Spring 2022 Section 508 Program Maturity Report

Executive Summary

Government-wide IT Accessibility Program | June 2022

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 was 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
- 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 requires that Executive Branch agencies assess and self-report semi-annually on the maturity of their Section 508 Programs. Several other agencies voluntarily participate

Semi-Annual 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

Accessibility is Foundation to Experience

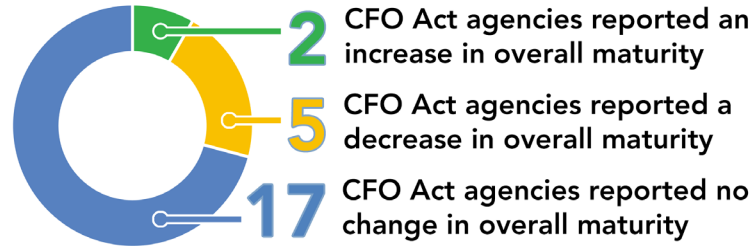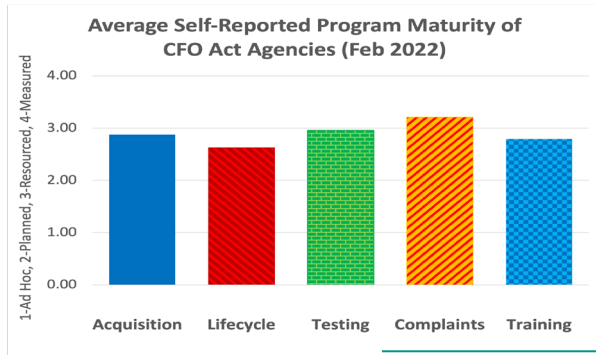## *Federal CIO comments at the ACT-IAC CX Summit*

❑ "Users from all walks of life, with **all types of abilities**, have a right to be able to use a federal website to apply for benefits, manage a claim or contact customer support. That means we need to **take seriously** Section 508 **accessibility** standards when we design digital experiences. It has to be **as important** as designing **security** into all of our products."

❑ "Failure in one area can have **detrimental** ripple effects."

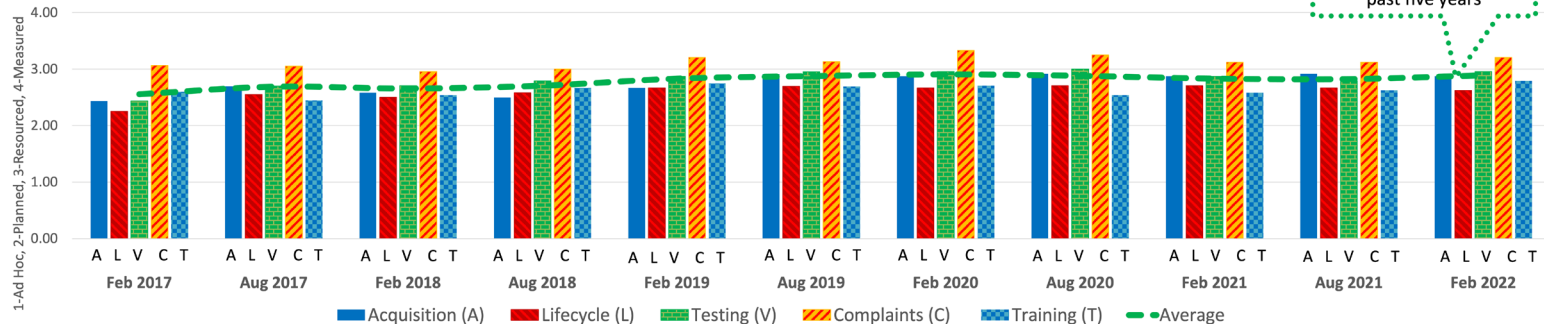❑ "The nerd in me will continue to **focus every single day on accessibility**."

