



# Spring 2021 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 access to electronic and information technology provided by the Federal government to employees and the public.
  - 2017 final rule - jointly updated requirements for information and communication technology covered by Section 508 of the Rehabilitation Act and Section 255 of the Communication Act.
  - 2021 is the 20th anniversary of the Section 508 standards becoming enforceable
  - The 21st Century Integrated Digital Experience Act (IDEA) (2019) re-emphasized web and digital service accessibility



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

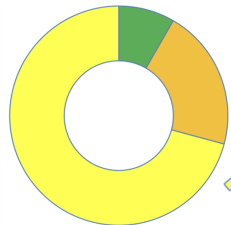
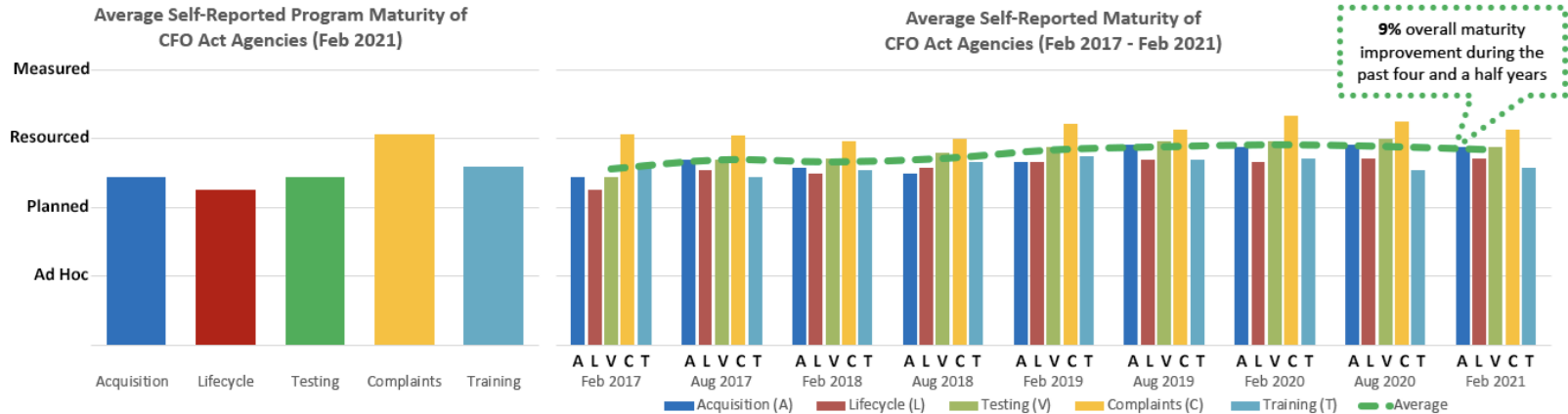


- Bi-Annually Executive Branch agencies self-report on\*:
- the maturity level of the Section 508 Program across five performance metrics
  - the number of Internet and Intranet websites tested for compliance
  - the percentage of those websites tested which were found to be conformant
  - the number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

(\*See Appendix A for agency submitted data)

