported Internet and intranet web pages evaluated for compliance by CFO Act agencies (Figure 1) decreased significantly due to a single agency reporting a total of 3,009,166 fewer Internet pages evaluated. The data reveals that while agencies are testing fewer websites than in previous reporting cycles, the number of reported non-conformance issues has increased, possibility signaling more thorough testing is occurring.

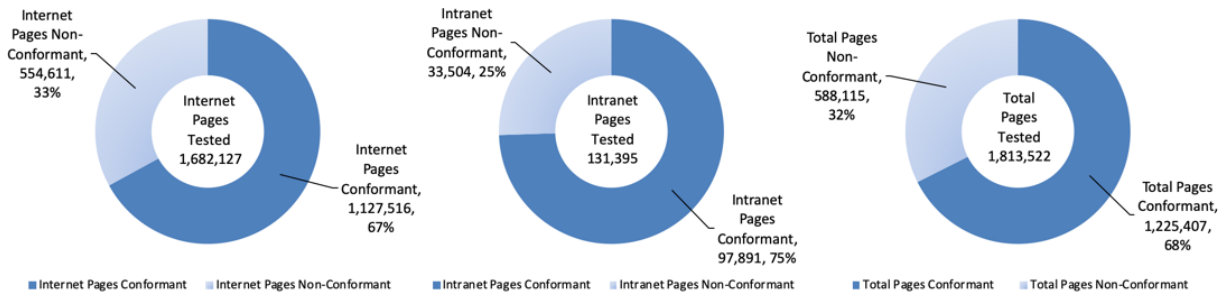


Figure 1: Number of CFO-Act Agency webpages found to be conformant/non-conformant among those tested.

There is also evidence that agencies have a growing wherewithal to address website accessibility issues, possibly in anticipation of implementing the 21st Century Integrated Data Experience Act (21st Century IDEA). This summer, GSA issues a “challenge” to agencies to improve website accessibility for three common issues on a small sample of less-complex websites (1005 website home pages). Agencies responded quickly and were able to achieve an 11% improvement within 120 days, demonstrating the capacity to address website accessibility errors where stakeholders are directly engaged. GSA thanks all who contributed to the success of this demonstration.

### Summary of Section 508 Program Resources

Agencies reported a slight increase in the number of Section 508 Program staff, of at least people throughout the agency who are responsible for implementing Section 508. When compared to February 2019, the data show that CFO Act agencies experienced a turnover rate of 5.6% (which is a big improvement the near 17% turnover rate reported in the previous reporting cycle). Thirty-three people lost and 39 added across the government.

While self-reported data does not yet provide sufficient data to establish ideal staffing levels, it is reasonable to assert that low number of staff, and/or high turnover rates, may impact an agency’s ability to integrate Section 508 across each phase of the IT lifecycle, and/or tackle accessibility challenges that the 21st Century IDEA brings.

**IMPORTANT STAFFING METRICS**

- 588 - Number of 508 Program FTEs across all agencies
- 129 - Highest number of 508 Program FTEs reported by a single agency
- 11 - Median number of FTEs per agency
- 26 - Average number of FTEs per agency
- 1 - Lowest number of 508 Program FTEs (reported by three agencies)
- 93% of FTEs work for twelve agencies
- 74% of FTEs work for six agencies
- 48% of FTEs work for three agencies

### Recommendations

Generally speaking, agencies report challenges in their ability to perform, track and report on their program activities, and some may not be aware of the full scope of work required in each reported category (policies, resources, measurement). Based on the reported data, some agencies lack sufficient IT accessibility subject matter expertise and the tools necessary to significantly improve the accessibility of the IT portfolios.

GSA would like to remind agencies of the significant GSA and U.S. Access Board resources available, and encourage all agencies to take advantage of the wealth of information, guidance, tools, and training on [Section508.gov](https://www.section508.gov) to improve accessibility of websites and digital services under 21st Century IDEA.

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

1. **Acquisition** – In line with previous reporting, and an analysis of [FedBizOps](https://beta.sam.gov) (now [beta.sam.gov](https://beta.sam.gov)) solicitation data, few agencies regularly include accessibility requirements in IT solicitations (with some notable exceptions), and agencies lack the capacity to monitor the accessibility of official communications, software and mobile devices. This continues to leave the U.S. Government open to legally liability in two areas: failure to provide an inclusive workplace for all federal employees, and failure to make government information available to all citizens.