Clare Martorana
Federal Chief
Information Officer

At-a-Glance: Measuring Maturity

"You can't manage what you can't measure." **- Peter Drucker**

Average Self-Reported Program Maturity of CFO Act Agencies (Feb 2022)

2 CFO Act agencies reported an increase in overall maturity

5 CFO Act agencies reported a decrease in overall maturity

17 CFO Act agencies reported no change in overall maturity

Average Self-Reported Maturity of CFO Act Agencies (Feb 2017 - Feb 2022)

12% overall maturity improvement during the past five years

At-a-Glance: Measuring Testing

Web Conformance of CFO Act Agencies

Total Pages Not Conformant
14%

Total Pages Conformant
86%

Internet and Intranet Web Pages Tested

Volatility of Web Page Testing by CFO Act Agencies

8,000,000
6,000,000
4,000,000
2,000,000
0

Feb 2017 | Aug 2017 | Feb 2018 | Aug 2018 | Feb 2019 | Aug 2019 | Feb 2020 | Aug 2020 | Feb 2021 | Aug 2021 | Feb 2022

Number of Internet Pages Visited (DAP)*, 19,043,523

Number of Internet Pages Tested (Agency Reported), 5,596,600

Number of Internet Pages Tested (Agency Reported)

Number of Internet Pages Visited (DAP)*

12.5% of CFO Act Agencies are Not Testing Intranet Pages

PDF PDF PDF PDF PDF

Less than 1/3 of PDFs are Accessible among top 10 downloaded files for CFO Act agencies (combined)

*Digital Analytics Program

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At-a-Glance: Measuring People

Changes in the accessibility landscape since August

39 New Program Managers
13 PMs have departed since Sept 1
3.3 years is the average tenure of PMs
1.0 year is the median tenure of PMs

34 Program Manager Vacancies
8 vacancies greater than 1 year
2 agency-wide vacancies over 1 year

39 Average Number of 508 Staff
13 median number of staff per agency
230 staff reported in a single agency

168 FTE net gain (4% Turnover)
234 FTEs were hired/left §508 Programs
3 agencies reduced §508 Program staff

29% of Program Managers
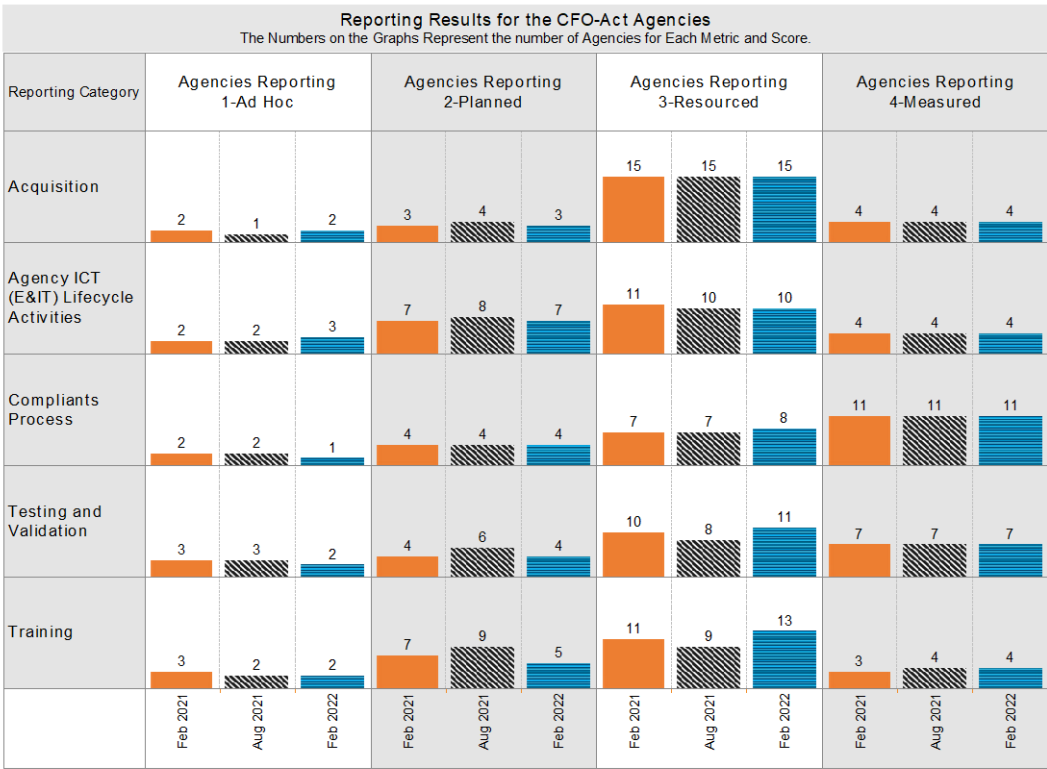Attend GSA & USAB Meetings/Training
(Average attendance: 2 of 6 events)