# At-a-Glance: Measuring Maturity

*“You can’t manage what you can’t measure.” - Peter Drucker*



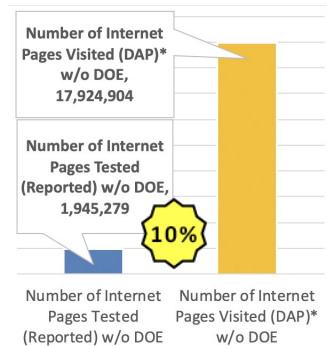
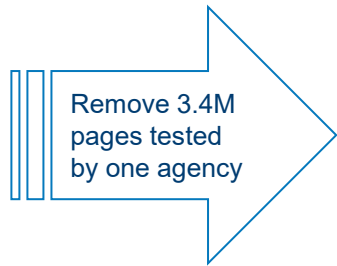
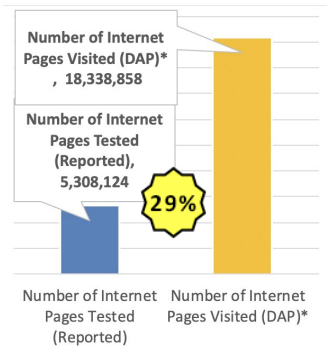
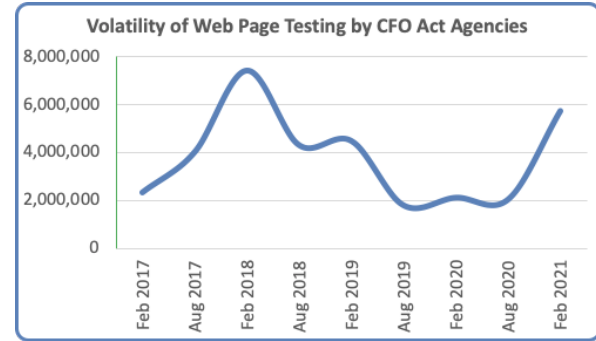
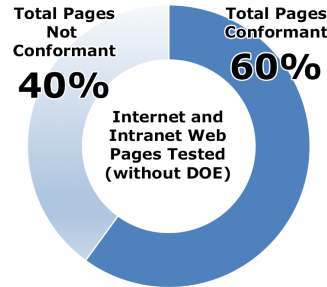
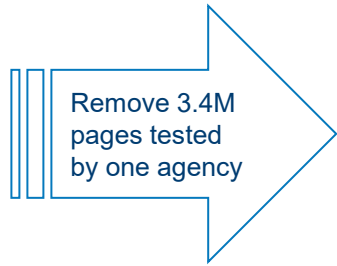
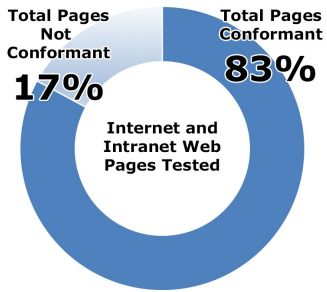
- 2 CFO Act agencies reported an increase in overall maturity
- 5 CFO Act agencies reported a decrease in overall maturity
- 14 CFO Act agencies reported no change in overall maturity



- 3 CFO Act agencies together have...
  - 144 Accessibility Program Employees
  - \$9.4B IT Budget
  - 2.5M Web pages visited since Sep 2020
  - 0 Web pages tested (as reported)

# At-a-Glance: Measuring Testing

## Web Conformance of CFO Act Agencies



**84% of PDF Documents Inaccessible** among top 10 downloaded files for CFO Act agencies (combined)

**25% of CFO Act Agencies are Not Testing Intranet Pages** <sup>4</sup>

# At-a-Glance: Measuring People

## Changes in the accessibility landscape since August



### 36 New Program Managers

16% turnover since March 1, 2020  
4% (10) turnover since October 1, 2020



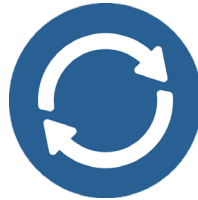
### 9 Program Manager Vacancies

3 vacancies greater than 1 year  
1 department-wide vacancy over 1 year



### 29 Average Number of 508 Staff

14 median number of staff per agency  
131 staff reported in a single agency



### 17 FTE net gain (5% Turnover)

93 FTEs were hired/left §508 Programs  
4 agencies reduced §508 Program staff



### 26% of Program Managers

Attend GSA & USAB Meetings/Training  
(Average attendance: 2 of 6 events)

