Autumn 2021 Section 508 Program Maturity Report

Executive Summary

Government-wide IT Accessibility Program | December 2021

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
- Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce
- Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government

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

Accessibility is Foundation to Experience

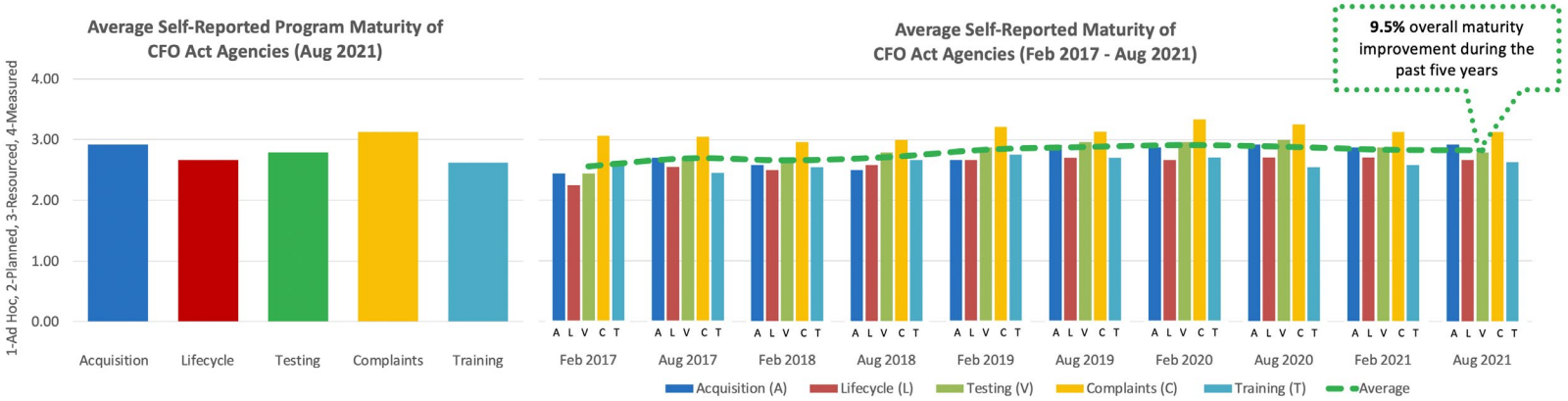
Federal CIO comments at the ACT-IAC CX Summit

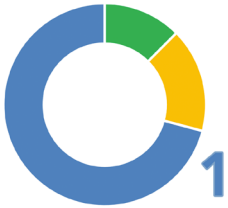
- "Users from all walks of life, with **all types of abilities**, have a right to be able to use a federal website to apply for benefits, manage a claim or contact customer support. That means we need to **take seriously** Section 508 **accessibility** standards when we design digital experiences. It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