11 Accessibility Statements
Do not appear on websites for Executive
Branch agencies as per OMB memo

Program Maturity

Self-Reported Results for CFO Act Agencies

Reporting Results for the CFO-Act Agencies
The Numbers on the Graphs Represent the number of Agencies for Each Metric and Score.

- **Only 5** CFO Act agencies (21%) consider themselves '*Measured*' in three or more of the five categories (unchanged)

- Agency maturity remains largely **unchanged** from prior reporting

- **20 years have passed** since the release of the standards and some agencies remain *"Ad Hoc"* within each reporting categories

- High occurrence of *'Measured'* Complaints Processes may be due to the record keeping of agency **Civil Rights offices** rather than the Section 508 Program

(See Appendix B for definition of terms)

Webpage Conformance: Summary

Government-wide

- Government-wide web conformance data, when consolidated, **hides the real challenge** facing the federal government and its goal to be a **model** for diversity, equity, inclusion and **accessibility**

- Agency-specific web page testing data highlights **inconsistent** testing, change management and publishing procedures as well as poor quality controls. This has resulted in:
  - Government-wide, agencies tested 29% of the number of pages viewed on their public-facing websites, yet:
    - 1 agency is testing 349% of their public-facing web pages (DOE: 3,485,105 pages)
    - 14 agencies are testing less than 1% of the number of public-facing web pages
  - 86% of web pages tested are reported as conformant; but with the removal of only **one** agency's testing data (DOE), conformance drops to 74%
  - 66% 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 94% of the total number of web pages tested; 91% conformant
  - Intranet pages represent 6% of the total number of web pages tested; 55% conformant
  - 3 CFO Act agencies (12.5%) are **not testing** Intranet pages

Webpage Conformance: Snapshot

Self-Reported Results for CFO Act Agencies

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

91%
Conformance
of 5,596,600
Internet Pages

55%
Conformance
of 359,911
Intranet Pages

88%
Conformance
of 5,956,511
Total Pages
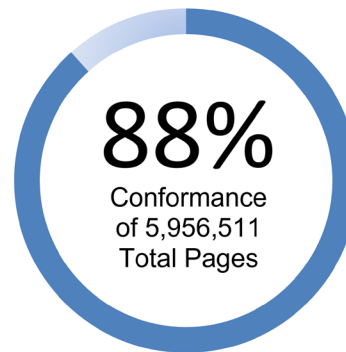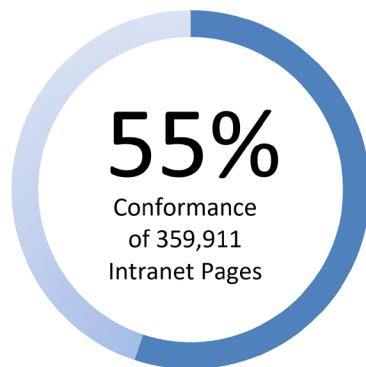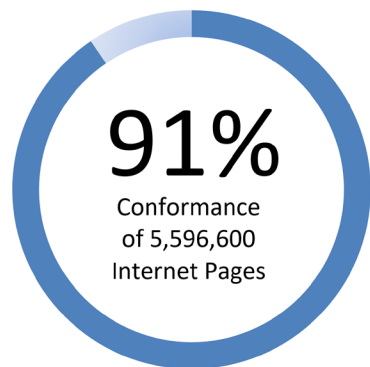
Risks as reported:
- Agencies tested only 2.2% more Internet and Intranet pages since Aug 2021
- 3 CFO Act agencies (12.5%) are not testing Intranet pages
- Volatility of testing remains a barrier to accessible customer interactions and employee inclusion