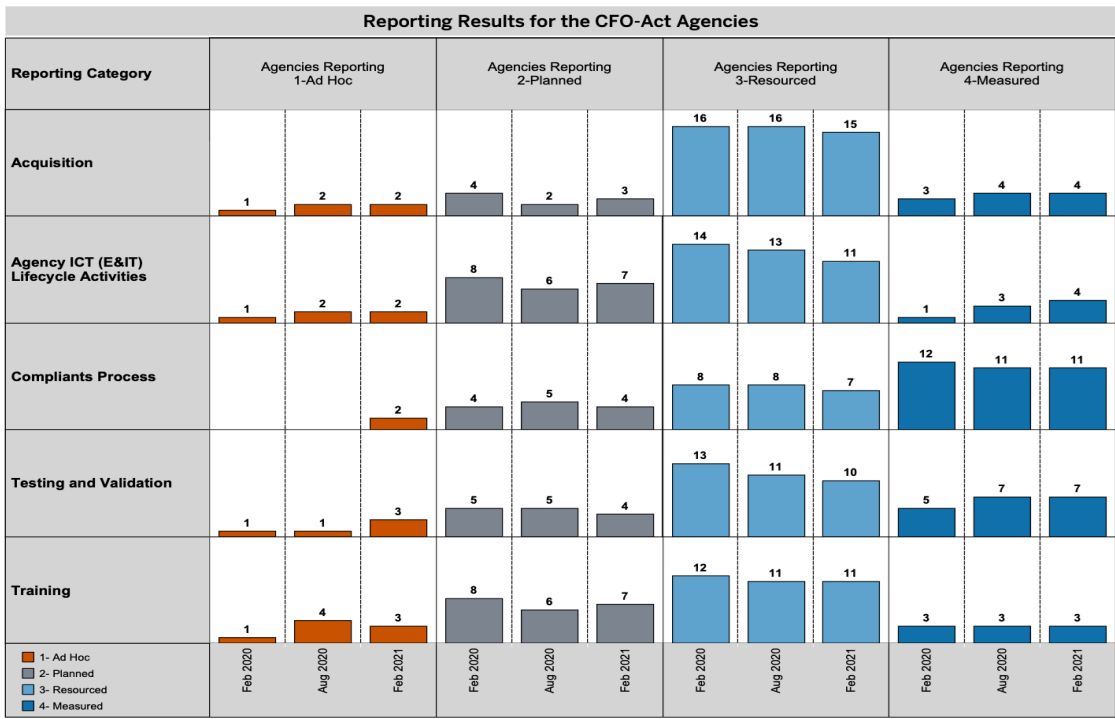


### 47% of Program Managers

Subscribe to Sec508ICAT Listserv  
36 new PMs are not subscribed

# Program Maturity

## Self-Reported Results for CFO Act Agencies



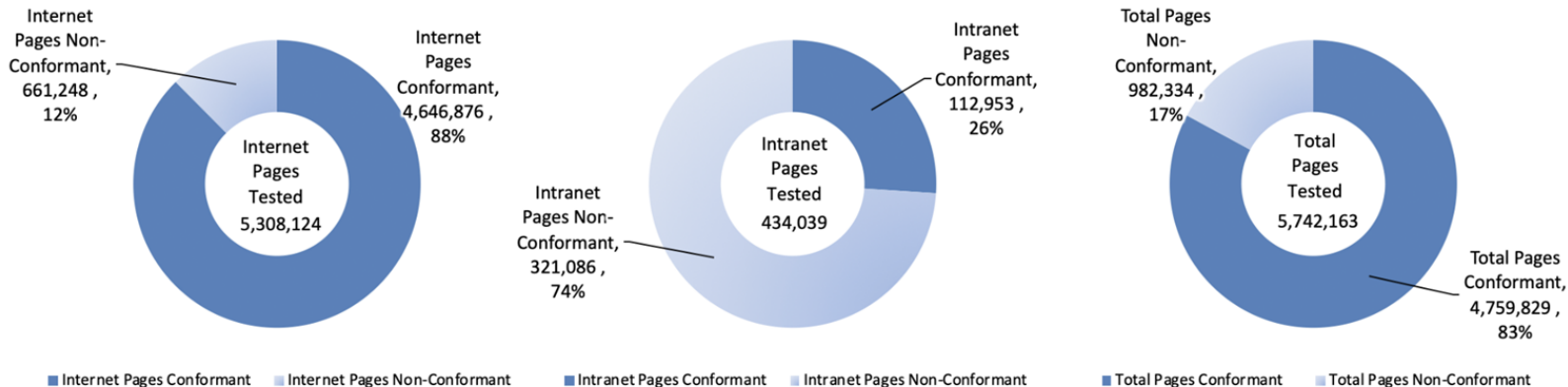
- Agency Maturity remains largely unchanged from prior reporting periods
- 20 years have passed since the release of the standards and some agencies remain “Ad Hoc” within each reporting categories
- High occurrence of ‘Measured’ Compliant Processes may be due to the record keeping of agency Civil Rights offices rather than the Section 508 Program
- Only five CFO Act agencies (15%) consider themselves ‘Measured’ in three or more of the five categories (unchanged)

