



September 2024

FEDERAL ACCESSIBILITY

OMB Is Tracking Agency Implementation of Its Guidance on Information and Communication Technology

GAO Highlights

Highlights of [GAO-24-107031](#), a report to congressional requesters

Why GAO Did This Study

Federal agencies provide services through ICT, such as websites, electronic documents, and kiosks. If ICT is not accessible, millions of Americans who have a disability may be unable to access these services. Section 508 is intended to make federal ICT accessible, but GSA and others have reported that federal ICT accessibility has been a persistent challenge.

GSA recently published its first annual *Assessment*, based on self-reported information from 249 agencies and sub-agencies. OMB also issued guidance to federal agencies on Section 508 ICT accessibility. Further, DOJ is required to issue reports on the topic every 2 years. GAO was asked to review GSA's *Assessment* and OMB's guidance, and how agency implementation of this guidance is tracked.

This report (1) summarizes GSA's *Assessment* and OMB's guidance; and (2) describes how OMB tracks agencies' implementation of its guidance, and the roles of GSA, DOJ, and the Access Board in tracking guidance implementation. The Access Board is a small federal agency responsible for setting standards for agency compliance with Section 508 and providing technical assistance.

GAO reviewed and analyzed GSA's *Assessment* and OMB's guidance, and interviewed officials from GSA, DOJ, OMB, and the Access Board. In addition, GAO reviewed other agency documentation and relevant federal laws and guidance.

View [GAO-24-107031](#). For more information, contact Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov.

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OMB Is Tracking Agency Implementation of Its Guidance on Information and Communication Technology

What GAO Found

Section 508 of the Rehabilitation Act of 1973 requires federal agencies to develop, procure, maintain, and use information and communication technology (ICT) that is accessible to people with disabilities. However, in December 2023 the General Services Administration's (GSA) *Governmentwide Section 508 Assessment* reported low compliance with federal ICT accessibility requirements and made recommendations to agencies. In the same month, the Office of Management and Budget (OMB) published guidance for agencies that included recommendations, expectations, and requirements. GSA's *Assessment* and OMB's guidance generally fit in four categories:

- **Managing ICT accessibility programs.** According to GSA's *Assessment*, 48 percent of agencies reported they had no formal ICT accessibility program, or it was in development. OMB required that agencies establish Section 508 programs with appropriate resources, such as staff, technology, and tools.
- **Building knowledge.** GSA found that 50 percent of agencies reported that their ICT staff sometimes or never had sufficient knowledge to ensure that accessibility requirements were met. GSA recommended and OMB set an expectation that agencies develop training plans for staff.
- **Creating accessible ICT.** GSA reported that 53 percent of agencies that procure ICT did not always verify that procured ICT met accessibility requirements. Both GSA and OMB recommended that agencies use available tools to incorporate ICT accessibility requirements into the contracting process.
- **Monitoring accessibility.** GSA found that 44 percent of agencies reported they lacked formal written policies and procedures to process and resolve complaints related to ICT accessibility. OMB required that by March 2024, agencies establish or update their public feedback mechanisms for complaints.

Examples of Considerations for Information and Communication Technology Accessibility



Include alt text for images that describes any information that is communicated visually



Include text transcriptions for audio-only files for people to read along



Make websites navigable using only a keyboard

Source: GAO analysis of information from the World Wide Web Consortium and www.Section508.gov. | GAO-24-107031

OMB staff said they have started to track the implementation of its requirements with deadlines that have passed. They also will use three mechanisms to continue tracking implementation: 1) agencies' responses to questions in GSA's *Assessment*, 2) desk officer reviews of selected agencies' ICT programs, and 3) reviews of agencies' ICT budget requests to ensure they are appropriately prioritizing accessibility. Officials at the Access Board, GSA, and the Department of Justice (DOJ) stated they do not have direct roles in ensuring that agencies implement OMB's guidance, but that their ongoing responsibilities related to ICT accessibility will likely support agencies' implementation.

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Abbreviations

Access Board	U.S. Access Board
<i>Assessment</i>	<i>Governmentwide Section 508 Assessment</i>
CFO Act	Chief Financial Officers Act of 1990, as amended
GSA	General Services Administration
<i>Guidance</i>	<i>Memorandum M-24-08, Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act</i>
DOJ	Department of Justice
ICT	information and communication technology
OMB	Office of Management and Budget
Section 508	Section 508 of the Rehabilitation Act of 1973

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September 23, 2024

Congressional Requesters

Millions of Americans use federal information and communication technology (ICT) such as websites, videos, software, electronic documents, computers, and information kiosks to access critical information, benefits, and services from the federal government. Accessible ICT helps federal agencies meet their missions and serve the American people, including the more than 60 million American adults who have a disability.¹

Federal ICT accessibility is addressed in Section 508 of the Rehabilitation Act of 1973 (Section 508). Section 508 generally requires federal agencies to develop, procure, maintain, and use ICT that allows access for federal employees and members of the public with disabilities comparable to those without a disability.² Inaccessible ICT can affect individuals with a wide range of disabilities, including disabilities related to mobility, vision, hearing, or processing information. Four agencies play key roles related to Section 508: the U.S. Access Board (Access Board), General Services Administration (GSA), Office of Management and Budget (OMB), and Department of Justice (DOJ).³

Although Section 508 has existed in its current form for almost 25 years, GSA and others have reported that compliance has been persistently low

¹C.A. Okoro, N.D. Holli, A.C. Cyrus, and S. Griffin-Blake. "Prevalence of Disabilities and Health Care Access by Disability Status and Type Among Adults – United States, 2016." <http://dx.doi.org/10.15585/mmwr.mm6732a3>.

²29 U.S.C. § 794d. Section 508 uses the term "electronic and information technology." Around 2017, the Access Board revised the Section 508 standards and began using the term "information and communication technology." This is also the terminology used in international guidelines and standards. In this report we generally use "ICT accessibility" to refer to the accessibility of ICT as it pertains to Section 508 legal requirements and standards.

³The Access Board was originally established in 1973 as the Architectural and Transportation Barriers Compliance Board. The Access Board is a small federal agency with several responsibilities related to promoting accessibility for people with disabilities. It has a 25-member governing board that consists of 13 individual private citizens, a majority of whom must have a disability, along with 12 federal agency representatives. The Access Board also has approximately 25 full-time staff.

across the federal government.⁴ Most recently, in December 2023, GSA published the first *Governmentwide Section 508 Assessment (Assessment)*, which reported low Section 508 compliance across the federal government and was the first report in response to a new annual requirement.⁵ While GSA, DOJ, and others previously reported on Section 508 compliance among certain agencies and along certain metrics, GSA's 2023 *Assessment* is the first comprehensive government-wide report of this scale and frequency. As such, it establishes a baseline for future reporting on government-wide ICT accessibility. Additionally, in December 2023, OMB issued new guidance to federal agencies in its Memorandum M-24-08, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act (Guidance)*.⁶

You asked us to review recent reports and guidance on federal ICT accessibility and key agencies' roles. This report (1) summarizes findings and recommendations in GSA's *Assessment* and OMB's direction to agencies in its *Guidance*; and (2) describes how OMB is tracking agency implementation of its *Guidance*, and the roles the Access Board, GSA, and DOJ have regarding tracking implementation of the *Guidance*.

To address our first objective, we analyzed the findings and recommendations in GSA's 2023 *Assessment* and the recommendations, expectations, and requirements in OMB's December 2023 *Guidance*. We organized these findings, recommendations, expectations, and requirements into four categories for the purposes of our analysis: Managing ICT Accessibility Programs, Building Knowledge, Creating Accessible ICT, and Monitoring Accessibility.⁷ (For a full list of

⁴Section 508 was originally enacted in 1986 and was later amended in 1988, 1992, 1998, and 2000.

⁵General Services Administration Office of Government-wide Policy, *FY23 Governmentwide Section 508 Assessment* (Washington, D.C.: December 2023).

⁶Office of Management and Budget, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act*, M-24-08 (Washington, D.C.: Dec. 21, 2023).

⁷GSA's *Assessment* contained findings and related recommendations to agencies. OMB's *Guidance*, which OMB staff characterized as establishing government-wide policy to assist agencies with implementing ICT accessibility requirements, included recommendations, expectations, and requirements to agencies. OMB staff said that in its *Guidance*, they used the language "shall" or "must" to indicate requirements, "will" or "should" to indicate expectations, and "are encouraged" to indicate recommendations for agencies.

recommendations, expectations, and requirements, organized by the four categories, see app. I.)