Webpage Conformance: Trend Line

CFO Act Agencies

Conformance of Self-reported Internet and Intranet Webpages Tested over 11 Reporting Cycles
CFO Act Agencies | Feb 2017 - Feb 2022

Total pages tested increased **103,307 (2%)** (Aug 2021 - Feb 2022)

Total page conformance increased **143,523 (3%)** (Aug 2021 - Feb 2022)

Legend: Internet Conformant — Internet Non-conformant — Intranet Conformant — Intranet Non-conformant — # Total Tested
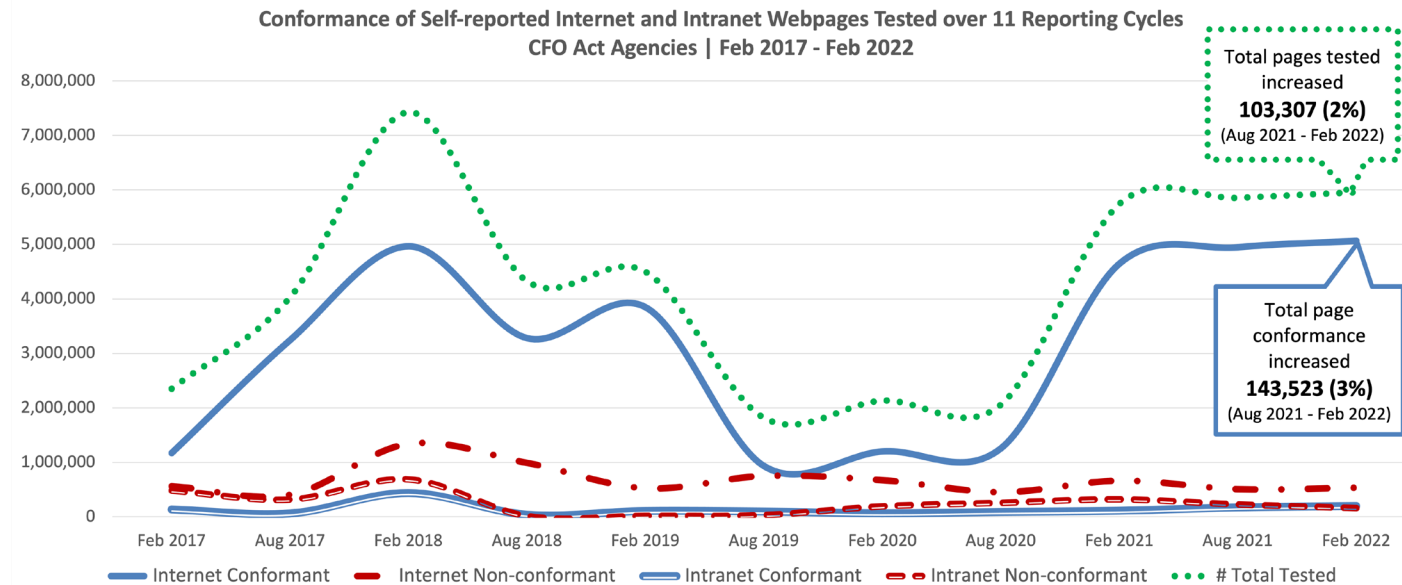
NOTE: When evaluating the trends over the last eleven reporting cycles, agencies inconsistently test and measure web page conformance. As a result, agencies may lack sufficient data to determine program maturity and identify gaps in agency policy, development, testing, change management, and content 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
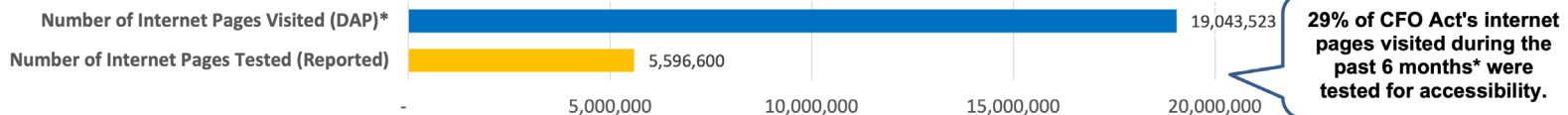
Number of Internet Pages Visited (DAP)* — 19,043,523