(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 | February 2021

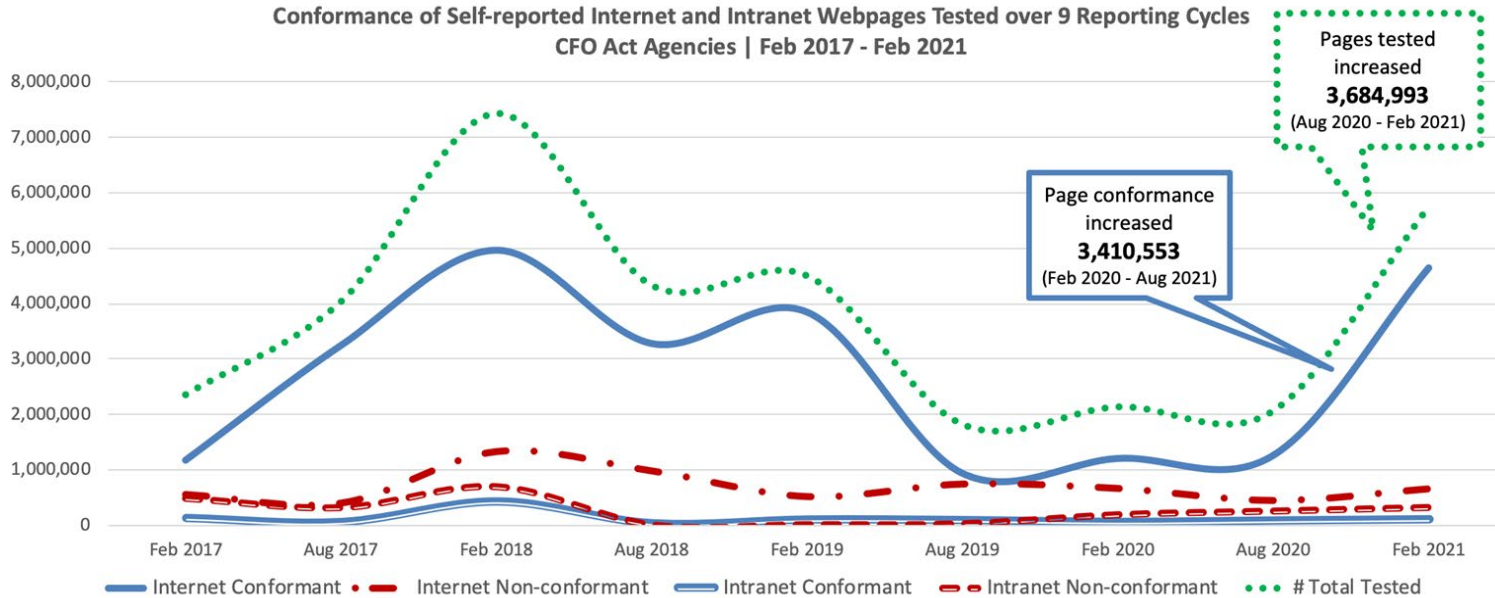


### Risks as reported:

- Agencies tested 179% more Internet and Intranet pages since Aug 2020 (2,057,170 vs 5,742,163)
- 2 agencies increased testing by 3145% and 1527% respectively. If these outliers are removed from the total, agencies only tested 1,962,381 which results in a 2% decrease in testing

# Webpage Conformance: Trend Line

## CFO Act Agencies

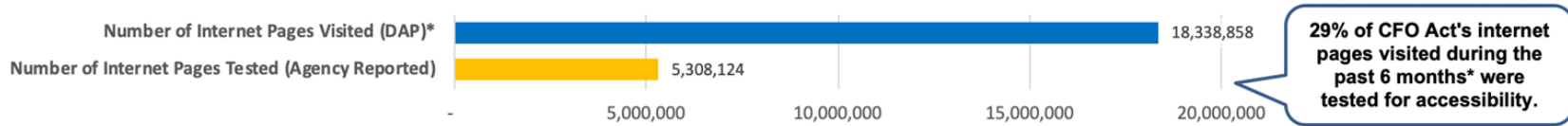


**NOTE:** When evaluating the trends over the last nine reporting cycles, agencies inconsistently test and measure web page conformance. As a result, agencies may lack sufficient data to determine program maturity and identify gaps in agency policy, development, testing, change management, and content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