3 CFO Act agencies reported an increase in overall maturity

4 CFO Act agencies reported a decrease in overall maturity

17 CFO Act agencies reported no change in overall maturity

2 CFO Act agencies are *Measured*

10 CFO Act agencies are *Resourced*

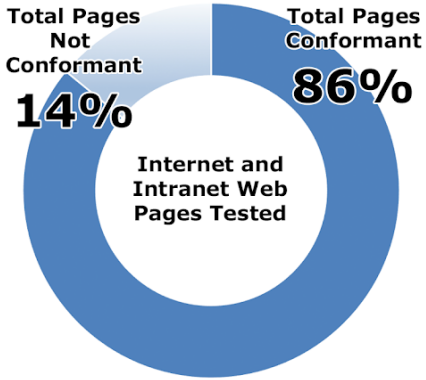
9 CFO Act agencies are *Planned*

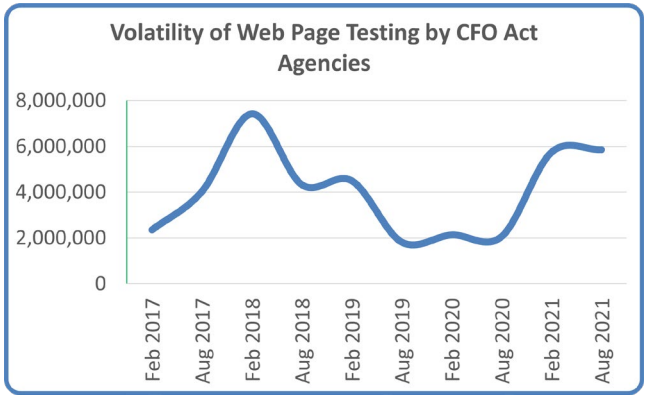
3 CFO Act agencies are *Ad-Hoc*

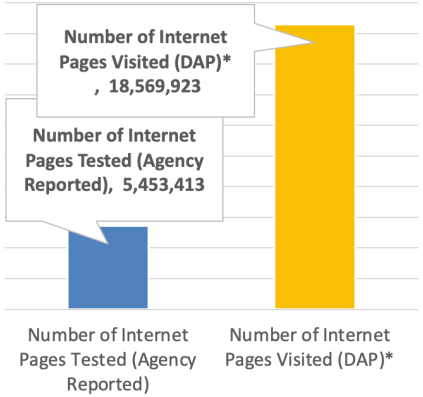
GSA OFFICE OF GOVERNMENT-WIDE POLICY

At-a-Glance: Measuring Testing

Web Conformance of CFO Act Agencies







16% of CFO Act Agencies are Not Testing Intranet Pages

4% of CFO Act Agencies are Not Testing Either Intranet or Intranet Pages

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

At-a-Glance: Measuring People

Changes in the accessibility landscape since August

34 New Program Managers

21 PMs have departed since March 1
4.1 years is the average tenure of PMs
1.8 years is the median tenure of PMs

38 Program Manager Vacancies

1 CFO-Act agency vacancy over 1 year
10 agency-wide vacancies over 1 year
8 additional vacancies over 1 year

32 Average Number of 508 Staff

9 median number of staff per agency
208 staff reported in a single agency

69 FTE net gain (10% Turnover)

221 FTEs were hired/left §508 Programs
9 agencies reduced §508 Program staff

18% of Program Managers

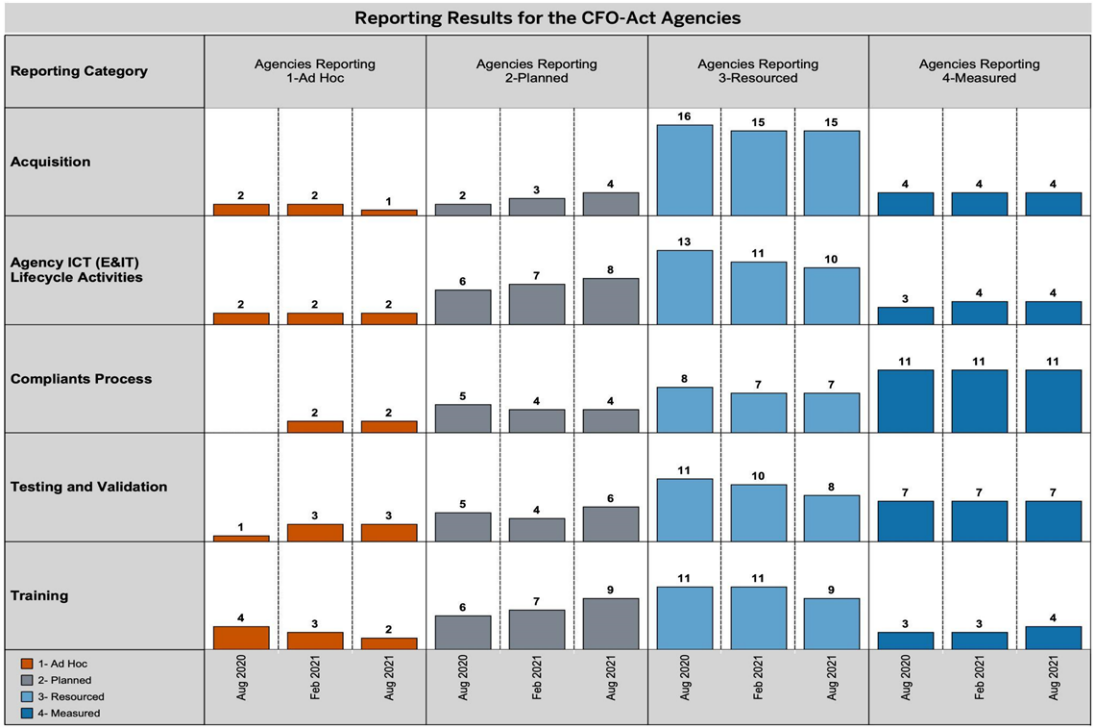
Attend GSA & USAB Meetings/Training
(Average attendance: 2 of 6 events)