Number of Internet Pages Tested (Reported) — 5,596,600

(chart x-axis: - , 5,000,000 , 10,000,000 , 15,000,000 , 20,000,000)

29% of CFO Act's internet pages visited during the past 6 months* were tested for accessibility.

- On average, agencies are **testing 29% of pages** available on their public-facing Internet websites

- **Only 19 (**58%) of reporting agencies** are **testing *more than* 1%** of their visited internet web pages

- 100% of CFO Act agencies are configured to use Digital Analytics Program metrics

- 10% of non-CFO Act agencies are **not configured** to use Digital Analytics Program metrics

- 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

Number of unique pages visited between Sep 1, 2021 through Feb 28, 2022 available from the Digital Analytics Program.
** Agencies configured to use the Digital Analytics Program (DAP)

PDF Document Conformance: Snapshot

CFO Act Agencies

PDF Conformance among Top 10 Downloads (FEB 2022) CFO Act Agencies

Chart showing bars:
- Non-conformant (not tagged): 35
- Non-conformant (tagged): 94
- Conformant PDF: 65
- File not PDF: 46

PDF Conformance among Top 10 Downloads (DEC 2019 - FEB 2022) CFO Act Agencies

Line chart (Dec 2019 – Feb 2022) with series: Non-conformant (not tagged), Non-conformant (tagged), Conformant PDF
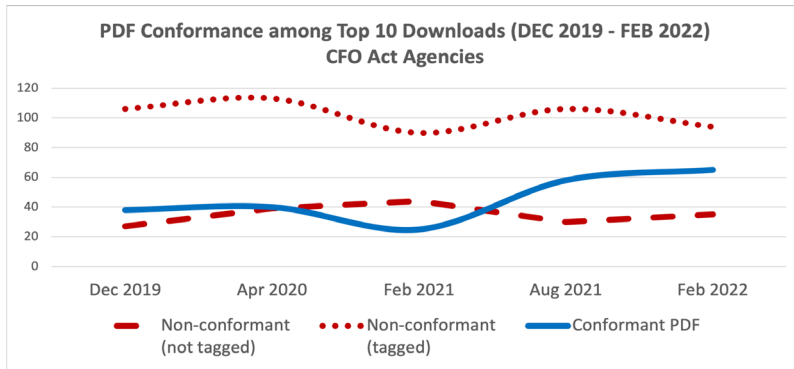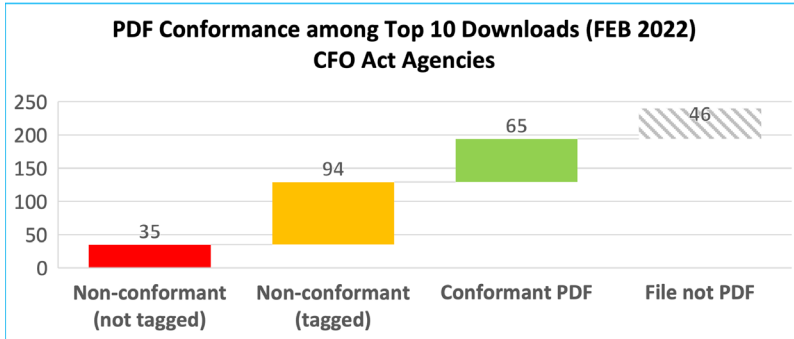
- In Feb 2022, among the possible 240 "top 10 downloads" from the 24 CFO Act agencies, 194 (80%) were PDFs*

- Among those 194 PDF documents, 65 (34%) were found to be conformant.