GSA's *Assessment* is based on findings from a survey of federal agencies. This included a total of 249 respondents, including some agencies that provided one department-level response, and some agencies that responded at the sub-agency level.⁸ Agencies were required to submit self-reported responses to 105 survey questions by August 2023.⁹ We assessed the reliability of selected findings in GSA's *Assessment* by interviewing GSA officials, reviewing supporting workpapers and other documentation, and comparing statistics cited in this report with the underlying data and methodological documentation. We found the information sufficiently reliable for the purposes of our report.

To address our second objective, we interviewed officials from the Access Board, DOJ, GSA, and OMB. In addition, we reviewed agencies' documentation on ICT accessibility and relevant federal laws and guidance.

We conducted this performance audit from August 2023 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

⁸GSA used "reporting entities" to refer to agencies that had responded, but we use the term "agencies" in this report.

⁹Federal law required OMB to disseminate criteria and instructions that agencies were required to use to evaluate how they comply with Section 508 standards. 29 U.S.C. § 794d-1. In response, OMB, in coordination with GSA, the Access Board, and other agencies developed 105 assessment criteria to evaluate agencies' Section 508 compliance. OMB distributed instructions and the assessment criteria in April 2023. GSA posted these instructions and criteria on Section508.gov and developed and released an online tool for each agency to submit responses by August 2023. Because these assessment criteria asked agencies to provide self-reported responses through an online survey tool, for the purposes of this report we refer to the assessment criteria as survey questions.

Federal ICT Accessibility





If federal ICT is not accessible, it can significantly impact the lives of individuals with disabilities and federal agencies' abilities to fulfill their missions. For example, at the beginning of the COVID-19 public health emergency, the National Association of the Deaf reported that key federal briefings did not always include American Sign Language interpreters or quality captioning, limiting peoples' access to key, timely public health information.¹⁰ In addition, according to the National Federation of the Blind, during this time, some information that was posted online was inaccessible to blind or low vision people who rely on assistive technologies such as screen readers.¹¹ This included key information such as accessing COVID-19 tests and vaccines.

For an agency to have ICT that meets federal requirements, it must comply with Section 508, including by conforming with federal ICT accessibility standards. These standards are required by Section 508 and provide technical specifications and requirements for ICT products and services procured, developed, maintained, or used by the federal government. They relate to a broad range of ICT such as computer hardware, software, websites, mobile apps, telecommunications, and video. (See fig. 1 for examples of considerations for ICT accessibility.)

¹⁰Howard A. Rosenblum, Chief Executive Officer, National Association of the Deaf, "March 19 Update Coronavirus Transcript," March 19, 2020, video recording and transcript, 5:26, <https://www.nad.org/march-19-update-coronavirus-transcript/>.

¹¹National Federation of the Blind, "2022 Presidential Report: An Address Delivered by Mark A. Riccobono, President, at the Annual Convention of the National Federation of the Blind" (Baltimore, MD: July 8, 2022). Accessed July 2, 2024, <https://nfb.org/resources/speeches-and-reports/presidential-reports/2022-presidential-report>.

Figure 1: Examples of Considerations for Information and Communication Technology Accessibility

 <code></code>	Include alt text for figures and images that describes or conveys information communicated visually for people using screen readers, which read aloud the information on a page.
	Include text transcriptions for audio-only files to make the audio information accessible for people to read along.
	Make websites navigable using a keyboard so that people are not required to use a mouse.
	Tag and structure electronic documents with headings and built-in styles; convert scanned documents into text and tag form fields to be navigable and fillable to work with assistive devices.

Source: GAO analysis of information from the World Wide Web Consortium and [www.Section 508.gov](http://www.Section508.gov) | GAO-24-107031

GSA outlined in its *Technology Accessibility Playbook* that federal agencies can take a number of steps to ensure ICT accessibility.¹² These steps can include, for example, having:

- policies addressing ICT accessibility;
- training for federal employees to increase awareness of accessibility considerations;
- procedures for incorporating accessibility during design and contracting processes; and
- procedures for individuals with disabilities to submit complaints if ICT is not accessible and processes for agencies to track, prioritize, and resolve these issues.

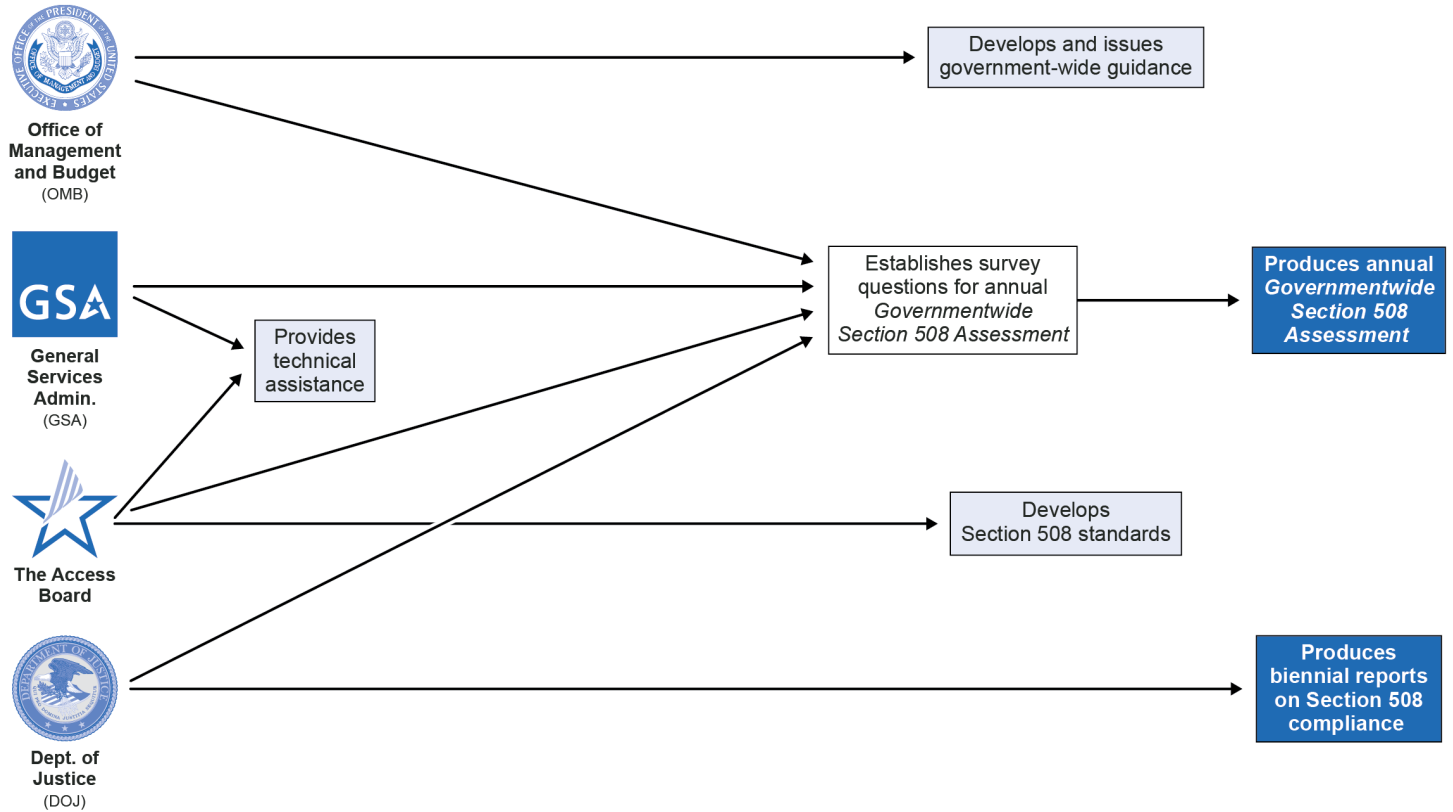
Four Agencies' Roles in Supporting Federal ICT Accessibility

Four agencies support and report on government-wide federal ICT accessibility related to Section 508 (see fig. 2).¹³ This includes conducting key activities such as developing guidance, establishing standards, and providing technical assistance, as well as collecting and reporting data.