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

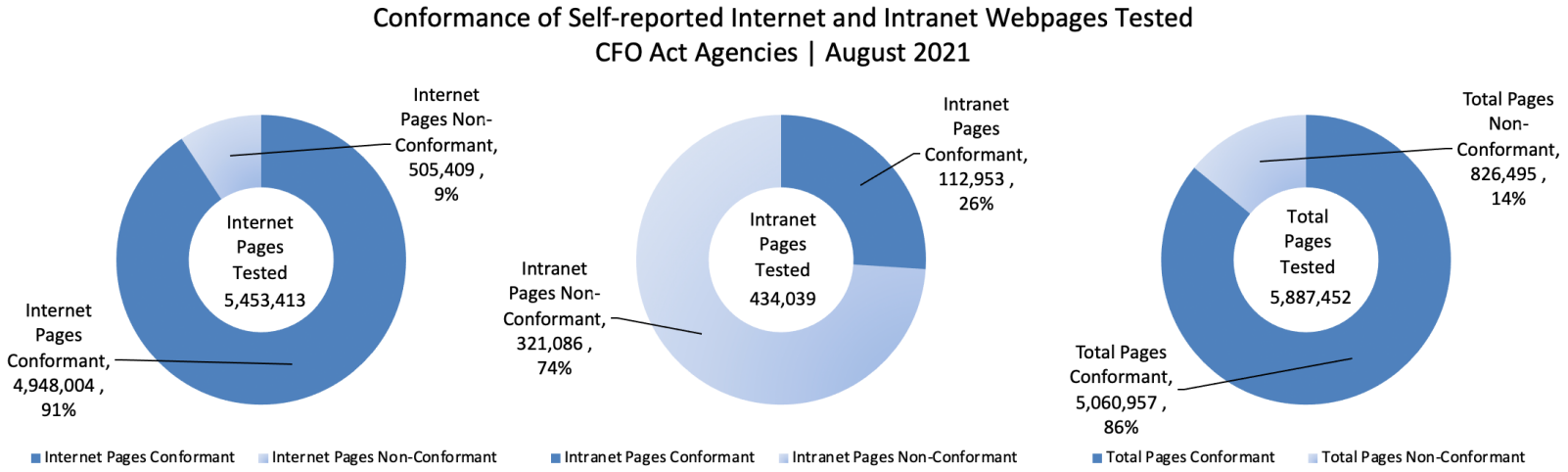


- **Only 5** CFO Act agencies (21%) consider themselves '*Measured*' in three or more of the five categories (unchanged)
- Agency maturity remains largely **unchanged** from prior reporting
- **20 years have passed** since the release of the standards and some agencies remain *"Ad Hoc"* within each reporting 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: Snapshot