- **No** agency had all of their PDFs fully conformant

- Of the remaining 129 (66%) PDFs
  - 94 (73%) were found to contain at least one issue**; creating a possible barrier to access
  - 35 (27%) of the PDF documents were untagged***; preventing access by individuals using text-to-speech and other assistive technologies

*Data obtained from analytics.usa.gov "Top Downloads Yesterday" agency report. PDF document testing followed Accessible Electronic Document Community of Practice 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

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Program Support Staff

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**
  - 3 agencies reported a decrease in staff while 12 agencies reported an increase
  - 3 agencies reported a 100%+ increase in FTE staff
  - 1 agency reported a decrease of 23 FTEs (a 37% decrease)
  - Data volatility suggests that self-reported data results in inconsistent reporting and a difficultly in measuring progress and workforce management

- 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 230 FTEs and another reports 1 FTE (for a median of 13 FTEs)

- Agency Program Manager cadre and community participation since August 2021
  - 39 new PMs (15%), with 34 (13%) vacancies
  - 64 of the PMs (29%) participated in a GSA or USAB conference, webinar or event
  - 13 PMs (6%) have departed or are no longer serving as PM
  - 1.0 years is the median tenure of PMs, 3.3 years is the average tenure of PMs

Standout Agencies from our Spring Cycle

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 metric categories

- Department of Energy and Department of the Interior for consistently high levels of webpage testing and conformance

- Office of Personnel Management and the Social Security Administration for having the highest PDF conformance rates among 'Top 10 Downloads'

Recommendations

Recommendations to Agencies

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)

Assess, Educate, Implement and Measure

Implement
- Include Section 508 requirements language in all IT acquisitions
  - Use the Accessibility Requirements Tool (ART) to create solicitation language
  - Use the Solicitations Review Tool (SRT) to monitor solicitations for adequate requirements language
- Implement publication controls that **prohibit** inaccessible content from being posted
- Implement an agency-wide testing process for consistent, actionable results for all ICT
- Require that **agency-wide web testing processes** align with the ICT Testing Baseline
- 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 web pages and other ICT testing
- Identify and record conformance metrics for documents and other media
- CIO/CAO should require regular briefings on accessibility performance metrics