¹²GSA, "Technology Accessibility Playbook" (Washington, D.C.: June 2016), accessed July 26, 2024, <https://www.section508.gov/manage/playbooks/technology-accessibility-playbook-intro/>.

¹³Section 508 and the Consolidated Appropriations Act, 2023, direct these four agencies to support and report on government-wide Section 508 compliance.

Figure 2: Key Activities of Four Agencies Involved in Federal Information and Communication Technology Accessibility Under Section 508



Source: GAO analysis of information from OMB, GSA, the Access Board, and DOJ; Agencies (logos). | GAO-24-107031

Note: Section 508 refers to Section 508 of the Rehabilitation Act of 1973.

OMB. OMB oversees federal agencies’ ICT practices, which include practices and policies related to ICT accessibility. As part of this role, OMB issues guidance on complying with Section 508 to federal agencies, most recently in a strategic plan in 2013 and the *Guidance* in 2023.¹⁴ Since 2023, OMB has also been involved with developing the survey

¹⁴Office of Management and Budget, *Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act* (Washington D.C.: January 24, 2013).

questions agencies must report on for the annual *Assessment* in collaboration with the Access Board and GSA.¹⁵

GSA. GSA provides technical assistance to agencies and other interested parties on federal ICT accessibility and develops resources such as the *Technology Accessibility Playbook*. GSA also maintains Section508.gov, a central repository of resources to help agencies comply with several aspects of federal ICT accessibility such as policy, training, procurement, testing, and complaints. It collaborates with the Access Board on many of these efforts.

In addition to collaborating with OMB and the Access Board to develop the survey questions, GSA takes the lead in collecting and analyzing agencies' responses and producing its annual *Assessment* based on this information. Prior to 2023, GSA produced biannual (twice a year) reports based on a few metrics; these reports have since been replaced by the annual *Assessment*.¹⁶ These earlier reports focused on the 24 agencies listed in the Chief Financial Officers Act of 1990, as amended (CFO Act).¹⁷

The Access Board. The Access Board sets the ICT accessibility standards for Section 508—last updated in 2018—which establish the specific requirements that agencies must comply with.¹⁸ The Access Board also provides technical assistance to agencies and other interested parties on ICT accessibility and develops resources such as a Section 508 Best Practices webinar series. In addition, the Access Board collaborates with GSA on many of its efforts related to federal ICT

¹⁵The Office of Science and Technology Policy also contributed to the survey questions. However, the provision of law that required OMB to disseminate criteria and instructions for agencies to use to evaluate accessibility did not include an explicit role for the Office of Science and Technology Policy.

¹⁶GSA's prior reporting was initiated in response to OMB's strategic plan, issued in 2013.

¹⁷See 31 U.S.C. § 901(b). These 24 agencies are: the U.S. Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs, as well as the U.S. Agency for International Development, Environmental Protection Agency, General Services Administration, National Aeronautics and Space Administration, National Science Foundation, Nuclear Regulatory Commission, Office of Personnel Management, Small Business Administration, and Social Security Administration. GSA officials also told us that approximately 10 other agencies voluntarily submitted responses.

¹⁸Section 508 requires the Access Board to establish accessibility standards.

accessibility, including technical assistance and to develop the survey questions for the *Assessment*.¹⁹

DOJ. DOJ has been required since 2001 to issue biennial (every 2 years) reports on Section 508 compliance to the President and Congress. The law states that these reports should include information on the state of federal agency compliance with Section 508, including actions regarding individual complaints lodged with federal agencies. For example, DOJ's 2012 report included topics on general processes for Section 508 implementation, procurement, administrative complaints and civil actions, website compliance, and inter- and intra-agency coordination. DOJ has published reports in 2000, 2004, 2012, and most recently in January 2023.²⁰ DOJ also provided input on the survey questions for the *Assessment*.

History of Agencies' Reported Federal ICT Accessibility Challenges

Reports have consistently identified challenges with federal ICT accessibility and agencies' compliance with Section 508. For example, DOJ's 2012 report found that 35 percent of agencies had a Section 508 office or program.²¹ Prior to the 2023 *Assessment*, GSA's less detailed reports, which focused on specific Section 508 metrics at CFO Act agencies, also found challenges. For example, GSA's Spring 2022 report found that, among the top 10 downloaded PDFs for each CFO Act agency, less than one-third of these PDFs fully met federal ICT accessibility standards.²² Other reports from agencies and

¹⁹GAO has previously examined how the Access Board and GSA collaborate on providing technical assistance on Section 508 to federal agencies. See GAO, *U.S. Access Board: Interagency Efforts to Promote Accessibility for People with Disabilities Generally Followed Leading Collaboration Practices*, [GAO-23-105948](#) (Washington, D.C.: June 26, 2023).

²⁰See published reports on DOJ's website: <https://www.justice.gov/crt/section-508-home-page-0>. DOJ also plays a role with accessibility requirements for state and local governments, which are covered by Title II of the Americans with Disabilities Act of 1990 (Title II). Specifically, Title II requires DOJ to promulgate regulations governing state and local governments under Title II. See 42 U.S.C. § 12134(a). In April 2024, DOJ promulgated a final rule revising requirements for web and mobile application accessibility under Title II.

²¹Department of Justice, Civil Rights Division, *Section 508 Report to the President and Congress: Accessibility of Federal Electronic and Information Technology* (Washington, D.C.: September 2012).

²²General Services Administration, Office of Government-wide Policy, *Spring 2022 Section 508 Program Maturity Report* (Washington, D.C.: June 2022). See <https://www.section508.gov/manage/pmr/> for a list of available reports.

nongovernmental entities have reported similar challenges with federal ICT accessibility.

GSA Found Widespread ICT Accessibility Challenges and Recommended Changes, and OMB Issued Guidance to Agencies

GSA's 2023 *Assessment* found overall low compliance with ICT accessibility requirements under Section 508 across federal agencies. Specifically, GSA reported that "the government as a whole is not meeting the minimum standard or legal obligation to provide equal access to all members of the public and federal employees with disabilities." For example, among the agencies that reported testing their ICT, less than 30 percent of their top-viewed intranet and internet pages, electronic documents, and videos fully met federal ICT accessibility standards, according to GSA.²³ The widespread low compliance described in the *Assessment* is particularly noteworthy because the results are from self-reported agency data.²⁴

Given reported persistent and widespread issues with federal ICT accessibility, GSA made recommendations to agencies in its *Assessment* and OMB provided direction to agencies in its *Guidance* through recommendations, expectations, and requirements.²⁵ OMB staff characterized its *Guidance* as establishing government-wide policy to assist agencies in meeting Section 508 legal requirements and other aspects of ICT accessibility. Some of the requirements in OMB's *Guidance* included specific deadlines of 30, 90, and 180 days from

²³This percentage is among agencies that had the resources to test their intranet and internet pages, electronic documents, and videos for meeting accessibility standards. Out of 249 agencies, 91 provided test results for intranet pages, 119 provided test results for internet web pages, 101 provided test results for electronic documents, and 88 provided test results for videos. GSA also noted in its *Assessment* that agencies tend to solely rely on automated testing for public web pages (rather than both automated and manual testing), and that there is a risk of inflation of scores due to the inability of automated tools to comprehensively test for all federal ICT accessibility standards.

²⁴GSA's *Assessment* findings were based on self-reported data from 249 agencies related to their information and activities from June 1, 2022, to May 31, 2023. Given that GSA did not conduct independent testing and did not require agencies to submit documentation, these self-reported results from agencies may reflect a more positive state of Section 508 compliance. GSA acknowledged in its *Assessment* that it had some concerns that the results may underestimate the scope of ICT accessibility challenges, including Section 508 program managers receiving pressure to answer questions in a more positive way.

²⁵OMB previously issued a strategic plan on Section 508 in 2013. OMB staff said that the 2023 *Guidance* addressed critical gaps from its 2013 strategic plan, including related to ensuring ICT for federal employees is accessible; elevating practices for procuring accessible products; evaluating and monitoring ICT for accessibility; providing criteria for prioritizing agencies' remediation efforts; and requiring that agencies formally establish agency-wide Section 508 programs and details on policies, procedures, and Section 508 program managers.

publication for agencies, as well as one recurring annual requirement. The remaining recommendations, expectations, and requirements from OMB and the recommendations from GSA did not have specific deadlines.