# Web Pages Tested vs Number of Pages

**RISK: Only 29% of CFO Act Internet Pages Tested for Conformance**



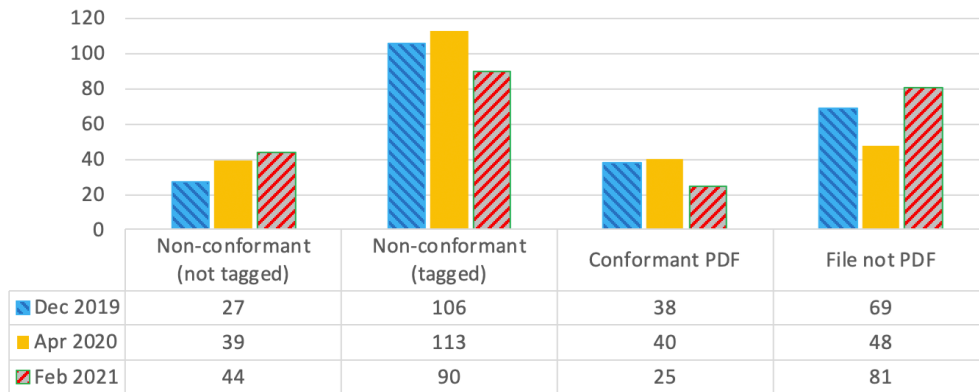
- On average, agencies are **testing 29% of pages** available on their public-facing Internet websites
- **Only 11 (34%)** of reporting agencies\*\* are **testing more than 3%** of their visited internet web pages
- The reported number of pages tested could include repeated tests of a given webpage, and thus the actual number of unique pages tested could be lower
- **2 non-CFO Act agencies** are **not configured** to use Digital Analytics Program metrics

\*Number of unique pages visited between Sep 1, 2020 through Feb 28, 2021 available from the [Digital Analytics Program](#). Number of unique pages may include visited pages that use query parameters. \*\* Agencies that use the [Digital Analytics Program](#)

# PDF Document Conformance: Snapshot

## CFO Act Agencies

**PDF Conformance among Top 10 Downloads (DEC 2019 - FEB 2021)  
CFO Act Agencies**



\*Data obtained from [analytics.usa.gov](https://analytics.usa.gov) "Top Downloads Yesterday" agency report. PDF document testing followed CIOC ACOP AED COP guidelines.

\*\* Issues generally included: file name, title, language, contrast, image alt text, table or structure headings

\*\*\* Untagged documents appear as a blank document to screen readers

- Between Apr 2020 and Feb 2021 the number of PDF documents, among the "top 10 internet downloads"\* decreased, but non-conformance increased
- In Feb 2021, among the possible 240 "top 10 downloads" from the 24 CFO Act agencies, 159 (66%) were PDFs
- Among those 159 PDF documents, 25 (16%) were found to be conformant.
- Of the remaining 134 (84%) PDFs
  - 90 (67%) were found to contain at least one issue\*\*; creating a possible barrier to access
  - 44 (33%) of the PDF documents were untagged\*\*\*; preventing access by individuals using text-to-speech and other assistive technologies

# Webpage Conformance: Summary

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## Government-wide

- Agency web conformance fluctuations likely caused by disparate enterprise-wide testing methods
- Agency-specific web page testing data highlights inconsistent testing, change management and publishing procedures as well as poor quality controls. This has resulted in:
  - Agencies are testing only 29% of pages viewed on their public-facing Internet websites
  - 17% of web pages tested are reported as non-conformant; 40% when leaving out 3.4M pages tested by one agency
  - 84% of top PDF documents downloaded contain one or more accessibility issue
- Internet pages have a significantly higher testing and conformance rate than Intranet pages;
  - Internet pages represent 88% of the total number of web pages tested; 83% conformant
  - Intranet pages represent 12% of the total number of web pages tested; 17% conformant
  - 6 CFO Act agencies (25%) are not testing Intranet pages
  - 3 CFO Act agencies (12.5%) are not testing either Internet or Intranet pages

# Program Support Staff

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## Summary

- Based on the self-reported metrics, CFO Act agency Section 508 Programs continue to experience volatility in staffing - impacting the ability to operate an effective program
  - 2 agencies reported an increase in staff by 18 and 19 FTEs respectively
  - 1 agency reported a decrease of 23 FTEs
  - 6 other agencies reported an increase in staff by 18 people in total
  - 5 agencies reported a decrease in staff (by 21 total staff members)
- 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 131 FTEs and another reports 1 FTE (for a median of 14 FTEs)
- Agency Program Manager cadre and community participation
  - 36 new PMs (15%), with 9 (4%) vacancies, since Mar 2020
  - 120 of 224 active PMs (47%) are not subscribed to the Sec508ITAC listserv
  - 61 of PMs (27%) participated in a GSA or USAB conference, webinar or event

# Recommendations

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## *Assess, Educate, Implement and Measure*