Online Resources

Section508.gov

1. Executive Guide to Federal IT Accessibility
2. Technology Accessibility Playbook
3. Accessibility Training
4. Buy & Sell Accessible Products and Services
5. Accessibility Requirements Tool (ART)
6. Create Accessible Digital Products
   a. Documents
   b. PDFs
   c. Presentations
   d. Software and Websites
   e. Spreadsheets
   f. Video, Audio, and Social Media
   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 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
DHS	$7.3B	36.00	31.00	Resourced	Resourced	Resourced	Planned	Resourced	101,174	72.0	-	0.0
DOC	$3.7B	10.00	4.00	Resourced	Planned	Planned	Resourced	Planned	100	89.0	100	91.0
DOD	$37.0B	133.00	97.00	Ad Hoc	Ad Hoc	Ad Hoc	Measured	Resourced	50,216	88.0	4,007	89.0
DOE	$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	3,485,105	99.0	31,102	48.0
DOI	$1.4B	7.00	2.00	Resourced	Planned	Measured	Measured	Measured	724,960	93.0	4,972	88.0
DOJ	$3.1B	29.00	27.00	Resourced	Ad Hoc	Resourced	Ad Hoc	Ad Hoc	170	96.0	191	30.0
DOL	$779M	62.00	36.00	Measured	Measured	Measured	Measured	Measured	51,289	51.0	16,983	30.0
DOT	$3.6B	24.00	3.00	Resourced	Resourced	Resourced	Resourced	Resourced	773,978	75.0	136,853	83.0
ED	$844M	4.00	8.00	Measured	Measured	Measured	Measured	Measured	47	94.0	15	93.0
EPA	$370M	3.00	1.00	Resourced	Resourced	Resourced	Resourced	Planned	70,331	93.0	-	0.0
GSA	$729M	6.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	27,657	77.0	9,686	75.0
HHS	$6.6B	141.00	66.00	Resourced	Resourced	Resourced	Planned	Resourced	72,281	82.0	853	71.0
HUD	$437M	3.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	100	96.0	65	90.0
NASA	$2.3B	9.00	3.00	Resourced	Resourced	Measured	Resourced	Ad Hoc	735	61.9	1,996	63.4
NRC	$163M	1.00	0.00	Planned	Planned	Planned	Measured	Resourced	30	100.0	27	100.0
NSF	$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	70.0	25	96.3
OPM	$147M	7.00	9.00	Planned	Ad Hoc	Planned	Planned	Planned	2,242	98.0	26	100.0
SBA	$117M	1.00	1.00	Ad Hoc	Planned	Ad Hoc	Measured	Planned	3,601	27.5	-	0.0
SSA	$2.0B	30.00	11.00	Measured	Measured	Measured	Measured	Resourced	26,514	99.0	45,953	88.0
State	$2.4B	1.00	7.00	Measured	Planned	Planned	Measured	Resourced	71	40.0	23	30.0
Treasury	$4.8B	10.00	16.00	Resourced	Resourced	Resourced	Resourced	Resourced	28,241	85.0	3,478	66.0
USAID	$217M	3.00	2.00	Resourced	Resourced	Resourced	Resourced	Resourced	10,120	49.0	416	40.0
USDA	$2.4B	41.00	13.00	Resourced	Planned	Resourced	Planned	Resourced	43,546	19.0	17,537	10.0
VA	$6.1B	23.00	17.00	Planned	Measured	Measured	Measured	Measured	124,067	3.0	85,603	3.0
CNS	-	4.00	0.00	Measured	Planned	Planned	Measured	Planned	986	12.0	-	0.0
EEOC	-	1.00	1.00	Resourced	Measured	Measured	Resourced	Resourced	25	99.0	25	99.0
FCC	-	1.00	8.00	Planned	Resourced	Resourced	Resourced	Resourced	27	78.0	39	80.0
FDIC	-	1.00	2.00	Resourced	Resourced	Measured	Measured	Measured	25	96.0	25	95.0
NARA	-	1.00	0.00	Resourced	Planned	Resourced	Ad Hoc	Ad Hoc	10	100.0	10	100.0
NCUA	-	1.00	2.00	Resourced	Resourced	Measured	Measured	Measured	6,007	98.0	232	18.0
PBGC	-	9.00	0.00	Planned	Resourced	Planned	Measured	Measured	10,000	74.0	-	0.0
SEC	-	1.00	4.00	Resourced	Measured	Measured	Measured	Measured	9	96.8	42	91.9
USAB	-	4.00	0.00	Resourced	Resourced	Resourced	Planned	Planned	1,569	99.0	7	100.0
USITC	-	2.00	0.00	Resourced	Resourced	Measured	Resourced	Measured	140,878	82.0	2,502	94.0

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 AUG 2020	2	2	1	2	5
# of Agencies Reporting 1-Ad Hoc FEB 2021	2	2	3	4	4
# of Agencies Reporting 1-Ad Hoc AUG 2021	2	3	2	2	3
# of Agencies Reporting 2-Planned AUG 2020	3	8	6	12	6
# of Agencies Reporting 2-Planned FEB 2021	6	9	6	4	6
# of Agencies Reporting 2-Planned AUG 2021	5	6	12	16	9
# of Agencies Reporting 3-Resourced AUG 2020	23	17	13	12	16
# of Agencies Reporting 3-Resourced FEB 2021	22	17	13	12	16
# of Agencies Reporting 3-Resourced AUG 2021	22	16	14	11	15
# of Agencies Reporting 4-Measured AUG 2020	4	5	12	12	5
# of Agencies Reporting 4-Measured FEB 2021	4	6	12	14	6
# of Agencies Reporting 4-Measured AUG 2021	5	6	12	16	9