We categorized GSA's recommendations and OMB's recommendations, expectations, and requirements in the following four areas: (1) Managing ICT Accessibility Programs, (2) Building Knowledge, (3) Creating Accessible ICT, and (4) Monitoring Accessibility. (For a complete list of recommendations, expectations, and requirements from GSA's *Assessment* and OMB's *Guidance*, organized by these four categories, see app. I.)

Managing ICT Accessibility Programs

Key Terms: Managing Information and Communication Technology (ICT) Accessibility Programs

Managing ICT accessibility programs (related to Section 508 of the Rehabilitation Act of 1973) refers to agencies overseeing resources, funding, and policies necessary for ICT accessibility.

An ICT accessibility program manager—often referred to as a Section 508 program manager—is responsible for organizing and supporting the implementation of ICT accessibility requirements within their agency and serves as the central point of contact.

However, the General Services Administration notes in its *FY23 Governmentwide Section 508 Assessment* that an agency's compliance with ICT accessibility requirements is not the sole responsibility of the ICT accessibility program manager, but a shared responsibility agency-wide. An ICT accessibility program manager and program require leadership support, staff, and other resources to effectively improve ICT accessibility.

Source: GAO analysis of General Services Administration information. | GAO-24-107031

GSA's *Assessment* found that agencies were dedicating limited resources to ICT accessibility, which could impact an agency's ability to meet federal ICT accessibility standards. Specifically, GSA's *Assessment* stated that if agencies' ICT accessibility programs—sometimes called Section 508 programs—do not have sufficient staff, they cannot conduct adequate work to meet these standards.²⁶ For example, a regression analysis in GSA's *Assessment* showed that the likelihood of a more developed ICT accessibility program at an agency increases with each

²⁶In this section, we discuss ICT accessibility program managers and programs; these are specifically called Section 508 program managers and programs (or equivalent) in GSA's *Assessment* and in other resources related to Section 508.

hour per week the ICT accessibility program manager spends on it.²⁷ GSA found that 28 percent of agencies reported having a full-time ICT accessibility program manager, 51 percent reported having a part-time program manager, and 21 percent reported not having a program manager.²⁸ GSA's *Assessment* found that agencies also often devoted few resources to key aspects of an ICT accessibility program, such as testing. GSA found that less than half of all agencies reported testing their top-viewed intranet and internet pages, electronic documents, and videos to see whether they fully met ICT accessibility standards.

GSA's *Assessment* also found that many agencies reported lacking agency-wide programs and policies to address ICT accessibility. For example, 48 percent of agencies reported that they had either no formal ICT accessibility program or that it was in development. Additionally, 46 percent of agencies reported that they did not have a published, detailed ICT accessibility policy. GSA's analysis in the *Assessment* found that agencies reporting more developed and well-established ICT accessibility programs tended to report having ICT that better met accessibility standards.

Both GSA and OMB made related recommendations to agencies, and OMB outlined expectations and requirements, including required near-term actions. For example:

- OMB required that agencies establish agency-wide Section 508 programs with appropriate resources, such as staff, technology, and tools. Additionally, GSA recommended that agencies should consider including information about their ICT accessibility program capacity in annual budget requests to highlight any needed resources.
- GSA recommended and OMB set an expectation that agencies ensure that Section 508 program managers have sufficient authority to carry out the role. OMB added that agencies should ensure that Section 508 program managers possess the necessary knowledge, skills, and experience.

²⁷According to GSA's *Assessment*, the likelihood of a more mature ICT accessibility program increased by 0.048 for every hour per week the Section 508 program manager spends on it. This relationship was statistically significant at the 0.01 level, with a coefficient of determination of 39 percent.

²⁸For the 51 percent of agencies that had a part-time Section 508 manager, they reported working an average of eight hours per week on the ICT accessibility program.

- OMB required that by January 20, 2024, agencies provide or update the name and contact information of the agency-wide Section 508 program manager, then report any future changes to OMB within 30 days.²⁹
- OMB required that by June 18, 2024, agencies assess their own policies to ensure that ICT accessibility considerations are incorporated into relevant agency functions, develop a plan to update their policies in accordance with OMB's *Guidance* as needed, ensure that any changes are updated in agency ICT strategies, and make ICT accessibility policies publicly available.

Building Knowledge

Key Terms: Building Knowledge

Building knowledge refers to agencies' efforts to increase employees' awareness of information and communication technology (ICT) accessibility through training and provide a tone from the top and a working environment that promotes federal ICT accessibility.

According to the General Services Administration's (GSA) *FY23 Governmentwide Section 508 Assessment*, training helps increase understanding of accessibility considerations across government, provides a baseline set of skills when developing ICT, and helps improve agency functions.

GSA has noted that leadership support of ICT accessibility is also key for helping an agency meet ICT accessibility standards.

Source: GAO analysis of GSA information. | GAO-24-107031

GSA's *Assessment* found that categories related to training, culture, and leadership were among the areas that require the most attention across government to improve ICT accessibility.³⁰ Fifty percent of agencies stated that staff who were involved in developing and implementing ICT either sometimes or never had sufficient knowledge and skill to ensure that its ICT met accessibility standards. Additionally, 64 percent of agencies reported that they had no or only some development and testing staff trained in ICT accessibility web testing. Overall, 46 percent of agencies reported that ICT accessibility training was not required for any employees.

Related to agency culture and leadership, GSA's *Assessment* found that 57 percent of agencies said that they either sometimes or did not consider and include the needs of individuals with disabilities when determining ICT-related business needs. Further, GSA stated that leadership accountability would directly lead to improved accessibility but found that only 26 percent of agencies reported including meeting federal ICT accessibility standards in their ICT-related leadership and management performance plans.

GSA made recommendations and OMB set expectations for agencies in this area. For example:

²⁹OMB's 2013 strategic plan also had an action item for agencies to provide this information.

³⁰GSA's *Assessment* organized dimensions of accessibility into nine categories. The two categories that it found required the most attention were titled "training" and "human capital, culture, and leadership."

-
- GSA recommended and OMB set an expectation that agencies develop training plans for staff to incorporate ICT accessibility considerations in their work, as appropriate. GSA specified that mandatory annual training for those who regularly create digital products or have influence in procurement and development of ICT would be particularly helpful.
 - GSA recommended that relevant management entities and councils should consider incorporating and strengthening ICT accessibility metrics in relevant leadership performance measures, such as metrics on ICT meeting federal accessibility standards.
 - OMB set expectations that agencies should regularly engage with employees with disabilities individually and through groups to gauge whether people with disabilities are able to access and use government information and services comparable to those without disabilities, as well as promote awareness about the availability of assistive technologies to help employees with disabilities access and use ICT.

Creating Accessible ICT

Key Terms: Creating Accessible Information and Communication Technology (ICT)

Creating accessible ICT refers to integrating accessibility considerations into the process of developing, procuring, and deploying ICT. The General Services Administration has highlighted the importance of integrating accessibility from the start and testing for potential issues before deploying ICT, which is more effective than fixing problems after the ICT has been deployed.

Source: GAO analysis of General Services Administration information. | GAO-24-107731

GSA's *Assessment* found that agencies did not consistently incorporate accessibility when developing and procuring ICT. For example, 51 percent of agencies reported that federal ICT accessibility standards were regularly, frequently, or almost always integrated throughout the process of developing and deploying new ICT, while the remaining agencies reported that they were unsure of inclusion, never included, or included federal ICT accessibility standards on an ad hoc basis. GSA's *Assessment* found that 41 percent of agencies reported consulting with users with disabilities during acquisition or development of ICT either in an ad hoc or informal way. Further, of the agencies that procure ICT, 53 percent said they were inconsistent in verifying that the ICT received met federal accessibility standards, and that they often did so on an ad hoc basis or not at all. According to GSA, this indicates that some ICT procured by the federal government is adopted without ensuring it is accessible.

GSA's *Assessment* also found issues with how agencies tested for accessibility during the development process. For example, a best practice according to GSA and the Access Board is to use both manual and automated testing methods to ensure that web content meets federal ICT accessibility standards before it is published. However, GSA found that 48 percent of agencies reported that they sometimes or never

conducted comprehensive manual testing to ensure that web content met federal ICT accessibility standards before the content was published. A similar percentage reported the same for comprehensive automated testing. When agencies were asked how often they conducted user testing of web content that included people with disabilities prior to publishing, 87 percent reported that they never or only sometimes did so.