Self-Reported Results for CFO Act Agencies



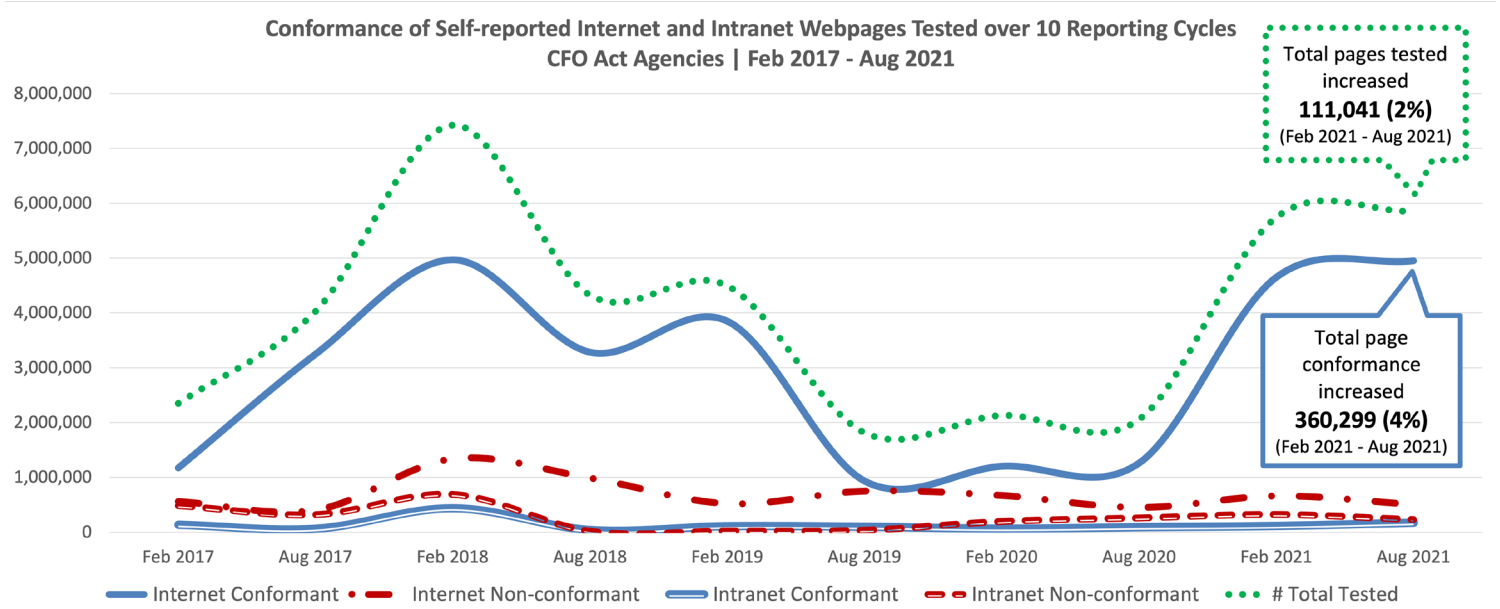
Risks as reported:

- Agencies tested only 2.5% more Internet and Intranet pages since Feb 2021
- 4 CFO Act agencies (17%) are not testing Intranet pages
- 1 CFO Act agencies (4%) are not testing either Internet or Intranet pages
- Volatility of testing remains a barrier to accessible customer interactions