Recommendation: Agencies must proactively specify accessibility requirements in all IT solicitations, including those for commercial software and in-house development projects. While agencies report ‘good’ planning and resourcing for acquisition accessibility, a previous GSA pilot provided evidence that a majority of all IT solicitations posted on [FedBizOps](https://beta.sam.gov) do not adequately address Section 508 requirements. Notably, those agencies that regularly review IT solicitations for inclusion of accessibility requirements show very high rates of compliant solicitations.

2. **Lifecycle Activities** – Collectively, a doubling of webpage non-conformance errors in this reporting period (from the previous reporting cycle) which may suggest that accessibility is not integrated into publishing policies, training, workflows and change management activities.

Recommendation: Agencies establish and maintain methods for tracking agency-wide accessibility compliance management to enable data-driven analysis to influence management and development decisions through all phases of the product life cycle.

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

Recommendation: Agencies track complaints of Section 508 non-compliance as a subset of other accessibility complaints to enable more accurate reporting of Section 508-specific complaints.

4. **Testing and Evaluation** – According to agency reporting for this period, only 1.6 million Internet web pages (down 61% from 4.4 million) and another 131 thousand intranet web pages were evaluated for conformance. Approximately 32% of those pages tested contained accessibility issues; compared to only 16% in the last reporting cycle.

Recommendation: Agencies incorporate accessibility testing into IT development methodologies to ensure that qualified accessibility testing resources are available to continually evaluate websites, software, mobile applications and other ICT for conformance to standards, prior to each deployment. To benefit from standardization and commonalities, agencies should integrate the [ICT Testing Baseline and Trusted Tester Program](#) for testing web-based applications, and the electronic authoring guidelines and checklists developed by the [Accessible Electronic Document \(AED\) Community of Practice \(CoP\)](#) into their development processes and procedures.

5. **Training** – During the August reporting cycle there was moderate participation in GSA and ACoP hosted training as not all CFO Act agency Section 508 Program Managers, or their backups, attended the bi-monthly meetings - with even fewer having representative attendance at all of the events.

Recommendation: We encourage agency Section 508 Program Managers to participate in GSA and ACoP hosted accessibility training, as well as training in other, related professional disciplines (e.g., acquisition, design, development, testing, change management, content development, multimedia) to ensure that accessibility is fully incorporated into IT product lifecycle processes. Efforts are underway to provide Section 508 training for website design and developers.

Ensure that adequate resources are made available for accessibility training, and leverage the free training available to agency staff from GSA and the ACoP to:

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

## Appendix A - Section 508 Program Maturity Reporting Process

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

This reporting and data analysis supports the following activities:

- GSA and the CIOC Accessibility Community of Practice (ACoP) use the findings to develop solutions and recommendations to improve Section 508 program management across the federal government.
- The ACoP uses information to inform their annual strategic agenda, which supports vendor outreach, development of effective education programs, and elevation of agency best practices.
- GSA OGP uses these reports to develop guidance for Section 508 Program Managers such as online and classroom training, technical assistance, and best practices documented on [Section508.gov](https://www.section508.gov).
- Federal agencies use this exercise as an opportunity to benchmark with other agencies, and share best practices to improve the accessibility of their IT portfolio.

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

## Appendix B -Program Maturity Evaluation Factors

### Program Maturity Evaluation Factors

- **Acquisition:** Validate that solicitations incorporate Section 508 language in procurement documentation (e.g., statement of work, performance work statement).
- **Agency ICT:** Validate that IT accessibility requirements are built into standard business processes, including enterprise architecture, design, development, content creation, testing, deployment, and ongoing maintenance activities.
- **Testing and Validation:** Test and validate Section 508 conformance claims.
- **Complaints Process:** Track and resolve incoming Section 508 complaints.
- **Training:** Train stakeholders on roles and responsibilities related to Section 508 compliance.

### Maturity Level Legend

- **Ad-Hoc:** No formal policies, processes, or procedures defined
- **Planned:** Policies, processes, or procedures defined and communicated
- **Resourced:** Resources committed and/or staff trained to implement policies, processes, and procedures
- **Measured:** Validation is performed: results are measured and tracked.