Both GSA and OMB made recommendations to agencies in this area and OMB set expectations. For example:

- Both GSA and OMB encouraged including users with disabilities during the design process, such as OMB's expectation that agencies incorporate the needs of individuals with disabilities by conducting inclusive research and inclusion of ICT accessibility subject matter experts during decision-making processes.
- Both GSA and OMB recommended that agencies use available procurement tools to incorporate ICT accessibility requirements into the contracting process.
- GSA recommended and OMB set an expectation that agencies conduct comprehensive testing and address accessibility issues prior to deployment.
- OMB set an expectation that, within 1 year, GSA, in consultation with the Access Board, will explore options to standardize the accessibility reporting process for ICT procurement government-wide.³¹ OMB stated that this should include a central repository of accessibility testing reports, supplied by vendors.

Monitoring Accessibility

Key Terms: Monitoring Accessibility

Section 508 of the Rehabilitation Act of 1973 requires that agencies have a process for federal employees and members of the public to file complaints. In addition, having monitoring processes in place likely helps increase transparency and accountability, and enables agencies to fix accessibility issues as

³¹The accessibility reporting process applies to vendors bidding for contracts in which ICT accessibility is relevant, and the central repository could allow agencies to determine whether specific ICT products might comply with Section 508. Vendors submit a document that provides information on the level to which the ICT product meets federal ICT accessibility standards. According to GSA's [Section508.gov](https://www.gsa.gov/section508), the most common way to complete this is using a voluntary template available from [Section508.gov](https://www.gsa.gov/section508), but this can be completed in other ways.

needed, according to the General Services Administration.

Source: GAO analysis of General Services Administration information and Section 508 of the Rehabilitation Act of 1973. | GAO-24-107031

GSA's *Assessment* found shortcomings in agencies' processes for receiving complaints from both the public and federal employees. For example, 53 percent of agencies reported providing instructions about how the public and federal employees could file ICT accessibility complaints even though complaints procedures are required for all agencies. Additionally, 44 percent of agencies reported that they lacked formal written policies and procedures for processing and resolving complaints related to ICT accessibility. Finally, 40 percent of agencies reported that they did not know the total number of ICT accessibility complaints filed in the prior 12-month reporting period.

GSA also described the importance of having a robust process to monitor for accessibility issues once ICT is in use and, when found, fixing them. However, GSA found that 48 percent of agencies said they never fixed ICT accessibility issues after the ICT was in use or only did so on an ad hoc basis.

GSA made recommendations and OMB required near-term action and set expectations in this area. For example:

- GSA recommended that agencies increase internal oversight of ICT accessibility. GSA also recommended that Congress explore options to proactively enforce compliance with ICT accessibility requirements across the federal government.
- OMB required that by March 20, 2024, agencies establish (or review and update, as appropriate) their public feedback mechanism for receiving ICT accessibility complaints and begin to track, review, and address feedback. Additionally, OMB required that agencies establish (or review and update, as appropriate) accessibility statements on their websites that include information needed for filing complaints.³²
- OMB set an expectation that agencies use specified criteria provided by OMB when prioritizing testing and fixing accessibility issues for ICT that is already in use.

³²OMB's 2013 strategic plan also had an action item for agencies to provide accessibility statements on websites.

OMB Has Started Tracking Agencies' Implementation of 2023 *Guidance*; the Access Board, GSA, and DOJ Have Varying Roles

OMB Started Tracking Agencies' Implementation of Its *Guidance* Using GSA's Annual *Assessment* and Its Own Reviews of CFO Act Agencies

OMB staff we interviewed said they have started to track whether CFO Act agencies implemented requirements in the *Guidance* with 30-, 90-, and 180-day deadlines and said they will use three existing mechanisms to continue tracking implementation of the *Guidance*, including requirements without specific deadlines. The three mechanisms are: (1) GSA's annual *Assessment*, (2) OMB's desk officer reviews, and (3) OMB's reviews of budget requests.³³ Each of these mechanisms is also used for other purposes. GSA's annual *Assessment* is government-wide, while OMB's desk officer and budget reviews focus primarily on the 24 CFO Act agencies. Effectively collecting timely and comprehensive information is critical to OMB's efforts to determine the extent to which agencies are implementing its *Guidance* and improving federal ICT accessibility under Section 508.

(1) GSA's annual *Assessment*. OMB staff said they plan to use agencies' responses to the survey questions for GSA's annual *Assessment* to help track agencies' implementation of its *Guidance*. Because these surveys will be conducted and reported annually in GSA's *Assessment*, OMB staff said they will be able to track responses over time. OMB staff stated that after publishing the *Guidance* in December 2023, they worked with GSA and the Access Board from January through April 2024 to finalize the survey questions for GSA's 2024 *Assessment*, including identifying which

³³In this section, we describe how OMB tracks the implementation of its recommendations, expectations, and requirements. GSA's annual *Assessment* also included recommendations to agencies. According to GSA officials, GSA plans to track the status of its recommendations in each future *Assessment*, as well as continue to track agencies' progress on Section 508 compliance. Officials said that most of the recommendations in the *Assessment* were based on agencies' responses, allowing GSA to track agencies' progress by evaluating their responses to the same questions in subsequent years.

questions would enable OMB to track implementation of its *Guidance*. For example, a survey question in the annual *Assessment* asks each agency to indicate the status of its ICT accessibility policy, which OMB staff said aligns with a requirement in OMB's *Guidance*. Agency responses to the 2024 *Assessment* questions were due July 31, 2024. OMB staff said they did not plan to collect supporting documentation to validate agencies' responses to the *Assessment* survey questions. For example, the survey questions for the *Assessment* ask about agencies' ICT policies but do not request that agencies provide copies of the policies. OMB staff as well as officials from the Access Board and GSA told us that requesting and analyzing documentation would require additional resources. However, OMB staff and GSA officials said they had reserved the right to ask for additional documentation from agencies, and OMB staff said that they might request this from agencies on a case-by-case basis.

(2) Desk officer reviews. OMB staff said they expect to use desk officer reviews to track federal ICT accessibility, including agencies' implementation of its *Guidance*. OMB desk officers have a variety of responsibilities, including tracking the 24 CFO Act agencies' progress on statutory requirements and OMB's policies related to ICT. Staff said that the frequency of such reviews is at each desk officer's discretion, but they generally are expected to occur at least monthly. OMB staff said desk officers may also review non-CFO Act agencies as time and capacity allow. According to OMB staff, starting in July 2024, desk officers are expected to use their ongoing reviews to track progress in implementing the *Guidance* and to identify possible gaps, including any missed deadlines (see text box). OMB staff noted that an agency's results in GSA's annual *Assessment* may inform those discussions. OMB staff also said that desk officers may request that an agency provide documentation, such as internal policies, if they have concerns that it is not fully implementing OMB's *Guidance*. If an agency does not follow OMB's *Guidance*, desk officers can elevate the issue to more senior staff to seek solutions, according to OMB staff.

Office of Management and Budget (OMB) Time-Specific Information and Communication Technology (ICT) Accessibility Requirements for Federal Agencies and OMB's Tracking of Implementation by the 24 Agencies in the Chief Financial Officers Act of 1990 (CFO Act)

In May 2024, OMB staff told us the agency had taken steps, including using desk officer reviews, to track whether agencies had implemented its requirements with specific deadlines, with a focus on CFO Act agencies. These requirements, some of which reference Section 508 of the Rehabilitation Act of 1973 (Section 508), are as follows:

- **By January 20, 2024:** agencies shall provide the name and contact information of the agency-wide Section 508 program manager; then report any future changes to OMB within 30 days.
 - OMB staff reported that as of April 2024, most agencies and all 24 CFO Act agencies had submitted a name and contact information of the agency-wide Section 508 program manager. OMB staff said they plan to work with General Services Administration (GSA) officials to maintain this information on GSA's Section508.gov website (see <https://www.section508.gov/tools/program-manager-listing/>).
- **By March 20, 2024:** agencies shall establish (or review and update, as appropriate): (1) digital accessibility statements on all agency websites and (2) a public feedback mechanism for receiving complaints or reports about accessibility issues with agency websites and digital services and begin to track, review, and address feedback.
 - OMB staff reported that they had manually reviewed the 24 CFO Act agencies' websites as of April 2024, and found that 20 of the 24 CFO Act agencies had established or updated their ICT accessibility statements and public feedback mechanisms for receiving feedback and complaints. OMB staff said they notified the four agencies that had not updated their statements. In June 2024, OMB staff said that one of the four agencies had updated its statement after being notified by OMB.
- **By June 18, 2024:** agencies shall conduct a comprehensive assessment of agency policies to ensure that ICT accessibility considerations are incorporated in all relevant agency functions; develop a plan to update agency policies to align with OMB's requirements, as needed; ensure any changes to policies are also updated in agency digital strategies; and make ICT accessibility policies publicly available.
 - OMB staff said that, starting in July 2024, they will meet monthly with agencies to learn whether agencies have met this requirement.
- **By July 31, 2024, and annually:** agencies shall report to OMB and GSA on their compliance with Section 508, in accordance with criteria and instructions disseminated by OMB.
 - OMB staff said they plan to track whether agencies have responded to the survey questions—also referred to as criteria—for GSA's *Governmentwide Section 508 Assessment* each year.