**Agencies which use Digital Dashboard

Webpage Conformance: Trend Line

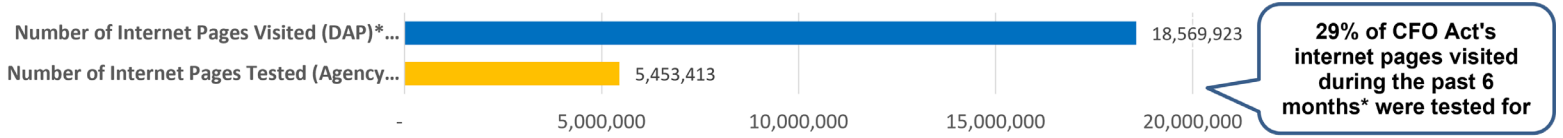
CFO Act Agencies



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



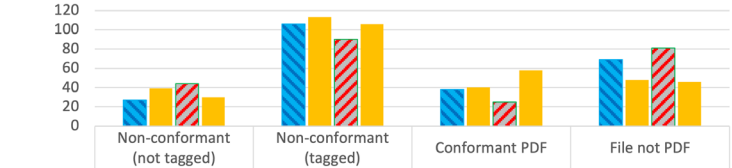
- On average, agencies are **testing 29% of pages** available on their public-facing Internet websites
- **Only 17 (**50%) of reporting agencies** are **testing *more than* 1%** of their visited internet web pages
- 10% non-CFO Act **agencies** are **not configured** to use Digital Analytics Program 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, 2020 through Feb 28, 2021 available from the Digital Analytics Program.*

PDF Document Conformance: Snapshot

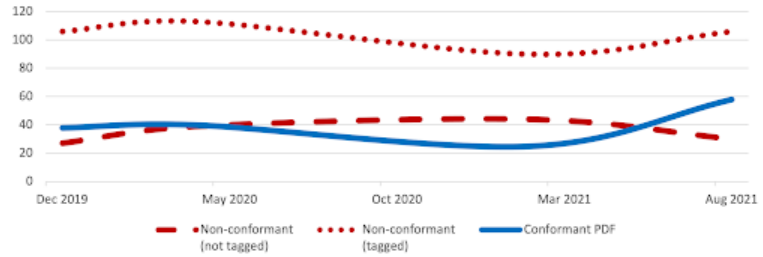
CFO Act Agencies

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



	Non-conformant (not tagged)	Non-conformant (tagged)	Conformant PDF	File not PDF
Dec 2019	27	106	38	69
Apr 2020	39	113	40	48
Feb 2021	44	90	25	81
Aug 2021	30	106	58	46

PDF Conformance Trend among Top 10 Downloads (DEC 2019 - AUG 2021) CFO Act Agencies



- In Aug 2021, among the possible 240 “top 10 downloads” from the 24 CFO Act agencies, 194 (80%) were PDFs
- Among those 194 PDF documents, 54 (28%) were found to be conformant.
- Only one agency’s, Office of Personnel Management (OPM), PDFs were fully conformant
- Of the remaining 140 (72%) PDFs
  - 110 (79%) were found to contain at least one issue**; creating a possible barrier to access
  - 30 (21%) 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 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

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 348% of their public-facing web pages (DOE: 3,481,788 pages)
    - 17 agencies testing less than 1% or the number of public-facing web pages
  - 14% of web pages tested are reported as non-conformant; but with the removal of only **one** agency's testing data (DOE), that number drops to 24%
  - 72% 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 93% of the total number of web pages tested; 91% conformant
  - Intranet pages represent 7% of the total number of web pages tested; 26% conformant
  - 4 CFO Act agencies (17%) are **not testing** Intranet pages
  - 1 CFO Act agency (4%) is **not testing** either Internet or Intranet web pages

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**
  - 9 agencies reported a decrease in staff while only 6 agencies reported an increase
  - 1 agency reported an increase in staff of 129 FTE (a 163% increase)
  - 2 agencies reported a decrease of 25 and 29 FTEs respectively (a 93% and 57% decrease)

- 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 208 FTEs and another reports 1 FTE (for a median of 9 FTEs)

- Agency Program Manager cadre and community participation since February 2021
  - 34 new PMs (14%), with 38 (16%) vacancies
  - 44 of the PMs (18%) participated in a GSA or USAB conference, webinar or event
  - 21 PMs (9%) have departed or are no longer serving as PM
  - 4.1 years is the average tenure of PMs, and 1.8 years is the median tenure of PMs

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

- 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 being 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 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 (Email) is available to provide technical assistance to individual Executive Branch agencies