### Assess

- Establish the goal of being *Measured* in all five performance categories by Q1 FY2024 - see [Technology Accessibility Playbook Play » 11](#)
- Assess your Section 508 Program Maturity - see [Technology Accessibility Playbook » Play 2](#)
- Assess and right-size staff dedicated to support Section 508 Program activities and sufficiently train your workforce - see: [Technology Accessibility Playbook » Play 5](#)



### Educate

- Require onboarding and annual Section 508 training for 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
- Encourage workforce development through CIOC Accessibility Community of Practice (ACOP) supported conferences, webinars, training and collaboration

# Recommendations (Continued)

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## *Assess, Educate, Implement and Measure*



### Implement

- Require Section 508 language be included in all IT acquisitions
  - Use the [Accessibility Requirements Tool](#) (ART) to create solicitation language
  - Use the [Solicitations Review Tool](#) (SRT) to monitor your solicitations for language
- Implement publishing guidelines which prohibit inaccessible content from getting posted
- Implement an agency-wide testing process for consistent, actionable results
- Require that agency-wide web testing processes align with the [ICT Testing Baseline](#)
- Increase testing across websites, software, documents, video media and other ICT
- Require test results in decision making/change management procedures



### Measure




- Identify and track the number of pages published on each of your websites to best understand the scope of testing tools and resources needed to maintain conformance
- Identify and record conformance metrics for webpages and other ICT testing
- Identify and record conformance metrics for documents and other media
- CIO/CAO should be frequently briefed on accessibility performance metrics

# Initiatives & Actions

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## *GSA Government-wide IT Accessibility Program*

The GSA Government-wide IT Accessibility Program will:

-  • Promote the [ICT Baseline for Web](#), which establishes the minimum tests and evaluation guidance for determining whether Web content meets the Section 508 requirements
-  • Manage the Section 508 PM Cadre:
  - Establish semi-annual Program Manager (PM) verification to affirm agency PM designation, work status, contact information, and organizational positioning
  - Mature notifications of designation, onboarding and listing of new PMs
  - Automatically subscribe Program Managers to the Sec508ITAC Listserv
-  • Leverage the analysis and findings of this report to prioritize accessibility training agendas and inform the CIOC Accessibility Community of Practice (ACoP) FY22 strategic agenda



# Online Resources

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## *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](#)
  - g. [Synchronized Media \(Multimedia\)](#)
7. [GSA Office of Government-wide Policy IT Accessibility Program Available to provide technical assistance to individual Executive Branch agencies \(Email\)](#)