Source: OMB Memorandum M-24-08, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act*, Section508.gov, and OMB staff. | GAO-24-107031

(3) Reviews of budget requests. OMB staff said they also consider federal ICT accessibility when reviewing CFO Act agencies' ICT budget requests. Specifically, they said that desk officers will review agencies' ICT budget requests to ensure that resources are

appropriately prioritized to implement OMB's *Guidance*, such as establishing and funding an agencywide Section 508 program. Because budget requests might not provide sufficient details to understand how agencies prioritize these efforts, OMB staff said desk officers, program examiners, and other staff typically have follow-up discussions with agencies as part of the budget review process.

OMB staff told us they considered OMB's tracking approach for its *Guidance* to be more robust than the approach the agency used for tracking implementation of its 2013 strategic plan on Section 508. Specifically, due to GSA's new annual *Assessment*, required by the Consolidated Appropriations Act, 2023, OMB will have more information about agencies' actions than it had following issuance of its 2013 strategic plan. They also said that GSA's annual *Assessment* includes agency-specific data that are publicly available in a format conducive to analysis. This could lead to greater transparency and thereby incentivize increased ICT accessibility.

OMB has begun tracking implementation of its *Guidance*, and GSA's *Assessment* provides a new baseline of federal ICT accessibility. OMB's *Guidance* has the potential to improve ICT accessibility, but the impact of the *Guidance* will depend on the extent to which agencies implement it and the extent to which OMB follows through on its tracking plans.

The Access Board and GSA May Help Agencies Implement OMB's *Guidance* through Their Technical Assistance and Reporting Roles

Access Board and GSA officials told us that their current roles related to providing technical assistance and reporting on ICT accessibility may help agencies as they implement OMB's *Guidance*. Officials from both agencies also said they have begun implementing OMB's *Guidance* recommendations to them related to supporting government-wide ICT accessibility. However, officials from both agencies said that they do not have a direct role in ensuring that agencies implement OMB's *Guidance*, and that OMB's *Guidance* does not change their roles or expectations related to federal ICT accessibility.

- **Technical assistance.** The Access Board and GSA's technical assistance related to federal ICT accessibility can assist agencies in implementing OMB's *Guidance*. The Access Board and GSA have also used existing resources to inform agencies about OMB's *Guidance*. For example, GSA reminded agencies in its May 2024 ICT accessibility newsletter of OMB's requirement to conduct a comprehensive assessment of agency policies by June to ensure ICT accessibility considerations are incorporated. GSA also reminded agencies about resources available on GSA's [Section508.gov](https://www.gsa.gov/section508) website. In addition, the Access Board has been hosting a bimonthly

webinar series on Section 508 best practices, including a webinar in May 2024 related to OMB's *Guidance*.

- **Reporting.** The Access Board and GSA officials said they will continue to work on the annual *Assessment*. While GSA leads the development of the *Assessment* itself, Access Board and GSA officials also said that the Access Board significantly contributed to the development of the 2023 *Assessment* and expects to contribute to future reports. To the extent that OMB uses questions in the annual *Assessment* to track how agencies implement its *Guidance*, GSA and the Access Board will support OMB's tracking by virtue of their roles in developing the *Assessment*.

DOJ Officials Said Its Role Regarding OMB's *Guidance* Is Limited to Reporting

DOJ officials said their role regarding federal agencies' implementation of OMB's *Guidance* is limited, except to the extent that DOJ's own reporting to meet its biennial requirement includes relevant information. DOJ's next biennial report was expected in early 2025. Instead of producing a separate report, DOJ officials said they plan to incorporate their required reporting into GSA's 2024 *Assessment* due to the breadth and frequency of GSA's new annual *Assessment*.³⁴ These officials said a separate report was not needed because it would likely address the same areas that GSA will cover in its annual *Assessment* and rely on the same survey questions developed for the *Assessment*. Specifically, DOJ is required to report on actions regarding individual Section 508 complaints; officials said they worked with GSA to ensure there were survey questions about complaints for DOJ to use to meet its reporting requirement.

Agency Comments

We provided a draft of this report to the Access Board, DOJ, GSA, and OMB for review and comment. The Access Board provided technical comments, which we incorporated as appropriate. DOJ, GSA, and OMB did not have comments on the report.

We are sending copies of this report to the appropriate congressional committees, the Executive Director of the Access Board, the Attorney General, the Administrator of GSA, the Director of OMB, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or curdae@gao.gov. Contact points for our Offices

³⁴As of June 2024, DOJ and GSA officials said they had not yet finalized the details of this plan, including an information-sharing agreement between the two agencies to facilitate combined reporting on ICT accessibility under Section 508.

of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink, reading "Elizabeth H. Curda". The signature is written in a cursive style with a large, prominent initial "E".

Elizabeth H. Curda
Director
Education, Workforce, and Income Security Issues

List of Requesters

The Honorable Bernard Sanders
Chair
The Honorable Bill Cassidy, M.D.
Ranking Member
Committee on Health, Education, Labor and Pensions
United States Senate

The Honorable Richard J. Durbin
Chair
Committee on the Judiciary
United States Senate

The Honorable Robert P. Casey, Jr.
Chairman
The Honorable Mike Braun
Ranking Member
Special Committee on Aging
United States Senate

The Honorable Kirsten Gillibrand
United States Senate

The Honorable Charles E. Grassley
United States Senate

The Honorable Patty Murray
United States Senate

Appendix I: Recommendations, Expectations, and Requirements from GSA's *Assessment* and OMB's *Guidance*

In December 2023, GSA made recommendations to agencies in its *Assessment* and OMB provided direction to agencies in its *Guidance* through recommendations, expectations, and requirements related to Section 508 of the Rehabilitation Act of 1973 (Section 508).¹ For the purposes of our analysis, we organized these recommendations, expectations, and requirements into four categories: Managing ICT Accessibility Programs, Building Knowledge, Creating Accessible ICT, and Monitoring Accessibility. We developed these categories based on our analysis of the content of GSA's *Assessment* and OMB's *Guidance*. The recommendations, expectations, and requirements below are listed first by category, then by the order in which they appear in GSA's *Assessment* and OMB's *Guidance*.

Table 1: Recommendations from the General Services Administration's (GSA) FY23 Governmentwide Section 508 Assessment, Organized by Category

Category ^a	Recommendation ^b
Managing Information and Communication Technology (ICT) Accessibility Programs	Congress should consider updating Section 508 of the Rehabilitation Act of 1973 (Section 508) to include:
	<ul style="list-style-type: none"> • Definition of agencies subject to Section 508. • Updated language, terminology, and scope.
	Agencies should have an assigned Section 508 program manager with utilization and authority that is proportionate and sufficient to ensure an effective Section 508 program.
Building Knowledge	Agencies should consider including information about Section 508 program capacity in its annual budget requests to highlight necessary resources to improve ICT accessibility.
	Relevant management entities and councils should explore approaches to incorporate and strengthen accessibility metrics in relevant leadership performance measures.
	Agencies should require mandatory annual Section 508 training for specific roles and responsibilities, particularly for those who regularly create electronic content and digital products or have influence in procurement and development of ICT.
	Congress should explore ways to strengthen accessibility capabilities within the federal workforce.
	Agencies should consider incorporating accessibility competencies into relevant position descriptions and performance measures.
Creating Accessible ICT	Agencies should more actively engage with the digital accessibility community, GSA, and the Access Board to develop and share best practices.
Creating Accessible ICT	Small and micro agency councils, communities of practice, and other interested agencies should explore the creation of a shared service model for Section 508 implementation, which could include testing, tools, and other accessibility-related products and services.