Appendix

Appendix A: Self-Reporting Results for CFO Act Agencies

Agency Initial	Annual IT Budget (see ITDashboard .gov)	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	39.00	31.00	Resourced	Resourced	Resourced	Planned	Resourced	126,227	69.8	-	0.0
DOC	$3.7B	10.00	4.00	Resourced	Planned	Planned	Resourced	Planned	100	95.0	100	92.0
DOD	$37.0B	121.00	87.00	Resourced	Resourced	Measured	Measured	Resourced	64,374	91.0	3,380	96.0
DOE	$2.6B	1.00	1.00	Resourced	Resourced	Resourced	Resourced	Resourced	3,481,788	99.0	26,266	40.0
DOI	$1.4B	7.00	2.00	Resourced	Planned	Measured	Measured	Measured	717,506	94.0	4,926	88.0
DOJ	$3.1B	2.00	0.00	Resourced	Ad Hoc	Ad Hoc	Ad Hoc	Ad Hoc	159	96.0	198	31.0
DOL	$779M	59.00	33.00	Measured	Measured	Measured	Measured	Measured	26,366	49.0	9,524	33.0
DOT	$3.6B	24.00	0.00	Resourced	Resourced	Resourced	Resourced	Resourced	704,561	79.0	124,363	78.0
ED	$844M	4.00	5.00	Measured	Measured	Measured	Measured	Measured	37	95.0	13	92.0
EPA	$370M	3.00	0.00	Planned	Planned	Planned	Planned	Planned	-	0.0	-	0.0
GSA	$729M	5.00	0.00	Resourced	Resourced	Measured	Measured	Resourced	24,489	75.3	9,729	74.6
HHS	$6.6B	95.00	43.00	Resourced	Resourced	Resourced	Resourced	Resourced	9,882	32.6	-	0.0
HUD	$437M	3.00	1.00	Resourced	Planned	Resourced	Resourced	Resourced	150	100.0	125	100.0
NASA	$2.3B	17.00	2.00	Resourced	Resourced	Ad Hoc	Ad Hoc	Ad Hoc	759	51.7	2,008	59.8
NRC	$163M	1.00	0.00	Planned	Planned	Planned	Measured	Planned	20	75.0	20	0.0
NSF	$132M	2.00	1.00	Resourced	Resourced	Resourced	Measured	Planned	25	96.3	25	92.3
OPM	$147M	7.00	0.00	Planned	Ad Hoc	Planned	Planned	Planned	2,031	99.0	85	100.0
SBA	$117M	1.00	1.00	Ad Hoc	Planned	Ad Hoc	Measured	Planned	2,949	32.0	-	0.0
SSA	$2.0B	31.00	9.00	Measured	Measured	Measured	Measured	Resourced	25,704	100.0	44,659	88.0
State	$2.4B	1.00	7.00	Measured	Planned	Planned	Measured	Planned	16	35.0	122	30.0
Treasury	$4.8B	22.00	0.00	Resourced	Resourced	Resourced	Resourced	Resourced	17,015	84.0	3,450	65.0
USAID	$217M	3.00	2.00	Resourced	Resourced	Resourced	Resourced	Planned	11,141	33.0	319	40.0
USDA	$2.4B	22.00	4.00	Resourced	Planned	Planned	Planned	Planned	114,377	35.0	11,593	15.0
VA	$6.1B	24.00	39.00	Planned	Measured	Measured	Measured	Measured	123,737	1.0	158,886	1.0

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	1	2	3	4	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	4	6	12	15	8
# 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	21	15	11	10	12
# 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	4	6	12	15	8

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 10 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
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
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
Internet Non-conformant	559,415	402,650	1,337,765	987,255	520,999	748,641	669,792	450,392	661,248	505,409
Intranet Tested	617,551	379,895	1,121,369	54,536	126,760	131,395	258,363	347,808	434,039	399,791
Intranet Conformant	135,480	62,539	434,483	39,742	107,866	97,915	64,686	90,307	112,953	172,124
Intranet Non-conformant	482,071	317,356	686,886	14,794	18,894	33,480	193,677	257,501	321,086	227,667
# 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
# 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
# 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
% Total C	56%	82%	73%	77%	88%	57%	59%	66%	83%	87%
% Total NC	44%	18%	27%	23%	12%	43%	41%	34%	17%	13%