## Appendix C: Section 508 Program Maturity Assessment Reporting Results – August 2019.

Reporting Category	Acquisition	Agency ICT (E&IT) Lifecycle Activities	Complaints Process	Testing and Validation	Training
# of Agencies Reporting 1-Ad Hoc Aug 2018	1	4	1	2	1
# of Agencies Reporting 1-Ad Hoc Feb 2019	1	3	1	1	2
# of Agencies Reporting 1-Ad Hoc Feb 2019	1	2	1	1	3
# of Agencies Reporting 2-Planned Aug 2018	10	6	7	9	3
# of Agencies Reporting 2-Planned Feb 2019	8	5	5	8	3
# of Agencies Reporting 2-Planned Feb 2019	3	6	4	8	2
# of Agencies Reporting 3-Resourced Aug 2018	11	10	7	8	5
# of Agencies Reporting 3-Resourced Feb 2019	12	13	6	11	5
# of Agencies Reporting 3-Resourced Feb 2019	16	13	9	11	6
# of Agencies Reporting 4-Measured Aug 2018	1	3	8	4	4
# of Agencies Reporting 4-Measured Feb 2019	2	3	12	4	4
# of Agencies Reporting 4-Measured Feb 2019	3	2	9	3	3

## Appendix D: Agency-provided Metrics and 508 Conformance Metrics (August 2019)

Agency	Federal Employee	Contractor Employee	Acquisition	Lifecycle	Testing	Complaints Process	Training	# Internet Webpages Evaluated	% Internet Webpages Conformant	# Intranet Webpages Evaluated	% Intranet Webpages Conformant
DHS	22.00	32.00	Resourced	Resourced	Resourced	Resourced	Resourced	103,235	63	0	0
DOC	10.00	4.00	Resourced	Planned	Planned	Resourced	Planned	20	85	50	75
DOD	50.00	38.00	Resourced	Resourced	Resourced	Measured	Resourced	14,409	39	1,274	62
DOE	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	58,321	73	11,965	94
DOI	9.00	0.00	Resourced	Planned	Measured	Measured	Measured	445,221	88	4,861	85
DOJ	24.00	13.00	Resourced	Resourced	Resourced	Planned	Planned	157	98	155	37
DOL	-	-	-	-	-	-	-	-	-	-	-
DOT	10.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	275,000	74	21,000	54
ED	3.00	4.00	Resourced	Measured	Measured	Ad Hoc	Resourced	61	96	7	92
EPA	3.00	3.00	Planned	Planned	Planned	Measured	Measured	0	0	0	0
FDIC	2.00	2.00	Planned	Resourced	Resourced	Measured	Resourced	92	87	92	63
GSA	3.00	1.00	Resourced	Resourced	Measured	Measured	Resourced	8,937	82	1,260	96
HHS	81.00	48.00	Resourced	Resourced	Measured	Resourced	Resourced	0	0	0	0
HUD	1.00	0.00	Resourced	Planned	Planned	Planned	Resourced	100	96	65	90
ITC	2.00	0.00	Planned	Planned	Planned	Resourced	Planned	99	90	40	60
MSPB	3.00	0.00	Resourced	Ad Hoc	Planned	Resourced	Ad Hoc	40	91	10	75
NARA	2.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	21	95	21	90
NASA	10.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	946	45	2,172	53
NCUA	1.00	3.00	Resourced	Resourced	Measured	Resourced	Measured	5,270	96	5,463	12
NRC	1.00	0.00	Resourced	Planned	Planned	Measured	Planned	0	0	0	0
NSF	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	98	0	0
OPM	7.00	13.00	Planned	Ad Hoc	Planned	Planned	Planned	2,696	98	148	100
SBA	1.00	0.00	Ad Hoc	Ad Hoc	Ad Hoc	Measured	Planned	900	60	0	0
SEC	1.00	0.00	Resourced	Measured	Measured	Ad Hoc	Resourced	11,132	100	3,100	100
SSA	35.00	8.00	Measured	Resourced	Resourced	Measured	Resourced	24,379	99	80,972	79
STATE	2.00	2.00	Measured	Resourced	Resourced	Resourced	Planned	0	0	18	33
TREASURY	35.00	19.00	Resourced	Resourced	Resourced	Resourced	Planned	8,175	92	1,047	23
USAID	1.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	191	99	0	0
USDA	15.00	5.00	Measured	Resourced	Resourced	Planned	Resourced	249,378	72	6,401	55
VA	24.00	41.00	Planned	Measured	Measured	Measured	Measured	489,976	0	0	0