¹OMB staff said that in its *Guidance*, they used the language “shall” or “must” to indicate requirements, “will” or “should” to indicate expectations, and “are encouraged” to indicate recommendations for agencies.

**Appendix I: Recommendations, Expectations,
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	Agencies should increase automated and manual Section 508 conformance testing, validation, and defect remediation before deployment and hold vendors accountable for conformant deliverables prior to acceptance.
	Agencies should use the Solicitation Review Tool and the Acquisition Requirements Tool or similar tools, to help incorporate sufficient accessibility requirements in procurement and contracting documentation.
	Agencies should explore ways to include users with disabilities in identifying targeted user needs of ICT that federal agencies develop, use, maintain, and procure.
Monitoring Accessibility	Congress should explore options to proactively enforce Section 508 compliance across the federal government.
	Congress may consider conducting oversight efforts into major providers of ICT to the federal government to determine the best course(s) of action to improve accessibility of high-use products.
	Relevant oversight and accountability bodies should consider increasing internal agency oversight of Section 508 compliance.
	Agencies should follow the Information and Communication Technology Testing Baseline for Web to adopt or create a standard enterprise testing methodology to increase Section 508 conformance, provide greater ability for information sharing, and allow for more consistent reporting across government.

Source: GAO analysis of GSA's *FY23 Governmentwide Section 508 Assessment*. | GAO-24-107031

^aThe categories in this table are for organizational purposes. In some cases, a recommendation applied to more than one category but we assigned it the category to which it was most applicable.

^bFor the purposes of brevity, the recommendation language from GSA's *FY23 Governmentwide Section 508 Assessment* has been abbreviated rather than reproduced in full. The recommendations are listed first by category, then by the order in which they appear in the document.

Table 2: Recommendations, Expectations, and Requirements from the Office of Management and Budget's (OMB) Memorandum M-24-08, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act*, Organized by Category

Category^a	Recommendation, Expectation, or Requirement^{b,c}
Managing Information and Communication Technology (ICT) Accessibility Programs	The agency Chief Information Officer (or designee) provides leadership and direction for the agency's Section 508 of the Rehabilitation Act of 1973 (Section 508) program.
	Agencies shall establish an agency-wide Section 508 program with appropriate resources (e.g., staff, technology, tools) and appoint a Section 508 program manager to serve as the agency's principal point of contact on Section 508 and the accessibility of ICT.
	Each agency Chief Information Officer (or designee) and Section 508 program manager should coordinate with the agency's Chief Acquisition Officer, Chief Diversity and Inclusion Officer, Chief Human Capital Officer, Equal Employment Opportunity Officer, General Counsel, and other relevant agency officials, digital services teams, and program staff to ensure implementation of Section 508 and to better support agency-wide accessibility efforts.
	Agencies should ensure Section 508 program managers possess the necessary knowledge, skills, experience, and authority to implement agency-wide digital accessibility policies and to monitor, assess, and provide technical assistance to the agency regarding Section 508 and ICT accessibility.

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Agencies should establish agency-wide policies and procedures to manage the accessibility of ICT. This includes, at a minimum, establishing:

- Clear authorities, roles and responsibilities, and expectations for how Section 508 compliance is addressed in technology acquisition, development, configuration, deployment, and maintenance activities;
- Documented processes and procedures for Section 508 conformance testing; and
- Documented processes and procedures for how Section 508 issues and complaints are reported, assessed, tracked, and resolved.

Agencies should establish a formalized process or plan to ensure that all agency electronic communications are accessible to the maximum extent practicable, and that the agency integrates accessibility reviews of electronic content, such as testing content with people with disabilities and various assistive technologies, prior to publication and distribution, whether internal or public. This process or plan should include all electronic content regardless of format (e.g., web content, mobile content, presentations, documents, worksheets, videos, audio recordings, and social media posts). Emergency communication should be included in these formalized processes and plans.

Agencies should develop an internal digital accessibility strategic roadmap and align it to agency-wide strategic planning efforts (e.g., agency strategic plans or information resource management strategic plans) and budget formulation efforts.

Agencies should keep in mind that legal provisions other than Section 508 may impose additional obligations related to the accessibility of ICT. Under Section 501 of the Rehabilitation Act of 1973, for example, modifying ICT or providing assistive technology may constitute a reasonable accommodation for an agency employee with a disability.

Within 30 days of the issuance of this memorandum, agencies shall report to OMB the name and contact information of the agency-wide Section 508 program manager. After this action, agencies are required to report any changes to the designated agency-wide Section 508 program manager to OMB within 30 days.

Within 180 days of issuance of this memorandum, agencies shall conduct a comprehensive assessment of agency policies to ensure that ICT accessibility considerations are incorporated in all relevant agency functions; develop a plan to update agency policies to align with the requirements of this memorandum, as needed; ensure any changes to policies are also updated in agency digital strategies; and make ICT accessibility policies publicly available.

Within 180 days, GSA, the Access Board, and the Office of Personnel Management will review existing Section 508 professional certification programs, identify opportunities to establish a professional certification program, and create and publish guidelines for acceptable commercial certifications for Section 508 program managers.

Within 180 days, the Chief Information Officer Council, in collaboration with the Chief Human Capital Officer Council, will develop best practices and guidelines, including standardized language for staff positions and a set of competency requirements, to improve the hiring and development of effective and qualified Section 508 program managers, digital accessibility testers, and related positions.

Building Knowledge

Agencies should develop an accessibility training plan that identifies appropriate training requirements for specific staff and the frequency at which it must be completed to maintain understanding of and the ability to apply Section 508 standards. Agencies should consider the incorporation of:

- Trainings on steps all staff can use to comply with Section 508 standards (e.g., creating accessible documents), and familiarity with agency digital accessibility policy;
 - Regularly scheduled trainings for acquisition professionals on the incorporation of Section 508 requirements into acquisition activities; for IT Help Desk staff on assisting employees who use assistive technologies and identifying and troubleshooting reported ICT accessibility issues; and for staff with broad responsibilities for official communication, information dissemination activities, and outreach and engagement activities on Section 508 requirements.
-

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Agencies should promote awareness about the availability of assistive technology that will help employees with disabilities access and use ICT.

Agencies should routinely assess the needs of employees to find opportunities to acquire assistive technology that will support access to and use of information and data.

Agencies should ensure that Section 508 program managers and employees or contractors tasked with testing and evaluating digital accessibility have appropriate expertise and have, at a minimum, participated in a certified Section 508 conformance training program, such as the Department of Homeland Security Trusted Tester Certification Program.

Creating Accessible ICT

Agencies are encouraged to consider adoption of the following practices when developing and managing procurement processes:

- Include Section 508 program managers or other digital accessibility subject matter experts as key stakeholders throughout the acquisition lifecycle.
- Use the Accessibility Requirements Tool or equivalent for ICT procurements to identify applicable accessibility requirements from Section 508 standards and incorporate them into procurement and contracting documentation.
- Use the Solicitation Review Tool or equivalent for ICT procurements to evaluate and improve incorporation of Section 508 standards into solicitations for ICT.
- Perform a technical evaluation and validate vendor documentation of Section 508 conformance for ICT products under consideration prior to purchase, and after purchase, as appropriate, if the ICT product changes or is updated (version or feature change, bug fix, etc.).
- Develop a plan for risk assessments and documentation of buying, developing, maintaining, and using ICT products that do not meet the Access Board's technical standards.

Agencies must ensure conformance to the Section 508 standards set by the Access Board when designing or developing ICT unless an exception applies.

Agencies should address the needs of current and potential users with disabilities by conducting inclusive research and incorporating applicable Section 508 standards in initial design, prototyping, and pilot efforts.

Agencies should conduct user-centered and collaborative co-design activities to identify the needs, preferences, and expectations of people with disabilities. Prior to deployment, agencies should test and validate design and development solutions with individuals with disabilities and assistive technology users.

Agencies should conduct comprehensive testing prior to deployment to help ensure conformance with all applicable Section 508 standards.

Agencies are encouraged to make ICT interoperable and compatible with common or frequently used assistive technology, to the greatest extent practical, and are encouraged to test and evaluate interoperability, compatibility, and the functionality of ICT with common or frequently used assistive technology. As required by OMB Circular A-130, agencies must generally support and maximize interoperability when designing or developing information systems, where appropriate.