Appendix D: Number of Self-reported Accessibility Program Staff over 10 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
Federal Employees	252	279	467	388	346	350	391	426	443	504
Contractor Employees	107	138	261	238	236	238	278	264	264	272
Total Program Staff	358	417	728	625	582	588	669	690	707	776
Average Program Staff	14.93	17.38	30.33	26.05	24.25	24.50	27.88	28.8	29.46	32.33

Appendix E: Number of Webpages Visited by Agency

Agency (CFO Act in Bold)	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	996,889.00	126,227.00	13%
DOC	977,206.00	100.00	0%
DOD	999,200.00	64,374.00	6%
DOE	999,727.00	3,481,788.00	348%
DOI	998,012.00	717,506.00	72%
DOJ	813,134.00	159.00	0%
DOL	694,869.00	26,366.00	4%
DOT	999,474.00	704,561.00	70%
ED	537,912.00	37.00	0%
EPA	999,755.00	-	0%
GSA	997,969.00	24,489.00	2%
HHS	804,511.00	9,882.00	1%
HUD	79,626.00	150.00	0%
NASA	996,508.00	759.00	0%
NRC	34,612.00	20.00	0%
NSF	371,423.00	25.00	0%
OPM	999,871.00	2,031.00	0%
SBA	894,607.00	2,949.00	0%
SSA	209,744.00	25,704.00	12%
State	999,541.00	16.00	0%
Treasury	994,589.00	17,015.00	2%
USAID	174,493.00	11,141.00	6%
USDA	997,440.00	114,377.00	11%
VA	998,811.00	123,737.00	12%
CNS	23,685.00	4.00	0%
EEOC	43,208.00	25.00	0%
FCC	-	10.00	N/A
FDIC	85,816.00	30.00	0%
NARA	990,072.00	10.00	0%
NCUA	6,609.00	5,817.00	88%
PBGC	14,516.00	5,904.00	41%
SEC	999,011.00	4.00	0%
USAB	3,950.00	3,290.00	83%
USITC	8,578.00	140,878.00	1642%
Total of All Reporting Agencies	*20,745,368.00*	*5,609,385.00*	*27.04%*

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

Maturity Category	Feb 2017	Aug 2017	Feb 2018	Aug 2018	Feb 2019	Aug 2019	Feb 2020	Aug 2020	Feb 2021	Aug 2021
Acquisition (A)	2.44	2.70	2.58	2.50	2.67	2.91	2.88	2.92	2.88	2.92
Technology Lifecycle Activities (L)	2.25	2.55	2.50	2.58	2.67	2.70	2.67	2.71	2.71	2.67
Testing and Validation (V)	2.44	2.70	2.71	2.79	2.88	2.96	2.96	3.00	2.88	2.79
Complaints Process (C)	3.06	3.05	2.96	3.00	3.21	3.13	3.33	3.25	3.13	3.13
Training (T)	2.60	2.45	2.54	2.67	2.75	2.70	2.71	2.54	2.58	2.63
Average	2.56	2.69	2.66	2.71	2.83	2.88	2.91	2.88	2.83	2.83

Composite scores above as based on 1-Ad Hoc, 2-Planned, 3-Resourced, 4-Measured

Appendix G: PDF Conformance Trend among Top 10 Downloads (Dec 2019 - Aug 2021) CFO Act Agencies

Date of Testing	Non-conformant (not tagged)	Non-conformant (tagged)	Conformant PDF
Dec 2019	27	106	38
Apr 2020	39	113	40
Feb 2021	44	90	25
Aug 2021	30	106	58