# Appendix

# Appendix A: Self-Reporting Results for CFO Act Agencies

Agency Initial	Annual IT Budget	Federal Employee	Contractor Employee	Acquisition	Lifecycle	Testing	Complaints Process	Training	# Internet Webpages Evaluated	% Internet Webpages Conformant	# Intranet Webpages Evaluated	% Intranet Webpages Conformant	Total # Employee	# Internet Conformant	# Intranet Conformant
DHS	\$7.3B	36.00	33.00	Resourced	Resourced	Resourced	Planned	Resourced	128,595	69.2	0	0.0	69	89,001	0
DOC	\$3.7B	10.00	4.00	Resourced	Planned	Planned	Resourced	Planned	100	92.0	100	90.0	14	92	90
DOD	\$37.0B	42.00	37.00	Resourced	Resourced	Resourced	Measured	Resourced	69,031	66.0	6,619	95.0	79	45,560	6,288
DOE	\$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	3,362,845	99.0	39,177	67.0	2	3,329,217	26,249
DOI	\$1.4B	8.00	3.00	Resourced	Planned	Measured	Measured	Measured	545,449	93.0	4,891	88.0	11	507,268	4,304
DOJ	\$3.1B	23.00	4.00	Resourced	Resourced	Ad Hoc	Ad Hoc	Ad Hoc	153	100.0	161	20.0	27	153	32
DOL	\$779M	60.00	34.00	Measured	Measured	Measured	Measured	Measured	366,027	54.0	11,733	28.0	94	197,655	3,285
DOT	\$3.6B	24.00	3.00	Resourced	Resourced	Resourced	Resourced	Resourced	452,750	84.0	24,200	70.0	27	380,310	16,940
ED	\$844M	4.00	5.00	Measured	Measured	Measured	Measured	Resourced	25	96.0	10	90.0	9	24	9
EPA	\$370M	3.00	0.00	Ad Hoc	Ad Hoc	Ad Hoc	Planned	Ad Hoc	0	0.0	0	0.0	3	-	0
GSA	\$729M	4.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	10,126	86.0	9,311	83.0	4	8,708	7,728
HHS	\$6.6B	90.00	41.00	Resourced	Resourced	Resourced	Ad Hoc	Resourced	0	0.0	0	0.0	131	-	0
HUD	\$437M	3.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	100	96.0	65	90.0	4	96	59
NASA	\$2.3B	10.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	903	46.8	2,045	54.6	13	423	1,117
NRC	\$163M	1.00	0.00	Planned	Planned	Planned	Measured	Planned	10	0.0	5	0.0	1	-	0
NSF	\$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	96.0	25	88.6	3	24	22
OPM	\$147M	7.00	8.00	Planned	Ad Hoc	Planned	Planned	Planned	4,152	100.0	15	100.0	15	4,152	15
SBA	\$117M	1.00	1.00	Ad Hoc	Planned	Ad Hoc	Measured	Planned	3,914	64.0	0	0.0	2	2,505	0
SSA	\$2.0B	31.00	9.00	Measured	Measured	Measured	Measured	Resourced	25,491	99.0	48,685	89.0	40	25,236	43,330
State	\$2.4B	2.00	7.00	Measured	Planned	Planned	Measured	Planned	0	0.0	0	0.0	9	-	-
Treasury	\$4.8B	32.00	19.00	Resourced	Resourced	Resourced	Resourced	Resourced	14,097	96.0	3,063	61.0	51	13,533	1,868
USAID	\$217M	3.00	1.00	Resourced	Resourced	Resourced	Resourced	Planned	1,560	32.0	0	0.0	4	499	0
USDA	\$2.4B	21.00	10.00	Resourced	Planned	Resourced	Planned	Resourced	132,566	32.0	16,172	10.0	31	42,421	1,617
VA	\$6.1B	25.00	39.00	Planned	Measured	Measured	Measured	Measured	190,205	0.0	267,762	0.0	64	-	0
CNS	-	4.00	0.00	Planned	Planned	Planned	Ad Hoc	Planned	4	4.0	-	0.0	4	0	0
EEOC	-	2.00	1.00	Resourced	Measured	Measured	Resourced	Resourced	25	99.0	25	98.0	3	25	25
FCC	-	1.00	6.00	Resourced	Resourced	Resourced	Resourced	Resourced	0	0.0	-	0.0	7	-	0
FDIC	-	1.00	2.00	Planned	Resourced	Measured	Measured	Measured	40	94.0	40	91.0	3	38	36
NARA	-	1.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	10	100.0	10	100.0	1	10	10
NCUA	-	1.00	2.00	Resourced	Resourced	Measured	Measured	Measured	6,589	98.0	459	12.0	3	6,457	55
PBGC	-	9.00	0.00	Planned	Resourced	Planned	Measured	Measured	5,939	82.0	-	0.0	9	4,870	0
SEC	-	2.00	4.00	Resourced	Measured	Measured	Resourced	Resourced	8	96.4	38	90.7	6	8	34
USAB	-	4.00	0.00	Resourced	Resourced	Resourced	Resourced	Resourced	567	100.0	11	100.0	4	567	11
USITC	-	2.00	0.00	Resourced	Resourced	Measured	Resourced	Resourced	48	98.0	195	79.0	2	47	154

## 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 2020	1	1	0	1	3
# of Agencies Reporting 1-Ad Hoc AUG 2020	2	2	2	1	5
# of Agencies Reporting 1-Ad Hoc FEB 2021	2	2	3	4	4
# of Agencies Reporting 2-Planned FEB 2020	4	8	4	5	8
# of Agencies Reporting 2-Planned AUG 2020	3	8	6	6	6
# of Agencies Reporting 2-Planned FEB 2021	6	9	6	4	8
# of Agencies Reporting 3-Resourced FEB 2020	16	14	8	13	12
# of Agencies Reporting 3-Resourced AUG 2020	23	17	12	13	16
# of Agencies Reporting 3-Resourced FEB 2021	22	17	13	12	16
# of Agencies Reporting 4-Measured FEB 2020	3	1	12	5	3
# of Agencies Reporting 4-Measured AUG 2020	4	5	12	12	5
# of Agencies Reporting 4-Measured FEB 2021	4	6	12	14	6