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 11 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	Aug 2021	Feb 2022
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	5,453,413	5,596,600
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	4,948,004	5,065,435
Internet Non-conformant	559,415	402,650	1,337,765	987,255	520,999	748,641	669,792	450,392	661,248	505,409	531,165
Intranet Tested	617,551	379,895	1,121,369	54,536	126,760	131,395	258,363	347,808	434,039	399,791	359,911
Intranet Conformant	135,480	62,539	434,483	39,742	107,866	97,915	64,686	90,307	112,953	172,124	198,216
Intranet Non-conformant	482,071	317,356	686,886	14,794	18,894	33,480	193,677	257,501	321,086	227,667	161,695
# 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	5,853,204	5,956,511
# 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	5,120,128	5,263,651
# Total NC	1,041,487	720,006	2,024,650	1,002,049	539,893	782,121	863,469	707,894	982,334	733,076	692,860
% Total C	55.7%	82.1%	72.7%	76.8%	88.0%	56.9%	59.5%	65.6%	82.9%	87.5%	88.4%
% Total NC	44.3%	17.9%	27.3%	23.2%	12.0%	43.1%	40.5%	34.4%	17.1%	12.5%	11.6%

Appendix D: Number of Self-reported Accessibility Program Staff over 11 Reporting Cycles - CFO Act Agencies

Staff Type	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	AUG 2020	FEB 2021	AUG 2021	FEB 2022
Federal Employees	252	279	467	388	346	350	391	426	443	504	587
Contractor Employees	107	138	261	238	236	238	278	264	264	272	357
Total Program Staff	358	417	728	625	582	588	669	690	707	776	944
Average Program Staff	15	17	30	26	24	25	28	29	29	32	39

Appendix E: Number of Webpages Visited by Reporting Agency

Agency Initial	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	997,648.00	101,174.00	10%
DOC	997,933.00	100.00	0%
DOD	999,523.00	50,216.00	5%
DOE	999,606.00	3,485,105.00	349%
DOI	997,309.00	724,960.00	73%
DOJ	882,184.00	170.00	0%
DOL	686,869.00	51,289.00	7%
DOT	999,269.00	773,978.00	77%
ED	999,640.00	47.00	0%
EPA	999,749.00	70,331.00	7%
GSA	997,109.00	27,657.00	3%
HHS	780,466.00	72,281.00	9%
HUD	68,665.00	100.00	0%
NASA	995,298.00	735.00	0%
NRC	41,062.00	30.00	0%
NSF	439,377.00	25.00	0%
OPM	999,927.00	2,242.00	0%
SBA	770,439.00	3,601.00	0%
SSA	226,678.00	26,514.00	12%
State	997,214.00	71.00	0%
Treasury	994,851.00	28,241.00	3%
USAID	176,634.00	10,120.00	6%
USDA	997,920.00	43,546.00	4%
VA	998,153.00	124,067.00	12%
CNS	46.00	986.00	2143%
EEOC	42,916.00	25.00	0%
FCC	-	27.00	N/A
FDIC	49,173.00	25.00	0%
NARA	994,307.00	10.00	0%
NCUA	7,982.00	6,007.00	75%
PBGC	10,926.00	10,000.00	92%
SEC	999,321.00	9.00	0%
USAB	4,137.00	1,569.00	38%
USITC	8,148.00	140,878.00	1729%
Total of All Reporting Agencies	21,148,194.00	5,613,689.00	26.54%

Appendix F: Average Self-Reported Maturity of CFO Act Agencies (February 2017 – February 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
Acquisition (A)	2.44	2.70	2.58	2.50	2.67	2.91	2.88	2.92	2.88	2.92	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
Testing (V)	2.44	2.70	2.71	2.79	2.88	2.96	2.96	3.00	2.88	2.79	2.96
Complaints (C)	3.06	3.05	2.96	3.00	3.21	3.13	3.33	3.25	3.13	3.13	3.21
Training (T)	2.60	2.45	2.54	2.67	2.75	2.70	2.71	2.54	2.58	2.63	2.79
Average	2.56	2.69	2.66	2.71	2.83	2.88	2.91	2.88	2.83	2.83	2.89