Agencies are encouraged to include ICT accessibility subject matter experts as authoritative decision-makers during development checkpoints and milestones.

In many contexts agencies must provide text alternatives to non-text electronic content, unless an exception applies, as provided by the Section 508 standards. Such alternatives may consist of, for example, text descriptions of images or charts, and closed captioning or text transcripts for videos.

Agencies should use HyperText Markup Language as the default when creating and publishing content online in lieu of publishing content in other electronic document formats that are designed for printing or preserving and protecting the content and layout of the document (e.g., PDF and DOCX formats), as provided by OMB M-23-22. This practice makes web content easier to find, use, and maintain, and makes it work more reliably with assistive technology.

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Agencies should generally avoid developing and using alternative versions (i.e., separate, accessible conforming versions of content) in lieu of making non-accessible electronic content accessible. The use of alternative versions should be limited, to the greatest extent practicable, to situations where electronic content cannot be made available in one accessible version for legal or technical reasons.

Agencies should utilize the Information and Communication Technology Testing Baseline for Web to assist in determining web content conformance with Section 508 standards.

Within one year, GSA, in consultation with the Access Board, will explore options for establishing a standardized accessibility conformance reporting process for government procurement of ICT, which should include a central repository of vendor accessibility conformance reports.

Within one year, GSA will establish a government-wide service to help agencies acquire products and services related to the accessibility of ICT, such as product testing accessibility, Accessibility Conformance Report evaluations, and website and document remediation. In addition, GSA is encouraged to explore solutions that enable Digital Accessibility as a Service (e.g., consulting, testing, training, and remediation).

Within 180 days, the Department of Homeland Security will explore scaling the Department of Homeland Security Trusted Tester Certification program to provide a comprehensive accessibility testing approach that includes testing electronic documents and other relevant ICT testing practices.

Within one year, the Chief Information Officer Council, in consultation with relevant agencies and interagency bodies, will explore opportunities to establish a government-wide program to provide assistive technology devices and services or assistive technology consultation services to federal agencies.

Within one year, GSA, in consultation with the Access Board, will explore establishing a federal digital accessibility design and testing lab staffed with accessibility specialists who can perform automated and manual testing and assessments of agency ICT, as well as provide user research and usability testing related to the accessibility of ICT.

Monitoring Accessibility

Agencies shall maintain a digital accessibility statement on federal websites that provides or links to the following information:

- The accessibility standard applied to the website and any known limitations or alternative versions, as appropriate;
 - The contact information for the Section 508 program manager (name and email address);
 - A public feedback mechanism that allows members of the public to report accessibility problems with agency websites and digital services to the agency's Section 508 program as well as relevant implementation teams;
 - Instructions for filing a complaint alleging a violation of Section 508;
 - Information about the agency's reasonable accommodations procedures for federal employees and job applicants, consistent with Section 501 of the Rehabilitation Act of 1973;
 - Instructions on the use of the telecommunications relay of service;
 - Links to any relevant, publicly available organizational policies or procedures on digital accessibility; and
 - Date that the digital accessibility statement was last updated or reviewed.
-

Agencies should write their digital accessibility statements in plain language to provide helpful and actionable information for the general user. These statements should not be geared toward specialized groups such as technical experts or lawyers.

Agencies should continuously monitor accessibility of ICT solutions after deployment as part of ongoing maintenance and should validate any updates to ICT solutions to ensure they will not negatively impact accessibility.

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Agencies should prioritize the review of existing electronic content for accessibility or remediation based on the size of the target audience, frequency of user access, and criticality to the agency and users.

Agencies should ensure systems are in place to monitor conformance with the Section 508 standards published by the Access Board. These monitoring systems should follow the entire software development lifecycle, including enterprise architecture reviews; IT program reviews; acquisition, design, development, production release reviews; and change control.

Agency Chief Information Officers should use Section 508 conformance as a performance measure when monitoring and evaluating information technology programs and resources. If the Chief Information Officer determines Section 508 conformance to be a risk or performance issue for a given program, then the Chief Information Officer should advise the agency head on options for modifying or terminating the program, as appropriate.

Agencies should regularly and routinely scan federal web content using automated testing tools to help ensure conformance with the Section 508 standards set by the Access Board, including, as applicable, the Web Content Accessibility Guidelines. Agencies should leverage automated testing tools in combination with targeted manual testing because automated testing tools cannot fully assess conformance to accessibility standards.

Agencies should perform manual conformance validation testing, such as the Trusted Tester Conformance Test Process for the Web, in addition to automated testing. In situations where limited resources prevent agencies from doing routine manual testing, agencies should employ sampling strategies or prioritize manual testing for priority efforts.

Agencies should collect qualitative feedback from users to assist in detecting inaccessible ICT and to inform remediation efforts.

Agencies should generally use the following criteria to prioritize targeted manual testing and remediation efforts for ICT based on activities that provide information, services, benefits, and programs to the public:

- Highest volume of traffic (e.g., transactions, customers served, or unique users to a website).
 - Volume or significance of feedback received from individuals with disabilities through the agency's public feedback mechanism.
 - Results of user research and usability testing with individuals with disabilities.
 - Submission of Section 508 complaints or initiation of litigation due to alleged inaccessibility of services or benefits.
-

Agencies should generally use the following criteria to prioritize targeted manual testing and remediation efforts for ICT that federal employees use:

- Extent of the product's use among federal employees; the inaccessibility of a common business application could have broad effects.
 - Volume or significance of feedback received from employees.
 - Results of user research and usability testing with individuals with disabilities.
 - Submission of Section 508 complaints or initiation of litigation due to alleged inaccessibility of ICT.
-

Agencies should cooperate with and promptly respond to inquiries from their agency's Office of the Inspector General and the Department of Justice to ensure independent oversight and evaluation of agency Section 508 implementation.

Agencies should engage regularly with employees with sensory, cognitive, and physical disabilities individually and through agency employee resource groups and consult with organizations and external individuals with disabilities to gauge whether agency ICT is enabling individuals with disabilities to have access to and use of government information and services comparable to that of members of the public without disabilities.

**Appendix I: Recommendations, Expectations,
and Requirements from GSA's Assessment
and OMB's Guidance**

Within 90 days of the issuance of this memorandum, agencies shall establish (or review and update, as appropriate) digital accessibility statements on all agency websites.

Within 90 days of the issuance of this memorandum, agencies shall establish (or review and update, as appropriate), a public feedback mechanism for receiving complaints or reports about accessibility issues with agency websites and digital services and begin to track, review, and address feedback.

Each agency shall report annually to OMB and GSA on its compliance with Section 508, in accordance with criteria and instructions disseminated by OMB.

Within 180 days, GSA and the Access Board, in coordination with OMB, will review and update existing government-wide resources (e.g., websites, best practices, guides, and playbooks) related to the accessibility of websites and digital services, including resources on Section 508 requirements, to identify opportunities to provide further assistance to agencies and consolidate existing resources.

- Anticipated updates to Section508.gov include sample accessibility statements, best practices for establishing and maintaining a public feedback mechanism, and best practices for establishing and maintaining a formal Section 508 complaint process.

Source: GAO analysis of Office of Management and Budget's Memorandum M-24-08, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act*. | GAO-24-107031

^aThe categories in this table are for organizational purposes. In some cases, a recommendation, expectation, or requirement applied to more than one category, but we assigned it the category to which it was most applicable.

^bThe language from OMB's Memorandum M-24-08, *Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act* has generally been reproduced in full, except for abbreviations and acronyms. The recommendations, expectations, and requirements are listed first by category, then by the order in which they appear in the document.

^cOMB staff said that in its *Guidance*, they used the language "shall" or "must" to indicate requirements, "will" or "should" to indicate expectations, and "are encouraged" to indicate recommendations for agencies.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Barbara Steel (Assistant Director), Shilpa Grover (Analyst in Charge), Marissa Jones Friedman, Linda Keefer, and Gloria (Juyoung) Lee made key contributions to this report. Also contributing to this report were James Bennett, Charlotte Cable, Alex Galuten, Jae Kim, Jocelyn Kuo, Zuhair Mahmoud, Michael Murray, Julie Phipps, Rebecca Sero, Norma-Jean Simon, Jessica Steele, Frances Tirado, Kevin Walsh, and Tatiana Winger.

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