### 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 over 9 Reporting Cycles for CFO Act Agencies

Test Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020	Feb 2021
Internet Tested	1,731,362	3,648,457	6,303,666	4,267,616	4,368,426	1,682,127	1,872,339	1,709,362	5,308,124
Internet Conformant	1,171,947	3,245,807	4,965,901	3,280,361	3,847,427	933,486	1,202,547	1,258,970	4,646,876
Internet Non-conformant	559,415	402,650	1,337,765	987,255	520,999	748,641	669,792	450,392	661,248
Intranet Tested	617,551	379,895	1,121,369	54,536	126,760	131,395	258,363	347,808	434,039
Intranet Conformant	135,480	62,539	434,483	39,742	107,866	97,915	64,686	90,307	112,953
Intranet Non-conformant	482,071	317,356	686,886	14,794	18,894	33,480	193,677	257,501	321,086
# Total Tested	2,348,913	4,028,352	7,425,035	4,322,152	4,495,186	1,813,522	2,130,702	2,057,170	5,742,163
# Total C	1,307,426	3,308,346	5,400,385	3,320,103	3,955,293	1,031,401	1,267,233	1,349,276	4,759,829
# Total NC	1,041,487	720,006	2,024,650	1,002,049	539,893	782,121	863,469	707,894	982,334
% Total C	56%	82%	73%	77%	88%	57%	59%	66%	83%
% Total NC	44%	18%	27%	23%	12%	43%	41%	34%	17%

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

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Staff Type	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	AUG 2020	FEB 2021
Federal Employees	252	279	467	388	346	350	391	426	443
Contractor Employees	107	138	261	238	236	238	278	264	264
Total Program Staff	358	417	728	625	582	588	669	690	707
Average Program Staff	14.93	17.38	30.33	26.05	24.25	24.50	27.88	28.8	29.46

## Appendix E: Number of Webpages Visited by Agency

Agency	Number of Internet Pages Visited Between Sep 01, 2020 - Feb 14, 2021 (DAP)	Reported Number of Webpages Tested by Agency	Percentage of Webpages Tested
DHS	996,728.00	128,595.00	12.90%
DOC	997,620.00	100.00	0.01%
DOD	999,502.00	69,031.00	6.91%
DOE	999,365.00	3,362,845.00	336.50%
DOI	997,640.00	545,449.00	54.67%
DOJ	811,816.00	153.00	0.02%
DOL	745,888.00	366,027.00	49.07%
DOT	999,449.00	452,750.00	45.30%
ED	461,126.00	25.00	0.01%
EPA	758,353.00	0	0.00%
GSA	998,393.00	10,126.00	1.01%
HHS	728,337.00	0	0.00%
HUD	126,222.00	100.00	0.08%
NASA	994,551.00	903.00	0.09%
NRC	47,457.00	10.00	0.02%
NSF	402,948.00	25.00	0.01%
OPM	999,941.00	4,152.00	0.42%
SBA	910,075.00	3,914.00	0.43%
SSA	211,469.00	25,491.00	12.05%
State	999,571.00	0	0.00%
Treasury	995,195.00	14,097.00	1.42%
USAID	161,760.00	1,560.00	0.96%
USDA	996,671.00	132,566.00	13.30%
VA	998,781.00	190,205.00	19.04%
CNS	38,708.00	4.00	0.01%
EEOC	43,501.00	25.00	0.06%
FCC	0	0	0.00%
FDIC	47,833.00	40.00	0.08%
NARA	985,901.00	10.00	0.00%
NCUA	0	6,589.00	0.00%
PBGC	11,765.00	5,939.00	0.00%
SEC	998,740.00	8.00	0.00%
USAB	18,642.00	567.00	3.04%
ISITC	9,813.00	48.00	0.49%
Total of All Reporting Agencies	20,465,306.00	5,320,739.00	26.00%

## Appendix F: Average Self-Reported Maturity of CFO Act Agencies (February 2017 – February 2021)

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Maturity Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020	Feb 2021
Acquisition (A)	2.44	2.70	2.58	2.50	2.67	2.91	2.88	2.92	2.88
Technology Lifecycle Activities (L)	2.25	2.55	2.50	2.58	2.67	2.70	2.67	2.71	2.71
Testing and Validation (V)	2.44	2.70	2.71	2.79	2.88	2.96	2.96	3.00	2.88
Complaints Process (C)	3.06	3.05	2.96	3.00	3.21	3.13	3.33	3.25	3.13
Training (T)	2.60	2.45	2.54	2.67	2.75	2.70	2.71	2.54	2.58
Average	2.56	2.69	2.66	2.71	2.83	2.88	2.91	2.88	2.83